




F-CDM-RtB

 <b>CDM: FORM FOR SUBMISSION OF “LETTER TO THE BOARD”</b> <b>(Version 01.1)</b> <i>(To be used only by the Project Participants and other Stakeholders for submitting Letter to the Board as per Modalities and Procedures for Direct Communication with Stakeholders)</i>	
Name of the stakeholder <sup>1</sup> submitting this form (individual/organisation):	Project Developer Forum
Address and Contact details of the individual submitting this Letter:	Address: 100 New Bridge Street, London, EC4V 6JA Telephone number: +65 6578 9286 E-mail Address: <a href="mailto:gareth.phillips@pd-forum.net">gareth.phillips@pd-forum.net</a>
Title/Subject (give a short title or specify the subject of your submission)	Choice of time for definition of MP
Please mention whether the Submitter of the Form is:	<input type="checkbox"/> Project participant <input checked="" type="checkbox"/> Other Stakeholder, please specify <a href="#">PD-Forum</a>
Specify whether you want the Letter to be treated as confidential <sup>2</sup> :	<input type="checkbox"/> To be treated as confidential <input checked="" type="checkbox"/> To be publicly available (UNFCCC CDM web site)
<b>Purpose of the Letter to the Board:</b>	
Please use the space below to describe the purpose for submitting Letter to the Board.	
(Please tick only one of the four types in each submission )	
<input checked="" type="checkbox"/> <b>Type I:</b> <input type="checkbox"/> <b>Request Clarification</b> <input checked="" type="checkbox"/> <b>Revision of Existing Rules</b> <input checked="" type="checkbox"/> Standards. Please specify reference project standard, PCP <input type="checkbox"/> Procedures. Please specify reference <input type="checkbox"/> Guidance. Please specify reference <input type="checkbox"/> Forms. Please specify reference <input type="checkbox"/> Others. Please specify reference <input type="checkbox"/> <b>Type II: Request for Introduction of New Rules</b> <input type="checkbox"/> <b>Type III: Provision of Information and Suggestions on Policy Issues</b>	
Please use the space below to describe in detail the issue that needs to be clarified/revised or on which the response is requested from the Board as highlighted above. In doing this please describe the exact reference source including the version (if any).	

<sup>1</sup> Note that DNAs and DOEs shall not use this form to submit letter to the Board.

<sup>2</sup> Note that the Board may decide to make this Letter and the Response publicly available



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**To** cdm-info@unfccc.int  
**From** Gareth.Phillips@pd-forum.net  
**Date** 08 Nov 2011  
**Subject** Choice of time of definition of the monitoring plan

Mr Duan Maosheng, Chair,  
Honorable Members of the CDM Executive Board,

As per the VVS validation procedure (Chapter 14), the DOE is required to validate the description of the monitoring plan (MP). However, oftentimes during the validation stage, the details of the monitoring plan are not fully available. This is because the project is often in the planning stages or still under construction and the full monitoring details are dependent on several factors including equipment availability and the execution of the PPA, which is normally agreed only after registration. However, based on the VVS guidance, the DOE expects the monitoring plan to define all the precise details. As a result, PPs give their best guess at the monitoring plan scenario. This leads to the situation where many MPs require a revision after project registration. With the aforementioned in mind, we ask the Board to clarify the validation requirement for monitoring plans, i.e., that during validation only a plan framework needs to be validated, the details of which will be documented in the first monitoring report and verified as part of the initial verification..

As per [VVS] para 234 the equipment used for monitoring must be controlled and calibrated in accordance with the monitoring plan, the applied methodology, the Board guidance, local/national standards, or as per the manufacturer's specification. The PD Forum wants to emphasise that the local and national standards or manufacturer specifications should be sufficient to refer to in the description of the monitoring plan when the final metering has not been implemented at the stage of validation.

The clarification of this issue by the executive board would reduce DOE/PP frustration and conflict during validation, as well as significantly reduce administrative post registration requests for monitoring plan changes.

Kind regards,

Gareth Phillips  
Chair

Please use the space below to mention any suggestions or information that you want to provide to the Board. In doing this please describe the exact reference source including the version (if any).



[replace this bracket with text, the field will expand automatically with size of text]	
If necessary, list attached files containing relevant information (if any)	<ul style="list-style-type: none"> <li>[replace this bracket with text, the field will expand automatically with size of text]</li> </ul>
<b>Section below to be filled in by UNFCCC secretariat</b>	
Date when the form was received at UNFCCC secretariat	

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**History of document**

Version	Date	Nature of revision
01.1	09 August 2011	Editorial revision.
01	04 August 2011	Initial publication date.
<b>Decision Class:</b> Regulatory <b>Document Type:</b> Form <b>Business Function:</b> Governance		