




F-CDM-RtB

 CDM: FORM FOR SUBMISSION OF “LETTER TO THE BOARD” (Version 01.1) <i>(To be used only by the Project Participants and other Stakeholders for submitting Letter to the Board as per Modalities and Procedures for Direct Communication with Stakeholders)</i>	
<i>Name of the stakeholder¹ submitting this form (individual/organisation):</i>	Project Developer Forum [Redacted]
<i>Address and Contact details of the individual submitting this Letter:</i>	Address: 100 New Bridge Street, London, EC4V 6JA Telephone number: +44 (0)20 7121 6100 E-mail Address: Rachel.child@pd-forum.net
<i>Title/Subject (give a short title or specify the subject of your submission)</i>	Post-registration changes
<i>Please mention whether the Submitter of the Form is:</i>	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other Stakeholder, please specify PD Forum
<i>Specify whether you want the Letter to be treated as confidential²:</i>	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
<u>Purpose of the Letter to the Board:</u> Please use the space below to describe the purpose for submitting Letter to the Board. (Please tick only one of the four types in each submission)	
<input checked="" type="checkbox"/> Type I: <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <input checked="" type="checkbox"/> Request Clarification <input type="checkbox"/> Standards. Please specify reference <input type="checkbox"/> Procedures. Please specify reference <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference </div> <div style="text-align: center;"> <input type="checkbox"/> Revision of Existing Rules </div> </div> <input type="checkbox"/> Type II: Request for Introduction of New Rules <input type="checkbox"/> Type III: Provision of Information and Suggestions on Policy Issues	
Please use the space below to describe in detail the issue that needs to be clarified/revise or on which the response is requested from the Board as highlighted above. In doing this please describe the exact reference source including the version (if any). 	

¹ Note that DNAs and DOEs shall not use this form to submit letter to the Board.

² Note that the Board may decide to make this Letter and the Response publicly available



PROJECT DEVELOPER FORUM

Project Developer Forum Ltd.
100 New Bridge Street
UK London EC4V 6JA

Europe: +44 (0)20 7121 6100
Asia: +65 6578 9286
Americas: +1 321 775 4870
office@pd-forum.net
www.pd-forum.net

CHAIRMAN: Gareth Phillips
t: +65 65789286
e: office@pd-forum.net

To cdm-info@unfccc.int
From rachel.child@pd-forum.net
Date 20 June 2012
Subject Post registration changes

Honorable Members of the CDM Executive Board,
Dear Mr. Duan,

The PD Forum acknowledges the work of the Board and Secretariat in consolidating a large number of documents into the Project Cycle Procedure (PCP), Validation and Verification Standard (VVS) and Project Standard (PS). Now that implementation of the requirements contained in these documents has commenced, attention is focussing on how these Procedures and Standards are working in practice. We would like to ask for clarification and expansion on one particular area at this stage.

According to the PCP, post-registration changes should be submitted by a DOE following one of two applicable tracks (issuance track or prior approval track). Appendix 1 of the Project Standard lists generic “Changes that do not require prior approval by the board”³. While this list is helpful, the PD Forum envisages a situation in which DOEs request prior approval by the Board for post-registration changes, regardless of this list, to avoid repercussions later if issuance track is followed but the Board deems that prior approval track would have been more appropriate.

To avoid a large number of submissions under the prior approval track and the corresponding drain on resources of both the Board and Secretariat that this would represent, the PD Forum has compiled the following list of examples of common post-registration changes. If the Board can clarify for these examples whether the appropriate route is issuance track or prior approval track, we hope that this list can be used by project developers and DOEs to determine the most appropriate route for actual project changes.

Change	Comments	Issuance track?	Prior approval track?
Corrections			
Name of the transformer station			
Location of the transformer station	Without changing the voltage		
Changes to the project design of a registered project activity			

³ Including:

- changes to the project design of a registered CDM project activity that do not adversely impact scale, methodology applicability or additionality of the project
- change of calibration frequency or practice for monitoring equipment not within the control of project participants



Change of equipment type (e.g. different manufacturer, different unit capacity)	Total investment and installed capacity remain the same		
Change in one parameter of investment analysis (e.g. total investment) but still within the bounds of sensitivity analysis			
Different type of biomass burned to that in registered PDD (for biomass fired plant)			
Permanent changes from the registered monitoring plan or applied methodology			
Change of location of meter (within control of PP)			
Change of accuracy of meter (within control of PP)			
Change in calibration frequency of meter (within control of PP)			
Change in number of meters (outside of control of PP)			
Temporary deviations from the registered monitoring plan or applied methodology			
Using backup meters/ back up calculation due to the main meter failure, as described in the registered PDD			
Change in frequency of monitoring certain parameters			
Monitoring alternative parameter to that required by the methodology but which leads to same result	e.g. ACM004 project monitoring steam consumption for start-up rather than auxiliary fuel		
Temporary deviations that are clearly immaterial.	Below the materiality thresholds		
Cross-checking meter readings with alternative documents instead of sales receipts	May happen at the beginning and end of monitoring periods when these dates do not match with the date that the grid company reads meters		

Your consideration of this list would be very welcome and we would of course be available to discuss them further with you,

With best wishes,

Rachel Child

Co Vice-Chair, Project Developer Forum



Please use the space below to any mention any suggestions or information that you want to provide to the Board. In doing this please describe the exact reference source including the version (if any).

[replace this bracket with text, the field will expand automatically with size of text]

If necessary, list attached files containing relevant information (if any)	<ul style="list-style-type: none"> [replace this bracket with text, the field will expand automatically with size of text]
--	---

Section below to be filled in by UNFCCC secretariat

Date when the form was received at UNFCCC secretariat	

History of document

Version	Date	Nature of revision
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.

Decision Class: Regulatory Document Type: Form Business Function: Governance
