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A6.4 MEP011-A01: Draft Methodological tool: Analysis of lock-in risk (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	COVER NOTE	Paragraph 7	The risk of lock-in emissions exists primarily for projects with high upfront capital investment, immobile, long-lived infrastructure, and high switching costs. Project operators are contractually or economically obligated to use the infrastructure or technology for its lifetime in order to ensure that upfront costs are reimbursed, and returns are generated as expected. Clean cooking projects do not have these characteristics. At the household level, the capital involved is relatively low, and appliances have short replacement cycles. Moreover, households have a much more dynamic approach to deciding when and how to replace their cooking appliances. While liquidity and credit obligations or constraints may be one factor, many other dimensions influence this decision, including family size, home location, fuel and technology availability, education, etc. Therefore, households routinely re-evaluate their cooking technology choices, and carbon projects can influence these decisions through behavior change, subsidies, incentives, etc. At the energy system level, even transitional cooking fuels do not entail the type of immobile, high-capital infrastructure typically associated with fossil fuels lock-in. Distribution networks are modular and low-capital, and markets for transitional cooking fuels are small relative to national energy systems. Moreover, electrification and grid expansion timelines are typically driven by infrastructure investment cycles, not by stove adoption patterns, making it highly unlikely that the adoption of transitional cooking solutions crowds out electric cooking. In general, therefore, there is very limited risk of lock-in emissions in the cookstove context, while the greater empirical risk is backsliding to high-emitting polluting fuels due to affordability concerns, supply instability, or household circumstances.	Clean cooking appliances typically have an operational lifespan below the ten-year threshold and would therefore be outside the scope of lock-in risks defined in the current methodological tool. However, we recommend that cookstove carbon projects should be explicitly exempt from lock-in emissions risk assessments for the reasons given above. This ensures regulatory clarity and avoids unnecessary technical debates.