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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	Applicability	6 – 10, 11-12	It is indicated that the 'methodological tool is applicable to Article 6.4 activities where its use is explicitly referenced in the applicable mechanism methodology'. However, later it is also cited that mechanism methodologies provide further specifications and requirements. The use case of the tool appears to be rather limited and that it does not provide sufficient details for its usage.	The usage and/or reference to the tool is likely to be limited. Specific areas of refinement are depicted in the next rows.
2	Technical or operational lifetime assessment	Footnote 10	It is cited that 'In some cases, there may be more than one main technology, measure or practice relevant for lock-in risk analysis (for example a dam and a turbine in the case of a hydro power plant), in which case the lock-in risk analysis shall be carried out separately for each one in accordance with the relevant guidance provided in the mechanism methodology'. Such sort of examples and going into the component level takes away the attention from lock-in risk context and rather make the tool unviable for application at project level.	Relevant example types where the application of the tool is envisaged should be provided.

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4	Greenhouse gas intensity assessment	Paragraph 21	It is cited that 'Activity participants shall compile a list of all credible alternatives that are comparable with the proposed Article 6.4 activity'. However, it is also to be noted that lock-in risk analysis is a part of the additionality steps, and the alternatives are already defined in the previous steps of additionality assessment.	The alternatives herein should be the same as considered in the start of the additionality assessment. The alternatives should be available under prevailing market, infrastructure, regulatory and financing conditions in the relevant boundary considered.
5	Greenhouse gas intensity assessment	Paragraph 21	It is cited that 'The MEP is further considering the utility of analysing technologies, measures or practices that may be implemented in the future and requests stakeholders to kindly provide inputs on the proposed text in brackets'. However, it is also to be noted that lock-in risk analysis is a part of the additionality steps, and the alternatives are already defined in the previous steps of additionality assessment.	The alternatives herein should be the same as considered in the start of the additionality assessment. Also, the aspect of additionality reassessment at the time of renewal and in particular lock-in risk reassessment should also be clarified.
6	Greenhouse gas intensity assessment	Paragraph 22	It is cited that 'Activity participants shall calculate the greenhouse gas intensity of the alternative …'. However, no details of how to calculate the GHG intensity is provided.	Example(s) or basis of calculating the GHG intensity should be provided.
7	Resource use efficiency assessment	Paragraph 28	It is cited that 'Under step 3, activity participants shall assess the use of resources by the proposed Article 6.4 activity to determine whether the activity involves a technology or practice that constitutes an inefficient use of resources that are substantial for mitigating climate change or achieving other policy objectives'. However, further details on this are mostly parked in the mechanism methodology.	To ensure workable usage of the tool further details or examples on the resource use efficiency assessment should be provided.