

# PROJECT DEVELOPER FORUM

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**From** gareth.phillips@pd-forum.net  
**Date** 11 February 2011  
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**Subject** **Feedback on draft methodology “Demand-side activities for outdoor and street efficient lighting technologies”**

Honourable Members of the CDM Executive Board, and the CDM SSC Team,  
Dear Mr. Mahlung,

The Project Developer Forum (PD Forum) welcomes the efforts by the Board, and its working group, and the Secretariat to solicit feedback from project participants regarding the development of methodologies.

The original call for public input on this methodology closed in April 2010, and the PD Forum and other stakeholders' submitted inputs with suggestions for improvement. Following the call for inputs a practitioner's workshop was held in June 2010 regarding similar types of methodologies, where our members participated. It has taken a long time for these inputs to be considered and a new draft of the proposed methodology to be published, for which feedback was now requested before SSC WG 30.

We note that some of the concerns expressed in our initial public input were taken into account in the new version, for example:

- Concept of luminous flux applied to LED systems
- Expansion of methodology scope to include both new installations and complete lighting systems

Nonetheless, the resulting draft has not addressed other important concerns, and no justification is provided for the proposed approach. We would like to recall our previous request that top-down methodologies prepared under the auspices of the CDM Executive Board be accompanied by background information justifying the proposed new methodology. As we suggested, this could be accomplished by adapting the existing submission forms for new methodologies for use by the CDM Executive Board and its panels and working groups (F-CDM-SSC-Subm for SSC methodologies and CDM-NM for regular methodologies), as appropriate. For example, Sections B and D of CDM-NM are needed to document the rationale for a proposed NM, as well as important explanations and justifications, such as for the choice of default values. This would help the public understand the methodologies proposed by the Board and better comment on them.

The resulting methodology is complex and far from easy to understand and thus apply to a project. Given the potential high use for this methodology in the developing world this is a disappointing result. We believe the proposed methodology could be streamlined and vastly improved, increasing the

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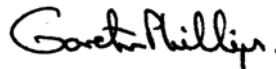
Subject **Call for public inputs on the possible introduction of the concepts of materiality and level of assurance in the clean development mechanism**

prospect that it will be viable and widely used. Several examples of complex provisions that would create barriers to its use and should therefore be removed or modified are:

- Para. 7(c) calls for PDDs to explain “how the project design utilizes professional lighting design practices”, without offering any guidance on what such practices are. Such ambiguous provisions create major problems in the validation process – but will not have any impact on the environmental integrity of the projects in terms of estimating CERs conservatively. Para. 11 uses a quantification methodology that does not allow lighting systems to be directly monitored as a basis for quantifying energy use and energy savings. Thus it treats each luminary individually, rather than the system as a whole. In most applications, direct monitoring of lighting system energy use would be far simpler, more automated/robust and less costly than the approach presented. The paragraph also introduces the concept of system outage factor, and requires baseline data that may often not be available.

As a result of this assessment, we have not made detailed comments on each point, but instead strongly recommend that the methodology be redrafted following consultation with lighting system operators in developing countries with the specific aim of making it more robust and easier to understand and apply. Only if this is achieved will this methodology be widely usable for the small scale projects in developing country contexts that this methodology is intended to support.

Kind regards,



Gareth Phillips  
Chair of the PD Forum