

 <p align="center"><b>CDM: Form for Submissions on Small Scale Methodologies and Procedures (version 03)</b>  <i>(To be used for presenting questions/proposals/amendments related to the simplified methodologies for small-scale CDM project activity categories)</i></p>	
Name:	Vladislav Arnaudov Institution: <a href="#">Mitsubishi UFJ Morgan Stanley Securities Co., Ltd.</a>
Affiliation <sup>1</sup> :	<input type="checkbox"/> DNA <input type="checkbox"/> DOE <input checked="" type="checkbox"/> PP <input type="checkbox"/> Stakeholder
Title/Subject (max. 200 characters):	Request for clarification regarding the applicability of AMS-III.AN. "Fossil fuel switch in existing manufacturing industries" to early-start CDM projects
Purpose of the submission:	<input checked="" type="checkbox"/> Query on an approved SSC methodology or small scale procedures <sup>2</sup> (Fill in field 1. below) <input type="checkbox"/> Request for Revision of an approved SSC methodology (Fill in fields 2. and 3. below) <input type="checkbox"/> Proposal for a new SSC methodology (Fill in fields 4. and 5. below)
Approved SSC methodologies <sup>2</sup> to which your submission relates to, if applicable.	AMS – III.AN. : Fossil fuel switch in existing manufacturing industries – Version 1
Contact Information (e-mail addresses to which the answers are to be delivered and phone contacts for possible dialogue on the submission).	E-mail: <a href="mailto:arnaoudov-vladislav@sc.mufg.jp">arnaoudov-vladislav@sc.mufg.jp</a> Tel.: +81-3-6213-6382
<b>Information for completing the form</b> Describe the questions related to the SSC Methodologies, Modalities and Procedures below. If the questions are related to a project under development or implementation, you may describe the context in which they arose.	
<b>Query on an approved SSC methodology or SSC procedures</b>	
1. If you have questions relating to the application of an approved small-scale methodology (AMS) please specify and provide reference to the exact technology/measure below. If you have questions related to procedures for SSC project activities please clarify below:	
Paragraph 10 of AMS-III.AN. "Fossil fuel switching in existing manufacturing industries" ver. 1 states that "...The baseline fuel consumption ( $FC_{FF,BL,i}$ ), product output ( $P_{BL,i}$ ) and/or input material ( $I_{BL,i}$ ) as relevant shall be available for the immediate three years prior to the start date of validation for the purpose of baseline emissions calculation. For element processes with less than three years operational history all historical data shall be available (a minimum of one year data would be required)."	

<sup>1</sup> Designated National Authority (DNA); Designated Operational Entity (DOE); Project Participant (PP), and Stakeholder.

<sup>2</sup> The list of all approved small-scale methodologies (AMS) can be found at <http://cdm.unfccc.int> and go to CDM: small scale CDM methodologies.

The current wording of the paragraph does not allow early start projects to apply the methodology, especially in case they have already started construction prior to the start of validation, as “the immediate three year data prior to the start of validation” will not be available.

Therefore, we would like to seek guidance from the SSC WG as of how AMS-III.AN. ver. 1 can be applied to early start CDM projects.

### **Request for revision of an approved SSC methodology**

2. If you are proposing an amendment/revision to an approved small-scale methodology (AMS), please provide justifications below:

N/A

3. If you are proposing an amendment/revision to an approved small-scale methodology (AMS) please provide the draft methodology with changes highlighted.

N/A

The following documents have been attached to this form:

- ☐ Draft methodology with changes highlighted in Word and PDF formats
- ☐ PDD in PDF format (optional)
- ☐ Additional information (please specify if you are providing any information note, published paper or a report in support of the request for revision of the SSC methodology)

### **Proposal for a new SSC methodology**

4. If you are proposing a new small scale methodology, please provide justifications below:

N/A

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5. For submitting a new small scale methodology a filled in form “CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)” is required.

N/A

The following documents have been attached to this form:

- ☐ Completely filled in form “CDM: form for proposed new small scale methodologies (F-CDM-SSC-NM)” in Word and PDF formats<sup>3</sup>
- ☐ A draft PDD (with sections A to C completed):
  - ☐ Relevant annexes to the PDD are provided
  - ☐ Additional information (please specify if you are providing any information note, published paper or a report in support of the new SSC methodology)

*Date you are delivering the contribution:*

**Information to be completed by the secretariat**

SSC-Submission number

<sup>3</sup> The current version of the form (F-CDM-SSC-NM) is available on the UNFCCC CDM website (<http://cdm.unfccc.int>).