

EB 55

Inputs from Designated Operational
Entities and Applicant Entities

Outputs from DOE workshop on Accreditation Standard

- UNFCCC hosted a very productive workshop with the DOE Forum on definition of technical areas, & revision to the Accreditation Standard concerning impartiality
 - Detailed comments given to AP after the workshop aimed to meet Board's expectations and DOEs realities
 - DOEs wish to emphasise the following general points:
 - Adapting to new requirements: the DOEs have trained and qualified staff based on the existing standard. Sufficient time must be given to adapt to the new requirements and they should not adversely affect teams on existing audits
 - Clear recognition should be given to experience gained through GHG auditing
 - Standardisation in the assigning of specific projects (or methodologies) to technical areas should also be sought
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Completeness Check

- Welcome new procedures for completeness checks
- Clear expectation for high quality reports
- However sending projects back to the beginning of the queuing process (currently 3 months) due to very minor errors represents a long delay to projects which may otherwise be good submissions
 - DOEs have received feedback from PPs noting with concern the current time taken to pass through the queue. Annex 10 of the EB 55 annotated agenda (Compliance with indicative timelines) shows Completeness Check currently taking ~100 days
 - This has risen since 2009 for both registration & issuance
 - The Board is requested to consider a different rule for minor errors which can be corrected quickly
- Furthermore, DOEs have requested the Board to, on an exceptional basis, allow DOEs to make corrections to registration or issuance requests made prior to 1 August 2010
 - This will reduce the burden on the UNFCCC secretariat and reduce delays to projects

Highest Tariff Lists

- The lists help DOEs and PPs and increase transparency
- The lists are based on information available to the Board from previous project submissions
 - The Board is urged to consider further information provided by stakeholders to update and improve these lists
 - The DOE Forum seeks clarification on whether additional information on 'highest tariffs' in specific provinces which is not included in the list, but nevertheless validated by the DOE in its reports, will be considered by the Board in decision making on projects, or whether the Board will consider only the information available to it in the current published highest tariff lists

Other Submissions from DOEs

- RINA sought clarification on how to treat a change in project design taking place at the end of the crediting period
- RINA asked if the Board could consider developing a procedure for withdrawal of PDD/Monitoring Report if the PP wishes to change to another DOE
- ERM CVS sought clarification on how to treat delays in the crediting period start date of more than 2 years
 - The Board may wish to consider whether the limitation of 2 years is still required and is this still needed in the light of annex 66 and 67 of EB 48 which provide procedures and guidelines on how changes to the design of a registered project should be assessed

Comments on the annotated agenda for EB 55

- Draft guidelines on the treatment of national/sectoral policies (Annex 7)
 - Obtaining data to support the assessment may be difficult in many countries
 - Determination of 'market prices' and projection of 'counterfactual values' forward from 1997/2001 may be particularly challenging
 - A decrease in subsidies for renewable energy is a change in an E- Policy, not an E+ policy in its own right
 - The Board is urged to consider the practicality of obtaining information to support project assessments when drafting its guidelines