



CALL FOR INPUT

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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)
1	4. Applicability	section 4.1 , para 11	The most critical point is that biomass cookstoves (which is the lion share of the clean cooking actions in Sub-Saharan Africa) are excluded in 11.(a) & (b) applicability test as that have to use the A6.4-MEP014-A04 "Energy efficiency measures in household cooking": - It is a hidden exclusion as it is not mentioned in the cover note: it is a mistake? Then correct it. - If done on purpose it is UNFAIR for Africa and INCONSISTANT. It created issues on section 6.2.1 which become inoperable It is would be particulary unfair for rural aeras in Sub-Saharan Africa to have this inconsistency between methodologies and penalise the poorest populations in the world. This exclusion would hamper TotalEnergies to further supports projects with the deployment of Advanced biomass cookstoves (ABS) (Tier 3-5 , ISO 19867-1:2018) as defined in "Clean Cooking in Africa 2026" International Energy Agency) .	Delete sub-paragraph (iii) of paragraph 11(a) and sub-paragraph (ii) of paragraph 11(b), If not possible to delete it, in rural aeras include biomass cookstoves that have a project start date less than 3 years. And impose A6.4-MEP014-A04 only for older projects. The rational is that older projects may not have quality data to set an historical baseline on KTP tests. ISO certified 'Improved cookstoves' should be listed as examples in 1.1. Scope

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2	4. Applicability	section 4.1 , para 11	11.(a) (ii) is requiring that rural electrification is below 50 per cent [and LPG distribution networks are not present] It seems very excessive. The criteria are too high level: electrification does not mean that the network can technically support electric stove (need grid for high electric power) and difficult to assess a proper LPG distribution networks. Anyway these criteria are excessive and spill over into the additionality test.	Delete sub-paragraph (ii) of paragraph 11(a)
3	4. Applicability	section 4.1 , para 12	Paragraph 12 (e) requirement on the stove ID are disproportionate: “(i) a tag/plate affixed or fired into the stove body such that its removal would damage or destroy the stove, or (ii) a SUM with a serial number permanently installed on the stove” and would exclude good commercial stoves (provided 1/ is solved positively and ICS are eligible)	replace with : (i) A tag or plate affixed or fired into the body of the cookstove in such a way that its cannot be removed easily from the stove;
4	7. Baseline scenario	section 7.4.2	We are concerned that MEP015 applies overlapping conservatism measures to the same sources of uncertainty, including lower-bound confidence interval adjustments, initial downward adjustments and a potential further activity-level uncertainty deduction. This risks materially over-discounting emission reductions and creates a more stringent treatment than the parallel MEP014-A04 methodology. We recommend adopting the MEP014-A04 approach, under which uncertainty is addressed once at the methodology level through Monte Carlo analysis calibrated to the 10th percentile, and removing any additional activity-level uncertainty deductions that would result in double counting of uncertainty impacts.	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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5	7. Baseline scenario	section 7.5.2	We supports aligning MEP015 with MEP014-A04 by exempting the methodology from the annual 1% subsequent-year downward adjustment under Section 7.2 of the Baseline Standard. The targeted households, affordability constraints and policy rationale are identical. The current annual adjustment is additive to the methodology's existing conservatism measures and therefore risks excessive discounting of emission reductions.	Propose to the SBM that this methodology be exempted from the application of a subsequent-year downward adjustment
6	7. Baseline scenario	section 7.4.2	MEP015 would benefit from greater clarity and standardisation regarding monitoring requirements from 2028 onwards. The methodology should explicitly state that stove use monitors become the sole basis for determining stove usage (Ψ_y), while surveys are retained only for complementary monitoring functions.	clarify in section 7.4.2 that from 1 January 2028 the determination of Ψ_y rests exclusively on stove use monitor measurements.
7	Appendix 7. Demonstration of requirement...	Appendix 8 !! I was not able to select Appendix 8 in the above field Section no	Key implementation parameters such as monitor deployment duration, minimum sample size, and panel rotation requirements should be specified directly within the methodology. This would improve consistency across validations, reduce uncertainty for project developers, and ensure harmonised implementation across activities.	Specify in Appendix 8: - the minimum deployment duration per stove use monitor for the determination of Ψ_y under paragraph 119. - the minimum number of stove use monitors to be installed in a monitoring period.

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8	10. Non-permanence provisions	10.2. Buffer pool contributions	We don't think the introduction of a Buffer pool for this type of activity is justified. The proposed tool ""A6.4-MEP014-A07 Draft methodological tool Reversal risk assessment"" will be commented separately but it shows that the approach is not adapted for clean cooking as the tool seems to hit a dead end as no human-induced factors of Reversal risk/Reversal risk reduction factor are not available. In case MEP decides to keep the Buffer pool, MEP should integrate the fNRB in the calculation : A simple science based model shows that the application of a sufficient fNRB covers the risk of non permanence. For instance : Let's assume the calculated impact of the project in one period is 100 tCO2 (emission reduction + removals). Let's assume a Non permanence risk tool would ask for a buffer of 20%, so 20t. Let's use 3 fNRB data: 20%, 50%, 70%. With these 3 fNRB the granted Emission Reductions in Carbon credits are respectively 20, 50 and 70 t; and the non granted Emissions Reductions are 80, 50 and 30 t. These non granted tonnes of CO2 are stored in the forest in form of wood biomass. They are higher than the 20 t of the buffer and show that the risk of non permanence is largely covered with an fNRB up to 80%	State that "additional Non-Permanence provisions are not needed, as the science shows that the fNRB covers the risk of non permanence." If a Buffer remains mandatory : integrate in A6.4-MEP014-A07 Tool Reversal Risk Assessment, the fNRB into the buffer calculation to reduce the need for buffer accordingly