

Name of submitter: Modern Energy Cooking Services

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Legend for Columns

- 1** = Section Number in the document
- 2** = Paragraph number
- 3** = Comment – the actual feedback or observation, including justification for what needs changing
- 4** = Proposed change – suggest the text if possible

A6.4-MEP003-A01 (v.01.0)			
1	2	3	4
Section no.	Para. no.	Comment	Proposed change (Include proposed text)
Throughout		The terms 'industry' and 'company' is used throughout when referring to key actors. However, some mitigation actions and associated baselines are in other sectors, such as residential for clean cookstoves	Adopt more generic language for describing different participants.
2	5 (c)	<p>The definition of BAT as per Section 2 omits or dilutes the key criteria as defined in the BAT approach in Section 6.</p> <p>The BAT approach in section 6 is stated to represent an economically viable and environmentally sound course of action, with the former nuanced to depend on the capacity of users to obtain financing, etc. The definition in 2.5(c) simply says under viable conditions.</p> <p>Best available technology (BAT) – the practice/technology/measure that provides a similar output and is most effective in reduction of emissions or enhancement of removals of greenhouse gases (GHG), and that is available, meaning accessible off the shelf, or via a tendering or direct contracting process, or by direct implementation by the end user, at the scale required for implementation, under viable conditions, taking into consideration costs and benefits</p>	<p>Suggest for 2.5(c) "Best available technology (BAT) – the practice/technology/measure that provides a similar output and is most effective in reduction of emissions or enhancement of removals of greenhouse gases (GHG), and that is available, meaning accessible off the shelf, or via a tendering or direct contracting process, or by direct implementation by the end user, at the scale required for implementation, taking into consideration costs and benefits <i>commonly experienced by users, and allowing for capacity to obtain financing and other relevant considerations;</i>"</p> <p>The other relevant considerations perhaps could be for example the market penetration rate such as electric cookstoves which are not widely available compared to the LPG or Improved Cook Stoves. (Please see below)</p>
6.1	31a	"An economically viable course of action does not need to be viable for all companies under all circumstances." Need to clarify this statement, as it implies that a technology that would be BAT to some subset of users (but by definition then not available or suitable to the remainder) might be determined as BAT for all users, removing the potential for credits to assist the less advantaged users.	Consider noting that the target market for a mitigation action might be scoped down to the subset with a higher baseline, due to a lower performing BAT. Clarify the statement and conditions for applicability.
6.1	32	"For technologies or practices applied in households, the mechanism methodology shall define "economically viable course of action" based on the type of activity." Will there be further definitions proposed? For poorer households the determination of BAT will depend strongly on the approach to determine what is economically viable (Please see below as well)	Provide the definitions of economically viable.
6.1	32	How to define the "commonly experienced costs" - is it the market price paid to buy the techs/solutions/measures, or does it include the cost of capital if credits are included or is it the subsidy minus cost – depending on the contexts?	Perhaps definitions/further elaboration may be required.

Call for public input	A6.4-MEP003-A01: Draft Standard: Setting the baseline in mechanism methodologies (v. 01.0)
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Throughout		The terms 'industry' and 'company' is used throughout when referring to key actors. However, some mitigation actions and associated baselines are in other sectors, such as residential for clean cookstoves	Adopt more generic language for describing different participants.
6.1	32	How to define the capacity of households to obtain financing?	Perhaps definitions/ further elaboration may be required.
6.2	40 (d)	Time period for performance data collection for all identified technologies – one to 3 years.	Allow use of existing data if collected within the last 3 years – and not require collection of new data.
8	61	Temperature Goal or Goals of the Paris Agreement	RMP has “temperature goal” of the Paris Agreement
6.1, 6.2, 6.3		Is it possible to choose to apply an approach that results in higher crediting baseline where multiple approaches are applicable.	Clarify the hierarchy of approaches when multiple approaches are applicable.
6.1, 6.2, 6.3		BAT is mentioned in several places as potentially being bound to some specific geography. Can BAT also be defined for some specific user segments (e.g. households below a certain income level, or perhaps companies below a certain size, users using a certain tech/solutions)?	Revisit the mentions of BAT applicability and consider mentioning scopes other than just geography.
Appendix 1, 9	16 b	The risk of overlap from emission sources or carbon pools that occur upstream and downstream of the mitigation activity (e.g., an efficient cookstove activity and an avoided deforestation activity claiming the same emission reductions). Are you implying that this could be between the activities under A5.2 and the clean cooking activities.	Perhaps mention PA A5.2 activities as well for clarity.