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Document reference number and title:

A6.4-MEP010-A02: Draft methodological tool - Determination of the technical lifetime of equipment (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 Applicability conditions	-	The applicability conditions seem to be appropriate. However, in real world cases (or at least some of them), the technology/measures such as efficiency increase, fuel switch, the lifetime of not an equipment but rather than the complete system (e.g., vehicle, manufacturing unit, power plant) needs to be evaluated. E.g., in case of PACM equivalent CDM AMS III AA, CDM AMS III AL, CDM AMS III AP, CDM AMS III AS. In these case, it is not just one piece of equipment that would justify the lifetime of the complete process/system but rather than multiple, and usually it is the one that involves the most cost or has the highest lifetime. E.g., in the case of energy efficiency of vehicle system (e.g., trucks), the methodology needs to ensure that the credits are not over the remaining lifetime of the vehicle. However, the vehicle has multiple key components - internal combustion engine, gearbox, control electronics. This tool may try to provide clarity that in such cases, what could be a more appropriate option or induce the mechanism methodology to do so.	Addition of text In case of activity types addressed by the methodologies that include technology/measures/practices including but not limiting improving energy efficiency, fuel switch, the remaining lifetime may be based on the key equipment with the highest CAPEX or highest system reliance. The mechanism methodology shall specify any additional requirements wrt Remaining Lifetime.

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2	5.1.3 General requirements for determining remaining technical lifetime	22 a) The equipment has been operated and maintained according to the recommendations and operations manuals of the equipment supplier to ensure that the technical lifetime specified by the manufacturer is not reduced	This as general requirement fits perfectly for Option (a) and Option c, however, this could be one of the reason that an activity proponent uses option b) to determine the RLT This could be due to one of the reason - The proponent will fully neglected the maintenance schedule - leading to reduce technical RLT - The proponent was not able to provide adequate evidence of the maintenance records that would match the recommendations mentioned in operation manuals/supplier/manufacturer - The activity proponent followed a different maintenance schedule due to national/local regulations or followed other technical recommendations that sought to improve efficiency/lifetime without any retrofit to the systems. This point is mentioned again in para 22d, further assisting the activity proponent in making the decision on the option to choose for determination of RLT. 22d further makes 22 a redundant.	Removal of the text as general requirement

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3	5.2 Option (a): Use of manufacturer's specified technical lifetime	25 Activity participants shall also identify the uncertainty associated with the technical lifetime for the purpose of assessing overall uncertainty, consistent with the mechanism methodology referring to this tool. The uncertainty specified by the manufacturer shall be used where available [Otherwise, other reliable data sources may be used.]	Usually in the case of technical specification/manual, there is a range of technical life mentioned. E.g., 15-20 years for DG sets. This range is different from uncertainty in determination. The probably range, is ideally already covered by previous requirements through para 18 of the document. However, this would be too punitive (which is different from being conservative) and in reality that DG set, if maintained probably might even run much more than its technical life time. In such scenarios, rather than having uncertainty, the requirement may also give an option that if manufacturer attests that the remaining life is the within the range (and can specify the quantum of RLT), it would be deemed sufficient enough. Still a bit conservative as we would be claiming for a number between the range and not the upper limit.	Where lifetime defined in the technical specifications/operations manual of the equipment are in range (e.g., 10 - 15 years), the activity proponent may - Choose the lowest value of the range (e.g., 10 years) - Through assessment by the manufacturer, attest technical life of value specified within the range (e.g., 14 years) In above two scenarios, the activity proponent is not required to do uncertainty assessment
4	5.3 Option (b): Use of an expert evaluation	29 For existing equipment, activity participants shall determine the remaining technical lifetime based on a third-party assessment by a certified or suitably qualified expert.	The term "suitably qualified expert" is a bit vague. Here the onus is on the proponent to justify how a person is suitably qualified and if qualification only is appropriate, i.e., min work experience is not required. It maybe worth to add what is meant by suitably qualified expert in the footnote This is required as some of the technical assessments to be made would be complex - e.g.. Remaining technical life of a boiler	Add footnote on what is meant by suitably qualified expert - Relevant education qualification/training with 3 years of relevant work experience or 5 years of relevant work experience.
5	5.4 Option (c): Use of default values	Table 2	The default values seem to be conservative enough. An already conservative value should not be further subjected to uncertainty reductions	Removal of uncertainty ranges from default values

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6	Box 1: Questions seeking public input	B: Input on the uncertainty associated with these default values	The default values are meant to be conservative, and values for many of the equipment list (if not all) seems to be conservative. E.g., boiler. Steam boilers for power plants especially could have a technical life of 35 years but the option c is only taking 25 years. With this, the uncertainty should be removed.	Removal of uncertainty ranges from default values./

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