Name of Stakeholder	**Umang Naudadishnal**
Organization	**Individual**
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Name of the document on which comment is provided	**Methodology for Grid Connected Renewable Energy Generation Projects GCCM001 v1.0 - 2019**

	Paragraph 15	**The methodology accepts assessments using the CDM Tool: "Tool for Demonstration of Additionality". The CDM rules seek to determine whether the project would not have been financially attractive (and therefore not have proceeded) without the CDM. Researchers have raised several critiques of this approach which are summarized in the report "How additional is the Clean Development Mechanism?" by the Oko-Insitut, INFRAS, Stockholm Environmental Institute, and Carbon Limits. Critiques include:** **1) Many investments in common CDM activities – e.g. power generation – are undertaken for a host of political, social, and strategic reasons that extend beyond simple project-level economics and may not be designed to maximise economic return. A market-based test such as investment analysis is not applicable in what is largely a non-market environment.** **2) concerned with transparency, subjectivity, and information asymmetry, such as whether project developers provide sufficient and credible information to allow replication of their calculations and justification of their conclusions, as well as the inherent information asymmetry between project developers and those, especially the CDM EB, tasked with reviewing the information. For example, early research found that project developers regularly provided investment analyses that were opaque, relied on proprietary company information, or were incomplete.**	**Phase out the use of the CDM additionality tool. Research supports that weaknesses in the tool's approach to investment analysis render it useless to assess additionality, particularly for projects (like renewable energy) where the reasons for carrying out such activities include political, social and strategic reasons beyond project-level economics.** **Further, the CDM additionality tool has not been updated since 23 November 2012. This is an outdated tool that has no role in today's carbon market. It will only serve to rubber stamp every project which applies it and will undercut the integrity of every GCC project.**

	Paragraph 17	No information is provided to support the statement that grid electricity tariffs in Qatar, Kuwait and Oman render 8(a) energy projects of any size additional. The positive list approach based on the above also disregards the reality that renewable energy projects are often undertaken for political, social and strategic reasons beyond project-level economics.	Approving via positive list all wind and solar projects of any size in these countries is wholly inappropriate and should not be permitted. At the very least, the size of positive list activities should be limited to small scale. Otherwise, a 100% government funded, profitable, large scale wind or solar farm built on the directive to diversify energy mix would be erroneously deemed additional and undermine the integrity of carbon credits.
	Paragraph 18	No information is provided about how GCC will assess requests by project owners to add their technology/location to the positive list. What are the criteria, considerations, review process?	Noting the above comments, more information should be made available regarding how such requests would be considered.