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Name of submitter	BENMOUSSA SAMIA
Affiliated organization of submitter	BENMOUSSA SAMIA
Email of submitter	benmoussa.samia@outlook.fr
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Document reference number and title: (Recommendation from the MEP to SBM020) **Draft mechanism methodology: Electricity generation from renewable sources connected to an electricity system (version 02.0)**				
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	4. APPLICABILITY	options A1 and A2 as presentend between paragraphs 13 and 15	Section 4: Applicability, Options A1 and A2 as presented between paragraphs 13 and 15 On country eligibility: I recommend Option A2 I recommend that the Supervisory Body adopt Option A2, which does not restrict the methodology to specific country categories. I have 3 reasons for this. First reason: it contradicts the SBM's own guidance. The Supervisory Body at its fifteenth meeting (document A6.4-SBM015, paragraph 37 g and i) clearly instructed the MEP to avoid using country categorizations not agreed under the Paris Agreement. Option A1 limits eligibility to LDCs and SIDS, which are development based country groups. Adopting Option A1 would go against the SBM's own instruction to the MEP. Second reason: the methodology already checks additionality. The methodology includes four tests to verify that a project is additional: regulatory analysis, investment analysis, lock-in risk analysis, and common practice analysis. These four tests already do the job of filtering out non-additional projects. Adding a country eligibility restriction on top of these tests is not necessary and risks excluding genuine additional projects simply because of where they are located, not because of the quality of the project itself. Third reason: many developing countries outside LDCs and SIDS still face real barriers. As the MEP itself acknowledges in paragraph 28 of the cover note of document A6.4-MEP014-A03, renewable energy projects in developing countries continue to face significant financing barriers including currency risk, policy uncertainty, and grid upgrade costs. These barriers exist in many developing countries that are not classified as LDCs or SIDS. Excluding these countries from the methodology reduces the mechanism's ability to support NDC implementation exactly where carbon finance can make a real difference.	I propose that the Supervisory Body adopt Option A2 for the country eligibility applicability condition. This means that no additional text is inserted into the methodology restricting eligibility to specific country categories. The methodology should remain applicable to all host Parties without restriction, as reflected in the "Option A2: No text" presented in the draft between paragraphs 13 and 15 of Section 4.