



CALL FOR INPUT

Name of submitter	Kishor Rajhansa, Massamba Thioye
Affiliated organization of submitter	Global Carbon Council
Email of submitter	communication@globalcarboncouncil.com
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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	INTRODUCTION	Paragraph 1	Constructing hydropower in an existing reservoir is not sufficient; the reservoir's volume and surface area must remain unchanged.	The mechanism methodology applies to activities generating electricity from certain types of renewable sources connected to the electricity system, such as hydro without the construction of a new reservoir or changing the volume and surface area of an existing reservoir, wind, solar, and geothermal.
2	DEFINITIONS	Paragraph 6 (e)	The requirement is unnecessarily strict. Even if a power plant at the same site was operated and then shut down 20 years ago, the new power plant is still not considered greenfield.	Greenfield power plant: A new power plant that is constructed and operated at a site where no power plant was in operation prior to the implementation of the project activity
3	APPLICABILITY	Paragraph 8	We propose a change to the applicability conditions that allows projects to deliver all electricity generated after meeting their auxiliary consumption needs.	This mechanism methodology is applicable to Article 6.4 activities that install a greenfield power plant that generates electricity from renewable sources and feeds all electricity generated, after any auxiliary consumption, into an electricity system. The power plant may include a battery energy storage system (BESS).

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4	APPLICABILITY	Paragraph 10 (a) (iii)	For the sake clarity, it would be useful to define what is considered peatland. We propose introducing a footnote based on the IPCC Glossary in the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. See: https://www.ipcc.ch/site/assets/uploads/2019/12/19R_V0_02_Glossary.pdf	Footnote: Peatlands are wetland ecosystems where soils are dominated by peat. In peatlands net primary production exceeds organic matter decomposition as a result of waterlogged conditions, which leads to the accumulation of peat. In absence of a host country definition of peat, it shall be defined as soft, porous or compressed, sedimentary deposit of plant origin with high water content in the natural state (up to about 90 percent).
5	APPLICABILITY	Paragraph 10 (b) (i)	The fact that the reservoir was established at least [X] years before the start date of the Article 6.4 activity does not prove that the reservoir was built independently of the Article 6.4 activity.	The reservoir is independently justified (by another dominant function such as irrigation or flood control), and is planned, approved, and financed independently. It is economically viable without hydropower revenues and is designed and timed such that hydropower does not affect its design (i.e. no design changes due to hydropower) or its construction schedule (i.e. it would have been built at the same time or earlier even without hydropower).
6	APPLICABILITY	Paragraph 14 (a)	We agree with this comment but propose some modifications in the text to allow projects to be registered with another GHG/non-GHG /certification programme, provided no double issuance happens.	The renewable electricity generated by the Article 6.4 activity is not claimed, credited, or utilized under any certification scheme or other crediting mechanism. Such claiming, crediting or utilization may occur under, but is not limited to, the issuance of energy attribute certificates (e.g., renewable energy certificates) with respect to the renewable electricity generated under the Article 6.4 activity; but it may be registered with another GHG or non-GHG certification programme, provided no double issuance of credits occurs.
7	APPLICABILITY	Paragraph 14 (c)	The term 'newly produced' imposes an unreasonable restriction without putting a restriction on what newly produced would mean. Hence we are suggesting an alternate text to ensure the project equipment was not used elsewhere or intended to be used elsewhere in absence of the project.	Furthermore, the mechanism methodology is only applicable under the following conditions: The equipment installed under the Article 6.4 activity has previously not being operated in any other plant.

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8	DEMONSTRATION OF ADDITIONALITY	Paragraph 26 (b) (i)	The way the requirement is written is a positive obligation. PPs are mandated to install renewables. It may specify: ☐ A minimum share (e.g., $\geq 30\%$ renewable capacity) ☐ A specific technology (e.g., solar required for new plants) As it does not necessarily exclude non-renewables, the legal requirement can be a hybrid system (renewable + fossil) and where such type of legal requirement exists, activities implementing renewable electricity are de facto not additional, according to this proposed art 6.4 requirement, even if they can substantiate that in the absence of the art 6.4. mechanism, they cannot be implemented. This is a too stringent and not needed requirement that can lead to loss of opportunity of GHG emission reduction. Indeed, you may have in place these positive obligations but still projects that are going well beyond the positive obligation not being implementable in the absence of the art 6.4 mechanism. Additionality is demonstrated for an art 6.4 activity in its entirety. No ER can be claimed for RE installation beyond the legal requirement of quantity of renewables. Either all the GHG ER are additional or they are not. A prohibition such as "Legal requirements explicitly prohibit the installation of non-renewable power plants" would be more suitable. Where PPs are banned from installing fossil (or other non-renewable) plants, where only renewables are allowed, activities implementing renewables are not additional. Now where the legal requirements explicitly require the installation of renewable power plants, the project can still be additional if it meets all the other additionality requirements. Emission Reduction up to the level of the legal requirement will not be granted as for that part, the project is the baseline.	The Article 6.4 activity is not implemented at a site where legal requirements explicitly require the installation of only renewable power plants;

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9	DEMONSTRATION OF ADDITIONALITY	Paragraph 26 (b) (iii)	We propose that the condition set out in paragraph 26(b)(iii) is best addressed by evaluating the effect of any such support or penalty scheme on the financial additionality of the project.	If an Article 6.4 activity is participating in a support scheme or is subject to a penalty scheme that is designed to achieve a quantitative target or outcome, the additionality assessment of any such A6.4 activity shall, in demonstrating its financial additionality, take into account all such benefits and penalties, regardless of the process through which the relevant support or penalty schemes are implemented.
10	DEMONSTRATION OF ADDITIONALITY	Paragraph 27	Para 13 section 4.2. of the standard: Demonstration of additionality in mechanism methodologies states that additionality is demonstrated for an article 6.4 activity in its entirety not for GHG ER: Mechanism methodologies shall ensure that additionality is demonstrated for an Article 6.4 activity in its entirety (e.g. the capture of landfill gas combined with use of the landfill gas for energy generation) and that additionality is not separately demonstrated for different parts of an Article 6.4 activity (e.g. separately for the landfill gas capture and the use of the landfill gas for energy generation. We cannot have for an art 6.4 project, some ER that are additional and others that are not. This reinforces the comment made upper on positive obligation vs prohibition.	If one or more of the legal requirements identified in paragraph 26 fail the requirements of that paragraph, then A6.4ERs cannot be claimed.
11	DEMONSTRATION OF ADDITIONALITY	Paragraph 28	This is not an additionality related requirement but rather a baseline related requirement.	Proposed to be moved to the baseline section.
12	DEMONSTRATION OF ADDITIONALITY	Paragraph 29	There is a risk of lock-in if there is an alternative to the project activity that is more aligned with the Paris Agreement goal than the project activity itself. For grid-connected renewable electricity projects, the alternative to the project activity is the combined margin, and there is a risk of lock-in only where the combined margin is cleaner than the project activity. Thus, we recommend: "Option 1: No lock-in analysis is required for any of the activities applicable under this mechanism methodology."	No lock-in analysis is required for any of the activities applicable under this mechanism methodology

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13	DEMONSTRATION OF ADDITIONALITY	Paragraph 33 (g)	We propose to exclude from the analysis of comparable activities all projects that are registered under other carbon crediting schemes.	Paragraph 33 (g) (#): Activity participants may exclude comparable activities registered under A6.4 and other carbon crediting schemes.
14	DEMONSTRATION OF ADDITIONALITY	Paragraph 33 (g) (ii) (b) (c)	We recommend Option 2, as the techno-economic and environmental characteristics of onshore and offshore wind power plants differ substantially (Tanvir & Etminan, 2026) and therefore cannot be considered similar. See: Tanvir, M. S., & Etminan, A. (2026). Comparative analysis of offshore and onshore wind turbines: Efficiency, design, and environmental impact. Wind Engineering, 50(1), 200-215.	33 (g) (ii) (b). For onshore wind power plants: all other onshore wind power plants; 33 (g) (ii) (c). For offshore wind power plants: all other offshore wind power plants.
15	DEMONSTRATION OF ADDITIONALITY	Paragraph 33 (g)(f):	We propose distinguishing between binary, flash-steam, and dry-steam geothermal technologies, as their techno-economic and environmental characteristics are highly site-specific (IRENA, 2017) and therefore cannot be considered similar. See: IRENA (2017), Geothermal Power: Technology Brief, International Renewable Energy Agency, Abu Dhabi. https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2017/Aug/IRENA_Geothermal_Power_2017.pdf	Paragraph 33 (g) (#): #For a binary geothermal power plant: all other binary geothermal plants #For a dry steam geothermal power plant: all other dry steam geothermal power plants #For a flash steam geothermal power plant: all other flash steam geothermal power plants
16	BASELINE EMISSIONS	Paragraph 38	With reference to our comments 8 and 10, we propose a modification to Equations 1 and 2 by deleting EG _{legal,y} . In addition, we propose a correction to the definition and notation of EGPJ,y. Specifically, the revised definition reflects that EGPJ,y is not the “electricity generation from the Article 6.4 activity,” but rather the amount of electricity generation that is eligible for crediting; accordingly, a change in the notation is also proposed.	$EGPJ,CR,y = EG_{plant,y} - EG_{shadowing,y}$ Equation (1) $EGPJ,CR,h = EG_{plant,h} - EG_{shadowing,h}$ Equation (2) $EGPJ,CR,y =$ Electricity generation eligible for crediting from the Article 6.4 activity in year y (MWh) $EGPJ,CR,h =$ Electricity generation eligible for crediting from the Article 6.4 activity in hour h (MWh)

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17	DATA AND PARAMETERS NOT MONITORED	We propose to include and additional Data/Parameter table	Situations may arise in which there is a trade-off between the use of a reservoir prior to the implementation of an A6.4 activity and the implementation of that A6.4 activity itself. For example, implementing an A6.4 activity may divert water from irrigation to power generation. It is unclear in the current version of the methodology how such trade-offs are to be addressed.	Add an additional monitoring parameter to ensure that any diversion of water from an existing reservoir resulting from the implementation of the project activity does not cause adverse environmental and/or social impacts. This parameter shall be assessed once, at the beginning of the project's first crediting period. If adverse impacts are identified, appropriate mitigation measures shall be implemented, and this shall be verified at the first monitoring. If adverse impacts are identified and mitigation measures are not implemented, the issuance of credits shall be paused until the mitigation measures have been fully implemented and verified.
18	APPENDIX	Paragraph 4 (c) (vi)	Level of service increase as compared to the baseline scenario (rebound effect) as opposed to level of service used to satisfy additional demand and equal to the level of service under the baseline scenario which is done by greenfield project and is not related to rebound effect.	Increase in the level of service compared to the baseline scenario as a result of the implementation of the Article 6.4 activity (rebound effect). This emission source is affected by the Article 6.4 activity if the electricity generated by the project power plant lowers electricity prices, leading to an increased use of electricity.
19	APPENDIX	Paragraph 10	Low operating cost (market demand response to the intervention) may lead to rebound effect but this effect is largely compensated by the substitution effect (from fossil to electric end uses) as well as the market creation and suppression (decline of high emission products: transformative changes)	Nevertheless, this emission source is not considered here for simplicity and because although low operating cost (market demand response to the intervention) may lead to rebound effect, this effect is largely compensated by the substitution effect (from fossil to electric end uses) as well as the market creation and suppression (decline of high emission products: transformative changes). This may outweigh the rebound effect.