



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:	24–27 February 2009, SSC WG 19
Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):	Definition of terms, marking requirements, clarification on monitoring, Baseline Penetration requirements
Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.	AMS-II.J version 02
Name of the authors of the query:	Naoki Matsuo Institution: Climate Experts Ltd. n_matsuo@climate-experts.info

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:

QUERY SECTION

We would like to request the following changes in order to reduce ambiguities and make the methodology more complete;

A. Calculation of emission reductions

We believe that it should be acceptable to split the project activities for long period (such as more than one year) into several campaigns^(*) or periods.

This is because for such case the project participants may wish to calculate reductions per campaign or period since the methodology defined the electricity savings as follows:

13. The electricity savings from the efficient lighting equipment installed by the project activity shall be considered from the date of completion of installation of the equipment.

For the project activity as a PoA, we believe that it can be read “a project activity” as “a CPA under the PoA” since one CPA may cover several campaigns in a certain area.

(*) Here “campaign” means that an activity carried out intermittently for short period (e.g. one month) during longer period, and is similar to a sales promotion period by a seller in market (for open-market business model).

Our concern is how para. 13 of the methodology is interpreted. We believe that it can be read as:

"The electricity savings from the efficient lighting equipment installed by the project activity shall be considered from the date of completion of installation of EACH equipment."

The phrase "completion of" may suggest as follows:

In case the project installs CFLs on Jan. 1 to Jan. 31 as the first phase (campaign).

And the project installs CFLs on June 1 to June 31 as the second campaign.

The electricity savings shall be considered from July 1.

If this is not what is intended in the methodology, it is OK for us.

We suggest to change the para 13 as we suggested above or to use the phrase "from the date of use of each equipment" in order to avoid misunderstanding. "

B. Definitions of terms & examples

Several terms need definition and sample(s) in order to ease the project participants to use this methodology and also DOE to validate and verify the project activity.

- 1) Definition or samples of "NTG (Net-to-Gross)" (Paragraph 12, Eq. (1)) is required, if NTG includes free ridership, resale, rebound, etc. If not, it is almost impossible to determine a site-specific value based on a lighting survey.
- 2) Example of "Double accounting" (Paragraph 7). Does this mean that CER claims from PP and CFL users who replace incandescent lamp(s) with the project CFL(s)?
- 3) Concrete examples of "undesired secondary market effects (e.g., leakage)" (Paragraph 8)

Although "Leakage" is seen in Paragraph 8, "leakage" is not well described. Does this mean resale of CFLs?

C. Marking (Paragraph 6)

Paragraph 12, states;

Efficient lighting technology under the project activity (e.g. uncovered compact fluorescent lamp with integrated electronic ballast) shall, in addition to the standard lamp specifications, be marked for clear unique identification for the project. Such marking may for example include:

- Batch number providing information on period of manufacture;
- Standard to which the lamp type is certified.

C.1 Marking

Question: Is removable marking acceptable?

We believe marking can be removable one, such as sticker. This is because;

- a) Permanent marking is not practical, and
- b) If its purpose is to avoid resale of the project CFL(s), it does not work since the buyer of the sold project CFL(s) can not be identified by monitoring.

C.2 Items to be marked

Question: Are batch number and standard mandatory?

We believe only identifications of the project activity of distribution period/campaign (refer to A above) are necessary to monitor LFR (Lamp failure rate) and adequateness of the project CFL use (i.e. the place of the CFL in use).

Providing those data batch number and period of manufacturing are not necessary.

Additional marking of standard of certification is also not necessary since this information is available from the lamp model number in standard lamp marking.

D. "Lock-in" type

Paragraph 12 defines "BP" as;

Baseline Penetration Factor⁹ (BP = 1 - (# of pieces of screw-in or lock-in efficient lighting equipment / total # of pieces of screw-in or lock-in lighting equipment), based on ex ante representative sample

survey; BP is only applicable to “Project Activity under Programme of Activities (CPA of PoA)” and in other cases set BP to “1.0”

Please clarify whether “lock-in” type is one of type of CFL.

If this type means “tube” type, this type should not be used to calculate this factor since this type is not covered by the methodology according to paragraph 1. In addition, this type is not easily replaceable with incandescent lamp.

E. Special treatment of PoA

I wonder why special treatment to include “BP” only for PoA. We believe that the treatment shall be consistent for SSC and CPAs of a PoA. We consider that the concept of BP is not needed for PoA also.

Consideration of concern by the COP/MOP

As you may be aware, the COP/MOP has a great concern for the status-quo of the methodologies for demand-side energy efficiency projects in the household sector as well as lack of PoAs. We hope that SSC WG will have to play a key role in this area, namely, by modifying the current AMSs by incorporating submissions as well as by revising them by itself. We hope the requirements by the COP/MOP to be shared by the SSC WG members.

For several methodologies like AMS-II.J (this methodology), supply side monitoring can be used instead of demand-side one-to-one (or sampling) monitoring. The methodology for renewable power generation does not require the monitoring of the power plants connected to the grid but to monitor supplied electricity to the grid instead. For AMS-II.J, it is reasonable (at least for SSC) to assume that the supplied CFLs will be used during the lifetime (approximately equal to the rated life). The monitoring of whether the CFLs are used may be needed, but it is good enough. As requested by the COP/MOP in Poznan, the reason why AM0046 (Distribution of efficient light bulbs to households) has not been used shall be assessed and reported back to the COP/MOP with the possible solution to overcome the barrier(s). We believe that the biggest barrier is the complexities and costs for monitoring.

REVISION SECTION

A. Required confidence interval for average daily operating hours monitoring

Paragraph 12, states;

“Average daily operating hours of the lighting devices replaced by the group of “i” lighting devices, use lower of the following: a) 3 hours per 24 hrs period; b) Daily usage hours determined by the baseline survey. A different value for “daily operating hours”, corrected for seasonal variation of lighting hours if any, may be used only if it is based on 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”

However, according to

Indicative simplified baseline and monitoring methodologies for selected small-scale CDM project activity categories, A. General guidance, Paragraph 12 (e),

(e) Wherever a statistical sample is proposed for monitoring, the sample should be representative of the population and should have a minimum level of confidence of one times the standard deviation (one sigma), unless detailed specifications are provided as part of the indicated methodology.

Therefore, this methodology is to be revised as;

“Average daily operating hours of the lighting devices replaced by the group of “i” lighting devices, use lower of the following: a) 3 hours per 24 hrs period; b) Daily usage hours determined by the baseline survey. A different value for “daily operating hours”, corrected for seasonal variation of lighting hours if any, may be used only if it is based on continuous measurement of usage hours of baseline lamps for a

minimum of 90 days at representative sample households (sampling determined by minimum 68% confidence interval and 32% maximum error margin”

Recommendation by the SSC WG:

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

Please refer to paragraph 11 of the meeting report of the SSC WG 19
(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.

A. With respect to the calculation of emission reductions, the SSC WG believes that as a small scale methodology AMS-ILJ includes a number of simplifications, and that allowing crediting to begin as EACH lamp is installed would significantly complicate the equations, record keeping and analyses required for compliance with the methodology. Therefore, we are not recommending a change at this time.

B. With respect to the definitions of terms & examples, the SSC WG would like to offer these clarifications:

- NTG: The SSC WG may recommend modifications to the methodology, at a future meeting, to clarify the differences between NTG and BP and/or eliminate the overlap of NTG and BP in PoAs.
- Double accounting: The concern for double accounting is that CERs are not claimed by both the project proponent and others, such as the manufacturer, distributor, and/or end users. The SSC WG may recommend clarifications at a future meeting.
- Undesired secondary effects and leakage: The concerns to be addressed by paragraph 8 include avoiding (a) end users, receiving project CFLs, who are not complying with the program requirements (e.g. outside the boundary area, installing in locations with low number of operating hours, using in place of CFLs, using in place of low wattage incandescent lamps, etc.), and (b) end user participants in the project not installing the lamps.

C. With respect to marking, the SSC WG would like to clarify that removable marking is not acceptable as this would seem to defeat the purpose of the marking, which is used for tracking of lamps through surveys. In terms of other clarifications with respect to marking requirements, the SSC WG may recommend modifications or clarifications to the methodology at a future meeting

D. Lock-in Type: Lock-in type is reference to the fastening mechanism used to secure the lamp to the lamp socket. Screw-in and lock-in (or bayonet) are the two most common types, and lamps made for one are not interchangeable with the ones made for the other type; thus the reason for distinguishing in the BP surveys. The SSC WG may recommend modifications or clarifications to the methodology at a future meeting.

E. Special treatment of PoA: The SSC WG believes that Baseline Penetration is an appropriate consideration for purposes of not crediting lamps that would have been used in place of incandescent lamps without the CDM program. However, the SSC WG may recommend modifications to the methodology, at a future meeting, to clarify and/or eliminate the overlap of NTG and BP in PoAs.

Revision Section – sampling requirement. Note that the General Guidance that you reference indicates that a specific methodology's sampling requirements may take precedence over the General Guidance. The SSC WG is in the process of reviewing sampling requirements and may recommend modifications to the methodology at a future meeting.



Signature of SSC WG Chair

(Hugh Sealy)

Date: 27/02/2009



Signature of SSC WG Vice-Chair

(Peer Stiansen)

Date: 27/02/2009

Information to be completed by the secretariat

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