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Document reference number and title: (Recommendation from the MEP to SBM020)

Draft mechanism methodology: Cooking energy transition

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)
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1	4. Applicability	Paragraphs 11(a)(iii) and 11(b)(ii)	Paragraphs 11(a)(iii) and 11(b)(ii) make this mechanism methodology available only in areas that do not otherwise fulfil the applicability conditions of paragraphs 12 to 13(f) of A6.4-MEP014-A04. The evident purpose is to allocate activities between the two instruments. As drafted the provision does not achieve that purpose, for three reasons. Firstly, it renders section 6.2.1 inoperable. The conditions attaching to the simplified additionality route for fuelwood and charcoal cookstoves at paragraph 37 reproduce the conditions in the excluded range: sub-paragraph 37(a) corresponds to A04 paragraph 13(a); 37(b) to A04 paragraphs 13(b) and 12; 37(c) to A04 13(c); 37(d) to A04 13(d); 37(e) to A04 13(e); and paragraph 12(c) of this methodology to A04 13(f). Any activity that qualifies for section 6.2.1 therefore fulfils A04 paragraphs 12 to 13(f), and is on that account excluded from this methodology by paragraph 11(a)(iii) or 11(b)(ii). Section 6.2.1 has no possible user, and every biomass activity that is in fact eligible for this methodology must proceed under the comprehensive demonstration at section 6.3. This conclusion does not depend on how the word “areas” is construed. Read narrowly, so as to capture only the genuinely area-level conditions — the primary fuel share, the artisanal charcoal production test and the two low-income tests — the contradiction is more direct rather than less, because those are the conditions that section 6.2.1 requires to be satisfied. Secondly, the cross-reference ends at A04 paragraph 13(f) and so omits A04 paragraph 11, which contains the requirement that activities be implemented in rural areas. An urban artisanal charcoal activity serving low-income households — the activity type that paragraph 11(b) and Table 1 of the cover note describe this methodology as covering — fulfils A04 paragraphs 12 to 13(f) and is therefore excluded here, while A04 excludes it because it is not rural. It is eligible under neither instrument. Thirdly, the cross-reference also omits A04 paragraph 13(j), the prior-penetration screen. A rural low-income area in which the penetration of equivalent or higher efficiency cooking technology exceeds the A04 13(j) threshold	Delete sub-paragraph (iii) of paragraph 11(a) and sub-paragraph (ii) of paragraph 11(b). Replace the allocation function performed by those sub-paragraphs with the provision proposed at Comment 2 below, and reflect the corresponding position in the applicability conditions of A6.4-MEP014-A04 so that the two instruments are consistent with one another.
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			is excluded from A04 on that ground, and excluded from this methodology because the area continues to fulfil paragraphs 12 to 13(f). It too is eligible under neither instrument. Alongside this A04 determines the baseline from standardised default values. This methodology determines it from measured pre-activity fuel consumption. Paragraphs 11(a)(iii) and 11(b)(ii) channel the great majority of rural biomass activities to the instrument that relies on defaults, including activities that hold protocol-compliant Kitchen Performance Test data fully capable of supporting a measured baseline. DelAgua's comments to the consultation on A6.4-MEP014-A04 version 02.0 argued properly conducted project-level Kitchen Performance Tests under strict protocol adherence offer better accuracy than any standardised alternative, and excluding measured data does not make a methodology more conservative, it makes it less accurate. The effect of the present drafting is to prohibit use of the more accurate instrument in exactly those cases where the evidence to support it exists. We would add that the defect is capable of resolution now. Neither instrument has yet been adopted by the Supervisory Body, and the allocation between them cannot be settled coherently within one document alone. We would ask that the applicability conditions of the two methodologies be reconciled and stated consistently in both.	

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2	4. Applicability	Paragraph 11; paragraph 13; new provisions proposed	Deleting the cross-reference removes the contradiction but leaves the two instruments overlapping with no allocation rule between them. We accept that an allocation principle is required and suggest that it should be based on the evidence available to the activity rather than on its geography. The distinction between the two methodologies is evidential rather than geographic. A04 exists to serve activities that cannot support a measured baseline and must therefore rely on standardised defaults. This methodology exists to serve activities that can measure. The allocation rule follows from that distinction: where an activity holds pre-activity Kitchen Performance Test data obtained in accordance with the requirements of this methodology, it should be permitted to apply this methodology; where it does not, A04 applies. That test is objective, it is verifiable at validation from documentation the activity must hold in any event. It also allocates each activity to the instrument that will produce the more accurate result for it, which is the outcome the rules, modalities and procedures require. If the MEP would prefer a simpler administrative test, a date-based provision would achieve substantially the same allocation, on the basis that activities designed from the mid-2020s onwards will generally have been designed to collect pre-activity Kitchen Performance Test data. We would not object to eligibility being conditioned on the first crediting period commencing on or after 1 January 2023, and offer that as an alternative rather than as our preferred formulation.	Insert a new sub-paragraph in paragraph 11 as follows: "This mechanism methodology may be applied by Article 6.4 activities that hold pre-activity Kitchen Performance Test data for the target population, obtained in accordance with the requirements of this mechanism methodology and of the Sampling and surveys tool. Where an Article 6.4 activity is eligible to apply both this mechanism methodology and the mechanism methodology 'Energy efficiency measures in household cooking', the activity participants may apply either, and shall record and justify that choice in the PDD, PoA-DD or CP-DD." In the alternative, if the MEP prefers a date-based test, insert in paragraph 11 the words "and whose first crediting period commences on or after 1 January 2023".

3	4. Applicability	Paragraph 11(a)(ii)	Paragraph 11(a)(ii) requires the activity to be located in a country where rural electrification is below 50 per cent, and, in bracketed text, where LPG distribution networks are not present. Neither limb is defined, and neither can presently be assessed with confidence. On electrification, four questions are open: what data source and vintage govern; whether the figure is national or sub-national; whether it means grid connection only or includes off-grid supply such as solar home systems and mini-grids; and at what point it is assessed, and whether it is re-tested on renewal of the crediting period. If the figure is national but the activity is sub-national, an activity in an unelectrified province may be excluded because of conditions elsewhere in the country. The draft also does not state what the condition is for. It appears capable of doing one of two different jobs. If it is a technical test of whether electric cooking is a realistic alternative in the area, then household access is the wrong metric. Electric cooking requires reliable supply at sufficient power for high-load appliances, at an affordable tariff. A household connected at low capacity, or subject to frequent outages, has electricity but cannot cook with it. Access rates does not capture this. If instead it is a proxy for the stage of economic development in the area, then it duplicates work already done elsewhere in the methodology. Paragraphs 37(d) and 37(e) test low income and poverty directly, against recognised indices and a defined income threshold. A proxy indicator adds no information that those tests do not already provide, and it introduces a bright line where the direct tests require evidence. The bracketed LPG limb raises the same difficulty in sharper form. "Not present" is binary and undefined, and some LPG distribution exists in almost every country in which these activities operate, including in rural markets. Read literally the limb would exclude most eligible activities; read purposively it is unclear what degree of presence is intended to disqualify. We would also observe that assessing the availability of alternative cooking options is the function of the additionality demonstration in section 6, where it is tested on evidence specific to the activity.	Specify in paragraph 11(a)(ii): the data source and vintage to be used; whether the figure is assessed at national or sub-national level, and if sub-national, at what administrative tier; whether electrification is measured by grid connection alone or includes off-grid supply; the date at which the assessment is made; and whether the condition is re-tested on renewal of the crediting period. Provide that an activity satisfying the condition at validation continues to satisfy it for the duration of the crediting period. State the purpose the condition serves. If it is intended as a test of whether electric cooking is a feasible alternative, express it in terms that bear on that question, such as supply reliability and available connection capacity, rather than access alone. If it is intended as a proxy for the stage of economic development, delete it, on the basis that paragraphs 37(d) and 37(e) test that matter directly and on evidence. Delete the bracketed requirement that LPG distribution networks are not present, or replace it with a defined and measurable threshold of LPG availability in the target population
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			Reproducing that assessment as an undefined threshold in the applicability conditions places the question in the wrong part of the methodology.	
4	4. Applicability	Paragraph 12(e), read with paragraph 12(f)	Paragraph 12(e) requires each project cookstove to be linked to a specific household by a permanent unique identifier affixed to the cookstove, and limits the acceptable means to two: a tag or plate affixed or fired into the body of the stove such that its removal would damage or destroy the stove, or a stove use monitor with a recorded serial number permanently installed on the cookstove. We support the underlying requirement without qualification. Permanent, one-to-one, auditable identification of stove and household is fundamental to the integrity of a cookstove activity, and paragraph 12(f) already requires an identifier management system that maintains traceability of each cookstove and its linkage to the corresponding household. Our comment concerns only the closed list of acceptable means. Restricting the means to those two options is disproportionate at programme scale and secures no integrity gain over widely used alternatives. Destructive-removal tags and plates add manufacturing cost and are not offered by all producers. The second option presents a more fundamental difficulty. Stove use monitors are deployed on a representative sample, which is how paragraphs 118, 119 and 171 regard their use. Treating a stove use monitor as an identification route requires a monitor to be installed on every credited stove, at a hardware, installation and data management cost bearing no relation to the identification function it would perform. At the scale at which our programmes operate that requirement is not implementable.	Amend the introductory words of paragraph 12(e) so that the listed means are not exhaustive, for example: “The identifier shall be implemented through one of the following means, or through any other means that to a reasonable endeavor achieves permanent, unique and auditable identification of the cookstove and its linkage to a single household:”

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5	2. Definitions	Paragraph 7(v), definition of “User household”	The definition of a user household requires a functioning project cookstove used, on average, for at least five cooking events per week during the monitoring period. For activities applying this methodology, the threshold performs a materially different function than it would in a methodology that credits on the basis of assumed savings per stove. Here, activity fuel consumption is measured directly through Kitchen Performance Tests under paragraphs 163 and 168, and from 1 January 2028 stove usage is measured directly using stove use monitors. Emission reductions are therefore already limited to the fuel consumption actually displaced. A household using the project cookstove three times a week generates a correspondingly smaller measured reduction, and is credited accordingly. The threshold does not protect against overestimation, because the measurement already does that; it operates instead as a binary exclusion that discards genuine, measured reductions in households falling below it. The five-event threshold also sits awkwardly with observed cooking practice in the geographies this methodology serves. Cooking frequency varies with household size, seasonal agricultural labour, school terms and fasting periods. A household that cooks on the project stove four times a week in one monitoring period and six in the next is a continuing user in substance, but moves in and out of eligibility. We would not object to a threshold that excludes stoves that are not in genuine use, which is a legitimate concern. Our point is that the threshold should be calibrated to that purpose rather than set at a level that excludes measured reductions in partially adopting households, and that where usage is determined by direct measurement the case for a high threshold falls away.	Reduce the threshold in the definition of “User household”, for example to at least one cooking event per week, which is the threshold applied in the CLEAR methodology and in earlier drafts in this series. In the alternative, provide that where the parameter Ψ_y is determined using stove use monitors in accordance with section 7.4.2, the threshold shall be at least one cooking event per week, retaining the five-event threshold only where Ψ_y is determined by usage survey. Retain the existing provision permitting activity participants to adopt a higher threshold and to specify it in the monitoring plan.

6	7. Baseline scenario	Paragraphs 86 to 90; Table 3; Question 6	We do not propose changes to the cap or flag values themselves, and we support their retention. Nor do we favour disaggregating the caps on a geographical basis: a single global cap set at a defensible level is more transparent and less contestable than a set of regional values, each of which would require its own evidential basis. Our comment concerns paragraph 90, which provides that where the flagged threshold is exceeded, activity participants shall provide justification explaining why a higher baseline is realistic for the applicable geographic area, and that where no appropriate and credible justification can be provided the baseline energy consumption values shall be capped to the flag values. As drafted, the flag operates as a cap by default. It is unclear however what makes a justification appropriate and credible, who determines that question, and what evidence discharges it. In practice the determination will fall to the designated operational entity, with the consequence that identical measured data may be accepted in one validation and rejected in another. Where it is rejected, the effect is not a request for further evidence but a substitution of the flag value for the measured value, which is a material reduction in credited volume arrived at through an unspecified test. The two illustrative justifications offered — the use of plancha cookstoves, and circumstances where wood is relatively abundant — are narrow, and neither is available to activities in much of Sub-Saharan Africa. Several ordinary and well-documented factors push measured per-capita consumption above the rural flag value without indicating anything abnormal. Per-capita metrics are mechanically sensitive to household size, so a small household consuming normally at household level can exceed a per-capita flag on that basis alone. Long-cooking staples such as dried beans and maize, high fuel moisture content, high-altitude and cool-season conditions, and simultaneous use of the cooking fire for water heating all have the same effect.	Retain the cap and flag values as drafted, retain the flag mechanism, and retain global rather than geographically disaggregated caps. Amend paragraph 90 to specify what constitutes appropriate and credible justification, and to provide that documented compliance with the Kitchen Performance Test protocol and sampling requirements of this mechanism methodology is sufficient. For example: “Where the flagged threshold is exceeded, activity participants shall provide justification in the PDD or CP-DD explaining why a higher baseline is realistic for the applicable geographic area. A Kitchen Performance Test conducted in accordance with the requirements of this mechanism methodology and of the Sampling and surveys tool, and documented as such, shall constitute sufficient justification.” Expand the illustrative list of justifications to include, at least: average household size in the target population; the prevalence of long-cooking staple foods; fuel moisture content; altitude and seasonal temperature conditions; and simultaneous use of the cooking device for water heating. Where a justification is not accepted, provide that the designated operational entity shall state its reasons in writing by reference to the criteria in paragraph 90.
7	7. Baseline scenario	Note 2; paragraphs 125 to 134; paragraph 187 and Note 3; paragraphs 114 and 119	The draft applies a conservative statistical treatment to the same underlying parameter uncertainty at three separate points, and the effect is cumulative. The first is the	In response to Note 2, replace both Option 1 and Option 2 with the approach adopted in A6.4-MEP014-A04 version 02.0: a single uncertainty analysis conducted at methodology

			parameter Ψ_y. Under paragraph 114 it is applied at the lower bound of the confidence interval at the 95/10 reliability level of the survey result, and then capped. Under paragraph 119, which is mandatory from 1 January 2028, the 95/10 lower bound continues to apply to the value obtained by direct measurement using stove use monitors. The second is the initial downward adjustment. Under both options in section 7.5.1 the adjustment is set at the lower bound of the 95 per cent confidence interval relative to the central estimate: under Option 1 across all sources of uncertainty in the unadjusted baseline emissions, and under Option 2 across the baseline energy consumption parameters. Under either option the result is floored at ten per cent of the first-year difference between baseline and activity emissions by equations (26) and (28), and it is then carried forward unchanged for the whole of the crediting period by equation (32). The third is bracketed paragraph 187, which would require a further uncertainty analysis on the emission reductions themselves, by error propagation or Monte Carlo simulation, determined at a one-sided 90 per cent confidence level. Note 3 records that the MEP has not yet decided whether this is required, having regard to the conservative assumptions already present in the methodology. Each of these applies a lower bound to inputs that already contain lower bounds, and the calibration is materially tighter than the applicable standard requires. The lower bound of a two-sided 95 per cent confidence interval is the 2.5th percentile. Paragraph 13 of the Annex to the Baseline Standard requires that emission reductions be very unlikely to be overestimated, which in the calibrated language of the IPCC Fifth Assessment Report, and on the MEP's own reading in the parallel instrument, corresponds to the tenth percentile. The first two layers are therefore calibrated approximately four times more tightly than the standard requires, before the third is applied on top of them. The MEP has already considered and resolved this question in the parallel instrument. In A6.4-MEP014-A04 version 02.0 the MEP records that error propagation and standard 95 per cent confidence interval treatment produced unusable	level by Monte Carlo simulation, calibrated at the tenth percentile in accordance with paragraph 13 of the Annex to the Baseline Standard, with the resulting initial downward adjustment specified in the methodology rather than determined by each activity. If an activity-level determination is nonetheless retained, calibrate it to the tenth percentile rather than to the lower bound of the 95 per cent confidence interval, and restrict it to the baseline energy consumption parameters as in Option 2. In response to Note 3, delete bracketed paragraph 187 in its entirety. The uncertainty it would address is already addressed at methodology level, and its retention alongside section 7.5.1 would deduct twice for the same uncertainty. In paragraphs 114 and 119, retain the 95/10 lower bound where Ψ_y is determined by usage survey, and delete it from paragraph 119 where Ψ_y is determined by direct measurement using stove use monitors, the measured value being applied as determined.
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			outcomes given non-normal parameter distributions, the IPCC default methane emission factor for charcoal combustion being the worked example. The MEP accordingly conducted the Monte Carlo analysis at methodology level, calibrated it to the tenth percentile, and found that the quantification in that methodology already sat at or above that level. It concluded that no determination of aggregate uncertainty is required at activity level. We supported that resolution and continue to support it. Applying a different and substantially more conservative treatment to the same physical uncertainties in a sibling instrument covering the same sector is difficult to justify on technical grounds, and it produces the outcome that the methodology which relies on direct measurement is penalised more heavily for uncertainty than the methodology which relies on defaults. We would also note that requiring activity-level error propagation or Monte Carlo simulation, documented parameter by parameter in the PDD, imposes a substantial analytical burden on activity participants and on designated operational entities for no gain in accuracy once the methodology-level analysis has been performed. Our answer to Note 2 is therefore that neither Option 1 nor Option 2 should be adopted in the form drafted.	

8	7. Baseline scenario	Paragraphs 139 to 142; equation (32)	Paragraph 139 sets the annual increase in the downward adjustment at 0.01, first applied in the calendar year following the calendar year of the start date of the first crediting period, and equation (32) compounds it across the crediting period. Paragraph 142 explains that the one per cent annual reduction is intended to keep baselines ambitious over time while acknowledging the economic realities of clean cooking activities and the affordability barriers they face. In the parallel instrument the MEP has recommended that the Supervisory Body exempt the methodology from subsequent-year downward adjustment altogether, using the route available under section 7.2 of version 01.0 of the Baseline Standard. The stated rationale is that the methodology applies exclusively to low-income and impoverished households where autonomous adoption of improved cookstoves is negligible, and that the activities deliver health and gender benefits alongside the climate benefit. The one per cent adjustment survives there only as a fallback should the exemption be declined. This methodology imposes the same population tests on its simplified additionality route. Paragraph 37(d) requires low income or poverty to be demonstrated against a recognised index, and paragraph 37(e) caps income at the World Bank lower-middle-income threshold. The households are the same, the evidential basis is the same, and paragraph 142 acknowledges the same affordability barriers. The treatment should be the same. The two adjustments also compound. The initial adjustment under section 7.5.1 already prices parameter uncertainty at the lower bound of the 95 per cent confidence interval and carries forward unchanged for the whole crediting period. The annual increase is then layered on top of it. The same margin of conservatism is taken twice, once through the uncertainty treatment and again through the passage of time, and the cumulative effect in the later years of the crediting period is material.	Recommend to the Supervisory Body that this mechanism methodology be exempted from the application of a subsequent-year downward adjustment, under section 7.2 of version 01.0 of the Baseline Standard, on the same grounds and in the same terms as recommended in A6.4-MEP014-A04 version 02.0.
9	10. Non-permanence provisions	Paragraphs 182 to 184; equation (59); Appendix 10 paragraphs 30, 31, 33 and 35	The methodology's own analysis establishes that a buffer pool contribution is not justified for activities that reduce the consumption of non-renewable biomass, and the draft then requires one. Appendix	Exempt activities applying this mechanism methodology, in respect of reductions in non-renewable biomass consumption, from the buffer pool contribution, consistent with the exemption already granted at paragraph 33(a)

			10 paragraphs 30 and 31 record that activity participants affect but do not control the relevant greenhouse gas reservoirs; that the sites at which project cookstoves operate are always geographically distinct from the locations at which the fuels are produced or collected; and that observed changes in carbon stocks in those reservoirs cannot be attributed to household cooking energy efficiency measures. Those are the three conditions in paragraph 13 of the reversals standard. Paragraph 35(b) goes further, recording that participants have no ability to cause reversals and that their economic interest lies only in reducing forest emissions, which categorically limits moral hazard. On that basis paragraph 33(a) exempts participants from reversal monitoring, reversal-related notification and reporting, post-crediting period monitoring and post-reversal actions. Paragraph 33(b) nonetheless retains the buffer pool contribution, and paragraph 184 requires the resulting units to be cancelled immediately. The two positions are inconsistent. The fraction of non-renewable biomass is fixed ex ante under the applicable tool at the start of the crediting period, as paragraph 41 provides. Credits are therefore issued only in respect of the non-renewable share of the biomass displaced. Any subsequent loss of carbon stocks in the reservoir, from natural or human-induced pressure unrelated to the activity, would by definition increase the non-renewable fraction in that landscape. Because the activity continues to apply the lower, ex-ante value, its credited emission reductions become more conservative at the moment such a loss occurs. Applying a buffer contribution on top of that discounts the same risk a second time. There is a further structural point. Removals are neither claimed nor quantified in these activities. The buffer pool mechanism is designed to secure removals against subsequent loss of the carbon they represent. Where no removal has been credited, there is no credited quantity capable of being reversed. We note finally that the contribution in equation (59) depends on a draft tool that is itself acknowledged at footnote 45 as still under development and not yet approved. A provision central to the credit volumes an	and on the reasoning already set out at Appendix 10 paragraphs 31 and 35. This may be effected by deleting paragraphs 183 and 184 and equation (59), and by removing the term for buffer pool contributions from equation (61). If a contribution is nonetheless retained, provide expressly that it shall not be additive to the ex-ante determination of the fraction of non-renewable biomass in respect of the same reversal risk, and quantify the extent to which that determination is treated as already accounting for that risk. In any event, section 10 should not be finalised until the consultation on the Reversal Risk Assessment tool has concluded and its final form is available for stakeholder review, so that activity participants are able to quantify the provision before the methodology is adopted.
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			activity can expect cannot properly be finalised while the instrument that determines its magnitude remains unsettled.	

10	8. Activity scenario	Paragraphs 114 to 119; paragraphs 163, 168 and 171; Appendix 8, sections 2 and 3	Three monitoring instruments operate in parallel for biomass activities. - Paragraphs 163 and 168 require Kitchen Performance Tests measuring the use of all fuel types by all cooking devices in sampled households. - Section 7.4.2 requires the determination of Ψ_y by usage survey under paragraph 114 until 31 December 2027 and by stove use monitors under paragraphs 118 and 119 from 1 January 2028. - --- Paragraph 171 then requires stove use monitor measurements to complement both the Kitchen Performance Tests and the surveys, with monitors placed on all project cookstoves in the Kitchen Performance Test sample for the purposes of the Hawthorne adjustment. We support each of these instruments individually. Our comment concerns two points on which the requirements are not determinate. First, the residual function of the usage survey after 1 January 2028. Paragraph 117 provides that the caps cease to apply where Ψ_y is estimated using stove use monitors, and the heading to section 7.4.2.2 makes that option mandatory from that date. What the draft does not state is whether the usage survey continues to have any role in the determination of Ψ_y after that date, or whether a survey result may constrain the measured value where the two diverge. On one reading the survey ceases to be relevant to Ψ_y and is retained for other purposes; on another it operates as a ceiling or cross-check. The distinction affects both cost and outcome and is presently open. Second, three parameters governing stove use monitor deployment are unspecified. Appendix 8 is detailed on installation, sensor placement, temperature analysis and the public presentation of stove use algorithms, and it specifies sampling by reference to the 95/10 precision guidance in Appendix 5. For the Hawthorne adjustment it fixes a thirty-day deployment. It does not specify the minimum deployment duration per monitor for the determination of Ψ_y under paragraph 119, as distinct from the thirty days fixed for the Hawthorne adjustment; it does not specify a minimum number of monitors to be installed in a monitoring period beyond the general precision requirement; and it does not state whether monitored households are re-	Confirm in section 7.4.2 that from 1 January 2028 the determination of Ψ_y rests exclusively on stove use monitor measurements, and that usage surveys are retained only for the purposes for which they remain necessary — household eligibility, verification of the presence and functionality of the cookstove, and characterisation of fuel and stove stacking — and do not independently constrain the measured value. Specify in Appendix 8 the minimum deployment duration per stove use monitor for the determination of Ψ_y under paragraph 119. Specify in Appendix 8 the minimum number of stove use monitors to be installed in a monitoring period. Specify in Appendix 8 whether monitored households are re-randomised in each monitoring period or retained as a panel, and if retained, the maximum period for which a household may remain in the panel.
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			randomised in each monitoring period or retained as a panel, and if retained, for how long. Each of those is presently a matter for the designated operational entity. The consequence is inconsistent treatment between activities verified by different entities, and exposure for activity participants who have built monitoring systems to a defined standard if a verifier adopts a stricter reading at a later validation.	