

This is a small, but a complex methodology while determining baseline. AMS.II M which was indicated as approach document for this methodology was adopted in EB 62, dated 15 July 2011. There has not been a single project registered under this methodology because of its intricate baseline. This methodology is the “diluted AMS.II M” and certainly needs improvements as it has potential to become least signal-to-noise methodology. Here are the comments.

1. Methodology fails to assure that a fully functional Flow Restrictor Aeration Device (FRAD) is in place throughout the crediting period. For e.g., how are the operational hours of each FRAD ensured. When the FRAD is detachable, how is it ensured that FRADs are not removed and reinstalled during the monitoring period claiming VERs for the period not in operation. This is precisely the reason AMS.II M has made the device an integral and non-removable part of the shower.
2. Methodology fails to ensure the FRAD is not changed / replaced during the course of monitoring period, for maintenance or other reasons
3. $Q_{water,b}$ and $Q_{water,p}$ are based on sampling. Flow rates are function of each showerhead design (both in baseline and project scenarios). If the baseline shower-heads have different flow-rates, flow-rate of which showerhead will be used for the computation of baseline emissions and What is the procedure for the sampling?
4. Author’s assumption is duration of the shower is constant in both baseline and project conditions (service level). What is the rational for having such an assumption linked with the time? Why is the service level not linked to the volume. If the service level is linked to the Quantity of water used for shower, there are no emission reductions.
5. Equations of $V_{water,b}$ and $V_{water,p}$ are not consistent.