



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)

<i>Date of SSC WG meeting:</i>	26–29 April 2010, SSC WG 25
<i>Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):</i>	Clarification on the determination of operating hours for project activities replacing ICL with CFL under AMS-II.C
<i>Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.</i>	AMS-II.C, ver. 13 “Demand-side energy efficiency activities for specific technologies”
<i>Name of the authors of the query:</i>	Meinrad Burer, Abhishek Goyal, Narendra Paruchuri Institution: Gold Standard Foundation meinrad@cdmgoldstandard.org , abhishek@cdmgoldstandard.org , narendra@energhg.in

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 Stakeholder:

Our query is related to calculation of baseline emissions and project emissions from project activities that involve replacement of inefficient Incandescent Lamps (ICL) with energy efficient Compact Fluorescent Lamps (CFL) and apply the small-scale CDM methodology, AMS II.C, version 13.

Baseline emissions are calculated using the energy consumption in the baseline, using equations (1) and (2). Project emissions are calculated using the energy consumption in the project activity using equations (5) and an unnumbered equation later to the equation (5). This unnumbered equation is the same as the equation (2) used for calculating the baseline emissions, and no descriptions for parameters have been given. We feel that the parameters used in the equations (2) and the unnumbered equation should be read differently for the baseline situation and project situation respectively.

Paragraph 12 in the monitoring section of the methodology requires monitoring and recording of the “number” and “power” of a representative sample of the replaced devices, while the replacement is underway, in a way to allow for a physical verification by DOEs. Paragraph 13 requires monitoring of either “power” and “operating hours” or the “energy use” of the devices installed. In the above guidance, we interpret the “power” as the parameter ‘pi’ (or ‘p_i’) and “operating hours” as the parameter ‘o_i’.

In the absence of a clear guidance in the methodology, the above requirements lead to different interpretations as given below:

- As the parameter ‘O_i’ is not clearly defined for equation (5), the operating hours derived from the sampling of the project activity could potentially be used for the operating hours of the devices operating in the baseline – this is however not conservative given the well-known ‘rebound effect’;
- Since the description of ‘O_i’ clearly refers to the operating hours of the baseline devices (in Equation 2), this may imply the monitoring of a baseline sample, similar to the approach used in AMS II.J where continuous measurement of usage hours of baseline lamps for a minimum of 90 days at representative sample households is stipulated.

- iii. Since the Monitoring section of the methodology does not refer to the baseline situation, this may imply that the operating hours of the baseline devices in equation 2 can potentially be based on existing data from national/regional surveys available in public domain, as long as data are appropriate for the considered project activity and have proven to be conservative.

We kindly request the CDM EB to clarify which of the approaches above are applicable to remain in line with the requirements of AMS II.C, version 13. We have noticed that project activities making use of AMS.II.C have been registered with both approaches i) and ii) above, e.g. project activities ref. no. 2709 and PoA ref. no. 2535 for approach i) and project activities ref. no. 1754, 2457 and 2476 for (ii).

In case the approach i) is the applicable approach as per the intended interpretation of the methodology, we also kindly request the CDM EB to clarify as to how the operating hours of the devices should be derived when the project activity opts for option b) of the monitoring section, i.e. the monitoring of 'energy use' of a sample of devices installed as part of the project activity.

Recommendation by the SSC WG:

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

Please refer to paragraph 28 of the meeting report of the SSC WG 25 (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.

Before responding to the specific questions of the author, the SSC WG would like to note that since there is a specific methodology for CFL projects, AMS-II.J, it is preferable to use this methodology for these types of projects versus using a generic methodology developed for a wide range of project types.

The SSC WG takes note that an equation is not numbered in AMS-II.C and will number the equation when and if a revision is made to the methodology in the future.

With regards to the definitions of p_i and o_i , they are defined when they first appear in equations and standard practice is to not repeat definitions. However, it is possible that a future version of AMS-II.C will clarify that o_i as used in the un-numbered equation should be considered the operating hours during the project period – which, as discussed below, may or may not be the same as the baseline hours.

With respect to determining operating hours for projects involving one for one replacement of incandescent (IC) lamps with CFLs, it can be assumed that the baseline operating hours of the IC lamps are equal to the project operating hours of the CFL lamps. In such cases the operating hours of the project and baseline lamps can be determined using annual surveys during the project period. Monitoring requirements indicated in current versions of AMS-II.J and any related AMS-II.J clarifications may be used as guidance for monitoring requirements as well as the General Guidelines For Sampling And Surveys. For example, AMS-II.J currently calls for: (a) continuous measurement of usage hours of baseline lamps for a minimum of 90 days at representative sample households (sampling determined by minimum 90% confidence interval and 10% maximum error margin), (b) correction for seasonal variation of lighting hours if any, and (c) that sampling must be statistically robust and relevant i.e., the survey has a random distribution and is representative of target population (size, location).

The SSC WG believes whether the use data from national/regional surveys to determine the operating hours of baseline and/or project lamps for projects involving one for one replacement of incandescent (IC) lamps with CFLs is appropriate and conservative should be assessed on a case to case basis (e.g. using the procedures for request for deviation).

Signed by the Chair, Mr. Peer Stiansen

Date: 29/04/2010

Signed by the Vice-Chair, Mr. Hugh Sealy

Date: 29/04/2010

Information to be completed by the secretariat

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