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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	DEMONSTRATION OF ADDITIONALITY	Para 28	Regulatory requirements in practice cannot be applied retrospectively. Therefore, ceasing crediting on the date when a new relevant legal requirement enters into force is inappropriate as the activity was done before such a legal requirement was in place.	Activity participants shall assess the requirements of paragraph 26 for each monitoring period. When a new relevant legal requirement enters into force, during the course of monitoring, the activity will be rendered ineligible for renewal.
2	DEMONSTRATION OF ADDITIONALITY	Para 29	Option 1, Para 29 should be adopted. Given the low GHG emission intensity of renewable power generation technologies, activities eligible under this methodology are deemed to have no lock-in risk. In Kenya, geothermal fields have demonstrated low emission intensities that are below 50g/KWh, based on studies done on fields that account for more than 85% of the installed geothermal capacity. The DNA of the party pursuant to the activity should be left with authority to determine, during its process of developing letters of approval, whether the activity poses lock-in risks or not.	Option 1 remains as drafted

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3	BASELINE EMISSIONS	Para 39 (a)	Shadowing effect is appropriately expressed in reference to the hub height and the rotor diameter and not the express distance between turbines. In addition, power plants that do not share the same wind resource and are not on the downwind of the Article 6.4 activity are not affected by shadowing effects from the Article 6.4 activity. Shadowing effect is geographic specific, in Kenya where topography is not even, shadowing effect is rarely applicable. There are also other natural factors that are attributed to shadowing effects.	The distance between the wind turbines installed under the Article 6.4 activity and any other wind power plants is greater than 8 times the rotor diameter of the largest turbine of the Article 6.4 activity, given that the other wind power plants share the same wind resource and is downwind of the Article 6.4 activity; or