



CDM: Recommendation form for Small Scale Methodologies (Version 01.1)

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

Date of SSC WG meeting:	09–12 October 2012, SSC WG 39
Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):	Revision of AMS-III.S to clarify the applicability, project boundary, baseline determination and leakage
Indicative methodology to which your submission relates <i>(refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable:</i>	AMS-III.S “Introduction of low-emission vehicles/technologies to commercial vehicle fleets”
Name of the authors of the query:	Jiwan Acharya Institution: Asian Development Bank Jacharya@adb.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 Stakeholder:

Introduction

The Technical Support Facility (TSF) under the Carbon Market Program of the Asian Development Bank is encouraging project proponents in its developing member countries (DMCs) to use CDM for promotion of GHG reducing projects. Currently, TSF is assisting the electric vehicle project in the Philippines which is being developed by the Department of Energy, Government of Philippines as a PoA. As part of ADB's assistance in developing this CDM project; a request for revision of AMS III C under SSC_602 is being submitted. This request for revision also refers to another request for revision SSC_547:

Issue 1 Elements of 'Fixed Route' in the methodology

AMS III S was modified to version 03 following request for revision in AMS III C through SSC_602. The revision removed the condition of fixed route from the methodology. However, there are still elements of the methodology that refer to fixed route clause. We request to change paragraphs 1, 5, 7 and elements of para 20 in current version of the methodology. These changes can be seen in attached file in track change mode.

Issue 2 Baseline Determination for Non-Standard Vehicles

The Philippines has a number of urban transport modes including jeepney and tricycle. These vehicles are not made by established manufacturers. It is difficult to get fuel consumption data from supplier/assembler of the vehicle. In such circumstances, it is best to estimate the emission of the vehicle through appropriate equivalent conditions. The methodology requires minimum one year data for baseline determination through representative samples with +/- 95% confidence interval. However, this is rather costly and time consuming method. It will be more realistic to allow a sampling method for estimation of baseline emission. This will be based on measurements taken under highway conditions or actual traffic conditions of comparable routes. We would request EB to consider use of elements given in paragraph 14; option A that is used for AMS III C version 13.

Issue 3 Scrapping of Replaced Vehicles in case of PoAs

This clarification is in line with an earlier clarification that was raised by ADB in SSC_547 (<http://cdm.unfccc.int/methodologies/SSCmethodologies/clarifications/63945>) for AMS I. F version 02. As part of that clarification it was pointed out that the leakage calculation has to be done in case the project is

not scrapping an existing fossil fuel based electricity generation device when a PoA is applied. However, similar provision is not available for projects following normal stand-alone path. This creates a conflict of principle within the methodology. The provision was also considered to be not consistent with the principle of suppressed demand.

In case of AMS III S version 3.0, similar situation is observed in para 23 and para 19. Hence, we request EB to remove para 23 from the methodology.

Issue 4 Description of the project activity

The project will be following provisions of EB 65, Annex 5 (Clean Development Mechanism Project Standard

http://cdm.unfccc.int/filestorage/Q/9/N/Q9NO4DL7S15VKA23MGE6PW8YIFTCRH/eb65_repan05.pdf?t=bFp8bThvdXVqfDAnCTvBHEvEOZGCnwfeFwE1) paragraph 146, foot note 15; which is related to geographical reference to the project.

146. The coordinating/managing entity shall provide the geographic reference or other means of identification¹⁵ of the CPAs. (foot note 15 For example: the geographic reference for stationary CPAs; the registration number or GPS devices for mobile CPAs.)

In case of mobile CPAs, the GPS device is a rather costly option. It will be cost effective to allow vehicle registration number as identification for the mobile CPAs.

Issue 5 Calculation of Emission Reduction Based on Passengers only

Our understanding of the methodology is that the emission reduction is to be calculated based on passenger only and it excludes driver. This is also consistent with the calculation of emission reduction in case of goods vehicle. In case of goods vehicles, driver is excluded. We request to confirm this understanding.

Additional information requested from the PP (on 28.09.2012) and their responses received (on 04.10.2012) are mentioned below.

In general, the SSC team agreed to remove the reference to 'fixed route' since SSC WG has relaxed the condition of "fixed routes" in this methodology through earlier revision. For example in the first paragraph PP wish to simply say "operating under comparable conditions" which is in SSC team's opinion not the same thing as saying "on route with comparable conditions". Also in order to make the equation valid in particular the one for baseline emission factor calculation by use of the specific baseline emission factor (t CO₂ per passenger per km) derived from historical data; the SSC WG relaxed the requirement of "fixed" route, but retained the requirement of "route" for ensuring comparable ex ante and ex post route conditions. Thus the PP needs to demonstrate that the route(s) taken in baseline and project scenario are under comparable conditions, if not exactly the same route.

The issue faced by PP i.e. how the deletions made by PP will lead back to the issue of fixed route, was not clear to SSC WG.

The SSC WG seeks further information from the PP on the following issues;

1. If the need to identify the routes is removed as in para 5 of meth, how will the service level on each route be identified?
2. In the context the monitoring first parameter '*DTPJ,i,y,k*' word "area" has no meaning - if route maps are available then the same can be used for obtaining distance travelled. There is no need to remove it as it is not a requirement.
3. Remaining changes in the monitoring table seems to be idem.

PP Response - Dear SSC WG team, thank you for considering and getting broader picture of our submission. The main reason for excluding route is that the impression of fixed route still remains. It may be worthwhile for you to note that our project is for different 'cities' in Metro Manila. All the cities have their own boundary and jurisdiction. The newly introduced vehicles (as well as baseline vehicles) will be working in same area and do not have permission to operate outside the designated area although, their routes can be different. Thus, in our case, the area is fixed but, routes are not. Which is why we are trying to remove the term 'fixed route'

Our response for your specific questions is as follows:

1. In the Philippines project the E-tricycles will be operating within a prescribed geographical area of a

city (unit within metro city). Therefore, the need to consider route length will be required only in ex post calculation. This will not be required in baseline condition. In the baseline if the project boundary is defined then that should be enough. Once there is a determination that the distance travelled is defined in a particular area irrespective of route, that should be sufficient to guarantee the maintenance of equivalent service levels in the baseline and project scenarios.

2. The logic applicable for question 2 and 3 is also same. The validator should not confuse the route identification with the 'fixed route'. We propose that as far as the vehicle is moving around in same urban area, there will not be a need to see which route is followed.

Further to above we also notice that there is a need to have additional clarification in the methodology regarding.

- a. Comparable route is considered in foot note 1 where comparable conditions are explained. This part is also affecting determination of the baseline. How to do baseline survey also needs guidance. However, this is a small scale methodology. Flexibility of working out baseline conditions should be provided to the PP as well as validator. This should be similar to energy efficiency methodology AMS II C.
- b. Para 3 of the methodology is talking of only specific type of vehicles. Various urban conditions around the world are having number of vehicle types. 'Any other' may be added to type of vehicles so that applicability of the methodology is more wide spread.

Recommendation by the SSC WG:

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

Please refer to paragraph 18(b) of the meeting report of the SSC WG 39
<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 agreed to revise the methodology considering the issues 1, 2 and 3 in the submission. However, the SSC WG decided to clarify the issues 4 and 5 in the submission as follows and not to include the same in the revised methodology.

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http://cdm.unfccc.int/filestorage/Q/9/N/Q9NO4DL7S15VKA23MGE6PW8YIFTCRH/eb65_repan05.pdf?t=bFp8bThvdXVqfDAnCTvBHEvEOZGCnwfeFwE1) paragraph 146, foot note 15; which is related to geographical reference to the project.

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In case of mobile CPAs, the GPS device is a rather costly option. It will be cost effective to allow vehicle registration number as identification for the mobile CPAs.

SSC WG agreed to clarify that, para 146 of the CDM-Project Standard requires PP to provide means of identification for a CPA and as per footnote 15, in case of mobile CPAs the means of identification could be, but not limited to registration number or GPS device. Also footnote 15 did not restrict PP to use either GPS or registration number as the only option to provide geographic reference or identification for a CPA.

Issue 5 Calculation of Emission Reduction Based on Passengers only

Our understanding of the methodology is that the emission reduction is to be calculated based on passenger only and it excludes driver. This is also consistent with the calculation of emission reduction in case of goods vehicle. In case of goods vehicles, driver is excluded. We request to confirm this understanding.

SSC WG agreed to clarify that, while calculating the emission reductions using this methodology the driver shall be excluded for passenger and cargo vehicles.

Signature of SSC WG Chair: Mr. Peer Stiansen

Date: 12/10/2012

Signature of SSC WG Vice-Chair: Ms. Fatou Gaye

Date: 12/10/2012

SECTION TO BE FILLED IN BY THE UNFCCC SECRETARIAT

SSC-Submission number:	SSC_649
Date when the form was received at UNFCCC secretariat:	12 October 2012
Date of transmission to the EB:	12 October 2012
Date of posting in the UNFCCC CDM web site:	12 October 2012

History of the document

Version	Date	Nature of revision(s)
01.1	12 April 2012	Editorial changes to include new logo and other improvements.
01.0	2005	Initial publication.
Decision Class: Regulatory Document Type: Form Business Function: Methodology		