CALL FOR INPUT

Name of submitter	Anuradha Singh
Affiliated organization of submitter	General Carbon advisory Pvt. Ltd
Email of submitter	anuradha@general-carbon.com
Date of submission	27/03/2026

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

A6.4 MEP012-A03: Draft mechanism methodology: Electricity generation from renewable sources connected to electricity systems (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	3.1 table 1	Project type: a greenfield power plant that generates electricity from renewable sources and feeds all electricity generated into an electricity system. The power plant may include a battery energy storage system;	1. We note that the draft methodology applies to greenfield renewable power plants and allows inclusion of an integrated BESS. However, in practice, the solar/wind generation equipment and the BESS equipment are often commissioned with time lag. We suggest that the methodology may consider the installation as the renewable power plant if the BESS is commissioned within 24 months from the commissioning of the solar or wind power plant, provided it remains part of the same project activity. Also, it may be explicitly mentioned in the methodology that the energy generating and storage assets may not be colocated.

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

A6.4 MEP012-A03: Draft mechanism methodology: Electricity generation from renewable sources connected to electricity systems (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)
2	APPLICABILITY	-	-	We note that the current draft methodology specifically refers to Battery Energy Storage Systems (BESS). However, other energy storage technologies, such as Pumped Storage Project (PSP) and other storage systems, can also play an important role in improving the reliability and dispatchabilty of renewable power plant . We suggest MEP to consider expanding the applicability of the methodology, to include other storage technologies beyond BESS, subject to appropriate monitoring, accounting, and safeguards. Note that such a provision for PSP was already a part of ACM 002