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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	APPLICABILITY	Paragraph 8	The requirement that all electricity generated must be supplied to the electricity system is too restrictive. In real project situations, some electricity is used internally for operating the plant, including auxiliary needs and startup activities. Because of this, it is more practical and realistic to base eligibility on the electricity that is actually delivered to the electricity system.	Paragraph 8 shall be revised such that net electricity is supplied to the electricity system, rather than requiring that all electricity generated must be exported.
2	APPLICABILITY	Paragraph 14(b)	It is indicated in paragraph 14(b) that electricity supplied through the electricity system to specific consumers is not intended to be covered. This suggests that projects involving captive consumption, third-party sale, wheeling arrangements, or supply to identified consumers through the electricity system may be outside the scope of the methodology. Since similar scope-related issues have required clarification previously under ACM0002, the intended scope should be stated more clearly in the draft methodology.	Paragraph 14(b) should be clarified to explicitly state the treatment of projects involving captive consumption, third-party sale, wheeling arrangements, supply to identified consumers through the electricity system, and power sale through energy exchanges under open access arrangements, including whether such project types fall outside the scope of this methodology.

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3	APPLICABILITY	Paragraph 15; Paragraph 8; Paragraph 37(c) footnote 26; Paragraph 62(c) footnote 31	The methodology is presented as a standalone renewable electricity methodology, and only limited reference is made to BESS. This is not sufficient for projects where renewable electricity and storage are used together. Since such projects are becoming more common, clearer provisions are needed for the treatment of storage.	Paragraph 15, paragraph 8, paragraph 37(c) footnote 26, and paragraph 62(c) footnote 31 shall be revised such that a separate section for BESS is included, and the treatment of charging source, stored electricity, energy losses, internal use, and time-shifted electricity supply is clearly stated.
4	APPLICABILITY	Paragraph 19; Paragraph 14 (c)	As reflected in paragraph 19, leakage from the use of pre-used equipment is avoided by requiring that equipment installed under the Article 6.4 activity is newly produced and not previously used. Because of this, clearer treatment is needed for ordinary replacement of failed parts, warranty replacements, and certified spare parts during project operation, so that normal operation and maintenance actions are not confused with transfer of baseline equipment.	Paragraph 19 and paragraph 14(c) shall be clarified such that ordinary replacement of failed components, certified spare parts, and normal operation and maintenance replacements are not treated as use of pre-used equipment, provided that no baseline equipment is transferred from another plant into the credited activity.

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5	DEMONSTRATION OF ADDITIONALITY	Paragraph 26(b)(iii)	It is indicated in paragraph 26(b)(iii) that participation in support schemes, penalty-linked schemes, or competitive procurement designed to achieve a quantitative target or outcome is relevant to the additionality assessment. In many jurisdictions, renewable electricity projects are developed under such policy-supported arrangements. However, participation in such arrangements does not necessarily mean that a project is financially viable without Article 6.4 revenues. In particular, some IPPs may participate in tenders but still face viability gaps due to high capital expenditure and insufficient returns under conventional electricity sale arrangements. Clearer guidance is therefore needed to ensure that such participation is not treated as determinative in itself where Article 6.4 revenue remains relevant to project viability.	Paragraph 26(b)(iii) shall be clarified such that participation in support schemes, penalty-linked schemes, or competitive procurement is assessed based on whether such arrangements fully remove the need for Article 6.4 incentives, rather than being treated as determinative in itself. In particular, participation in a tender or competitive procurement process should not automatically lead to the conclusion that the project is non-additional. There may be independent power producers (IPPs) that seek to develop projects in response to such tenders, but due to the high capital expenditure involved, the conventional mode of electricity sale to the respective distribution companies (DISCOMs) may not be financially viable on its own. In such cases, additional financial support through Article 6.4 incentives may still be necessary to make the project viable. Therefore, where a project activity can demonstrate, through an investment analysis, that its internal rate of return (IRR) remains below or only within the applicable benchmark without Article 6.4 revenues, such project activity should still be allowed to qualify for registration under the applicable methodology.
6	DEMONSTRATION OF ADDITIONALITY	Paragraphs 29–31	For solar projects, the lock-in concern appears to be linked mainly to land use. However, the same level of concern may not exist where the project is implemented on barren, degraded, non-arable, or otherwise low-value land with no meaningful competing productive use. In such cases, a full land-use lock-in assessment may create unnecessary burden without improving environmental integrity.	Paragraphs 29–31 shall be revised such that, for solar projects, a simplified or no land-use lock-in assessment is applied where the land can be demonstrated to be barren, degraded, non-arable, or otherwise of low competing land-use value, based on appropriate supporting evidence.

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7	BASELINE EMISSIONS	Paragraphs 41–55	It is shown in paragraphs 41–55 that the baseline is reduced in the start year through a minimum 10 per cent downward adjustment or a larger uncertainty-based reduction and is reduced again by a factor of 0.99 in the start year. It is also shown that the downward adjustment increases by 1 per cent of the start-year baseline in later years. In a simple example, a baseline of 188,245 tCO₂e becomes about 167,726 tCO₂e in the first year and about 167,538 tCO₂e in the second year, meaning that the credited amount declines even when generation remains unchanged. This creates unnecessary complexity and may result in double conservativeness where changes in the electricity system are already captured in the electricity-system emission factor. In addition, the application of a blanket 10 per cent downward adjustment to renewable energy projects such as solar and wind appears insufficiently justified, given that generation data in such projects is measured through calibrated meters and authorized SCADA systems with limited scope for material error. Clearer explanation and project-type differentiation are therefore needed.	Paragraphs 41–55 shall be revised such that the downward adjustment method is simplified and clearly explained, and additional annual reduction is avoided where changes in the electricity system are already reflected in the electricity-system emission factor. Further, the application of a uniform downward adjustment, including the minimum 10 per cent reduction, should be reconsidered for renewable energy project activities such as solar and wind power projects. Downward adjustments may be more relevant for certain categories of projects, such as energy transition or energy efficiency activities, where baseline emissions or performance parameters may involve greater uncertainty or scope for manual intervention. By contrast, in renewable energy projects, electricity generation data is typically measured accurately and conservatively through well-calibrated energy meters, and project operations are monitored and controlled through authorized SCADA systems. As a result, the data obtained is robust, transparent, and subject to limited scope for material error. In such circumstances, the application of a blanket 10 per cent downward adjustment appears arbitrary unless supported by a clear scientific or methodological rationale. Therefore, the methodology should either exempt such project types from the fixed downward adjustment or provide a clear justification for the application of the 0.1 downward adjustment factor to renewable energy projects where measurement uncertainty is already minimal.

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8	BASELINE EMISSIONS	Paragraphs 43–49	As mentioned in paragraph 43, the uncertainty of the first-year unadjusted baseline is required to be determined at the lower bound of the 95 per cent confidence interval. As mentioned in paragraph 44, uncertainty in all relevant parameters is required to be documented, and the overall uncertainty is required to be derived through methods such as error propagation or Monte Carlo simulation and submitted with the PDD. As mentioned in paragraph 45, this uncertainty is directly used to reduce the first-year baseline. As mentioned in paragraphs 47 and 48, the lower of the uncertainty-based adjusted baseline and the minimum discounted baseline is required to be used. As mentioned in paragraph 49, the higher of the two downward-adjustment values is required to be carried forward as the initial downward adjustment. These requirements create a significant calculation and documentation burden for standard grid-connected wind and solar projects and may make the first-year baseline more conservative than necessary.	Paragraphs 43–45 shall be revised such that a simplified or default approach is provided for determining first-year baseline uncertainty for standard grid-connected wind and solar projects. Paragraphs 47–49 shall be revised such that, where the baseline is based on standard metered electricity generation and a standard electricity-system emission factor, project-specific uncertainty modelling, including Monte Carlo simulation, is not required by default and the initial downward adjustment is not made more conservative than necessary

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9	BASELINE EMISSIONS	Paragraph 37(c); Paragraph 38; Paragraph 62(c)	As mentioned in paragraph 37(c), electricity generation from solar and wind power plants is required to be treated as intermittent, regardless of whether the plants are operated with an integrated BESS. As mentioned in footnote 26 to paragraph 37(c), this treatment is only a temporary provision and further revision is envisaged. As mentioned in paragraph 38, electricity generation from the Article 6.4 activity is calculated on the basis of electricity generated by the project power plant and fed into the electricity system, but no separate treatment is provided for the stored renewable component or for later electricity supply from storage. As reflected in paragraph 62(c), the methodology does not yet provide a complete and clear treatment for renewable energy projects with storage. Because of this, the benefit of storing renewable electricity and supplying it later is not clearly recognized. This is also not fully aligned with policy approaches that give importance to the stored component of renewable energy with storage.	Paragraph 37(c) shall be revised such that solar and wind projects operated with an integrated BESS are not automatically treated as intermittent in the same manner as projects without storage. Paragraph 38 shall be revised such that the stored renewable component and the later supply of electricity to the electricity system are clearly addressed in the baseline calculation. Paragraph 62(c) shall be revised consistently such that the source of charging, the later supply of electricity, and energy losses are clearly addressed for renewable energy projects with storage.
10	BASELINE EMISSIONS	Paragraphs 39–40; Section 9	As mentioned in paragraph 39, reduction in electricity generation by other wind power plants through shadowing effects is not required to be accounted for only under limited conditions, including where the distance between wind turbines is greater than a threshold that is still left open for public input. As mentioned in the note under paragraph 39, the MEP has specifically requested stakeholder input on this distance. Because of this, the practical treatment of wind shadowing is not yet fully defined, and a high technical burden may be created for wind projects in areas where multiple wind plants are located close to each other.	Paragraphs 39–40 and Section 9 shall be revised such that practical default distance thresholds and clear default evidence sources are provided for wind shadowing. Site-specific studies shall be required only where shadowing is likely to be material.

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11	PROJECT EMISSIONS	Paragraphs 56–64	As mentioned in paragraphs 56–64, project emissions are required to include emissions from fossil fuel consumption at the project site and from electricity consumption. This means that even small quantities of backup fuel use or imported auxiliary electricity are required to be monitored and included in project emissions. This is broader than the usual treatment under ACM0002 for standard renewable electricity projects, where such emissions were often limited or treated as negligible. Because of this, a high monitoring and documentation burden may be created even where the quantities involved are very small and do not materially affect the overall result.	Paragraphs 56–64 shall be revised such that a project-emission threshold is defined, below which project emissions are deemed immaterial and may be treated as zero. Project emissions above that threshold shall be calculated as PE and deducted from the baseline emissions accordingly.
12	PROJECT EMISSIONS	Paragraphs 57–64; Paragraph 62(c)	As reflected in paragraphs 57–64, project emissions are required to include electricity consumption and other relevant project-side emission sources. As reflected in paragraph 62(c), separate treatment is not yet clearly provided for storage-linked situations where electricity may be used for grid charging, renewable charging, auxiliary consumption, or later discharge. Because of this, project emissions for renewable energy projects with storage may not be quantified and verified in a fully consistent manner.	Paragraphs 57–64 and paragraph 62(c) shall be revised such that a separate project-emissions treatment is provided for renewable energy projects with storage. In this treatment, grid charging, renewable charging, auxiliary consumption, later discharge, and battery losses shall be clearly distinguished and addressed.

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13	AVOIDANCE OF DOUBLE COUNTING	Paragraph 14(a); Paragraphs 73–74	As mentioned in paragraph 14(a), the methodology applies only where the renewable electricity from the activity is not also claimed, credited, or used under another certification scheme, crediting mechanism, or environmental attribute system. As mentioned in paragraphs 73–74, activity participants are also required to provide evidence that the emission reductions are not being claimed elsewhere in overlapping market or accounting frameworks. This means that the current draft relies mainly on full exclusion where overlap exists. Because of this, the methodology may become too restrictive even in situations where the same environmental integrity objective could still be achieved through transparent cancellation, ring-fencing, or reconciliation of the relevant claims, instead of complete prohibition.	Paragraph 14(a) and paragraphs 73–74 shall be revised such that participation in environmental attribute systems is permitted where the relevant claims are transparently cancelled, ring-fenced, or otherwise reconciled in a manner that prevents double claiming. Clear conditions shall be provided to distinguish prohibited overlap from overlap that is adequately managed through transparent accounting treatment.
14	AVOIDANCE OF DOUBLE COUNTING	Paragraph 73(b)	As mentioned in paragraph 73(b), evidence is required to show that the emission reductions are not being claimed in overlapping domestic mitigation schemes or other relevant systems. This means that, during verification and issuance, activity participants may need to repeatedly submit documentary proof for the same type of overlap check. Because of this, additional documentation burden and avoidable delays may be created if no standard form of evidence, declaration, or acceptable documentary pathway is specified in the methodology.	Paragraph 73(b) shall be revised such that standard templates, standard declarations, and clear acceptable evidence pathways are provided for overlap checks with domestic mitigation schemes and other relevant systems. Where the same type of overlap assessment is repeated across monitoring periods, the methodology shall also clarify when previously submitted evidence may continue to be relied upon, subject to confirmation that no relevant change has occurred.

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15	DEMONSTRATION OF ALIGNMENT WITH THE POLICIES	Paragraph 75	As mentioned in paragraph 75, confirmation from the host-country DNA is required to show that the activity is consistent with the host Party's relevant policy and planning framework. In some host countries, a specific technology or only a specific component of a technology configuration may be recognized as an important policy element, rather than the whole project configuration in general. For example, in India, 'renewable energy with storage (only stored component)' is identified as an eligible activity area under the Article 6.2 activity list. Because of this, clearer guidance is needed on how policy alignment is to be demonstrated where the relevant host-country policy signal applies to a specific technology component, such as the stored component, and not necessarily to the full project configuration as a whole.	Paragraph 75 shall be clarified such that policy alignment may be demonstrated where the host-country framework recognizes a specific technology, or a specific component of a technology configuration, as an important policy element. In such cases, the relevant component shall be clearly defined and separately accounted for in the activity description and supporting documentation.
16	DATA AND PARAMETERS NOT MONITORED	Data / Parameter table 3	As reflected in Data / Parameter table 3, the methodology does not yet clearly specify the acceptable data sources to be used for wind shadowing effects. As also indicated in the draft, public input has been invited on the sources commonly used to report the shadowing effect. Because of this, implementation may become difficult if a clear order of acceptable evidence is not provided, especially where different types of studies or documents may be used for the same purpose.	Data / Parameter table 3 shall be revised such that a clear hierarchy of acceptable evidence sources is provided for assessing wind shadowing effects. Preferred primary evidence shall include project-specific micro siting / wake-loss modelling prepared using appropriate wind flow modelling and optimization tools, together with turbine coordinates, rotor diameter, predominant wind-direction analysis, and site-assessment inputs consistent with IEC 61400-1. Acceptable secondary evidence shall include micro survey / wind-resource-assessment reports, detailed layout drawings, land-boundary / GIS maps, and inter-developer spacing records or mutual-consent documents from a government recognized R&D Institute where applicable. Where these records show that the site complies with applicable micro siting separation norms or otherwise demonstrates no material shadowing risk, default conservative assumptions shall be permitted instead of project-specific re-modelling.

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17	DATA AND PARAMETERS MONITORED	Data / Parameter table 4	As reflected in Data / Parameter table 4 and in the equations for EGPJ,y and EGPJ,h in paragraph 38, renewable electricity generation that would occur in the baseline due to legal requirements (EGlegal,y / EGlegal,h) is required to be deducted. This means that the methodology requires legal or regulatory requirements to be translated into generation quantities. In practice, this may be difficult to apply consistently unless a standard conversion method is provided, because legal requirements in countries such as India may be expressed in different forms, including percentage-based obligations, procurement obligations, storage obligations, tender-based supply requirements, or other regulatory instruments. Further, the existence of an RPO, Energy Storage Obligation, or similar legal requirement should not automatically mean that a project's generation is legally required baseline generation. Such obligations may create compliance demand, but they do not by themselves demonstrate that a specific project activity would be implemented without Article 6.4 support. If the project activity can demonstrate through investment analysis that its IRR without Article 6.4 revenues remains below, or only within, the applicable benchmark, then the project cannot reasonably be assumed to occur merely because such obligation exists. Clearer guidance is therefore needed both on how legal or regulatory requirements are to be converted into annual or hourly generation quantities, and on when such quantities should appropriately be treated as EGlegal,y / EGlegal,h.	Data / Parameter table 4 shall be revised such that, for determining EGlegal,y / EGlegal,h, a standard procedure is provided for converting legal or regulatory requirements into generation quantities. For example, in Indian projects, acceptable evidence may include central or state RPO / Energy Storage Obligation notifications, SERC regulations or orders, procurement guidelines, tender / RfS documents, LoA / PPA provisions, and any other applicable government or regulatory requirement that clearly defines the relevant obligation. The procedure shall also clarify how obligations expressed in percentage form, procurement-target form, storage-obligation form, or other regulatory formats are to be translated into annual or hourly electricity generation quantities. In addition, the methodology shall clarify that the mere existence of an RPO, Energy Storage Obligation, procurement mandate, or similar legal or regulatory requirement shall not automatically mean that the corresponding electricity generation is to be treated as EGlegal,y / EGlegal,h. Such treatment should only apply where it can be reasonably demonstrated that the legal or regulatory requirement would, by itself, result in the implementation of the relevant project activity in the baseline without the need for Article 6.4 support. Where a project activity demonstrates through a robust investment analysis that its IRR without Article 6.4 revenues is below, or only within, the applicable benchmark, the project activity should not be presumed to occur solely due to the existence of such obligation, and the corresponding generation should not be deducted as legally required baseline generation. The methodology should therefore provide clear criteria for distinguishing between general regulatory demand signals and generation that is truly mandatory and financially viable in the baseline.

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18	DATA AND PARAMETERS MONITORED	Section 14, Paragraph 79	As reflected in Section 14 para 79, the monitored-parameter tables do not yet clearly identify the full set of data needed for renewable energy projects with storage. This means that, for storage-linked projects, key parameters such as charging source, charged energy, discharged energy, battery losses, and time-shifted delivery may not be monitored in a consistent way unless they are explicitly listed. In India, storage is already being recognized in policy and procurement frameworks, including the National Framework for Promoting Energy Storage Systems, RPO / Energy Storage Obligation-related measures, and bidding guidelines for firm and dispatchable renewable power with storage. Because of this, clearer and more complete monitored-parameter requirements are needed so that the stored renewable component can be verified properly in practice. Further, the battery system should be recognized as a separate technology component for monitoring purposes, because it performs a distinct function by storing electricity, incurring efficiency losses, and discharging electricity at a different time for delivery to the grid. This distinction is also relevant in light of the broader Article 6.4 methodological direction, under which storage may require separate technical and accounting treatment. If BESS-specific parameters are not explicitly monitored, the storage contribution may be under-accounted or inconsistently verified.	Section 14 shall be revised such that BESS-specific monitored parameters are added for renewable energy projects with storage. For Indian projects, these parameters should include at least the charging source, charged energy, discharged energy, round-trip efficiency, auxiliary load, and time-shifted electricity delivered to the electricity system. Acceptable project evidence may include meter data, inverter / PCS records, SCADA / EMS / BMS logs, scheduling and settlement records submitted to the relevant load dispatch center, contractual or bid documents identifying the storage-linked supply obligation, and performance documents showing round-trip efficiency or operating losses. In addition, the methodology shall clarify that the battery energy storage system is to be recognized as a distinct technology component within renewable energy projects with storage, rather than being treated merely as an auxiliary part of the generation system. Separate monitored parameters shall therefore be required to identify electricity charged into the battery, the source of that electricity, electricity discharged from the battery, storage losses, and the quantity of time-shifted electricity ultimately supplied to the electricity system. Where applicable under the relevant Article 6.4 methodological framework, renewable electricity directly supplied to the grid and renewable electricity supplied after storage should be capable of separate identification and verification if they are subject to different technical or crediting treatment. The methodology should therefore explicitly require the monitoring architecture necessary to support separate recognition of the BESS component and any stored renewable electricity delivered to the grid.