

ACE Energy Holdings B.V.

Willem de Zwijgerlaan 13-3
1056 JD Amsterdam
The Netherlands
KvK 98778013

The Supervisory Body of the Article 6.4 mechanism

c/o UNFCCC secretariat

By email: A6.4mechanism-info@unfccc.int

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Agenda item 3.4 (Methodologies): A6.4-MEP016-A01, including Appendix 8

23 SEPTEMBER 2026

Dear Members of the Supervisory Body,

A measured-consumption route for biomass cookstoves in the “Draft mechanism methodology: Cooking energy transitions”

African Clean Energy (ACE) designs, manufactures and sells the ACE One, a fan-assisted biomass gasifier cookstove with an integrated solar panel, battery and lighting, in Senegal, Uganda, Kenya, Cambodia and Lesotho. Every stove we credit records its own operation continuously through a built-in controller, and we claim no emission reductions for a stove whose data we do not hold. Our input concerns biomass cookstoves that record their own operation, a group that includes ours but is not limited to it.

We support the adoption of the draft methodology at SBM 023. We make one request, on the scope of the revision the Supervisory Body is invited to mandate once the methodology is adopted (annotated agenda, paragraph 21), and ask for one clarification.

1. Biomass cookstoves have no measured-consumption route

As drafted, the route for activities with monitored energy consumption (section 8.2) is open in practice only to electric and LPG cookstoves. Paragraph 150 states that all activity fuel types applying Method 1 are electricity or LPG. Data and parameter table 34 limits the measurement of monitored energy consumption to electricity meters and LPG fuel-sales records. Footnote 41 retains the relevant equation “for a future version of the mechanism methodology that may address measured, biomass-sourced fuel types”.

Biomass activities are therefore quantified on the route without monitored energy consumption, with fuel use estimated from kitchen performance tests on a sample of households. Stove use monitors fitted to every stove remove the survey caps on user households and provide an activity-specific Hawthorne adjustment (cover note, paragraphs 32 and 44; Appendix 8, sections 1 and 2). That is valuable, and we support it. What the draft cannot do is credit how much each stove is actually used: an activity that records the operation of every stove is still credited on sample-average consumption per user household.

This limits the return on full-population monitoring for biomass developers, at the moment the methodology is moving the sector towards measured usage, with stove use monitors mandatory from 1 January 2029. It also leaves improved biomass cookstoves without the measured pathway that electric and LPG activities already have.

2. Request: include measured biomass in the revision mandate

Paragraph 21 of the annotated agenda envisages a mandate to revise the methodology after adoption, limited to institutional users. We ask that the Supervisory Body expand that mandate to include the measured, biomass-sourced fuel types anticipated in footnote 41, and give this work a defined place in the MEP workplan for 2027, covering in particular:

- a. continuous monitoring of the operation of all project cookstoves, converted to energy by calibration against activity kitchen performance tests or controlled cooking tests, and applied through Method 1 or Method 2; and
- b. comprehensive sales records of processed biomass fuels such as pellets and briquettes, under conditions for exclusive fuel delivery, safeguards against diversion and cross-checks against monitored use, drawing on those set for LPG in data and parameter table 34. Whether a discount such as the 80 per cent cap applied to LPG is needed would be for the MEP to assess.

THE OBVIOUS OBJECTION

Operation time is a proxy. Monitoring every stove removes sampling error, but not bias in the conversion from operation to fuel: a fan can run with little fuel in the chamber, and the relationship varies with fuel type, household practice and the condition of the device. The methodology's existing provisions are a starting framework: stratification by fuel type and region, recalibration at least every two years (the frequency set for activity kitchen performance tests in data and parameter table 35), the conservative bound, the outlier test on per-person consumption, the data-gap rule in paragraph 144 and the public presentation of algorithms (Appendix 8, section 5.3).

They would need to be complemented by independent field validation of the conversion, repeated when the fuel supply, operating conditions or device design change, and by explicit treatment of calibration and model uncertainty in the conservative bound. We would expect the MEP to set these requirements, and would be glad to contribute data to test them.

3. Clarification: built-in monitoring as a stove use monitor

Appendix 8 already allows stove use monitors on biomass devices where the device and algorithm can reliably distinguish cooking events, and anticipates parameters other than temperature, such as power (section 5.3.1). Its placement and photograph requirements, however, assume a temperature sensor fixed to the stove. We ask that the Supervisory Body confirm, or request the MEP to clarify, that monitoring built into the cookstove itself, such as logging of the combustion fan or of power draw by the stove's own controller, qualifies as a stove use monitor where it is validated against the performance requirements of Appendix 8. The placement and photograph requirements would then apply to add-on sensors, with device identifiers and firmware versions (section 5.3.4) serving as the equivalent record for built-in monitoring.

We would welcome the opportunity to contribute to the MEP's work on this revision, and would be glad to share a calibration method, anonymised data samples and an event algorithm to test the approach.

Yours faithfully,



Ruben Walker

Founder & CEO, ACE Energy Holdings B.V.

ruben@afrikanenergy.com / +31 6 3383 1208