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Instruction: Enter your input in the table below.

Document reference number and title:
A6.4-MEP010-A01: Draft Methodological tool: Emissions from electricity generation and/or consumption (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	Section 3.2.2	Para 15	The determination of whether **higher or lower emission factors are conservative (Case 1 vs Case 2)** may be challenging in complex projects involving: • Mixed generation/consumption, • Partial export/import to grid, • Dynamic operational patterns	Additional **worked examples** illustrating Case 1 vs Case 2 decisions, and Clear decision trees or flowcharts to reduce interpretation risk and validation disputes
2	Section 3.2.3	Para 21 – Table 2	Several OM options assume access to: ○ Hourly dispatch data, ○ Information on must-run units, ○ Periods when systems operate solely on renewable/nuclear/storage. Such data is often **non-public or inconsistent** across jurisdictions.	Clarify: • Acceptable data proxies, • Use of system operator reports or secondary datasets, • Conditions under which conservative assumptions may replace unavailable dispatch data
3	Section 3.2.5	Para 32	The tool allows inclusion of **non-physical losses (e.g., pilferage)** only if conservative. However, determining conservativeness ex ante may be subjective	Provide clearer guidance or default treatment for **non-technical losses**, especially in countries where they form a significant share of total losses

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4	Section 3.2.3	Para 28	The introduction of **discounts for historical OM/BM data** to reflect increasing renewable penetration is conceptually strong. However, the tool does not yet specify: • Discount magnitudes, • Calculation methodology, • Regional differentiation.	Prioritize finalizing and publishing: • Default discount factors, • Transparent calculation logic, • Regional or system-type differentiation where possible
5	General	General	Many stakeholders will seek to transition CDM projects using **TOOL05/TOOL07** logic. Differences in OM/BM weighting, applicability, and conservativeness may materially affect credit volumes.	Provide a **transition note or guidance document** explaining: • Key methodological shifts, • Expected direction of impact on emission reductions, • How legacy data can be reused where appropriate
6	Section 5.3	Paras 25–31	only naming the grid, without documenting dispatch structure or boundary justification.	• Insert a dedicated subsection requiring the activity participant to describe the project electricity system boundary, • identify the relevant dispatch centre(s), assess transmission constraints as per paragraphs 27–30, and specify when the boundary assessment will be updated.
7	Section 5.7.1.2	Paras 56–57	OM method selection is usually stated without demonstrating compliance with applicability conditions.	• Require explicit justification of the selected OM method, confirmation that applicability conditions in paragraph 57 are met, and explanation for exclusion of other OM methods.
8	Section 5.7.1.2	Paras 58–59	Must-run classification is often implicit or undocumented in the document	• Add a mandatory table listing each power unit, its must-run status, applicable criteria under paragraph 59, data sources used, and justification
9	Section 5.5	Paras 36–39	Misalignment between electricity quantity aggregation period and EF determination is common.	• Require confirmation that the electricity generation or consumption aggregation period aligns with the EF time resolution, and justification where conservative zero values are applied under paragraph 39.

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10	Section 5.7.1.2.2	Para 72	The paragraph mentions – *"The simple OM emission factor shall be determined as an annual emission factor for each calendar year of the crediting period."* At the same time, it allows an Ex ante option where the emission factor is determined once for the entire crediting period. This may be interpreted ambiguously and could lead to inconsistent interpretation.	Clarify whether the simple OM emission factor: • requires annual recalculation, • may be applied as a single ex ante value across all calendar years, or • requires separate ex ante values to be calculated for each calendar year at validation.
11	Section 6	Data / Parameter table 1, table 2 and table 6	Electricity meters are specified as the primary measurement source for monitoring electricity generation and consumption. However, in captive generation systems, EMS or real-time energy monitoring systems are often used as the primary basis for energy accounting and billing especially in case of hybrid systems. Clarification would be useful on whether such systems may be considered acceptable data sources in captive generation contexts.	• Clarify whether EMS or real-time energy monitoring systems may be accepted as data sources for monitoring electricity generation, consumption, and net delivered electricity in table 1, 2 and 6. • Specify that such systems may be used provided the readings can be cross verified using calibrated meters and are subject to appropriate QA/QC procedures.
12	Section 2	Definition (i)	The current definition of net electricity generation does not address whether the issuance, sale, or redemption of environmental attributes (such as renewable energy certificates) should be deducted from the net electricity generation figure. It should be clarified that these environmental attribute transactions are to be explicitly deducted if applicable, ensuring transparent and consistent accounting.	• Add to the definition of net electricity generation: "Net electricity generation shall be calculated after deducting any electricity amounts associated with the issuance, sale, or redemption of environmental attributes if such transactions occur

-- (*Please add rows as required*) -