
Methodology rejected simply due to complexity of the issue

<i>CDM reform category:</i>	1. Need for reforms of the CDM Governing Institutions 2. Need for procedural improvements and provision of adequate resources
<i>CDM reform sub-category:</i>	1.a Professionalise the CDM governing body(-ies) 2.b Agree and implement clear timelines for each regulatory process
<i>Example:</i>	Request for Revision to expand AM0014 for multiple fuel use

- On 17/9/2008 PP requested to revise AM0014 to allow for multiple fuels in the baseline (AM_REV_0125).
- On 7/11/2008 MP35 could not conclude (issues: BL scenario eligibility, additionality demonstration), which was the case for all of the subsequent meetings: MP36 (time constraints); MP37 (number of issues with this old methodology, now in combination with AM_REV_0126); MP38 (agreed on several changes); MP39 not conclusive (does not account for heat distribution losses and fuel mix determination of baseline).
- On 14/10/2009 MP40 recommends rejection to EB, although working further “on this complex issue”. MP will hire an external expert and invites proponents to help.

Impact:

- The project registration and the underlying project implementation has been delayed for over one year so far.

Improvement recommendation:

- Include the proponents in early stage of the discussion to find a pragmatic solution and to give guidance on how to proceed with the project.
- Improve the professionalization of the EB and its Methodologies Panel

The related Project in Pakistan faces a gas shedding regime where the supply of natural gas is cut by the authorities. In addition surplus electricity is exported to the grid. This causes AM0014 to be not applicable.

Obviously the proposed revision raised concerns, whether the new version was still conservative and did not open doors for gaming. However, First Climate tried to provide evidence, that the new formulas still ensure the integrity of the methodology. In the end the revision was rejected simply because it could not be fully understood – which partly lies in the complexity of the revision.

To a larger part the rejection probably was caused by the fact that the Methodologies Panel simply was not vested with the necessary resources. The decision to seek for external consultants should have

come much earlier.

Whereas EB50 adopted a new SSC methodology able to deal with multiple fuels, the meth panel still has not come any further on this issue.
