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	section 63	We welcome the MEP's decision to open this revised draft for public input. We would note, that a seven-day window including a weekend constrains the ability of practitioners to coordinate substantive technical responses, and that this in turn limits the value the call for input can deliver to the MEP. Advance visibility of planned consultations would materially improve the quality of stakeholder input.	Announce forthcoming methodology calls for input through the MEP work plan and provide a longer minimum comment window (for example 21 days). Where a compressed timeline is unavoidable, keep the stakeholder communication channel open for late substantive input ahead of the relevant SB meeting.

2	3. Normative and informative references	, paragraphs 28–29 (baseline determination); Table 3 backstop values; Cover Note paragraph 76	This is our most material comment. The methodology's benchmark baseline, and in particular the Table 3 backstop values, are fundamentally inconsistent with measured reality in the geographies this methodology is intended to serve. First, on structure: the Cover Note (paragraph 76) rejects a baseline option grounded in actual, measured pre-activity emissions without setting out the technical reasoning for that rejection. A project-specific measured baseline, derived from Kitchen Performance Tests conducted under a strict protocol, is permitted under CLEAR (PMM004), Gold Standard TPDDTEC v5.0 and Verra VM0050. Our experience deploying KPTs at scale across multiple Sub-Saharan African markets is unambiguous: no approach offers better accuracy than properly conducted project-level KPTs under rigorous protocol adherence. Excluding measured data does not make the methodology more conservative; it makes it less accurate, and it severs the baseline from observed reality. Conservativeness can be fully preserved by subjecting a measured baseline to strong quality requirements and to the BAU cap in Section 7.6 as a hard ceiling. Second, on the backstop level: the 0.49 t fuelwood per person per year figure is not a credible central estimate. It corresponds to the suppressed-demand floor in CLEAR (0.5 t/person/yr, defined there as the minimum level of energy services required for cooking) — a lower bound, not an expected value. Gold Standard's equivalent framework operates with a cap of 1.25 t/person/yr and a verification threshold of 0.75 t/person/yr, an architecture that manages over-crediting risk without collapsing the baseline to a floor. Field measurement across our operating geographies consistently shows pre-activity consumption far above 0.49 t/person/yr; recent best-practice KPT data in Rwanda substantially exceeds this figure even after the conservative accounting that current protocols and methodology's require. The combined effect is a baseline so far below observed consumption that viable, high-integrity activities in LDCs will not be financeable under this mechanism. We do not believe that is the MEP's intent, and no	(a) Introduce an additional baseline option based on project-specific measured pre-activity fuel consumption, subject to: conformance with a defined KPT protocol; sampling reliability of 95/10 on total energy consumption per person per year; and mandatory application of the Section 7.6 BAU cap as a ceiling, so that the measured baseline can never exceed the conservative envelope. (b) If the benchmark approach is retained, publish the evidential basis for the Table 3 backstop values and revise them. As drafted, 0.49 t/person/yr is a suppressed-demand floor presented as a baseline, and 16.6% baseline efficiency sits above the published literature range. An architecture combining a realistic default with a verification threshold (as in Gold Standard's framework) would preserve conservativeness while keeping the mechanism investable.

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			evidential basis for the 0.49 figure has been published against which stakeholders can engage.	

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3	10. Non-permanence provisions	paragraphs 50–52, 53(c), 55(b), 57(b); Equation 36 (fBuffer)	The methodology's own analysis establishes that the buffer-pool contribution is not justified for fNRB-based demand-side cookstove activities. Paragraphs 50–52 and 53(c)/57(b) confirm that activity participants neither control the relevant carbon reservoirs nor have any incentive to increase reversal risk; that the reservoirs are geographically distinct from the activity; and that observed changes in them cannot be attributed to the activity. These are precisely the exemption conditions in A6.4-STAN-METH-007. The draft applies this rationale to exempt participants from reversal monitoring, but not from the fBuffer discount itself. The two positions are inconsistent. The inconsistency matters because the fNRB parameter already accounts for the risk the buffer is intended to cover. fNRB is fixed ex-ante, at the start of the crediting period, under the applicable tool. Any subsequent loss of carbon stocks in the reservoir — from natural or human-induced pressure unrelated to the activity — would, by definition, raise the fraction of non-renewable biomass in the region. Because the activity continues to apply the lower, ex-ante fNRB, its credited emission reductions become more conservative the moment such a loss occurs. Applying fBuffer on top of this discounts the same risk twice. We would add a procedural point. The buffer contribution in Equation 36 depends on the draft Reversal Risk Assessment Tool (A6.4-MEP014-A07), which is under a separate, ongoing consultation and is not finalised. We make no comment here on the content of that tool; our point is that a methodology cannot properly be finalised while a provision central to its credit volumes rests on an instrument that stakeholders have not yet been able to assess in final form, and that activity participants cannot yet quantify.	Exempt fNRB-based demand-side cookstove activities from the buffer-pool contribution, consistent with the exemption rationale the methodology itself sets out for reversal monitoring. If any residual buffer is retained, ensure it is not additive to fNRB in respect of the same risk. In any event, Section 10 should not be finalised until the consultation on the Reversal Risk Assessment Tool has concluded and its final form is available for stakeholder review

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4	3. Normative and informative references	paragraph 44; Section 8.2.3, paragraphs 104–107 (Hawthorne effect); Cover Note paragraph 77	We support the methodology's treatment of stove use monitors. Continuous, device-level measurement is the most robust available evidence of real-world stove usage and of the Hawthorne effect itself, and we support both the incentive structure for SUMs deployment and the mandatory transition to SUMs-based measurement of the Hawthorne effect from 1 January 2028. We recognise the cost and logistics this places on activity participants, including ourselves, and consider it justified by the integrity gains. Direct measurement under Equation 34, in place of the survey-pathway default, anchors the adjustment in observed behaviour rather than assumption, and we encourage the MEP to retain these provisions as drafted.	No Change