

Response to comments from the public consultation on Methodology M/E-ER01 Implementation of GHG Emission Reduction Projects Through Renewable Energy Use for Electric Power Generation

Version 2.1

**Response to comments on the public consultation of M/E-ER01 Implementation of GHG
Emission Reduction Projects Through Renewable Energy Use for Electric Power
Generation**

Dear participants:

Cercarbono extends its sincere thanks for your participation in our public consultation of the ***Methodology M/E-ER01 Implementation of GHG Emission Reduction Projects Through Renewable Energy Use for Electric Power Generation*** version 2.1, carried out electronically from 12.04.2024 to 31.05.2024.

These valuable comments will allow us to generate a more complete and robust methodology document so developers and formulators so that developers and formulators of GHG emission reduction activities through renewable energy use can participate under our carbon market certification program.

As soon as we have the new version of the methodology, we will inform you.

The following table details the different comments received with their respective responses issued by our technical staff, a document that will also be available on our web site, section: Consultations. We thank you once again for your time spent in your review and your valuable contribution.

Cordially yours,

A handwritten signature in black ink, appearing to read 'Alex Saer', is positioned above a horizontal line. The signature is stylized with several vertical strokes and a large loop.

Alex Saer
Cercarbono's CEO

No.	Comment	Section of the document	Answer
1	In the fourth line it says "aún" and it should be "a un".	Section Summary	We appreciate the comment, and the revision has been made accordingly as applicable, however, prior to publication, an additional general revision of style, spelling, typography and consistency of references is made by method.
2	At the beginning of the fourth paragraph "The change" is confusing. It could be left as just "The use of renewable energies..."	Introduction	The wording has been modified to avoid confusion, referring now to the energy transition, which is actually the meaning of this paragraph.
3	In the fourth paragraph "This methodology is applicable for ..." at the end refer to the section corresponding to additionality (Section 5). In addition, it would be useful to provide a context as to why in this version the use of biomass is being excluded.	Section 3	Such cross-reference has been included at the end of the paragraph. As for the comment regarding the context of the non-inclusion of biomass, it is not applicable to do so in the text, since it is not common to explain what is not included. This is done briefly in the version history, although the reason is that firstly, it is a new methodology if the scope of application is considered, and only retains the name, and secondly, within the VCMs, RE and biomass projects are not treated together in a single methodology, as the projects related to the latter have unique characteristics such as aspects related to leakage, generally not present in the sources included in the version of the methodology.

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4	Footnote 2 is not superscripted	Section 3.1	Nevertheless, prior to publication, an additional general review of style, spelling, typography and consistency of references is carried out by method.
5	Renewable energy sources could be listed or refer to Section 3 for reference. Also list the eligibility conditions for ease of reading.	Section 4	Reference has been made to section 3. Regarding enumeration, since this section is organized with bullets and sub-bullets, it is not considered necessary to add numbering, thus maintaining the use of numbered lists and lists of items with symbols, common to the rest of our methodologies.
6	A definition of "integrated hydropower CCMP" could be given. Ensure correct use of subscripts and superscripts (e.g. m2).	Section 4.2	The definition is made in the section itself, but for clarity, a footnote referring to a definition is added. The format corrections referred to have been made, however, prior to publication, an additional general review of style, spelling, typography and consistency of references is carried out by method.
7	It could be placed after the "Calculation of GHG emissions in the project scenario" section to give continuity to the content related to the project scenario. No variable is being designated for this parameter, which, although considered zero for the methodology, should be included in the calculation equations.	Section 8.2	This change in the order of presentation has been made. In addition, the general order of the methodology was revised for its published version, arranging sections according to an order more easily identifiable with the sequence of the project formulation process.
8	For greater clarity, potential uses of fossil fuels consumption could be indicated, since there is	Section 8.3.1	Explanatory text has been included, and the consumption of emergency equipment or plants

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	still some doubt as to whether auxiliary services equipment is applicable		for auxiliary services has been considered negligible under certain premises, although it has been decided to consider auxiliary generation plants as contributors to fossil fuel consumption, if applicable, due to the implementation of new systems where there is significant generation to maintain delivery capacity in conditions of low availability of RE resources, which in turn is consistent with the prevailing criteria in the VCM, related to being more conservative in the methodologies in the calculation of emission reductions.
9	It is more complicated to read the table of variables and parameters that need to be monitored. The previous presentation of separate tables is more comfortable to read. Separate applied value from periodicity	Section 16.2	We have taken into account your suggestion, although the current arrangement without separation is the result of comments that requested the opposite, indicating that you find it more convenient that all the variables and parameters not monitored are in a single table in alphabetical order for quick reference, so the final decision will be agreed upon. Regarding the separation of the applied value in a different column than the periodicity, the possibility of doing so will be considered, although this would make the table longer by reducing the width of the rest of the columns, so options are being analyzed, including the periodicity in the measurement method, since it is part of it.

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10	It is better to have the equations gathered in the methodology and not to refer to other methodologies as it was done in the previous version referring to the CDM, ACM0002 for project emissions determination.	General	General comments are welcome, although it is considered that they are not susceptible and do not require a response as they describe aspects that are included in the methodology subject to comments.
11	Very positive to provide a reference to how the uncertainty calculation should be approached as it is a very recent element and there is not enough knowledge about it.	General	General comments are welcome, although it is considered that they are not susceptible and do not require a response as they describe aspects that are included in the methodology subject to comments.