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:	20–23 March 2012, SSC WG 36
Title/Subject (give a small title or specify the subject of your submission, maximum 200 characters):	Clarification on the eligible technology under AMS-II.M
Indicative methodology to which your submission relates (refer the items of Appendix B of the Simplified Modalities and Procedures), if applicable.	AMS-II.M "Demand-side energy efficiency activities for installation of low-flow hot water savings devices"
Name of the authors of the query:	Daniel E. White / George T. Maher Institution: Investment Technology Resources, Inc. DanWhite@itr-inc.org, GeorgeTMaher@itr-inc.org

Summary of the query:

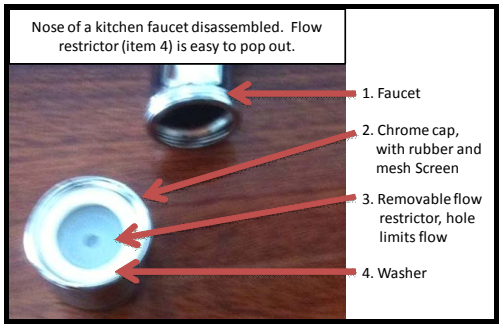
Please use the space below to summarize the query related to SSC methodologies/categories SSC Modalities and Procedures provide recommendation/analysis of the SSC WG.

Original text from PP

In paragraph 1of methodology AMS-II.M, "low-flow devices" are described with reference to showerheads and faucets. Paragraph 2 adds that low-flow devices must contain integral, non-removable flow restrictions and that removable flow restriction inserts are not an allowable technology.

We ask clarification that a faucet regulator satisfying the corollary of paragraph 2 (i.e., contain integral, non-removable flow restrictions and do not use removable flow restriction inserts) is an allowable low-flow device technology under paragraph 1.

The record in the AMS-II.M proceeding indicates the concern is "…to ensure that such devices are of relatively high quality, do not simply involve the insertion of plastic flow restrictors, and/or are not easily disabled." (SSC31, Annex 2 adopted in CDM-EB-61, ¶ 56. See also SSC32, Annex 2, para. 4.) The removable technology addressed in this concern is shown in the following graphic. This technology is common in many showerheads, faucets, and faucet regulators because it is relatively low-cost, effective, and easy for users to clean.



We seek this clarification because we are pursuing a Program of Activities using AMS-II.M that would deploy, along with showerheads, faucet regulators that contain integral, non-removable flow restriction technology. We are NOT using the pictured technology. Our technology uses a high-quality pressure

adjusting spring and pin mechanism manufactured to specific specifications for optimal low-flow performance in local conditions. This is the same technology incorporated into the showerhead we plan to use. There is no removable flow restrictor and the low-flow operation cannot be disassembled or disabled. Moreover, of our three inline installation variations (in the base of the faucet, in the supply lines upstream of the faucet, and at the faucet tip), one is equal to a showerhead in removal difficulty and the other two are more difficult. Also, periodic installation monitoring per the methodology requirements is equivalent to showerhead monitoring.

For avoidance of doubt, we also seek confirmation that the sentence "Such low-flow devices are to permanently replace baseline faucets" in methodology paragraph 1 does not preclude qualification of a baseline faucet retrofit. Replacing faucets in their entirety is complex, costly, and sometimes impossible. Unlike showerheads, there are numerous sink and faucet design elements that are not interchangeable. Moreover, the vast majority of faucets, if not all, use disqualifying removable flow restrictors.[1]

The points above compellingly support clarification that retrofitting a faucet with a flow regulator using integral, non-removable flow restriction technology is allowable as a low-flow device under AMS-II.M.

Recommendation by the SSC WG:

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

Please refer to paragraph 24 of the meeting report of the SSC WG 36 <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.

For the first query, the SSC WG agreed to clarify that the methodology covers the installation of faucet regulators that contain integral, non-removal flow restrictions. However, the eligibility of a specific project technology should be assessed by a DOE during the validation process.

For the second query, the SSC WG also agreed to clarify that project proponents do not have to replace the entire "faucet" to be in compliance with AMS-II.M if, and only if, in the case of not entirely replacing a complete faucet, that the installed device becomes an integral, non-removable flow restriction; per paragraph 2 of the methodology.

The SSC WG also appreciates that the author of the query noted the error in paragraph 15 of the methodology. The SSC WG agreed to clarify that the "Measurement method" descriptions for the parameters $FR_{BL,measured}$ and $FR_{P,measured}$ should be reversed as shown in the table below. The SSC WG agreed to recommend a correction in the revision of the methodology at a future meeting.

[1] All new faucet fixtures we found in our developing country program areas use removable flow restrictors because they are low cost to manufacture and incorporate. As it imperative to install technology for both showerheads and sinks, requiring complete faucet replacement renders the methodology useless.

Parameter name	Parameter definition	Measurement method
$FR_{BL,measured}$	Measured flow rate of baseline device (litres/minute)	Measurement, using calibrated instrumentation, of flow rate of ~~installed~~ existing (baseline) device to be replaced by project low-flow device. Measurements taken with water control valve(s) in full open position(s). At least three measurements taken and average of three measurements is used. Measurements taken at time of project installation
$FR_{P,measured}$	Measured flow rate of project device (litres/minute)	Measurement, using calibrated instrumentation, of flow rate of ~~existing (baseline) device to be replaced by project~~ installed low-flow device. Measurements taken with water control valve(s) in full open position(s). At least three measurements taken and average of three measurements is used. Measurements taken at the time of project installation

Signed by the Chair, Mr. Peer Stiansen
Date: 23/03/2012

Signed by the Vice-Chair, Ms. Fatou Gaye
Date: 23/03/2012

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