

Comments from Modern Energy Cooking Services on [A6.4-MEP016-A01](#) - Draft mechanism methodology: Cooking energy transitions

3.1 Applicability and para 66: we strongly support inclusion of institutional cooking. This is a growing opportunity and from work we have been doing using the GS MECD, there is no evidence that applying the same standard to institutional cooking as well as household cooking is problematic.

3.1 Applicability and para 16: “(b) For electric cookstoves, activity participants should select cookstoves with the highest-tier nationally available efficiency rating”. Many countries do not yet have well established efficiency rating systems. Even for those that do, the meaning of this sentence is unclear, as would depend on the ‘tiered’ nature of the standards. Eg an Electric Pressure Cooker will have a higher efficiency than an Induction plate, but we assume both of these should be included. In addition, many people will not appreciate that ‘should’ is intended to convey encouragement rather than mandated. Alternative wording is needed to make clear the intention is to incentivise activity participants to select higher-efficiency technologies appropriate to the particular cooking application, rather than to restrict eligibility to the single most efficient electric cooking technology available nationally.

Para 33: we welcome introduction of CCTs for defining Specific Energy Consumption.

3.6 para 35 Downward adjustment: a project/configuration-specific Monte Carlo procedure is used to set the initial downward adjustment. The document explicitly says that for some configurations - including LPG or electric stoves where fNRB is relatively low - the calculated P10 adjustment can exceed 100%, in which case that project stove type simply cannot be included in the Article 6.4 activity. This means the A6.4 uncertainty architecture can move beyond merely discounting credits and effectively make some modern cooking transitions non-creditable, even though there may still be a positive expected emissions reduction. This does not seem appropriate. We ask whether the UNFCCC has explored representative test cases to see if this could be a serious practical problem?

Methodology 8.2 para 143. We support a method for tracking fuel or electricity use by all project cookstoves. However we are aware of strong commercial concerns about the costs of 100% monitoring. Drawing a distinction between metering of usage (for which the main cost is the hardware of metering) and monitoring of that usage (which incurs ongoing data costs), we see benefits in allowing a method for 100% metered devices, but with a (large) sample of those actually monitored each period. That sample could be rotated around the complete cookstove set each period, and the choice of sample could quite easily be defined by a third party, removing potential for project developed bias. Other stakeholders have presented evidence of the solid statistical basis of such a practice, and while some risks would remain that bias could be introduced, these risks seem very small. We would propose that any such sampling method for tracked fuel or electricity use be clearly labelled as such, and should perhaps attract a small penalty. This encourages 100% monitoring and maintains that as the highest integrity approach.

Methodology 8.2 para 144. We welcome the very clear rules for handling missing data in a monitoring period. This topic has not been addressed so clearly in other methodologies.