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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	-	Editorial correction. The sections should be kept consistent across all methodologies. The landfill methodology (A6.4-AMM-001: Flaring or use of landfill gas), the sections are swapped.	The sections should be kept consistent across all methodologies.
2	NORMATIVE REFERENCES	19	It is cited that the methodology is based on elements from ACM0002 and AMS-I.D. Though it is good to have a singular methodology however the aspect of small-scale consideration is not evident thereafter in the methodology.	The methodology should have consideration and provide simplification in small-scale context.
3	PROJECT BOUNDARY	Table 2	Shadowing effects of wind power plants and CO2 emissions from same are included. This aspect is linked to greenfield installation, common practice check and stakeholder consultation too. In case of scenario of the other effected wind power plant due to shadow effect also claiming carbon credits, therein the credit volume would get impacted (reduced) apart from discounting happening for the A6.4 activity too. The stakeholder consultation and associated issue being addressed across the involved parties would ensure the A6.4 activity progressing.	Suggest removing the shadow effect aspect or introduce a screening rule to assess the material impact of this on leakage and accordingly the consideration of such by the project proponent.

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4	DEMONSTRATION OF ADDITIONALITY	Paragraph 26(b)(iii)	It is cited that “The Article 6.4 activity does not participate in a support scheme or is subject to a penalty scheme that is designed to achieve a quantitative target or outcome, such as a competitive bidding processes for the installation of a certain capacity of renewable power plants.” The stated paragraph does not appear to be aligned with its origination as legal basis or regulatory requirement.	Suggest removing the stated condition
5	DEMONSTRATION OF ADDITIONALITY	Paragraph 29-31	Option 1: No lock-in analysis is required for any of the activities applicable under this mechanism methodology Given the low GHG emission intensity of renewable power generation technologies, activities eligible under this methodology are deemed to have no lock-in risk. Also, that a mix of RE sources would be required considering intermittent and continuous sources too and thus lock-in analysis for RE generation technologies is not appropriate.	No lock-in analysis is required to be conducted under this mechanism methodology
6	DEMONSTRATION OF ADDITIONALITY	Paragraph 33(c)	It is cited that “A time-bound approach shall be used reference period shall be defined as the most recent [3][5] years prior to the earlier of ...”	5 years would be suggested.
7	DEMONSTRATION OF ADDITIONALITY	Paragraph 33(d)(ii)	It is cited that “For Article 6.4 activities implemented in countries other than LDCs or SIDS: The applicable geographical area shall correspond to the relevant [continent][regional group under the UNFCCC]”	Continent would be suggested.

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8	DEMONSTRATION OF ADDITIONALITY	Paragraph 33(f)	The common practice factor thresholds to be applied under this mechanism methodology. Is it not the cost of respective renewable generation that matters for additionality instead of the penetration rate of renewables in power generation? For e.g., even if 80% of power generation came from PV the remaining 20% could still be additional as those could be remaining higher cost options, e.g., due to remaining sites that might receive less radiation. Either one would need to become much more granular on cost-classes of renewables (difficult and not recommendable) or better not to require common practice analysis at all (preferred). A penetration threshold would reward countries that have done little in promoting renewables and penalizes those that advanced the low (least) cost investments and are now struggling with higher cost options.	Common practice levels for non-LDCs and LDCs – Suggest 10/15% Non-LDCs and 20/25% LDCs. To try to promote development of RE projects in LDCs. However, also noting the stated comment and associated justification, common practice analysis is more appropriate in cases where additionality demonstration relies on barrier analysis, i.e., where we deal with commercially viable activities that are prohibited by financing or any other types of barriers.
9	DEMONSTRATION OF ADDITIONALITY	Paragraph 33(g)	Comparable, similar and different activities Options for similar activities for wind power – recommend option 2, as the costs of off-shore wind are significantly higher so it doesn't seem a fair comparison.	Option 2 is suggested.
10	BASELINE EMISSIONS	Paragraph 36	It is cited that “Where an Article 6.4 activity installs a greenfield hydropower plant at an existing reservoir, the activity participant shall consider all possible alternatives with regard to the existing reservoir and justify...” In some paragraphs, the methodology requires projects to demonstrate certain things without being clear how this is demonstrated. It would be helpful if the methodology gave more guidance on what proof should be provided.	Paragraph 36, hydropower plants on existing reservoirs should ‘justify that there were no feasible alternatives’. Providing a method for justification would be helpful.
11	BASELINE EMISSIONS	Paragraph 38	As per earlier comment, inclusion of shadow effect reduction should be reviewed, based on its materiality.	See above suggestion on this in the boundary section
12	BASELINE EMISSIONS	Paragraph 39	Paragraph 39(b) is more appropriate	The shadowing effects may affect other wind power plants that are registered as an Article 6.4 activity, depending on the density of their installation (for example).

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13	BASILINE EMISSIONS	Paragraph 44	It is cited that “This documentation and the derivation of the overall uncertainty through the error propagation or Monte Carlo simulation methods shall be provided together with the PDD (e.g., in a spreadsheet).” The grid emission factor related uncertainties are already defined in the Tool and such additional requirements would pose undue burden on the project participants.	Suggest to remove this clause or provide guidance on uncertainty handling (especially for weak data systems)
14	DEMONSTRATION OF ALIGNMENT WITH THE POLICIES	Paragraph 75	Requires DNA confirmation, but lacks operational clarity	As this is included in every methodology, consider providing standardized templates for host country approval and NDC alignment