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Ref. No.: JCI-CDM-C-12-025

CDM Executive Board

c/o Secretary to the CDM Executive Board


Subject : Response to Request for Registration Incomplete for "Barefoot Power Lighting Programme" - Ref No.00006110

Dear Sirs,

Please find the attached documents which show the responses from the Project Participant ("Barefoot Power Pty Limited") and the DOE ("Japan Consulting Institute") to the Request for Registration Incomplete for the captioned CDM project / Reference No.6110.

If you have any further question or request, please let us know.

Yours sincerely,



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Response to Request for Registration Incomplete

Project title : Barefoot Power Lighting Programme (Hereafter referred as the PoA Project)
Reference No.: 00006110
Project Participant : Barefoot Power Pty Limited (Hereafter referred as “BFP”)
DOE : Japan Consulting Institute (Hereafter referred as “JCI”)
The PoA Documents : CDM-SSC-PoA-DD for Barefoot Power Lighting Programme
(Hereafter referred as “PoA-DD”)
CDM-SSC-CPA-DD for Barefoot Power Lighting Programme SSK-KE-01,
as the 1st CPA in Kenya
(Hereafter referred as “CPA-DD-KE-01”)

Issue 1:

The DOE shall explain whether the PoA involves the dissemination of ambient lights. If so, please also explain whether the ambient lights have a configuration of diodes with a minimum illumination of 20 lux as per paragraph 2 of AMS-III.AR version 1.

Response from the PP and DOE:

The DOE interprets the comment by CDM team of UNFCCC secretariat referred *Foot Note 2 of paragraph 1 of AMS-III.AR version 1*, and not *per paragraph 2 of AMS-III.AR version 1*.

The PoA Project (Barefoot Power Lighting Programme) had planned the dissemination of both ambient lights and task and portable lights, and the required design specifications were applied as specified per *paragraph 11 (c) (i) of AMS-III.AR version 1* for ambient lights under *Option 2*.

However, Barefoot Power Pty Limited (the CME for the PoA Project) has changed the list of the project lamps (for both ambient lights and task and portable lights) which apply the design specification under *AMS-III.AR version 1* including specified per *Foot Note 2 of paragraph 1 of AMS-III.AR version 1* (“ a single LED lamp has a configuration of diodes with a minimum illumination of 20lux”).

The revised first CPA plan has selected the project lamps which are designed under *Option 1 per paragraph 10 of AMS-III.AR version 1* , and fulfill the specification under *AMS-III.AR version 1* including specified per *Foot Note 2 of paragraph 1 of AMS-III.AR version 1* , as specified at section A.2. of the revised CDM-SSC-CPA-DD-KE-01 for Barefoot Power Lighting Programme SSK-KE-01. (the revised CPA-DD-KE-01)

JCI has assessed and confirmed that such technical specifications were adequately defined at page 7 of the revised CDM-SSC-PoA-DD for Barefoot Power Lighting Programme (the revised PoA-DD), as well as at section A.2. of the revised CDM-SSC-CPA-DD for Barefoot Power Lighting Programme SSK-KE-01 (the revised CPA-DD-KE-01) , therefore the revised project lamps are fully complying with “the LED based lighting systems” defined per *paragraph 1 of AMS-III.AR version 1*, including specified per *Foot Note 2 of paragraph 1*.

Issue 2:

The DOE shall explain how it has validated that the lamps of the PoA have a rated average life of at least 5,000 hours given that it is not clear whether the light output of the PoA lamps will remain more than 70% of the lamp's initial light output after the useful lifetime of at least 5,000 hours (page 7 of the PoA-DD). Please refer to paragraph 3 of AMS-III.AR version 1.

Response from the PP and DOE:

The project lamps of the PoA Project had been designed to fulfill the technical specifications listed at Para.3 or Para.11 (a) of *AMS-III.AR version 1*. JCI had verified the life certified by the manufacturer on “the relative luminous flux will not reduce by more than 30% of initial luminous flux” through the evidence /7.11/ , which was demonstrated at Table5 -Eligibility Check- Item 3a and Table7- Applicability's Check- Item 3a in the validation report Rev.0 dated 25 April 2012.

BFP has added the more explicit description as “a useful lifetime of at least 5,000 hours that will be certified by manufacturer at which the lamp's initial light output declines by no more than 30%”, which has been included in the revised PoA-DD under section A.4.2.1.(page 7), and the manufacturer certifications for the listed project lamps have been added as described in the revised CPA-DD-KE-01 under section B.2. Item 3.a. for justification to be included in the PoA Project.

JCI has justified the claimed performance at the revised PoA-DD and the revised CPA-DD-KE-01, through the certification by the manufacturer (the additional evidences /7.20//7.21//7.22/ are listed below) , and has explained quantitatively in the revised validation report under section 7.1. Table7- Applicability's Check- Item 3a ,and under section 5. Table5 -Eligibility Check- Item 3a .

Therefore the project lamps of the PoA Project are in accordance with Para.3 of *AMS-III.AR version 1*.

Attachment list

Attachment-1: The manufacturer certification for the one project lamp type “Firefly Mobile” issued by Operations Director for the products

(Document list number /7.20/ in the revised validation report)

Attachment-2: The manufacturer certification for the one project lamp type “PowerPack Junior Matrix” issued by Operations Director for the products

(Document list number /7.21/ in the revised validation report)

Attachment-3: The manufacturer certification for the one project lamp type “PowerPack 5W” issued by Operations Director for the products

(Document list number /7.22/ in the revised validation report)

Issue 3 a) :

The DOE shall explain how it has validated the completeness of the eligibility criteria in the PoA-DD as per paragraph 14 of EB65 Annex 3, given that:

(a) the conditions that ensure that CPAs meet the requirements pertaining to the demonstration of additionality has not been specified and consolidated in the eligibility criteria (page 8-10 of the PoA-DD), and the barrier of access-to-capital at the CME level is a general barrier of the PoA;

Response from the PP and DOE :

The conditions to ensure that CPAs meet the requirements pertaining to demonstration of additionality has been defined in the revised PoA-DD under the Table Item 6a and 6b of section A.4.2.2.

As an example of the CPAs, BFP also demonstrated in the revised CPA-DD-KE-01 (Table. Item 6a and 6b under section B.2.) how the first CPA has met such requirement defined by the CME as the eligibility criteria for inclusion.

JCI has assessed such conditions and procedure applied by the CME in the revised PoA-DD and also in the revised CPA-DD-KE-01 , and has validated and reported in the revised validation report under section 5. Table5-Eligibility Check – Item 6a and 6b, as well as under section 8.1.-Additionality of the Programme-, through the *Standard per EB65, Annex 3*, and has concluded that the demonstration of additionality both CME level and CPA level were appropriate, and the revised PoA-DD and the revised CPA-DD-KE-01 have specified and consolidated in the eligibility criteria, thus complying with *paragraph 14 (f) of EB65 Annex 3*.

Issue 3 b) :

The DOE shall explain how it has validated the completeness of the eligibility criteria in the PoA-DD as per paragraph 14 of EB65 Annex 3, given that:

(b) conditions related to undertaking local stakeholder consultations and environmental impact analysis has not been specified and consolidated in the eligibility criteria; and

Response from the PP and DOE :

BFP has defined in the revised PoA-DD under the Table Item 7 of section A.4.2.2. about the condition for inclusion of CPA for eligibility criteria related to undertaking local stakeholder consultations and environmental impact analysis.

As an example of the CPAs, BFP has also demonstrated in the revised CPA-DD-KE-01 (Table. Item 7 under section B.2.) how the first CPA has met such requirement defined by the CME.

JCI has assessed such conditions and procedure applied by the CME in the revised PoA-DD and also in the revised CPA-DD-KE-01 , and has validated and reported in the revised validation report under section 5. Table5-Eligibility Check – Item 7, through the evidences, and has concluded that the procedures of stakeholder consultation as well as environmental legal requirement were adequately implemented at CPA level under the CME's management.

Thus JCI validated the revised PoA-DD and the revised CPA-DD-KE-01 have specified and consolidated in the eligibility criteria, thus complying with *paragraph 14 (g) the Standard per EB65 Annex 3*.

Issue 3 c) :

The DOE shall explain how it has validated the completeness of the eligibility criteria in the PoA-DD as per paragraph 14 of EB65 Annex 3, given that:

(c) the conditions related to sampling requirements for the PoA has also not been specified and consolidated in the eligibility criteria.

Response from the PP and DOE :

BFP has defined in the revised PoA-DD under the Table Item 10 of section A.4.2.2. about the condition for inclusion of CPA for eligibility criteria related to sampling requirements. As an example of the CPAs, BFP has also demonstrated in the revised CPA-DD-KE-01 (Table. Item 10 under section B.2.) that the first CPA is not required to carry out sampling and survey defined by the CME.

JCI has assessed such conditions and procedure applied by the CME in their revised PoA-DD and CPA-DD-KE-01 , and has validated and reported in the revised validation report under section 5. Table5-Eligibility Check – Item 10, and has justified the case of the first CPA that it is not required to carry out sampling and survey defined by the CME, because the listed project lamps are under *Option 1 per paragraph 10 of AMS-III.AR version 1* , as appropriately described under section A.2. of the revised CPA-DD-KE-01.

Thus JCI validated the revised PoA-DD and the revised CPA-DD-KE-01 have specified and consolidated in the eligibility criteria, thus complying with *paragraph 14 (j) the Standard per EB65 Annex 3.*

Issue 3 a&b) :

The DOE shall explain how it has validated the completeness of the eligibility criteria in the PoA-DD as per paragraph 14 of EB65 Annex 3, given that:

Further, the DOE shall also explained how it has validated that the eligibility criteria are:

(a) verifiable; and

(b) sufficiently objective and comprehensive to permit the assessment of the inclusion of CPAs in PoA. Please refer to EB65, Annex 3, paragraph 15 & 16.

Response from DOE :

The Eligibility Criteria Check by JCI has been summarized at Table 5 under section 5 of the revised validation report, in which “Means of verification by CME”(the objective conditions defined by CME), and “Justification by DOE”(DOE’s assessment on their usability for inclusion of CPAs) were demonstrated for each items (from 1 to 14 items) listed by the CME under section A.4.2.2 of the revised PoA-DD. The JCI’s assessment has been implemented through the evidences from the project participant, information from the third party, information during the on-site assessment, and the related Guidelines and Standard, according to *paragraph 15 & 16 of the Standard per EB65, Annex 3*, therefore JCI has validated the completeness of the eligibility criteria in the revised PoA-DD as per *paragraph 14 of EB65 Annex 3.*

Issue 4 a) b) c) d) :

The DOE shall explain how it has validated the compliance of the PoA with EB65, Annex 3, paragraph 17, given that the management system of CME (page 10 of the PoA-DD) did not specify:

- (a) the records of arrangements for training and capacity development for personnel;*
- (b) procedures for technical review of inclusion of CPAs;*
- (c) procedure to avoid double counting; and*
- (d) records and documentation control process for each CPA under the PoA.*

Response from the PP and DOE :

BFP had developed the CME management system and had compiled in “BFP Record Keeping and Project Monitoring Manual”, which was demonstrated in the PoA-DD dated 20 April 2012 under either section A.4.2.2. from aspect of CMP control for inclusion of CPAs, and also under section A.4.4. from aspect of CME’s operational, management and monitoring management.

BFP has compiled the required competencies of CME to check the features of CPAs within section A.4.2.2. in the revised PoA-DD. This has covered the six aspects of CME’s management system as guided per *paragraph 17 of the Standard per EB65 Annex3*, including the above clarification items from (a) to (d) by CDM team of UNFCCC secretariat.

JCI has verified all items covered under section A.4.2.2. in the revised PoA-DD, through the evidence check (such as “BFP Record Keeping and Project Monitoring Manual version3”) and confirmation with the eligibility criteria check under section A.4.2.2. of the revised PoA-DD and under section B.2. of the revised CPA-DD-KE-01. JCI’s such validation has been covered at section 6 of the revised validation report, and JCI has concluded the revised PoA-DD complied with *paragraph 17 of the Standard per EB65 Annex3*.

Issue 5 a) :

For the CPA,

- (a) some of the project LED lamps appear to have an illumination of less than 20 lux (page 3 to 8 of the CPA-DD), which is not in line with paragraph 2 of the methodology;*

Response from the DOE :

As already explained above at Issue 1, the listed project lamps in the revised CPA-DD-KE-01 fulfilled illumination intensity specified at *paragraph 1 of the methodology* including specified per *Foot Note 2 of paragraph 1*.

Issue 5 b) :

For the CPA,

- (b) 11 eligibility criteria were checked in the CPA-DD, whereas 12 criteria were determined in the PoA-DD; and*

Response from the PP and DOE :

As already explained above at Issue 3, the revised PoA-DD under section A.4.2.2. and the revised CPA-DD-KE-01 under section B.2. have covered the same items.

Issue 5 c) :

For the CPA,

(c) The DOE shall explain how it has validated that the CPA is applicable to the applied methodology given that: (i) only two applicability criteria out of 9 have been assessed in page 16 of the CPA-DD; (ii) 7 lamps are included in the PowaPack Village Kit 15W (page 7 of the CPA-DD), which is not consistent with DOE justification in page 25 of the validation report (A maximum of five solar lamps per household is recognized in the PoA-DD A.4.4.1. and CPA-DD-(KE)); and (iii) no justification on the compliance of the CPA with paragraph 11 of the methodology. In particular, please refer to paragraph 7 and 11 of AMS-III.AR version 1.

Response from the PP and DOE :

Issue (c) (i) : The applicability assessment with the methodology, *AMS-III.AR version 1*. to the 1st CPA has been demonstrated under section B.2. (Table 1) of the revised CPA-DD-KE-01. In addition, the justification of the choice of the methodology to the PoA Project has been demonstrated under section E.2. of the revised PoA-DD.

JCI has validated such applicability assessment by the PoA Project including the case of the 1st CPA, and has summarized in the revised validation report under section 7.1 Table 7.

This summary has included the justification by DOE to Qualification of the PoA activity under the methodology as well as Justification by DOE to Compliance of the 1st CPA under the methodology, and concluded that the revised CPA-DD-KE-01 as well as the revised PoA-DD have appropriately covered all related paragraphs of the methodology for applicability assessment of the PoA Project.

Issue (c) (ii) : JCI had validated that a maximum of five solar lamps per household was recognized judging from the statement described at Foot Note 3 in page 7 of the CPA-DD-(KE) dated 23 April 2012 , that only 5 lamps will be counted for Emission Reductions calculation out of the seven lamps set in the said type of product, *PowaPack Village Kit 15W*. However the listed project lamps in the revised CPA-DD-KE-01 has not included *PowaPack Village Kit 15W* , thus no further assessment has been included in the revised validation report.

Issue (c) (iii) : BFP has revised the listed project lamps in the revised CPA-DD-KE-01, which are only *Option 1* project lamps defined per *paragraph 10 of AMS-III.AR version 1*. Thus no further assessment per *paragraph 11 of AMS-III.AR version 1* has been included in the revised validation report.

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