CALL FOR INPUT

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Document reference number and title: (Recommendation from the MEP to SBM020)

A6.4 MEP012-A03: Draft mechanism methodology: Electricity generation from renewable sources connected to electricity systems (version 01.0)

Item	Section no. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	PROJECT BOUNDARY	Table 2	Upstream emissions from the construction of the activity are excluded from the project boundary. The reasoning, found in the Appendix, argues that this is conservative to exclude because the upstream emissions from renewable power plants are lower than those from the construction of fossil power plants. This reasoning is not sufficient to justify exclusion.	Include upstream emissions from the construction of the activity.
2	DEMONSTRATION OF ADDITIONALITY	Paragraph 27	If the emission reductions of the Article 6.4 activity had also occurred as a result of legal requirements, it should not be possible to claim A6.4ERs for “emission reductions in excess of those emission reductions that would be achieved as a result of the legal requirements”. This will create significant loopholes for non-additional credits, where the activity is entirely viable without the revenue from excess emissions reductions.	Delete the text from "except" onwards. Proposed paragraph: “If one or more of the legal requirements identified in paragraph 26 fail the requirements of that paragraph, then A6.4ERs cannot be claimed.“

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3	DEMONSTRATION OF ADDITIONALITY	Paragraph 33	Renewable energy generation methodologies in carbon markets have historically been associated with major environmental integrity issues, namely non-additionality, as well as severe human rights impacts in the case of hydropower projects. A landmark report from 2016 recommended that renewable energy projects should no longer be eligible under the CDM, except when taking place in LDCs. As a consequence, in the last few years, many actors on the voluntary carbon market have significantly curtailed this project type. For instance, since 2020, Verra only registers small grid-connected renewable energy projects in LDCs, and excludes all large-scale projects and projects in non-LDCs. Gold Standard also only allows such projects to be set up in LDCs/SIDS/LLDCs (or low-income and low-middle-income countries with a renewable energy penetration rate less than 5% of total installed grid capacity). Notably, the ICVCM decided to reject most renewable energy methodologies from obtaining the CCP label. Sources: https://climate.ec.europa.eu/system/files/2017-04/clean_dev_mechanism_en.pdf https://verra.org/wp-content/uploads/2023/04/VCS-Standard-v4.0_Updated-watermarked.pdf https://globalgoals.goldstandard.org/202-ar-renewable-energy-activity-requirements/ https://icvcm.org/carbon-credits-from-current-renewable-energy-methodologies-will-not-receive-high-integrity-ccp-label/	The preferred change would be that only small-scale activities implemented in a least developed country (LDC) or small island developing state (SIDS) are eligible for this methodology. If this is not possible, then at the very least, the common practice threshold values in paragraph 33(f) should be as follows: 33(f)(i) 2.5 per cent for Article 6.4 activities located in non-LDCs/SIDS; and 33(f)(ii) 10 per cent for Article 6.4 activities located in LDCs/SIDS.

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4	DEMONSTRATION OF ADDITIONALITY	33(g)	Differentiating between onshore and offshore wind can lead to scenarios in which wind energy overall is already common practice, but mainly of the other variety, and therefore classified as not common practice. This could lead to an unwanted situation in which, in a country with significant offshore wind capacity, an onshore wind energy project would be deemed not to be common practice. Therefore, careful consideration of any potential loopholes that differentiation could create is needed.	Consider the risk of false negatives when determining additionality through the common practice analysis using option 2. If these risks are significant, opt for option 1 in paragraph 33(g)(ii)(a).
5	PROJECT EMISSIONS	Paragraph 57	Fossil fuel consumption associated with the construction or decommissioning of the Article 6.4 project power plant must be considered, and emissions from its construction must be included, for an accurate and conservative quantification of the emission reductions achieved by the activity. See also comment 1.	"This emission source shall include any fossil fuel consumption occurring during the operation of the Article 6.4 project power plant. This may, for example, include emissions from the operation of backup generators or emissions arising from maintenance of the Article 6.4 project power plant (e.g. emissions from fossil fuels used in ships or helicopters to maintain offshore wind power plants). Fossil fuel consumption and emissions associated with the construction or decommissioning of the Article 6.4 project power plant shall be included." Calculations to include these emissions should be added to this methodology section.
6	AVOIDANCE OF DOUBLE COUNTING	Paragraph 73(b)(ii)	In this conditional situation, it should be mandatory for the activity participant to provide this evidence.	"Where the Article 6.4 activity or the activities displaced in the baseline scenario fall within the scope of a mandatory domestic mitigation scheme, activity participants shall provide evidence in each monitoring report that the mitigation outcomes of the Article 6.4 activity are not counted in the mandatory mitigation scheme to reduce the obligations by the entities covered by the scheme. For example, in the case of an emissions trading system covering electricity generation, a confirmation from the operator of the emissions trading system may be sought that a number of allowances equal to the A6.4ERs being requested for issuance for the electricity generation component were cancelled before the issuance of the A6.4ERs."

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7	AVOIDANCE OF DOUBLE COUNTING	Paragraph 74	Since this is a general provision stemming from A6.4-STAN-AC-002, it would be helpful if this methodology included more detailed guidance on how to prevent double counting when participating in instances where the mechanism is formally recognised as a means to achieve a target set by frameworks, environmental markets, or mandatory domestic mitigation schemes. It is currently unclear how double counting will be prevented in these instances.	Elaborate on the requirements to prevent double counting in the case of participation in a framework or environmental market or domestic mitigation scheme that formally integrates the mechanism.
8	DATA AND PARAMETERS NOT MONITORED	Table 2 and 3	When referring to default values and uncertainties from the IPCC, it should be specified that these values must be derived from the latest IPCC Assessment Report, as we see no reason why they should not be updated to AR6 now and to AR7 in the future. If it is necessary to refer to a specific report, use AR6.	“Default value and uncertainty from the most recent IPCC Assessment Report." or “Default value and uncertainty from IPCC Sixth Assessment Report (AR6)."