



CALL FOR INPUT

Name of submitter	Alban de Villeneuve
Affiliated organization of submitter	TotalEnergies
Email of submitter	alban.de-villeneuve@totalenergies.com
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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	7. Baseline scenario	50	• Base line scenario based on Historical emissions must be introduced with strong quality requirements on the Kitchen Performance Test setting. It is allowed in the CLEAR PMM004 and in the revised GS and Verra Clean cooking latest methodologies. The MEP in his Cover Note has rejected this approach in paragraph 76 without giving any specific arguments to justify this choice. • We welcome the CLEAR methodology PMM004, but we are afraid that the MEP over conservative benchmark approach for the Baseline will set a precedent. • We ask that MEP clarifies that the improved biomass/charcoal stoves in rural areas remains part of the coming CLEAR PMM004 methodology as this methodology main focus is the transition of the CDM projects, not new projects.	Give the possibility to select among 2 options : 1) "An ambitious benchmark approach...", and 2) "An approach based on existing actual or historical data thanks to KPT, with KPT value to be substantiated by a third party above a certain threshold and capped @ 1,25t of wood (similar to GS). A minimum value can not become the reference!"

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2	7. Baseline scenario	59	In case MEP decides to keep the benchmark level, it would require a revision of the backstop numbers (Table 3). The 0.49 t fuelwood/(person x y) or the 0.49 t charcoal/(person x y) (from the 0.001277 TJ for woodfuels or 0.0040 TJ for charcoal) are far too conservative data not substantiated enough. For instance, the CLEAR PMM004 method has 0.5 but this is a low limit to address suppressed demand: “To account for suppressed demand, this methodology uses a baseline fuel consumption default value equivalent to 0.5 tonnes/(person*year) of air-dried wood; the minimum level of energy services required for cooking.”. Gold Standard RECH 5 methodology has a cap 1.25 fuelwood/(person x y) (8 MJ) and a threshold of 0.75 (4.8 MJ) above which the project developer is required to do external data verifications. This could be an approach that MEP could take. Latest 2026 data in Rwanda from a highly experienced partners (based on the best KPT practices of revised VCM standards) gives 0.9 fuelwood/(person x y) (6 MJ) already far below (43% reduction) the historical data used by all other projects in Rwanda which is 1.57 fuelwood/(person x y). The 0.49 t fuelwood/(person x y) is far too conservative in LDCs and will not enable investors to finance projects under PACM is Sub-Saharan Africa. GS also explained in its response to the previous consultation that “traditional three-stone fire or basic artisanal stoves, operate at ~10% to 11.8% thermal efficiency (Bailis et al., 2015; Urban et al., 2025).” The table 3 Backstop is using 16.6% which is too high.	For any potential Benchmark approach, use the Gold Standard approach with RECH 5 methodology : including a cap @1.25 fuelwood/(person x y) (8 MJ) and a threshold @ 0.75 (4.8 MJ) for external additional verification. And for Charcoal : Cap Value @ 0.40 tonnes/person/year and a threshold value for external verification @ 0.20 tonnes/person/year of charcoal; Use ~10% to 11.8% thermal efficiency for three stone fires.

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3	Cover note	52 Non Permanence	We don't think the introduction of a Buffer pool for this type of activity is justified. The proposed tool "A6.4-MEP014-A07 Draft methodological tool Reversal risk assessment" will be commented separately but it shows that the approach is not adapted for clean cooking as the tool seems to hit a dead end as non human-induced factors of Reversal risk/Reversal risk reduction factor are not available. In case MEP decides to keep the Buffer pool, MEP should integrate the fNRB in the calculation : A simple science based model shows that the application of a sufficient fNRB covers the risk of non permanence. For instance : Let's assume the calculated impact of the project in one period is 100 tCO ₂ (emission reduction + removals). Let's assume a Non permanence risk tool would ask for a buffer of 20%, so 20t. Let's use 3 fNRB data: 20%, 50%, 70%. With these 3 fNRB the granted Emission Reductions in Carbon credits are respectively 20, 50 and 70 t; and the non granted Emissions Reductions are 80, 50 and 30 t. These non granted tonnes of CO ₂ are stored in the forest in form of wood biomass. They are higher than the 20 t of the buffer and show that the risk of non permanence is largely covered with an fNRB up to 80%	State that "additional Non-Permanence provisions are not needed, as the science shows that the fNRB covers the risk of non permanence". If a Buffer remains mandatory : "Option to integrate in A6.4-MEP014-A07 the fNRB into the buffer calculation to reduce the need for buffer accordingly"
4	Cover note	31 SUM	We welcome the MEP proposal for the use of SUMs. Sampling with qualification of the "user households" shall meet the 95/10 reliability level. Having conservative caps of 90%/58% on monitoring via surveys is fine	-
5	Cover note	44 HE	We support the MEP about the Hawthorne effect only in case no SUMs is used	-
6	Cover note	54-56	We welcome the simplification of the uncertainty management	-
7	7. Baseline scenario	42	We welcome the 95/10 confidence / reliability ratio instead of 90/10	-

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8	Appendix 7. Demonstration of requirement...	20 DA	We welcome the exemption for Downward Adjustment Factor for LDCs and communities with the lowest income.	-
9	Cover note	76 BL	Same as COMMENT 1	Same as COMMENT 1
10	Appendix 7. Demonstration of requirement...	7 Determination of a conservative BAU scenario	Same as COMMENT 1	Same as COMMENT 1
11	10. Non-permanence provisions	paragraphs 50–52, 53(c), 55(b), 57(b); Equation 36 (fBuffer)	Same as COMMENT 2	Same as COMMENT 2