



## CALL FOR INPUT

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Document reference number and title: A6.4-MEP009-A01. Draft Methodological tool: Investment analysis (version 01.0)				
Item	Section no. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	5.2.1	16	Considering that CDM project validations took an average of approximately 362 days (with a range from about 72 days to five years), <sup>1</sup> A6.4 project developers may anticipate similar lead times and therefore initiate validation prior to the activity start date. The requirement in paragraph 16 for PDDs submitted for validation before the start date to be mandatorily updated—either through a request for approval of post-registration changes or as part of the first verification—may impose additional transaction costs and administrative burden, particularly for smaller-scale projects. We understand that the process should allow project developers to update relevant financial data and assumptions within the validation process itself, without requiring a separate post-registration change or deferring the update to the first verification.	16. Where the A6.4 activity PDD is submitted for validation registration prior to the start date of the Article 6.4 activity, the analysis shall be updated through the submission of a request for approval of post-registration changes in accordance with the procedure “Article 6.4 activity cycle procedure for projects” (A6.4-PROC-AC-002) or as part of the first verification of emission reductions and/or net removals, based on the data and information that was available at the start date.

<sup>1</sup> <https://doi.org/10.1016/j.enpol.2012.11.016>

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2	Appendix – Default values for the cost of equity	3	<p>The tool specifies that project participants shall apply the default value corresponding to the calendar year of the start date of the Article 6.4 activity (Appendix, paragraph 3). We are currently in the fourth quarter of 2025, and only the default values for the cost of equity up to 2024 have been published. This means that activities with a start date in 2025 would not have corresponding default values available.</p> <p>This provision should be reviewed to ensure practicality. In the absence of updated data, project participants should be permitted to apply the most recent available default values (e.g., from 2024) until the updated set is published. This approach reflects common financial practice, where the latest available parameters from the preceding year are used in project assessments.</p>	3. The cost of equity is provided for the years 2021 to 2024. Where these default values are used, activity participants shall apply the value corresponding to the calendar year of the start date of the Article 6.4 activity <b>or the latest available</b> , as defined in paragraph 73 of version 2.0 of the Standard “Article 6.4 activity standard for projects“ (A6.4-STAN-AC002).

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