

TABLE FOR COMMENTS – SCC-I.K

0	1	2	3	4	5	6	7
#	Initials	Para No./ Annex / Figure / Table	Line Number	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
1	PDF	Para 2	1-2	te	Basing the threshold on rated capacity results in very low thresholds as we have experienced in the case of biogas cook stoves. The reason is that cook stoves are only going to be used a couple of hours per day, rather than 24 hours a day.	PDF requests that a usage rate factor (e.g. 20%) could be applied to the rated capacity, such as 45 MW thermal / 0.2 = 225 MW thermal.	
2	PDF	Para 17-21		te	Our experience has shown that monitoring can be expensive and resource-intensive in solar cooker projects. More standardized approaches to monitoring, so that daily reporting by sample group would not required, would greatly reduce the monitoring burden and facilitate the expansion and replication of solar cookers.		

TABLE FOR COMMENTS – SCC-II.N

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1	PDF	documentation and measurement requirements in general		te	The documentation and measurement requirements are very strict compared with the few CERs per unit area or building that can be achieved. Transaction costs may simply be too high to make such a CDM project worthwhile.	PDF recommends an option within the methodology offering an alternative that replaces some documentation and measurements with simple but conservative assumptions, similar to AMS II.J (for residential applications).	
2	PDF	Para 1 (a) and (b), and Para 3	1-5	te	<p>Extension of applicability to Greenfield projects would be very relevant as leaving it out would exclude significant share of the potential from the scope of the methodology. For example the largest market for LED application is in Greenfield installations (60-70% of estimated market). The main problem with switching to LED is that the whole luminaire (light fitting) needs to be changed. This can be very costly.</p> <p>Energy efficient lighting technologies can be considered already at the design stage of the building with the financial encouragement from CDM. The absence of the electricity consumption baseline could be tackled by setting the baseline on a level of a relevant (and conservative) standard (e.g. an energy efficient lighting standard set by a host country). For example in the case of China a conservative baseline could be the Chinese Green Building labelling System (GBT 50378-2006), issued by The Ministry of Housing and Urban-Rural Development and The General Administration of Quality Supervision, Inspection and Quarantine at 2006. Additionality concerns could be tackled by an additionality test as in the cases of many other small scale CDM project types.</p>		

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3	PDF	Para 6	1-2	Te	The methodology is applicable to non-residential and multi-family residential buildings. We assume that other important lighting users in the category street lighting and outdoor lighting are to be covered by AMS II-L: Demand-side activities for outdoor and street efficient lighting technologies. However from the commercial perspective these two types of lighting should be combined. Else the scope of projects and PoAs will be limited. The combination of two methodologies under one project or PoA increases transaction costs and leads to monitoring complexities.		
4	PDF	Para 8		te	In practice for example LED suppliers provide a warranty on the lamps, as these solutions (specifically outdoor) are very expensive. This is a commercial perspective, the SSC-WG should not dictate the conditions of the commercial deal.		
5	PDF	Para 9 (a)		te	How is the service level to be compared? There is still a debate on how to compare LED lighting with existing lighting.		
6	PDF	Para 9 (a)		te	According to the Draft, project lighting system should meet international or national standards for lighting levels and quality. In many cases these standards are not available for a host country. It is recommended to have clear guidance for the cases where such standards are not available, or remove the requirement from the methodology.		
7	PDF	Para 9 (b)		te	This is a commercial condition: how can this be validated? Should all the installed lamps be checked by an independent entity?	•	
8	PDF	Para 11		te	Clear description of what is required would be needed. It should be taken account that in many countries, there is no possibility to scrap the baseline lighting equipment in an environmental friendly manner, or only at very high costs, making it impossible to implement the project.		

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9	PDF	Para 15 and Annex 4	4-	te	Consideration of space heating seems as an academic exercise. The impact is hard if not impossible to establish due to annual/daily variations. This is a signal to noise discussion.		
10	PDF	Para 23	21	ed	Typing error	6e to be replaced by 16e	
11	PDF	Para 23		te	A regular maintenance or warranty program is suggested to be included in the applicability of AMS-II.N. This would be relevant for the cases where the project equipment and systems retiring within the program are replaced by more expensive and higher-efficient equipment and systems.		