



**GLOBAL STAKEHOLDER CONSULTATION FORM FOR
PROPOSED NEW BASELINE AND MONITORING
METHODOLOGY OR METHODOLOGICAL TOOL
(version 01.0)**

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Reference number of proposed new methodology or methodological tool	A6.4-PNM001
<i>Based on an assessment of information in the A6.4-FORM-METH-002 and its application in sections A to C of the submitted draft project design document (A6.4-FORM-AC-020), provide your comments to the proposed new methodology using the tabular format below. Please indicate the sections or issues to which your comments refer to.</i>	
Date received by the secretariat	11 June 2025

#	Section / Para no./ Annex / Figure / Table	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)
1	A.3.	ge	The description of the methodology is deceptive. This methodology is indicated as applicable to project activities that produce ammonia, that is less carbon intensive than conventional ammonia production, primarily with renewable electricity for three processes. However, there is no information on how the technology used to produce ammonia by the baseline method (which is best available technology) by a new method or technology to produce ammonia. The only difference between baseline and project is that baseline is using Grid electricity and Project is using renewable energy. The methodology should clearly describe that it is reducing emissions by using renewable energy in place of Grid energy. This concept is applicable to every production process that if the Grid energy is replaced by renewable energy, (which is covered by CDM ACM-0002) then every production process will have a separate methodology. For example producing desalinated water with renewable energy, producing steel with renewable energy etc. Assuming that this methodology will apply to a completely off-Grid manufacturing plant, then this should be one of the applicability requirements of the methodology.	No change proposed as the basic concept is flawed. The description in the PDD document
2	B.1	te	The identification of scope is inappropriate. The correct scope will be 1 as the savings of emissions is not coming from the production process of ammonia but only from replacing Grid energy to renewable energy. The scope identification is to enable the DOEs to assign appropriate competent personnel for Validation and Verification.	Identify as Scope 1
3	B.4	te	The definition as given is confusing. Green or Low carbon Ammonia: Ammonia (NH ₃) molecules are produced by the combination of Hydrogen (H ₂) (produced from the electrolysis of water that uses primarily renewable energy) and Nitrogen that is separated from air).	Green or Low carbon Ammonia: Ammonia (NH ₃) molecules are produced by the combination of Green Hydrogen (H ₂) and Green Nitrogen that is separated from air).

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4	B.4	te	The definition given as below is confusing. Green Hydrogen: Production of hydrogen that consumes significantly (more than renewable electricity to power an electrolyser that separates water into hydrogen and oxygen. (Hydrogen generated through a clean and sustainable process where renewable electricity—such as from solar, wind, or hydro—is used to power electrolyzers that split water (H ₂ O) into hydrogen (H ₂) and oxygen (O ₂).)	Green Hydrogen: Production of hydrogen through a process run by renewable electricity to power an electrolyser that separates water into hydrogen and oxygen. (Hydrogen generated through a clean and sustainable process where renewable electricity—such as from solar, wind, or hydro—is used to power electrolyzers that split water (H ₂ O) into hydrogen (H ₂) and oxygen (O ₂).)
3	B.12.2	te	The monitoring plan is not monitoring some of the important parameters required to confirm applicability of the methodology. For example, There is no monitoring of the power consumed from Grid to satisfy condition 5 (primarily sourced energy from greenfield renewable power plants) and condition 6 requires that use of Grid energy shall not exceed 10%. This cannot be confirmed till the total electricity consumption and Grid electricity consumption is monitored ex-ante as well as ex post. There is no monitoring of the applicability condition 7 Condition 9: Monitoring of separation of green ammonia from conventional ammonia. Condition 10: Water consumption monitoring not more than 5% from locally available water. Condition 11.	Add monitoring parameters suitable for the applicability conditions and to ensure that only renewable energy is being used ex-ante and ex-post.
4	PDD A.1.3	te	The PDD does not show the boundary of the project in the figure and does not show the other likely uses of the electricity and fuel as given in the applicability conditions.	Re draw the boundary clearly indicating inputs to the project boundary in the form of Grid Electricity, fossil fuel etc.

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5	PDD	te	a) PDD document is being prepared for actual project which is based on a project feasibility report and considers all potential equipment used/likely to be used as per the technical design. There is no information on the equipment sources of renewable energy, storage of energy, back-up provision etc. the description of the project is lacking in detail. b) The monitoring section has been just copied from the methodology, indicating that there is no information related to the project design. It also does not indicate what type of flow meter are going to be used volume based or weight based. c) PDD has omitted the monitoring parameter related to Fuel consumed by the project activity F_{Consumed}.	

(Please add rows as required)

Document information

Version	Date	Description
01.0	23 May 2025	Initial publication of form template.
Decision Class: Regulatory Document Type: Form Business Function: Methodology		

<i>Version</i>	<i>Date</i>	<i>Description</i>
Keywords: A6.4 mechanism, developing methodologies and tools, stakeholder consultation		