CDM: Recommendation Form for Small Scale Methodologies (version 01)

(To be used for presenting questions/proposals/amendments to the simplified methodologies for small-scale CDM project activity categories)

Date of SSC WG meeting:	11–14 January 2011, SSC WG 29
Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):	Revision of AMS-II.E to provide baseline procedures for non-renewable baseline consumption and clarify the procedures for retrofitting existing buildings
Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.	AMS-II.E "Energy efficiency and fuel switching measures for buildings"
Name of the authors of the query:	Tobias Hoeck Institution: myclimate tobias.hoeck@myclimate.org

Summary of the query:

Please use the space below to summarize the query related to SSC methodologies/categories SSC Modalities and Procedures provide recommendation/analysis of the SSC WG.

Original text from PP:

The revision of the methodology is needed to provide baseline procedures for non-renewable baseline consumption and clarify the procedures for retrofitting existing buildings.

This request for revision is following the answer of the SSC Working Group on the 18th June 2010 to the Submission SSC_418. The following issues raised by the SSC WG have been addressed;

- Use of the CDM Sampling and Survey procedures -> The version used in AMS II-G.is slightly adapted
- Equations / approaches that address changes in fuel consumption such as weather and fuel costs, so the impact of the measures can be clearly distinguished from changes in energy use due to other variables.
- Inclusion of one approach from AMS.AE (control group approach)
- Cross-effects between the use of cook stove and space heating
- Referring to AMS-I.E. for monitoring and emission saving issues related to NRB
- Monitoring of energy consumption, weather and fuel prices

Inclusion of the possibility that multiple fuels may be both consumed in both project and baseline cases.

Recommendation by the SSC WG:

Please use the space below to provide amendments/change (in your expert view, if necessary).

Please refer to paragraph 21 of the meeting report of the SSC WG 29 <http://cdm.unfccc.int/Panels/ssc_wg>.

Answer to authors of query by the SSC WG:

Please use the space below to provide answer to the authors of the above query.

The small-scale working group of the CDM Executive Board would like to thank the author for the submission.

The SSC WG notes that this request for revision is associated with a proposed project to retrofit 4,000–5,000 private rural houses with improved stoves (presumed to be used for cooking and space heating) and/or the insulation of houses (floors, walls, ceilings) with local material (straw, loam, cotton fibre and others). The purpose of these efforts is to reduce the consumption of non-renewable biomass and fossil fuels, which are used in various combinations in the houses. The SSC WG also notes that this request for revision is a response to SSC_418 "Revision of AMS-II.E to provide baseline procedure to account for non-renewable biomass consumption", SSC_370 "Clarification on the applicability of AMS-II.E to a group of similar residential houses" and discussions between the SSC WG and the project proponent during and after the practitioners' workshop on "SSC Renewable Energy and Demand Side Energy Efficiency Methodologies" held on 14th June 2010 in Bonn.

The proposed revisions to AMS-II.E are substantial and involve greatly expanding the methodology. The proposed revised methodology attempts to account for savings in variable combinations of fuels (e.g. dung, wood, coal, etc.) used in the houses for heating and cooking; end uses that are also quite variable and which will vary with factors such as occupancy, weather and fuel costs. Thus, the SSC WG is still concerned that a methodology that reliably determines emission reductions from projects with so many variables will be complex, and that the overall effort associated with implementing the methodology, while for a worthy cause, may in the end require significant resources and thus not be viable for a project proponent to use cost-effectively.

Some particular concerns are:

- The variable nature of the retrofits proposed where each house might have a unique combination of stove and insulation modifications, potentially using different materials, and thus potentially resulting in different levels of cook stove efficiency and building insulation for each house;
- The proposed approach for adjusting baseline consumption by using fuel cost data will be very difficult to reliably implement in terms of collecting and verifying reliable cost data. It should be noted that the approach could be simplified by considering the historical fuel used to determine the baseline fuel (as in other SSC methodologies);
- The proposed way of determining "Cj" (fuel consumption) through the extrapolation of only seven days' worth of data does not appear to be adequate;
- The use of heating (and cooling) degree days as a fuel use correction factor will be complicated if, as expected, the base temperature (indoor heating/cooling set point) varies from house to house and throughout the year;
- The approach (paragraph 10) for determining baselines for new construction is very brief and as seen with the experience with the proposed SSC-NM053 "Determination of greenhouse gas emissions reductions based on whole-building simulation of building mitigation efforts using eQUEST/DOE-2.2", new construction building energy efficiency projects are complex. Therefore, it may be appropriate to not consider new construction;
- Data collection and monitoring requirements associated with fuel use mixes probably require further clarification.

In conclusion, given the complexity of the proposed project and the extent of the proposed modifications to AMS-II.E, the SSC_WG requested the secretariat to retain an expert consultant to provide inputs, to explore means with which emission reductions can be reliably determined from projects such as the one proposed in a new methodology, a revised AMS-II.E or a revised AMS-III.AE "Energy efficiency and renewable energy measures in new residential buildings".

Signed by the Chair, Mr. Peer Stiansen
Date: 14/01/2011

Signed by the Vice-Chair, Mr. Hugh Sealy
Date: 14/01/2011

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