CALL FOR INPUT	
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Document reference number and title: (Recommendation from the MEP to SBM020)
Draft mechanism methodology: Energy efficiency measures in household cooking (version 2.0).

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	Cover note	Consultation process / governance (Cover Note 63; work-plan)	We are concerned about the process by which this call for input was launched. The consultation was not announced in the MEP work plan, and the window to respond is only 7 days including a weekend. A compressed, unannounced deadline of this kind cannot be considered good practice for stakeholder engagement: it places disproportionate pressure on practitioners, prevents the coordination and field-data assembly that substantive technical input requires, and predictably lowers both the volume and the quality of responses - reducing the benefit the call for input is meant to deliver. The prior round (24 April to 15 May) was similarly compressed, so this is a recurring pattern rather than a one-off.	Announce methodology calls for input in advance through the MEP work plan, and provide a minimum comment window (e.g. 21-30 days) that excludes reliance on weekends, consistent with good regulatory consultation practice. Where a short timeline is unavoidable, state the reason and keep the stakeholder-communication channel (A6.4-PROC-GOV-007) explicitly open for late substantive input ahead of the relevant SB meeting.

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2	10. Non-permanence provisions	Section 10 (non-permanence) / paras 50-52, 53(c), 57(b); Cover Note 83	The methodology still requires decentralised cookstove activities to run a 100-year reversal-risk assessment and contribute A6.4ERs to the buffer pool. Its own paras 50-52 confirm all three A6.4-STAN-METH-007 para 13 exemption conditions are met: participants do not control the reservoir, it is geographically separate, and changes cannot be attributed to the activity. A demand-side efficiency activity avoids a combustion flux, it does not sequester carbon in a reversible stock. fNRB already discounts credited reductions for the non-renewable share, so a buffer on top double-discounts the same risk. If the methodology's own analysis satisfies the exemption conditions, the conclusion should be exemption.	Fully exempt fNRB-based demand-side cookstove activities from the buffer-pool contribution, not just from ex-post monitoring. Recognise fNRB as the complete instrument for forest-carbon risk, updated at each crediting-period renewal. If any residual buffer is retained, cap it so it is not additive to fNRB on the same tonnes.

3	10. Non-permanence provisions	Section 10 (non-permanence), paras 53(c), 55(b), 57(b); Cover Note 3.1.4, paras 51-52	"As already recognized by the draft methodology as per Paragraphs 51 and 52 of the cover note as well as paragraph 53c and 57b of Section 10, “activity participants neither control the relevant carbon reservoirs nor have any incentive to increase reversal risks, with their interests aligned toward reducing biomass consumption and associated emissions”. “Activity participants have a direct economic interest only in actions that reduce emissions from the reservoir (rather than increase them)”. Furthermore, “reservoirs are geographically distinct from the locations of the cookstove deployment by the mitigation activity and observed changes cannot be attributed to the activity”. We welcome this rationale, which has been correctly used to dismiss activity participants from monitoring potential reversals during the project lifetime. For the purposes of this comment, we refer to this rationale as “rationale 1”. However, when rationale 1 is analyzed in conjunction rationale 2, as explained below, it becomes clear that no discount factors (fBuffers, etc.) potentially attributable to reversal risks should be applied to clean cooking methodologies that are anchored on the fNRB approach. Rationale 2 is herein defined as the conceptual fact that losses of carbon stocks in the referred reservoirs are the result from higher pressure on forest carbon stocks (unrelated to the activity as per rationale 1) and, by definition, would lead to an increase in the fraction of non-renewable biomass factor (fNRB) at the activity region, either at national or subnational levels as applicable. The fNRB factor applicable to the activity is defined at the beginning of the crediting period, as per the recently updated fNRB tool. Since it is set before the potential carbon stock loss events have occured (carbon stock “reversals” as referred by the methodology), the activity fNRB is logically lower than what a new fNRB would be once it eventually incorporates such carbon losses. Therefore, it does not make sense to apply a discount factor (fBuffer - para 115 equation 36) for the potential “reversals” in carbon stocks outside of the control of the activity. If they eventually occur it will mean that the project ERs will become more conservative, since they were not	Exempt clean cooking projects relying on fNRB based methodologies not only from the monitoring criteria associated with reversals, but also from discounting reversal risks as (fBuffer), based on the combined nature of rationales 1 and 2 explained in the justification of this proposes solution.

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			considered in the fNRB default adopted by the activity. In conclusion the fBuffer factor should only be applicable to other types of clean cooking methodologies that do not rely on the fNRB rationale. If the fBuffer factor is applicable to a fNRB based methodology, it will result in a double discount, since the dynamics of carbon stocks is captured under the fNRB approach, either for natural or human-induced factors. Any additional carbon losses (reversals of carbon stocks outside of the control of the activity) would mean that the activity ERs will become more conservative, as explained above."	
4	3. Normative and informative references	Section 3.9.2 / para 44; Cover Note 77	A 25% default Hawthorne adjustment (para 44, survey pathway) remains. The methodology proposes a 75% default for HE_ind (equivalent to a 25% discount on PE-side fuel savings under the survey-only pathway). We have substantive concerns with the magnitude and the asymmetry of this provision. The 75% factor is not supported by the literature cited in the methodology. In particular, findings from a 2012–13 study by Berkeley Air Monitoring Group, recently re-analysed (BAMG 2025), did not find evidence of a strong Hawthorne effect for cookstove KPTs. The methodology should ground the proposed factor in current empirical evidence rather than older default assumptions.	"For the bridging period before SUMs become mandatory (2028), set the survey-pathway Hawthorne default to 10% (HE_ind = 0.90) for gathered-solid-biomass baselines, with an empirical waiver for projects deploying continuous SUMs or share references supporting a 25% discount for all markets. Retain SUMs as the preferred and eventually mandatory route taking into account the following comments on this subject. Where SUMs are deployed continuously, allow Eq 31 (HE_ind = MIN(1, PCE_m/PCE_KPT)) at face value without an upper cap below 100%."
5	3. Normative and informative references	Section 3.13 / paras 54-56, 58 (was para 105 in v1)	We thank the MEP for addressing our v1 comment on uncertainty analysis. v2 confirms that, based on a methodology-level Monte Carlo simulation with crediting set at the P10 level, emission reductions are very unlikely to be overestimated and individual activities are not required to undertake their own uncertainty analysis (paras 54-56). This resolves the concern we raised.	We support this approach. We ask only that the MEP confirm that parameters already fixed at conservative values (those listed as fixed and not monitored in para 58) are not additionally subjected to an uncertainty deduction, so that the same conservative margin is not applied twice to one parameter.

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6	3. Normative and informative references	Section 3.4 / paras 28-29, 51 (baseline approach; was 7.2 in v1)	" From our experience deploying KPTs at scale across multiple SSA markets, there is no measurement approach offering better accuracy than properly conducted project-level KPTs combined with rigorous protocol adherence. With strict KPT requirements, we can deliver the highest level of integrity for cookstove projects, anchored in directly observed reality rather than global averages. This third option could co-exist with Options 1 and 2 as currently drafted. It would also bring this methodology into closer alignment with the equivalent provisions in CLEAR, Gold Standard TPDDTEC, and Verra VM0050, enabling more comprehensive use of digital monitoring activities (including digital KPTs) and supporting transparency and confidence in the carbon market."	"Add Option 3, Project-specific measured baseline. Allow activity participants to determine the baseline using project-level KPT measurements of pre-activity baseline fuel consumption, subject to: • Conformance with a defined KPT protocol (suggested: aligned with the CCA KPT methodology referenced in Appendix 5); • Sampling reliability of 95/10 on total energy consumption per person per year; • Mandatory application of the BAU cap from Section 7.6 as a ceiling, i.e., the Option 3 KPT-based baseline shall be no higher than BAU_cons,y, ensuring compliance with paragraph 33 of the RMPs and removing any concern that empirical baselines could exceed the conservative envelope; • Demonstration that the resulting baseline is below the BAU baseline determined under Section 7.6. This preserves the methodologies conservativeness intent while restoring the value of empirically measured pre-activity baseline data, and aligns with the analogous provisions in parallel cookstove methodologies."
7	7. Baseline scenario	Appendix 7 - para 26 (wood-to-charcoal conversion factor)	By recognizing the most recent scientific references on wood to charcoal conversion factors, especially Urban et al 2026 and 4C 2025a, the methodology has made substantive progress. However, considering that the most recent evidence point to the weighted average of 7:1 and that the previous IPCC value was 6:1, we suggest to adopt a 6:1 factor instead of the 5:1 factor currently proposed by the methodology for three main reasons: (i) it represents transparent and objective criteria (below the most recent value and consistent with an IPCC factor) , (ii) 6:1 is still quite conservative, as it is lower the most recent data (7:1) and (iii) it would not over-penalize a major factor for the calculation of ERs, as the 5:1 is almost 20% higher than the higher end of the most recent evidence (7:1).	Adopt a 6:1 wood to charcoal conversion factor instead of 5:1 based on the objective criteria mentioned in the justification.

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8	Cover note	Additionality / paras 30(b)(ii), 34-35 (Cover Note 75)	The concern that an absolute prohibition on public-sector finance would outlaw blended finance has been resolved. v2 para 30(b)(ii) routes activities with public support into an investment analysis (paras 34-35) that can still demonstrate additionality where the support is insufficient to make the activity viable without carbon finance.	Acknowledge and support the revised wording. Clarify that partial fiscal incentives (tax / import-duty exemptions) listed in para 35 are handled within the investment analysis rather than as automatic disqualifiers.
9	Cover note	Cover Note 3.3 (validity to 31 Dec 2030) + dependent tools	"As mentioned on the first draft of the methodology, several core elements of A6.4-MEP013-A04 are governed by tools that are themselves still under development by the Supervisory Body, including the Sampling and Surveys Tool, the Reversal Risk Assessment Tool, and Draft Standard: Addressing leakage in mechanism methodologies. Its current form, an activity participant cannot fully execute the methodology because the inputs required by paragraphs 100–102 (buffer pool contribution) and Appendix 4 (sample size determination) are not yet quantifiable. This makes it difficult for developers to make investment decisions, and difficult for prospective buyers to understand the credit volume profile of projects developed under this methodology. "	"Postpone the validation of this methodology to allow first the tools and missing procedure to be approved to ensure the final and complete version of the methodlogy is open for inputs by teh public. Clarify whether activities registered under v02.0 will be required to update their PDD if the underlying tools change values materially, and whether vintages already issued would be retroactively affected. "
10	Cover note	Cover Note 3.3 (validity to 31 Dec 2030) + dependent tools	"The methodology validity expires 31 December 2030, with the rationale that this aligns with the 10-year cookstove technical lifetime assumption. However, projects considering registration in 2026 face a substantive uncertainty: a project registered in 2026 with a 5-year renewable crediting period would have its first renewal in 2031, by which time the methodology will no longer be valid. This uncertainty is a deterrent to investment. Carbon project finance typically depends on multi-period crediting visibility, and a methodology that expires before the second crediting period of projects registered under it creates pricing risk that prospective buyers will discount."	"Provide a clear statement from the Supervisory Body on the transition path: (i) will A6.4-MEP013-A04 be extended past 2030; (ii) will a successor methodology be developed and harmonised so existing projects can migrate; or (iii) will projects registered under v01.0 retain its provisions through to their natural crediting period end-dates? Commit to publishing the successor methodology framework by no later than December 2029, allowing developers and prospective buyers to plan for the transition."

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11	3. Normative and informative references	Section 3.1 / paras 10-11 (rural applicability); Section 6 additionality / paras 22-23; Cover Note 70, 73	"The methodology limits eligibility to rural low-income households, and v2 explains this as a standardization and scoping choice, with broader contexts to be covered by a separate methodology in preparation (paras 10, 70; Cover Note 73). We accept this scoping decision. Our concern is the absence of an explicit statement that the rural scope is not an additionality determination. The reasoning the methodology gives for the rural limitation is one of standardization and sequencing. That is a sound basis, but it is not stated plainly enough to prevent misinterpretation. A regulatory instrument of this standing carries significant weight in the market: how the UNFCCC scopes a methodology is read by buyers, ratings agencies and other external stakeholders as a signal about the integrity of whole project categories. Where the scoping rationale is left implicit, a reader who is not close to the methodological detail can readily misread the exclusion of urban and peri-urban households as an official finding that urban clean-cooking projects are not additional or lack environmental integrity. Such a misreading would be factually unfounded but reputationally damaging, and it would fall hardest on legitimate urban and peri-urban activities already registered under other frameworks, through no fault of their own. This risk is straightforward to remove, and doing so costs the methodology nothing. Neither v1 nor v2 presents any evidence that urban or peri-urban projects lack additionality, and the performance-based additionality test in this methodology is not premised on a rural-versus-urban distinction. The clarification we request simply makes explicit what the methodology already implies."	Add an explicit statement in the applicability section (and echoed in the cover note) that the restriction to rural areas is a standardization and sequencing choice specific to this methodology, and does not constitute any determination that urban or peri-urban clean-cooking projects are non-additional or lack environmental integrity. Confirm that the additionality of urban and peri-urban activities is a matter for the applicable methodology (e.g. PMM004/CLEAR) and is not prejudged by the scope of this one. We ask the MEP to weigh the market and reputational consequences of leaving this unstated, given the weight external stakeholders place on how the UNFCCC scopes its methodologies.

12	7. Baseline scenario	Section 7.3.1 - Baseline	"The fraction of non-renewable biomass (fNRB) is a key parameter and is impacted by multiple factors that are quite specific to a given geographic region. Data availability on these factors also varies greatly from region to region. Thus, the accuracy of estimates of fNRB also varies greatly by region. The Modeling Fuelwood Savings Scenarios (MoFuSS) tool has been peer-reviewed and refined significantly, including with input from UNFCCC's methodology panel, to more accurately assess the impact of woodfuel harvestly. UNFCCC relies on fNRB estimates generated by the Modeling Fuelwood Savings Scenarios (MoFuSS) tool for default fNRB values for cookstove methodologies. These default values underlie Tool 33 and represent a marked improvement over Tool 30. However, like all models, it has limitations. In particular, the estimates produced for Tool 33 rely on limited available data at the time the model was run. Researchers were required to make some assumptions about key parameters. In some contexts, these assumptions do not align with the actual situation on the ground and lead to inaccurate fNRB estimates. Further, Tool 33 only includes a provision for national fNRB values. While the MoFuSS tool estimates fNRB at a finer resolution (1 km), when these are aggregated to the national level, the estimates can become quite coarse. In countries with diverse ecosystems, this can lead to particularly stark. As an example, Ethiopia includes tropical, temperate and arid regions. MoFuSS values at a district level range from 0% to 77%. The national fNRB value, however, is 33%. Relying on a national fNRB value to estimate the impact of a subnational project in a country with a diverse geography can lead to significant over or underestimates of emissions reductions. In cases where there is reason to believe the model estimates do not reflect reality on the ground and there is local data available on key input parameters, we suggest that more accurate fNRB estimates can be developed leveraging the MoFuSS model. As the model itself is well validated, the remaining question would be the validity of revised input parameters. To ensure the integrity of this approach, the data	"Allow the use of more precise estimates of fNRB under this methodology, in addition to the current option of using national fNRB values as defined by Tool 33, based on the following options: 1. Allow revised country-level fNRB estimates, developed by MoFuSS team: In cases where relevant national and subnational data are available, it may be possible to produce more accurate estimates of fNRB for specific countries. Where the MoFuSS team is able to leverage this data and the existing MoFuSS tool to develop more accurate fNRB estimates, we recommend these be allowed under the methodology. To ensure that these revised estimates are valid, we further recommend that revised fNRB estimates and documentation outlining changes in input parameters and supporting data and evidence are provided to a DOE or to the MEP/SB directly for review and approval alongside the revised estimates. The use of independent research teams, such as the MoFUSS team, could also be a requirement to avoid any bias. 2. Allow subnational fNRB values, as defined by Tool 33, v2.0: As noted above, MoFuSS produces much finer fNRB estimates than national values. Version 2.0 of Tool 33 included estimates of subnational values of fNRB. However, these values were not included in the latest version. We recommend that these subnational estimates of fNRB, determined by MoFuSS developers for carbon projects, are allowed within the methodology. This will support more accurate emissions reductions estimates where there is significant variation within a country These can be leveraged immediately as these estimates are already published. They already represent more accurate values than the currently mentioned national values. Where revised estimates of fNRB are developed by the MoFuSS team, we further recommend that revised subnational estimates are allowed within the methodology as well. "

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			supporting changes to the default input parameters would need to be reviewed for quality and relevance. Finally, it is worth stressing that this does not represent any change in terms of methodological calculations. Rather, it allows for the use of more locally applicable and transparent data as inputs to increase accuracy and, hence, integrity. "	

13	7. Baseline scenario	"Section: 7 – Baseline scenario Paragraph/Table/Figure no.: Paragraph 57(c) and Table 3; related paragraphs 52–57 and Appendix 7, section 2, paragraphs 6–9"	"Paragraphs 52–57 establish an activity-specific ambitious-benchmark procedure based on the actual distribution of comparable cooking technologies in the target population. We support the use of representative survey data and the calculation of the weighted-average efficiency of the best-performing 20th percentile. Paragraph 57(c), however, requires the activity-specific benchmark to be compared with the standardized backstop in Table 3 and requires the lower fuel-consumption value to be selected. This creates an asymmetric treatment of activity-specific evidence. The Table 3 backstop is derived in Appendix 7 from a standardized population assumed to contain approximately 4.6 per cent improved cookstoves, with assumed improved-stove efficiencies of 32.72 per cent for fuelwood and 45 per cent for charcoal. The resulting top-20-per-cent performance distribution produces the standardized benchmark efficiencies of 16.6 per cent for fuelwood and 27.46 per cent for charcoal. The methodology separately cites the efficiency of unimproved cookstoves as 11.8 per cent for fuelwood and 22.1 per cent for charcoal (Urban et al. 2025), and it applies precisely these prevailing efficiencies to construct the conservative business-as-usual baseline. Paragraph 57(c) nonetheless requires the baseline to be quantified at the higher, aspirational benchmark efficiencies (16.6 per cent and 27.46 per cent) rather than at the prevailing efficiencies the methodology itself adopts for the counterfactual. The one-way cap therefore overrides the methodology's own measured prevailing efficiency with an aspirational one. The effect of paragraph 57(c) is therefore: ● where the actual population has less prior adoption of improved cookstoves than the standardized 4.6 per cent assumption, the survey-derived benchmark will generally reflect lower efficiency and higher fuel consumption; the Table 3 value then caps the baseline; ● where the actual population has greater prior adoption or better-performing baseline technologies, the survey-derived fuel-consumption value may be lower, and that lower value applies. Activity-specific data can therefore reduce the baseline where the surveyed population	"Amend paragraph 57(c) so that Table 3 operates as a default where valid activity-specific data are unavailable, rather than as a one-way cap on valid survey evidence: ""...(c) Where the pre-activity survey data do not meet the applicable data-quality requirements, or where no valid activity-specific data are available, the backstop values in Table 3 shall be applied as the ambitious benchmark. Where valid activity-specific data are available, the ambitious benchmark shall be the value determined under sub-paragraph (b). In all cases, the resulting crediting baseline shall remain subject to the comparison with the conservative business-as-usual baseline under paragraphs 90–92."" "

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			performs better than the standardized assumption, but cannot increase the baseline where the surveyed population performs worse. The procedure is structurally one-directional. This is particularly consequential for the poorest and least-served communities. Where prior penetration of improved cookstoves is below the standardized assumption, paragraph 57(c) credits those communities as though they already possessed the assumed level of improved-technology access. The result is that the communities furthest from clean-cooking access receive a lower baseline than their observed circumstances would support, even though the activity is most clearly additional in precisely those settings. The methodology permits empirical evidence to demonstrate better-than-standardized baseline performance, but does not permit equivalent evidence to demonstrate worse-than-standardized performance. This asymmetry weakens the purpose of the activity-specific survey and may introduce a systematic downward bias against populations with the lowest prior access to improved cooking technologies. The methodology already includes a separate environmental-integrity safeguard through the comparison of the ambitious benchmark with the conservative BAU baseline. That comparison prevents the crediting baseline from exceeding conservative BAU. It is therefore not clear why valid activity-specific survey results must also be capped by a standardized population assumption that may not reflect the host-country or target-population context. Because the benchmark efficiencies (16.6 and 27.46 per cent) exceed the prevailing efficiencies the methodology adopts for the business-as-usual baseline (11.8 and 22.1 per cent), the benchmark-derived crediting baseline already sits at or below the methodology	

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14	7. Baseline scenario	"Section: 7 – Baseline scenario Paragraph 51 (and consequentially Tables 3 and 4); paragraph 103 "	Paragraph 51 fixes the useful energy delivered for cooking at 0.001095 TJ per person per year for charcoal (3 MJ/person/day) and 0.001277 TJ for fuelwood (3.5 MJ/person/day). This parameter is the numerator of the ambitious benchmark (paragraph 57(b)), the backstop values (Table 3) and the conservative BAU baseline (Table 4); no other single parameter has comparable influence on credited volumes. Cover note paragraph 28 supports these values by reference to literature citing "a reasonable range of 2–4 MJ delivered per person per day" and notes a headroom of up to 5.75 MJ/person/day under the "Standard: Addressing suppressed demand in mechanism methodologies" (A6.4-STAN-METH-006). The charcoal value is thus set at the floor of the cited range, without stated justification for selecting the floor. For a suppressed-demand parameter, whose purpose under paragraph 33 of the RMPs is to prevent penalizing consumption suppressed by poverty, anchoring to the minimum locks in the deprivation the provision exists to correct. The MEP has already accepted this logic for fuelwood, raising it from 3 to 3.5 MJ (cover note paragraph 67); the same reasoning applies to charcoal.	Revise the charcoal value in paragraph 51 towards the upper end of the range cited in cover note paragraph 28 (e.g. 0.00146 TJ per person per year, 4 MJ/person/day).

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15	7. Baseline scenario	"Section: 7 – Baseline scenario Paragraph 103"	"The effect is compounded by paragraph 103, which pro-rates the baseline downwards for households delivering less useful energy than the reference - reducing credited volumes precisely for the most energy-poor households. In its consideration of public comments the MEP retained the equivalent provision on the basis that it ensures the attribution of emission reductions to the activity rather than addressing suppressed demand. Attribution, however, is already secured by the activity Kitchen Performance Test, which measures the use of all fuel types by all cooking devices in the activity household and therefore internalizes partial use and stove stacking. Paragraph 103 is accordingly redundant for attribution, and its remaining effect is to reduce the baseline for households whose measured useful energy is constrained by suppressed demand - the outcome paragraph 33 of the RMPs exists to prevent. "	Disapply the paragraph 103 pro-rating for households whose useful energy falls below the reference value due to suppressed demand;

16	7. Baseline scenario	"Section: 7 – Baseline scenario Paragraphs 51, 57(c) and 103 and Table 3 (baseline); cover note paragraph 31 (usage caps); section 3.9.4 and A6.4-AMT-009 (fNRB); cover note paragraphs 54–56 (Monte Carlo / P10) "	"The mechanism methodology applies a series of independent conservative adjustments to the baseline for household cooking: the ambitious benchmark is set at the best-performing 20th percentile (paragraphs 52–57); paragraph 57(c) caps that benchmark against a standardized backstop; paragraph 51 anchors the useful-energy parameter at the floor of the cited range; paragraph 103 pro-rates the baseline downward for households delivering less useful energy than the reference; survey-based usage adjustments are capped at 90 per cent (with customer support) or 58 per cent (without) (cover note paragraph 31); country-specific fNRB values are applied conservatively through the fNRB tool (A6.4-AMT-009, section 3.9.4); and, at the methodology level, a Monte Carlo simulation is run whose 10th-percentile (P10) result is used to demonstrate that the quantification is 'very unlikely to be overestimated' in IPCC AR5 terms (cover note paragraphs 54–56). The combined effect of each adjustment is nowhere assessed. This matters because the methodology-level Monte Carlo already bounds the aggregate uncertainty of the quantification at a 'very likely' level of conservativeness. Where aggregate conservativeness is already secured at the methodology level by the P10, the additional per-parameter downward caps - in particular the paragraph 57(c) cap, the paragraph 51 floor and the paragraph 103 pro-rating - represent conservatism layered on top of an already-conservative aggregate. That redundancy is not neutral: it falls disproportionately on the poorest and least-served households, for whom the suppressed-demand parameters and the activity-specific survey were introduced. The Supervisory Body is invited to assess the joint effect of these adjustments on credited volumes for the lowest-access population deciles, rather than assessing each adjustment in isolation, and - where the methodology-level P10 already demonstrates aggregate conservativeness — to relax the per-parameter downward caps addressed in Comments 1–4 rather than retaining both. "	Undertake and publish a combined sensitivity analysis of the baseline adjustments (paragraphs 51, 57(c) and 103, the usage caps, and the fNRB defaults) measured against the methodology-level P10, disaggregated for the lowest-access population deciles; and, to the extent the P10 demonstrates that the aggregate quantification is very unlikely to be overestimated, remove the per-parameter downward caps identified in Comments 1–4 to avoid the double-counting of conservatism.