

SUMMARY OF PUBLIC CONSULTATION

VM0038 Electric Vehicle Charging Systems v1.1 and VMD0049 Positive List for Electric Vehicle Charging Systems v1.1

A draft of VM0038 Electric Vehicle Charging Systems v1.1 and VMD0049 Positive List for Electric Vehicle Charging Systems v1.1 were open for public consultation between March 18, 2026 and April 17, 2026. This document includes a list of all comments received and Verra's response.

KEY QUESTIONS

Q1: VMD0049: Do you consider the updated positive list of countries appropriate, or is there any country that should be excluded from the list? Do you agree to differentiate AC chargers from DC fast chargers? If you propose any change, please also provide your rationale and sources of information. (Q1 – 12)

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1	Firefly GHG Consulting	The proposed positive list in VMD0049 draws on data from the IEA Global EV Outlook and follows the same overall approach used in v1. Continuing to rely on this data source, updated to reflect current information, is broadly reasonable. However, there are several concerns regarding how the data is being applied. 1) Inclusion of supranational regions	Thank you for the comments. 1) We adjusted the list to provide more clarity on countries included. Also, thank you for

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		Version 1 of VMD0049 included only individual countries. The proposed update, however, introduces supranational regions: Table 1 now lists “Central and South America” and “Middle East and Caspian,” while Table 2 adds these alongside “North America” and “Asia Pacific.” Using supranational regions raises two key issues. First, it is unclear which specific countries are included or excluded within each region. Second, and more fundamentally, supranational data can obscure significant country-level variation, potentially altering a project's additionality determination. For example, Table 2 lists the USA as eligible but excludes Canada and Mexico, without explanation. A review of IEA data shows that Canada is excluded due to exceeding the proposed EV bus stock share threshold, while Mexico is excluded due to lack of data. Despite this, Table 2 also lists “North America” as eligible, effectively including both Canada and Mexico. This contradiction undermines the credibility and internal consistency of the methodology. Recommendation: Remove supranational regions from Tables 1 and 2, as their use conflicts with the ISO 14064 principles of accuracy and relevancy. 2) Use of ‘car’ stock or sales share only The positive list treats EV stock or sales share as a proxy for determining whether EV use is common practice, yet Table 1 relies exclusively on IEA data for cars. The IEA also provides data for other light-duty vehicle categories, including vans and two- or three-wheelers, but these are not considered. No justification is provided for using only car data. Car adoption rates are only relevant for assessing common practice within the car segment and should not be used as a proxy for transport electrification more broadly, particularly in countries where cars are not the dominant transport mode. For instance, Viet Nam has 4.6% adoption based on car EV stock share alone, yet most travel is by motorbike	identifying the inconsistency with Canada. 2) Car data were used as a proxy for general EV transportation worldwide. 2/3 wheelers and vans can use the same AC charging infrastructure as cars. A differentiation could be made for the case of battery swapping for 2/3W but that is outside the scope of the revised positive list. We clarified that the current positive list excludes 2/3 wheelers. We may consider adding it in a subsequent revision. 3) AC and DCFC provide different services and have different costs and

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		(https://www.researchgate.net/publication/332227596_Modal_Preference_in_Ho_Chi_Minh_City_Vietnam_An_Experiment_With_New_Modes_of_Transport), where EV adoption is significantly lower at 2.6%. Car EV stock or sales data is therefore only appropriate for assessing charging projects serving cars. Other modes should be evaluated separately to avoid inappropriate inclusion or exclusion of projects. Recommendation: Table 1 should differentiate between cars, vans, and two-/three-wheelers, consistent with the mode-specific approach used in Table 2 for HDVs, in line with the ISO 14064 principle of relevancy. 3) Differentiation between AC and DC fast chargers The proposed update introduces different eligibility thresholds for AC and DC fast chargers, based on the assertion that AC chargers are more common in early adoption stages. However, this claim is not supported by evidence, nor by the data used in Table 1, which is limited to EV stock or sales share and does not distinguish by charger type. Applying different thresholds to the same underlying data is arbitrary. Moreover, the IEA data does not distinguish between BEVs and PHEVs, making it unsuitable for inferring charger-type differentiation. As a result, this change is not supported by the available data. Recommendation: Table 1 should not differentiate between AC and DC fast chargers, as using the IEA data to do this contradicts the ISO 14064 principles of accuracy and relevancy. 4) Completeness and accuracy Potential issues with data completeness and accuracy remain. For example, Seychelles is shown as having data through 2024, whereas the IEA data appears to extend only to 2023, and Russia appears eligible based on IEA data but is omitted from Table 1.	challenges. IEA reports on the differences and impact. We introduced further data and assessments in the appendix to better clarify the differentiation. 4) The two identified cases were adjusted and clarified. Thank you.

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		Recommendation: All data in Tables 1 and 2 should be systematically cross-checked against the IEA source to ensure consistency with the ISO 14064 principles of completeness and accuracy.	
2	Eco Sustainability	1. Analysis of the Positive List: Who Should be Excluded? Under VMD0049, regions qualify for additionality if EV penetration is <5%. While Equation 1 (total vehicles on road) is slow to update, Equation 2 (Sales Proxy) is the leading indicator of market maturity. Based on 2023/2024 data, several regions should be moved to the Negative List: China: EVs (BEV+PHEV) reached ~38% of new sales in 2023. Technology is no longer niche; it is the market standard. Germany, France, and the UK: Sales shares hover between 15% and 25%. These markets have transitioned past the point of requiring carbon-credit-driven additionality. Sweden, Netherlands, and Iceland: With sales penetration often >30–50%, maintaining these on a positive list is no longer defensible. United States (Sub-regions): While the national average remains low, states like California (>20% sales) should be excluded to maintain environmental integrity. Rationale: High sales penetration indicates that barriers (financial, social, or infrastructure) have been overcome. Issuing credits here results in "non-additional" units—funding activities that would occur regardless of the carbon market. Sources: IEA Global EV Outlook 2024: Authoritative data on sales share and market penetration. ICCT (2022/2020): Reports on infrastructure costs and gaps in the EU and UK. VCS Standard v4.7: Defines the requirement for valid, timely data in activity methods. 2. Differentiation of AC vs. DC Chargers There is a compelling case for a strict differentiation between AC (Level 1/2) and DC Fast Chargers (DCFC).	Thank you for your comments. 1) The positive list was updated in the current revision to exclude countries that have shown further EV deployment. We introduced a US states level list. 2) Agree. The distinction is already included in the module. 3) A. The updated positive list lowered the threshold for LDV stock share in case of AC chargers and added a sales share limit for cases where data was

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		Financial Barriers: AC chargers cost 500–500–2,000 to install; DCFC systems cost 50,000–50,000–150,000+. The business case for DCFC is significantly riskier and more dependent on external funding. Grid Impact: DCFC requires massive grid upgrades and incurs "demand charges," often making them operationally unprofitable without credits. Regulatory Context: Many building codes now mandate AC charging in new constructions (making them non-additional), while DC corridor charging remains a significant, non-mandated infrastructure gap. Sources: Rocky Mountain Institute (RMI) (2020): "Pulling Back the Veil on EV Charging Costs." CDM Methodology AMS-III.S (v4.0): Establishes precedent for differentiating by charging speed/type due to operational risk. 3. Proposed Changes to VMD0049 A. Move to a "Sales Share" Default Rationale: The current "Total vehicles on the road" metric is a lagging indicator. By the time the total fleet hits 5%, the new car market is often already at 50%. Proposed Change: Use a 3-year rolling average of New Vehicle Sales Share as the primary trigger for removal from the positive list. Source: IEA (2024) and VCS Standard v4.7 Section 3.5.11. B. Implement an "AC/DC Split" for Additionality Rationale: AC charging is becoming "Business as Usual" (BAU) in many markets due to utility rebates, whereas DC charging remains a high financial hurdle. Proposed Change: Allow countries to be on the Negative List for AC Chargers but remain on the Positive List for DC Chargers. Sources: BloombergNEF (BNEF) Electric Vehicle Outlook; VCS Tool for the Demonstration and	not available. B. The module already differentiates AC from DCFC. C. Regulatory surplus is already required for the positive list.

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		Assessment of Additionality (Common Practice Analysis). C. Automatic Exclusion Based on "National Mandates" Rationale: Projects must meet the "Regulatory Surplus" test. If a country mandates ICE bans (e.g., UK/Canada 2035) or infrastructure deployment, the activity is no longer additional. Proposed Change: Any country with a firm ICE-ban mandate and a sales share >10% should be automatically excluded. Additionally, exclude regions covered by mandates like the EU AFIR, which requires fast chargers every 60km. Sources: EU Regulation 2023/1804 (AFIR): Mandates specific infrastructure density. VCS Standard v4.7 Section 3.5.1: Defines Regulatory Surplus. ICVCM Core Carbon Principles (CCPs): Mandates that methodologies account for "policy-driven" shifts to ensure additionality.	
3	Motion Energy	Motion Energy's comments on the positive list address both the country coverage and the threshold framework, and are set out in full in the accompanying formal consultation response. In summary: Country coverage Motion Energy does not propose the exclusion of any country from the positive list. Our concern is with absences rather than inclusions. A number of countries and regions are absent from the positive list not because their EV penetration exceeds the relevant threshold, but because IEA Global EV Outlook data does not cover them. Pacific Island nations are one example; countries such as Fiji, Vanuatu and Papua New Guinea have negligible EV penetration by any measure but appear in neither Table 1 nor Table 2. Australia's absence from the HDV positive similarly reflects a data	Thank you for the comments. 1) We clarified the countries included in the positive list and clarified a path to include other countries by submitting official governmental data and a MIN request under VMD0049. 2) Stock share is a lagging indicator that

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		gap rather than high penetration. We request that Verra introduce a proponent-led pathway under which project proponents may present credible national government data to their VVB to confirm that their jurisdiction falls below the relevant threshold, where that jurisdiction is absent from or ambiguously represented in the module. We also request that Verra clarify how supra-national aggregates such as Asia Pacific and EU27 in Tables 1 and 2 are to be applied at the project level, given that a project is located in a specific country rather than a regional aggregate. Differentiation between AC and DC chargers Motion Energy supports the principle of differentiating between AC and DC charger types, as this reflects the different applicable fleet definitions in VM0038 v1.1. AC chargers serve BEVs and PHEVs combined, while DCFCs serve BEVs only, which is consistent with v1.0. However, we have two concerns with the implementation. First, the AC charger positive list threshold of 2.5% EV stock share is not adequately justified. Appendix A describes an adoption pattern but does not explain why 2.5% is the appropriate cutoff. At 2.5%, the threshold sits at the boundary between the Innovator and Early Adopter segments as defined by Rogers (2003), well before the transition to mainstream diffusion that Moore (2014) identifies at approximately 15 to 16% cumulative market share. The conditions that would make carbon finance unnecessary for public AC charging simply do not exist at this level of penetration, and the threshold falls disproportionately on communities dependent on public AC charging, including multi-unit dwelling residents and lower-income households for whom DCFC is not an affordable substitute. We request that the threshold be reinstated at 5%, consistent with the original VMD0049 v1.0 threshold and with the DCFC threshold under VM0038 v1.1 s.4(1)(b).	may not represent the adoption trend. Sales shares provide a different perspective on the trend. The stock share threshold was reduced to be consistent with a sales share that represents when EV adoption is becoming common. 3) IEA data on BEV+PHEV was used as the most extensive consolidated source of information worldwide. The distinction for DCFC is already addressed in the relevant threshold. Further data and analysis were included in the appendix to clarify the thresholds.

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		Second, the stock share figures in Appendix A appear to apply a single IEA BEV+PHEV combined figure to both the AC and DCFC positive list columns. For the AC column this is appropriate, as the applicable fleet is BEV+PHEV. For the DCFC column it is not; applying a BEV+PHEV combined figure overstates the penetration of the DCFC-relevant fleet in markets with significant PHEV adoption. We request that Verra confirm the fleet composition underlying the Appendix A figures and apply fleet-specific calculations consistent with the applicable fleet definitions in VM0038 v1.1. Sources Rogers, E.M. (2003) Diffusion of Innovations, 5th edition; Moore, G.A. (2014) Crossing the Chasm, 3rd edition; International Energy Agency (2025) Global EV Outlook 2025; VMD0049 v1.0 and v2.0 draft; VM0038 v1.1 draft, s.2 and s.4(1)(b).	Further differentiation between BEV and PHEV could be used for a more granular assessment at country level in a future revision.
4	Climate Bridge International	In Table 2, the scope of the 'Asia-Pacific' category is not clearly defined. As several individual Asian countries are separately listed within the same table, clarification is requested on which countries and regions are captured under the 'Asia-Pacific' grouping to avoid potential overlap or ambiguity.	Thank you for the comment. We clarified the countries included in the positive list.
5	3Degrees Group, Inc.	If the project is allowed to determine their own additionality by state or by county for the AC chargers as part of the verification or validation, the proposed solution is acceptable. Applying a blanket "no" to areas as large as the United States, which have differing penetration rates and EV adoption rates, would be highly limiting to EV expansion.	Thank you for the comment. We introduced a state-level positive list for the US and clarified a path to include other countries

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			by submitting official governmental data and a MIN to VMD0049. Projects can demonstrate additionality through a project method if they are not in the positive list.
6	Amazon Connection Carbon	Amazon Connection Carbon (ACC) considers the inclusion of countries such as Brazil in the updated positive list to be appropriate and strongly supports maintaining their eligibility for both AC and DC fast charging systems. The current classification reflects the reality that EV market penetration in these countries remains at an early stage, and that charging infrastructure deployment is still a primary barrier to adoption. In the case of Brazil, national EV stock share remains significantly below the thresholds defined in the methodology, supporting its inclusion in the positive list. However, ACC recommends two key refinements to improve methodological robustness and fairness: 1. Introduce explicit subnational flexibility While the national-level approach is appropriate as a baseline, it may mask substantial regional	Thank you for the comments. 1) If a country is not included in the positive list, the methodology allows for demonstrating additionality through a project method at national or subnational level. However, we added a path to include other countries by submitting official governmental data and

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		disparities within large and heterogeneous countries. In Brazil, for example, EV adoption and charging infrastructure are heavily concentrated in a few urban centers in the Southeast, while vast regions such as the North (including the Amazon) have extremely limited infrastructure and negligible EV penetration. Therefore, ACC recommends that the methodology explicitly allow for subnational (state or regional) eligibility assessments, particularly in cases where: infrastructure availability is significantly below national averages; EV market penetration is materially lower than national figures; and projects are located in infrastructure-constrained or frontier regions. This would ensure that the methodology does not unintentionally exclude high-impact projects in underserved areas. 2. Support differentiation between AC and DC fast chargers ACC agrees with the differentiation between AC chargers and DC fast chargers, as they serve distinct roles in EV ecosystem development: AC chargers (L1/L2) are typically associated with residential, workplace, and destination charging; DC fast chargers (DCFC) are critical for enabling long-distance travel, intercity connectivity, and corridor electrification.	a MIN request under VMD0049. 2) Agreed. The module already recognizes DCFC contribution to EV adoption.

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		This distinction is particularly important in regions where DC fast charging infrastructure is the primary enabler of EV adoption, such as in highway networks and remote areas. However, ACC recommends that the methodology recognize that in infrastructure-constrained regions: DC fast charging deployment often has a disproportionately higher enabling effect on market transformation compared to AC charging. Accordingly, ACC suggests that Verra consider: maintaining differentiated thresholds; and allowing for stronger recognition of DCFC additionality in low-infrastructure contexts, particularly in regions where corridor development is required to unlock EV adoption. Conclusion In summary, ACC supports the current positive list and the differentiation between AC and DC charging systems. However, we recommend: adding explicit provisions for subnational eligibility assessment; and strengthening the treatment of DC fast charging in infrastructure-constrained regions. These refinements would better align the methodology with real-world market dynamics, particularly in emerging economies and frontier regions such as the Amazon.	

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7	Anonymous 1	We support the direction Verra is taking with the positive list. It's a good step toward consistency and transparency. That said, relying mainly on EV stock share feels a bit limiting, especially given how fast markets are moving. Stock share is a lagging indicator. In many places, EV sales and charging infrastructure have accelerated quickly over the past few years, and this isn't always reflected yet in total stock numbers. The International Energy Agency has highlighted that EV sales growth is outpacing overall stock growth in a number of markets (Global EV Outlook, 2023–2024). This creates a risk where some markets may still appear “early-stage” on paper, even though they are already moving toward commercial viability. It might therefore be more useful to look at a combination of indicators—such as recent EV sales trends, infrastructure rollout, or even utilization levels—rather than relying on stock share alone. Data from the European Alternative Fuels Observatory, for example, shows how quickly both EV uptake and charging networks have scaled across parts of Europe in recent years. At the same time, it's important not to overlook markets that are genuinely still early. In Southeast Asia, EV adoption remains relatively low, and infrastructure development is still catching up. The IEA continues to highlight that deployment in the region is uneven and still heavily dependent on policy and financial support (IEA Southeast Asia Energy Outlook, 2022; Global EV Outlook, 2024). Expanding the positive list to include countries such as the Philippines, Cambodia and Laos would help ensure these markets are not left behind. We also agree with keeping the distinction between AC and DC chargers. They are fundamentally	Thank you for your comments. Both stock and sales are included in the applicability conditions to address this concern. We added a path to include other countries by submitting official governmental data and a MIN request under VMD0049.

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		different in terms of cost, utilization, and how they scale. But in practice, both are still being assessed using largely the same high-level indicators. The reality on the ground is more complex. Even within the same country, infrastructure development can vary significantly. Urban areas may move quickly, but in rural or remote regions, grid capacity is often a real constraint. The IEA notes that fast charging infrastructure typically requires higher grid capacity and often grid upgrades, which remain a barrier in less developed areas (Global EV Outlook, 2024). In these situations, AC charging is often the only viable option—but that doesn't mean it is commercially easy. A more flexible approach that considers multiple indicators—and allows for regional differences—would better reflect how these markets actually evolve, while still maintaining environmental integrity.	
8	Grutter Consulting and Zeroca	1. I consider the following things problematic from the list: a). Inclusion of regions such as Central and South America. It is unclear if this means that a non-listed country can use the region. My suggestion: state clearly that in case of individually listed country this needs to be taken and otherwise the region can be taken. A problem with listing regions is that one or various countries of the region might already be above the threshold value. As there is only a positive list this might result in the country still claiming to be eligible under the region. Suggestion: state as footnote in regions which (if any) non-listed countries are excluded. Alternative: eliminate regions. PPs can provide evidence for not listed countries based on national data sources, even if anecdotal, if a country is not listed. b). EV penetration rates can change relatively fast. The data provided in the activity list can be retrieved easily from the IEA website and in many countries the national registration statistics also	Thank you for the comments. 1) a) We clarified the countries included in the positive list 1) b) The positive list will be revised and updated according to the VCS rules to account for the progression of EVs. We

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		supply updated values. If the positive list is valid for various years this will allow non-additional projects to enter. My suggestion: The PP must use the approach as in the positive list and can use the data source as in the positive list but must use the latest available year at time of validation of a new project or program. 2. AC/DC I do not consider a separation technically justified. AC and DC chargers fulfil different purposes and splitting these up increases complexities. 3. Additional changes or inclusions recommended a). I suggest to include also as vehicle category Motorcycles/3W. This is covered either with chargers (AC or even DC) as well as with battery swap infra which can be considered AC chargers. The positive list for MCs could also be included here using the same data source without separation of AC/DC. The 5% stock penetration rate would also apply. Here for example in the group Africa various countries might have surpassed or are soon to surpass the 5% rate (see problem identified under 1a). The meth should be adjusted to clarify that MCs and 3Ws and battery swap is also included. The existing version of the meth included EVs and as such various projects have been approved with the existing meth by the VCS for MCs and battery swapping. b). Threshold values see below	may consider changing the approach to a dynamic list in the future. 2) The distinction is made precisely because they serve different purposes, provide different services and have different costs and challenges. 3) We agree that 2/3 wheelers can use the same AC charging infrastructure. A specific positive list for this group may be considered in a future revision.
9	Climate Neutral Business Network	11.No clear analysis was provided to support the application of new differentiated positive list % thresholds in the positive list for AC/DCFCs – compounded by inconsistencies in application of Verra's logic supporting differentiated rates, across LDV and HDV sectors a.Verra's application of 2.5% and 5% stock threshold levels appears arbitrary: there's no reference	Thank you for your comments.

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	(CNBN) on behalf of Connecticut Green Bank and other clients	to supporting market data or publications to support these levels (rather than others) if changes to Verra's longstanding single 5% threshold value are to be made i.The same applies to the 10% and 20% AC/DCFC % sales thresholds ii.For example, even Verra's statistical analysis of stock versus sales data has not been referenced relative to the proposed thresholds. b.These % stock thresholds are also inconsistent with and well below thresholds referenced in respected publications for when markets emerge from the "early adopter" phase i.Including market thresholds for the early adopter segment boundary developed by Rogers (2003) and the chasm identified by Moore (2014) at 15-16% penetration levels c.Verra's argument to differentiate DCFCs is that DCFCs "accelerate new EV adoption". This logic however: i.Misses the point in the VM0038 project activity definition – which is to promote EV driven miles over fossil fuel driven miles regardless of whether this arises in EVs purchased now or earlier (when additionality was even stronger); 1.This is an EV charging methodology not AMS III C which is focused on increased adoption of EV fleets ii.Also applies to L2s since these are used also for public charging to overcome range concerns, particularly in rural areas where DCFCs are less prevalent; applies particularly to L2s installed at multi-family housing developments where access to charging is notably lacking; applies to L2 residential charging since, with the increase in EV battery sizes and range, L1 charging is now effectively impractical (it takes 3 days to charge on L1 compared to 7-8 hours overnight with an L2 charger) d.There is no reference or alignment with common practice penetration rates including those with published penetration rates from other certifiers which are based upon the very same early adoption market thresholds that Verra is seeking to apply. For example, Verra's proposed stock	Further data and analysis were included in the appendix to clarify the thresholds. Further differentiation between BEV and PHEV could be used for a more granular assessment in a future revision. We introduced a US state-level positive list and clarified a path to include other countries by submitting official governmental data and a MIN to VMD0049.

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		thresholds for early adoption cut offs in VMD0049 v 2.0 (2.5% and 5%) are well below even the most conservative thresholds (10%) published by Gold Standard for non LDV/SID countries. Verra also fails to take into consideration threshold distinctions between LDV/SIDs and other countries. i.Verra does not specify common practice thresholds in its VT0008 as applicable to EV charging. ii.Gold Standard, however, has published thresholds for early adopter market boundaries during public comment (which are largely sustained) as 15% for stock and 25% for flow based approaches in LDCs/SIDs and 10%/15% respectively in other countries (https://goldstandard.cdn.prismic.io/goldstandard/aN0dvp5xUNkB1XFH_ToolCommonPractice_PC.pdf) è The resulting PBs are therefore biased towards a) BEVs; and b) fast public charging only (since no DCFCs are located in residential or many private commercial settings) when L2s also achieve the same outcomes that Verra argued justified the DCFC higher 5% threshold. è They also lack alignment and are unduly constraining compared with other credible publications' thresholds for early market adoption (Rogers, Moore, Gold Standard) è the same logic applies to the arbitrary allocation of differentiated thresholds to e-bus and e-trucks 12.Verra has been inconsistent in the required application of applicable fleets for L2 and DCFC when deriving their % threshold results. The results for DCFC thresholds are therefore inaccurate and unduly constraining. a.VM0038 v1.1 distinguishes applicable fleets by charger type: AC chargers serve BEVs and PHEVs combined, while DCFCs serve BEVs only. VMD0049 v2.0 appears to apply a single IEA stock share figure to both columns. i.The IEA Global EV Outlook states that its stock share figures refer to both BEV and PHEV unless	

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		otherwise specified. b.Verra has therefore applied the wrong applicable fleet (BEV/PHEV combined) to the determination of the DCFC % thresholds. There is no distinctions made in VCS's analysis regarding the stock/sales penetration rates for BEV vs BEV/PHEVs (i.e. all EVs). VM0038 (both v 1 and 1.1) requires that appropriate applicable fleets' data be applied when establishing the positive list thresholds for L2 and DCFCs – namely applying BEV/PHEV (all EVs) for L2 (since all these EVs can use L2 connectors) and only BEVs for DCFC (since PHEVs cannot use DCFC connectors). Verra applies the % stock/sales market penetration data from IEA which is based upon all EVs – BEV and PHEV. This data is applicable for the determination of L2 thresholds but the data is not the applicable fleet for DCFC threshold calculations. As a result, countries will be deemed ineligible far too soon since BEV market penetration rates will be below those for the combined PHEV/BEV market. The VMD0049 v2.0 revision references only “EV stock” and “EV sales” but has not applied the correct LDV sub EV fleets for DCFC threshold calculations nor been specific as to which sub fleet (BEV, PHEV, both) was used for each charger segment. Verra has therefore not applied the VM0038 required applicable fleet procedures to its positive list assessment and its results for DCFCs are based upon incorrect foundations (the wrong applicable fleet) resulting in significantly premature elimination of countries' DCFCs from the positive list. i.Verra might note that, had the proper applicable fleet (BEV only) been applied to DCFC threshold analysis, it would have supported Verra's interest to see DCFCs remain eligible for a longer period of time c.Proper analysis needs to be conducted and the positive list results remedied. 13.Other inconsistencies arising due to the application of both stock and sales benchmarks a.Inconsistencies arise as a result this dual track system; for example L2s for the US are deemed ineligible. On a stock basis, the US was considered above 2.5% at 2.7% penetration yet the US	

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		sales basis is still under 10% at 9%. Given the proposed “either/or” frame for the overall test, the US is still considered ineligible even while EV sales remain below the applicable threshold. b. Gold Standard’s (GS) approach avoids these confusions. Firstly, GS is clear when stock or sales thresholds should apply across different sectors/methodologies: only one threshold metric is applied in any given sector – and for EV charging systems GS would apply the stock metric (for an EV focused methodology like AMS III C it applies the sales metric). GS then applies clear % threshold values assigned separately across stock and sales metrics, differentiating between LDV/SIDS and other countries, with cut offs based upon early innovators, early adopters and early majority (take off) stages. The clarity of the GS system avoids the kind of inconsistencies arising in Verra’s approach and is far more nuanced and consistent with published research. (https://goldstandard.cdn.prismic.io/goldstandard/aN0dvp5xUNkB1XFH_ToolCommonPractice_PC.pdf) 14. Removal of sub-jurisdictional assessments a. All of the VMD0049 references to making assessments at subregional levels have been removed from v2.0. So all states in the US are treated identically when in reality the EV market penetration rates vary enormously by region. To remove sub-jurisdictional positive list assessments will result in series of false positives and negatives – which is why the subregional considerations were included in the v 1.0 positive list. i. For example, taking a US-wide average national stock rate will mean that states where EVs are more prevalent will be considered additional when the US has less than an average of 2.5% stock for L2s; and when the average exceeds 2.5%, the states where stocks are considerably lower will be false negatives. ii. In the US, the particularly strong EV market penetration rates for CA will skew the US average penetration rate, creating a major inequality for other US states where EV penetration rates lag.	

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		This is a particular concern when VCUs cannot even be issued in CA (due to double counting with LCFS credits) – yet CA's penetration rates preclude VCU issuance across all other US states. - For example, for the US in 2024, the US Alternative Fuels Data Center has the highest penetration rates for CA (4.1% BEV and 1.2% PHEVs) – notably higher than other states (next closest is WA at 2.8% for BEVs). CA also hosts a disproportionately large proportion of EVs (1554k BEVs, 447k PHEVs) out of a US total of 4504k BEVs and 1521k PHEVs) – representing 34% BEVs and 29% PHEVs – or 33% of all EVs. So CA's combined all EV penetration rate of 5.3% unduly skews the overall US rate by applying this high penetration rate at a 33% weighting. Unsurprisingly, no other US states exceeds VMD0049 v1.0 penetration rate of 5% and the vast majority of states also would remain positive even under v 2.0's proposed 2.5% threshold. Subjurisdictional market penetrations should therefore be retained to be accurate and avoid false positive/negatives. (https://afdc.energy.gov/transatlas#/?view=percent&fuel=ELEC&year=2024) b.The removal of the sophistication of the original v 1.0 positive test cascade across subregions is therefore unduly increasing false positive and negatives. It results in inaccurate positive list assessments for countries where one region unduly skews the result. The subjurisdictional assessments should be restored and be applicable to countries where, like the US, there is credible subregional data (e.g. by state) is available for stocks and/or sales. See detailed VM0049 inputs below for further points #15 - 17. Cannot be provided here due to space constraints.	
10	NA	Positive List of Countries The updated positive list is generally appropriate, but it should exclude or periodically review developed countries where EV adoption and charging infrastructure are already commercially viable	Thank you for your comments. The positive list is

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		(e.g., USA, Western Europe, China). Rationale: In such markets, EV charging expansion is driven by policy and market forces, so additionality is weak. The list should focus more on emerging economies (e.g., India, Southeast Asia, Africa) where financial and infrastructure barriers still exist. Differentiation Between AC and DC Chargers Yes, differentiation between AC and DC chargers is necessary. Rationale: AC chargers are low-cost and low-utilization (home/workplace use) DC fast chargers are high-cost, high-utilization, and critical for commercial fleets Without differentiation, emission reductions and additionality may be misestimated. DC chargers, especially in high-usage sectors, can generate greater and faster emission reductions. Conclusion The methodology should: Focus the positive list on less mature EV markets Differentiate AC and DC chargers for accurate crediting and additionality assessment	revised and updated periodically

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11	Marmota Solutions Inc.	Marmota supports updating the positive list using updated EV penetration data, and we recognize VMD0049 v2.0's stated reliance on IEA datasets (Global EV Outlook 2025 and Global EV Data Explorer). However, we do not support the inclusion of multi-country "regional groupings" as normative entries in Table 1 and Table 2 (e.g., "Central and South America," "Middle East and Caspian," "North America," "Asia Pacific," "Africa"). These groupings (i) obscure potentially material within-region heterogeneity and (ii) create overlap/precedence ambiguity when both a country and a region containing that country appear within the same table. For example, Table 2 lists "USA" and "North America" for buses with different values, while Canada and Mexico may or may not be intended to be covered by "North America" for the purposes of the positive list, and the document does not specify an overlap rule. This ambiguity creates a material risk of inconsistent determinations by VVBs and proponents and undermines transparency and consistency under the VCS Program principles. Verra should adopt one of the following two approaches: 1. Preferred: remove multi-country "regional groupings" from Tables 1 and 2, and list only countries (and any explicitly defined subnational regions, if Verra intends subnational eligibility). 2. If regional groupings are retained: Verra must (i) publish the exact membership for each grouping (by explicit reference to the underlying dataset's region definitions), (ii) define an explicit overlap/precedence rule (e.g., country entries override region entries, or vice versa), and (iii) apply a	Thank you for the comments. 1) We adjusted the list to provide more clarity on countries included. 2) We introduced further data and assessments in the appendix to better clarify the differentiation and thresholds.

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		conservative “no-qualification-by-aggregation” rule to prevent higher-penetration countries from qualifying through a low-penetration regional average. Marmota does not propose excluding specific individual countries beyond the above structural change, because the primary integrity risk arises from the grouping/overlap structure rather than any single clearly erroneous country entry based on the draft’s data presentation. Marmota supports differentiating applicable fleets where technically and methodologically justified (e.g., BEV/PHEV applicable fleet for AC L1/L2 vs BEV-only fleet for DCFC), consistent with VMD0049’s requirement to assess inclusion for each applicable fleet independently when projects include multiple charger types. However, we have concerns with the draft’s charger-type-specific positive list thresholds because the screening metric remains EV penetration (stock/sales) rather than charger deployment, charger utilization, or charger economics. Verra provides a qualitative rationale in Appendix A (DCFC may enable longer-distance travel and accelerate adoption; AC is common earlier), but does not provide sufficient quantitative justification for the specific 2.5% vs 5% threshold split for AC vs DCFC. Requested edits (acceptable compromise with conditions): If Verra retains charger-type differentiated thresholds, Verra should: publish the quantitative basis for the threshold calibration (including sensitivity and conservativeness rationale); and	

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		ensure the decision rule for “stock share vs sales share” is explicitly defined as a proxy/availability rule (not a permissive alternate test where both values exist). Absent this justification and clarity, Marmota recommends returning to the prior simpler approach used in VMD0049 v1.0—i.e., a single, consistent penetration threshold applied uniformly—because it is more transparent, reduces interpretive variance, and better supports consistent treatment across project types and vintages.	
12	Foreseeson Technology Inc	We note that the updated Table 1 and Table 2 now include several ‘regional groupings’ of countries; ‘North America’, ‘Middle East and Caspian’, ‘Central and South America’ and ‘Asia Pacific’. By comparison, v1 of VMD0049 only included individual countries. We are not supportive of including these ‘regional groupings’ in Table 1 or 2 as such groupings hide inter-country variation in EV stock share rates and/or availability of stock share data, which in turn could enable projects to be registered that do not meet the additionality criteria in VMD0049. We note, for example, when considering EV buses that Table 2 includes both ‘USA’ and ‘North America’ (of which USA is clearly a part) with different data presented for each entry. North America also includes Canada and Mexico, but neither country is included in Table 2 for EV buses. It is therefore not clear if Canada or Mexico are on the positive list, or not? We believe that Verra should exclude any regional groupings from Table 1 and 2 to improve the clarity and integrity of the positive list approach, ensuring that it maintains the ISO 14064 principles of relevance and accuracy, as well as consistent treatment of projects across different countries, and consistent treatment of projects registered under v1 and v2 of this Methodology. To support the rapid scaling of grouped projects (which are critical for cost-effective deployment of EV charging carbon finance), we recommend permitting sub-national (state/province-level) assessment for heterogeneous jurisdictions such as the United States, Canada, India, and Brazil.	Thank you for the comments. 1) We adjusted the list to provide more clarity on countries included and introduced a US state-level list. Subnational assessment can be done through a revision to the positive list. 2) The list does not differentiate between BEVs and PHEVs. The differentiation is related to the project charger

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		National averages mask material intra-country differences (e.g., California EV sales share >25% while many U.S. Midwest states remain <5%). Official, publicly available datasets already exist (U.S. DOE Alternative Fuels Data Center, Natural Resources Canada, etc.) and are referenced elsewhere in VM0038. Allowing sub-national application would reduce transaction costs, accelerate registration and issuance, and enable efficient grouping of sites without compromising additionality. Given the rapid evolution of global EV markets, we suggest Verra commit to annual updates of the positive list using the IEA Global EV Data Explorer as the authoritative source. We are not against the Methodology allowing for differentiation between BEVs and PHEVs in terms of additionality (i.e. allowing project additionality to be separately assessed for BEVs and PHEVs reaching the same common practice threshold); however, we do not believe that the data being used to develop the positive lists is appropriate for this purpose. The positive list in Table 1 is based on IEA data for overall electric vehicle (EV) stock share or sales share data and this data does not differentiate between charger types nor between vehicle types that could/not use AC vs DC chargers. Differentiating between chargers on the basis of this IEA data therefore does not make sense and distorts the basis for evaluating the additionality of different projects. As this risks the positive list approach violating the ISO 14064 principles of accuracy and relevancy, the VCS Program Standard v5.0 requirements for robust and transparent additionality assessment, as well as raising concerns regarding the consistency with which projects would be treated, we do not agree with this differentiation.	type AC vs DCFC. We introduced further data and assessments in the appendix to better clarify the differentiation and thresholds. Further differentiation between BEV and PHEV could be used for a more granular assessment at country level in a future revision

Q2: VM0038: Do you consider the thresholds under the applicability conditions of the methodology appropriate? Do you agree to differentiate AC chargers from DC fast chargers? If you propose any change, please also provide your rationale and sources of information. (Q13-23)

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#	Organization	Comment	Verra's Response
13	Firefly GHG Consulting	It is difficult to assess the appropriateness of the proposed thresholds because (a) the draft Methodology (VM0038) and the draft Tool (VMD0049) apply inconsistent approaches, and (b) no robust rationale or supporting evidence is provided to justify changes from the thresholds used in v1 of the Methodology. Notwithstanding these limitations, several substantive concerns arise from the proposed revisions. 1) Inconsistent thresholds between VM0038 and VMD0049 Draft VM0038 (Section 4, Applicability Conditions) states that a project is eligible if either: (a) the host country is included on the positive list in VMD0049; or (b) EV market penetration is below both the stock share and sales share thresholds specified in VM0038 (5% stock / 20% sales for AC chargers, and 7.5% stock / 30% sales for DCFC chargers). By contrast, VMD0049 defines eligibility based on either stock share, or sales share where stock data are unavailable. In addition, the thresholds in VMD0049 are significantly lower (2.5% stock / 10% sales for AC chargers and 5% stock / 20% sales for DCFC chargers). Under option (a), projects may rely on stock data alone (or sales data if stock data are unavailable). Under option (b), projects must demonstrate compliance with both stock and sales thresholds, yet these thresholds are less restrictive than those used under option (a). These variances introduce unequal treatment of projects and violate the principle of methodological consistency. No justification is provided for these divergent approaches. Recommendation: VM0038 and VMD0049 should be revised so that all projects are subject to a single, consistent set of thresholds, ensuring the Methodology meets the ISO	Thank you for the comments. The thresholds in VM0038 are for applicability conditions while those in VMD0049 are for additionality, and therefore stricter. They serve different purposes: eligibility vs additionality. The previous uniform threshold was not considered appropriate for the activity type and did not consider the different services AC and DCFC provide. AC and DCFC have different costs and challenges, and IEA reports on the differences and impact. Stock share is a lagging indicator. Data shows that when a country reaches ~5% stock share, EV

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		14064 principle of consistency. 2) Inconsistent thresholds between vehicle types Version 1 of the Methodology applied a uniform 5% common practice threshold across all vehicle types. The proposed revisions introduce differentiated thresholds between HDV buses and trucks, and between vehicles using AC versus DC fast chargers. The only justification offered is that AC chargers and EV buses are “more common” or “evolve faster.” This rationale is not relevant to the purpose of the threshold, which is to determine whether EV deployment constitutes common practice. No evidence is provided to demonstrate that common practice should be defined at different penetration levels for different vehicle types. Recommendation: A single common practice threshold should apply across all vehicle types (HDV buses, HDV trucks, and LDVs) to ensure consistency with the ISO 14064 principle of methodological consistency. 3) Introduction of a 2.5% threshold in VMD0049 The proposed reduction of the common practice threshold to 2.5% for AC chargers and EV buses represents a significant departure from the 5% threshold applied in v1. No evidence is provided to support the claim that a 2.5% penetration rate reasonably represents common practice (it is highly unlikely anyone would describe commuting to work by bicycle as ‘common practice’ if only 2.5% of people do so!). A 5% threshold is already conservative and should be applied consistently. Recommendation: The common practice threshold should remain at 5%, as in v1 of the Methodology, in line with the ISO 14064 principles of conservativeness and consistency.	sales are ~30%, which is a clear indication that EVs are already moving forward. The list does not differentiate between BEVs and PHEVs. The differentiation is related to the project charger type AC vs DCFC since they serve a different purpose. DCFCs enable more sales when compared to AC chargers. We introduced further data and assessments in the appendix to better clarify the differentiation. Further differentiation between BEV and PHEV could be used for a more granular assessment at country level in a future revision

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		4) Differentiation between AC and DC fast chargers Version 1 of VMD0049 did not distinguish between AC and DCFC chargers. The proposed revisions apply different thresholds but the IEA EV stock and sales data used in Table 1 do not distinguish between charger types, nor do they differentiate between BEVs and PHEVs. Applying different thresholds to identical underlying data is arbitrary and logically inconsistent. If differentiation between BEVs and PHEVs is intended, then data that clearly distinguishes between these vehicle categories would be required. Recommendation: In accordance with the ISO 14064 principles of accuracy and relevancy, Table 1 of VMD0049 should not differentiate between AC and DC fast chargers, as the current data does not support this distinction.	
14	Eco Sustainability	1. Evaluation of Applicability Thresholds The current thresholds are largely outdated and fail to reflect the massive scaling of the global EV industry. The 60,000 tCO₂e Scale Threshold (Section 4, Condition 5): Critique: This threshold limits "large-scale" projects to Annex I countries or those with EIA data. This is a legacy of 1990s-era CDM logic. In 2024/2025, countries like India, Brazil, and Vietnam have highly credible national statistics and massive EV deployments that should not be constrained by "small-scale" administrative hurdles. The 5% Penetration Threshold (via VMD0049): Critique: Using "Total Fleet on the Road" is a lagging indicator. Due to the 15+ year lifecycle of vehicles, a country could be deemed "additional" even if 40% of its new car sales are electric. This allows for the issuance of credits for activities that have already reached market maturity. 2. Differentiation of AC vs. DC Chargers	Thank you for the comments. 1) The 60k limit was removed as a general cap in the revised version but kept only for flexibility to small projects. The threshold for AC was set to 2.5% in the module and kept at 5% for DCFC since they serve a different purpose (allow longer distances to be driven). 2) Agree 3) A. Already part of v1.1 3) B. Agree that a van has a different consumption profile than

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		I agree strongly with differentiating these technologies, but VM0038 must evolve to assess their additionality independently. Current State: VM0038 differentiates them mainly through Default Factors (Appendix 1) and fleet eligibility (PHEVs are limited to AC; DCFC is BEV-only). The Case for Deeper Differentiation: Additionality should be assessed separately. In many urban centers, Level 2 AC charging is now "Common Practice" and often legally mandated in building codes for new developments. In contrast, High-power DC Fast Charging (DCFC) remains a high-cost (50k–150k+), high-risk investment that requires carbon finance to achieve a viable ROI. 3. Proposed Changes to VM0038 A. Shift Scale Eligibility to "Data Credibility" Change: Allow any country with a "Tier 1" national statistics rating or verified IEA data to host large-scale projects (>60,000 tCO₂e), regardless of Annex I status. Rationale: Geopolitical status is an obsolete proxy for data quality. Carbon markets must rely on scientific robustness and data integrity to scale. Source: ICVCM Assessment Framework, Section 4 (Scientific Robustness). B. Update Baseline Comparability for HDVs (Section 4.2) Change: Revise the "Comparable Fleet" definitions for heavy-duty vehicles to distinguish between long-haul and last-mile delivery. Rationale: VM0038 assumes a general diesel truck baseline. However, a last-mile e-van has a vastly different fuel profile and displacement impact than a long-haul semi-truck. Source: The International Council on Clean Transportation (ICCT) (2023): "Comparison of Real-World Fuel Consumption of Diesel and Electric Heavy-Duty Vehicles."	a truck. The applicable fleet and average performance parameters must be determined as part of the methodology on a project basis. 3) C. Thank you for the suggestion. We may consider this in a future revision. 3) D. Thank you for the suggestion. Avoided curtailment is an important mitigation measure but a completely different business than EVs replacing fossil vehicles.

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		C. Mandatory "Smart Charging" (V1G) Adjustments Change: Require the use of Equation 5 (Time-of-Day estimates) for any project utilizing smart-charging software. Rationale: Charging at peak-demand (high carbon intensity) vs. off-peak (high renewable mix) creates vastly different project emissions (P Ey PE y). Static annual grid averages are no longer accurate for sophisticated charging networks. Source: IRENA (2019/2023 Update): "Innovation Landscape for a Renewable-Powered Future: Smart Charging for EVs." D. Inclusion of "Grid Services" (V2G) in Calculations Change: Explicitly allow for credits generated by "avoided curtailment" when EVs act as grid storage. Rationale: The current methodology only tracks "miles driven." However, the carbon value of an EV also lies in its ability to soak up excess renewable energy that would otherwise be wasted. Source: Verra's "Methodology for Grid-Scale Energy Storage Systems" and the VCS Standard v4.7 Principle of "Environmental Integrity."	
15	Motion Energy	Motion Energy does not consider the thresholds at s.4(1)(b) to be adequately justified as currently set. The methodology applies a 5% EV stock share ceiling for AC chargers and 7.5% for DCFCs, above which projects are excluded from the methodology entirely	Thank you for your comments.

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		regardless of their additionality position. No empirical evidence is offered in the draft to demonstrate that these specific values represent the point at which the shifting effect identified in Appendix 4 becomes material. Both thresholds fall within the Early Adopter segment as defined by Rogers (2003), well before the transition to mainstream diffusion that Moore (2014) identifies at approximately 15 to 16% cumulative market share. At these penetration levels the market remains infrastructure-led, which is precisely the condition under which the shifting effect is least likely to be material. Motion Energy requests that Verra provide the empirical basis for the specific threshold values chosen and consider increasing them accordingly. Motion Energy also notes that a binary applicability exclusion is a disproportionate mechanism for what is fundamentally an uncertain risk. The shifting effect is more likely in mature markets but is not inevitable, and its magnitude varies by context. Conservativeness deductions or enhanced monitoring requirements calibrated to penetration level would be a more proportionate response than excluding projects entirely. Finally, the shifting effect argument does not apply to closed network projects, where the applicable fleet is constrained to a specific, identified and documented subset of EVs. Existing EVs from the broader market cannot access closed network chargers, and the Dy discount factor in the net reductions equation already exempts closed and private networks from double counting on the same basis. Motion Energy requests that Verra exempt closed network projects from the s.4(1)(b) thresholds, or provide a specific explanation of why the shifting effect risk is considered material for closed networks given the existing Dy exemption.	We applied a conservative approach to mitigate the risk of shifting effect. The market share thresholds depend on the type of activity. It is not appropriate to use one overall single value. Further data and analysis were included in the appendix to clarify the thresholds. Thank you for the suggestion to address the risk through a deduction calibrated to penetration levels or enhanced monitoring. We may consider this in a future revision. We agree that closed networks could be exempted from the thresholds in the applicability conditions and revised the methodology accordingly. Thank you.

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#	Organization	Comment	Verra's Response
		Do You Agree to Differentiate AC Chargers from DC Fast Chargers? Motion Energy does not agree to the differentiation between AC and DCFC thresholds as currently proposed. In the absence of empirical evidence demonstrating why the shifting effect becomes material at different penetration levels for AC and DCFC chargers respectively, Motion Energy is not in a position to assess whether the differential is appropriate or justified. More fundamentally, Motion Energy's position is that a binary applicability exclusion is not the appropriate mechanism for addressing the shifting effect risk regardless of where the threshold is set. The shifting effect is not an inevitable outcome at any given penetration level, and its magnitude varies considerably by context. Motion Energy proposes that the binary threshold mechanism be replaced with a framework of conservativeness deductions or enhanced monitoring requirements calibrated to penetration level, which would address the shifting effect risk in a proportionate manner without excluding projects entirely. Verra is requested to undertake and publish the empirical analysis necessary to underpin any such framework before the revision is finalized. Sources: Rogers, E.M. (2003) Diffusion of Innovations, 5th edition; Moore, G.A. (2014) Crossing the Chasm, 3rd edition; VM0038 v1.1 draft, s.4(1)(b), s.8.4 and Appendix 4.	
16	Climate Bridge International	1. With reference to Section 6 (Baseline Scenario), the methodology states that for closed charging networks, the new EVs and baseline vehicles must be 'identified' and that the operating characteristics of both the applicable and comparable fleets must be known and documented. However, it is unclear whether the project proponent is required to document each baseline vehicle individually, for example through vehicle identification numbers, registration records, and vehicle models for every vehicle in the comparable fleet, or	Thank you for your comments. 1) Every individual vehicle must be documented and average data for the aggregated fleet can be used.

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		whether aggregated fleet-level information would be sufficient, such as the total number of baseline vehicles, vehicle types, average age, and typical operating characteristics of the fleet as a whole. Clarification on the required level of detail would be appreciated. 2. With reference to Section 4 (Applicability Conditions), we would like to seek clarification on whether battery swapping stations qualify as eligible project activities under VM0038. If eligible, guidance is requested on how such stations should be classified, specifically, whether they constitute primary charging infrastructure or associated infrastructure for the purposes of this methodology. Additionally, it is unclear whether and how the charger specification requirements defined in the methodology apply to battery swapping systems, given the fundamental operational differences between swapping stations and conventional charging infrastructure. Given the growing prevalence of battery swapping as a viable alternative to conventional charging in certain markets, clarity on these points would assist project proponents in accurately determining the eligibility of such activities. 3. With reference to Section 7.4 (Common Practice Analysis), it is unclear whether this step is intended to assess the common practice of EV charging infrastructure specifically, or the broader common practice of electric vehicle adoption in the project region. This distinction has meaningful implications for the scope and methodology of the analysis required. Furthermore, Applicability Condition 1.b already requires project proponents to demonstrate EV market penetration in the applicable region. It is therefore unclear how Section 7.4 differs in scope and intent from this existing requirement, and whether the two	2) Battery swapping is eligible. The chargers are the primary infrastructure and the batteries, and any renewable energy system are the associated infrastructure. We clarified this in the methodology. 3) The common practice relates to EV charging infrastructure to complement the financial additionality assessment but may include an assessment of the EV adoption. We clarified this in the methodology.

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#	Organization	Comment	Verra's Response
		steps risk duplicating the same analysis. Clarification on the intended distinction between these two requirements would be appreciated, along with guidance on how project proponents should avoid overlap in their submissions.	
17	Amazon Connection Carbon	Amazon Connection Carbon (ACC) considers the proposed thresholds in the applicability conditions of VM0038 to be generally appropriate, and we agree with differentiating AC chargers from DC fast chargers. The two charger types serve distinct functions in the EV ecosystem and therefore should not be treated identically. For AC chargers, the proposed threshold is reasonable because these chargers are more commonly deployed in earlier-stage EV markets and are typically associated with residential, workplace, and destination charging. For DC fast chargers (DCFC), differentiated treatment is also appropriate because these systems play a distinct and much more strategic role: they enable intercity travel, corridor connectivity, commercial operations, and broader market confidence in EV adoption. In many emerging and infrastructure-constrained regions, DCFC is not simply another charger category — it is the core infrastructure that unlocks practical electric mobility. However, ACC recommends two important refinements to the applicability conditions. 1. Allow clearer subnational application of the thresholds The draft already introduces state/province-level consideration for AC chargers where relevant data is available, but this logic should be made more explicit and broader in practice, especially for large and heterogeneous countries.	Thank you for the comments. 1) The methodology already requires the subnational assessment of the applicability conditions thresholds (state or provincial level). Also, if a country is not included in the positive list in VMD0049, the methodology allows demonstrating additionality through a project method at national or subnational level. We clarified a path to include other countries by submitting official governmental data and a MIN request under VMD0049. 2) We agreed, and the methodology and module already recognize DCFC contribution to EV adoption.

Q2: VM0038: Do you consider the thresholds under the applicability conditions of the methodology appropriate? Do you agree to differentiate AC chargers from DC fast chargers? If you propose any change, please also provide your rationale and sources of information.

#	Organization	Comment	Verra's Response
		In countries such as Brazil, national figures can significantly understate the infrastructure gap in underserved territories. Regions such as the Brazilian Amazon face: very limited charging infrastructure; low EV penetration; high logistics costs; and strong dependence on fossil-fuel transport corridors. For this reason, ACC recommends that Verra explicitly allow subnational assessment not only as an exception, but as an accepted and encouraged option where regional disparities are material. This would improve accuracy and prevent frontier regions from being disadvantaged by national averages that reflect only more developed markets. 2. Recognize the stronger enabling role of DC fast charging in frontier markets ACC agrees with differentiating AC chargers from DCFC, but we believe the methodology should go one step further and acknowledge that, in infrastructure-constrained regions, DC fast charging has a disproportionately higher market-enabling effect. In frontier regions, AC chargers alone do not solve the main barrier to adoption. The lack of reliable fast charging along strategic routes prevents long-distance use, logistics applications, and confidence in EV deployment. As a result, DCFC often has stronger additionality and stronger transformational value than AC charging in these contexts.	

Q2: VM0038: Do you consider the thresholds under the applicability conditions of the methodology appropriate? Do you agree to differentiate AC chargers from DC fast chargers? If you propose any change, please also provide your rationale and sources of information.

#	Organization	Comment	Verra's Response
		ACC therefore recommends that Verra: maintain differentiated thresholds for AC and DCFC; preserve eligibility for emerging markets such as Brazil; and clarify that in low-infrastructure regions, DCFC deployment should be treated as a particularly strong indicator of market-enabling and non-common-practice activity. Conclusion In summary, ACC supports the differentiation between AC chargers and DC fast chargers and considers the proposed thresholds broadly reasonable. However, we recommend that Verra strengthen the methodology by: explicitly allowing subnational applicability assessments where regional disparities are significant; and recognizing the particularly important role of DC fast charging in unlocking EV adoption in frontier and infrastructure-constrained regions. These adjustments would improve the accuracy and fairness of the methodology while maintaining environmental integrity.	
18	Anonymous 1	We understand the intent behind tightening the thresholds, and we agree that protecting environmental integrity is important. However, the proposed reduction of the AC charger threshold to 2.5% feels a bit too blunt for how infrastructure develops in reality. EV adoption is not uniform within a country. While cities may show strong growth, many areas—especially rural or remote ones—are still constrained by grid capacity. In these	Thank you for the comments. The proposed 2.5% threshold applies to the positive list but does not exclude projects. Projects can demonstrate

Q2: VM0038: Do you consider the thresholds under the applicability conditions of the methodology appropriate? Do you agree to differentiate AC chargers from DC fast chargers? If you propose any change, please also provide your rationale and sources of information.

#	Organization	Comment	Verra's Response
		locations, DC fast charging is often not feasible, either technically or economically. The IEA has pointed out that fast chargers require significantly higher grid capacity and investment, which limits deployment outside urban centers (Global EV Outlook, 2024). This leaves AC charging as the only practical solution in many of these areas. But even then, these projects are not always commercially viable. Low utilization, long payback periods, and continued reliance on support mechanisms are still common. The IEA also highlights that charging infrastructure—especially in early-stage markets—often depends on policy support and financial incentives (Global EV Outlook, 2023–2024). Reaching a national EV penetration rate of 2.5% does not suddenly change these realities. Applying a single national threshold risks oversimplifying the situation and could exclude projects that are still genuinely dependent on carbon revenue—particularly in underserved or grid-constrained regions. We would also welcome more clarity on the basis for reducing the AC threshold to 2.5%. It would be helpful to understand what data or analysis supports the view that AC charging has reached commercial maturity at this level. From what we are seeing across Southeast Asia, that point may not have been reached yet. We agree with differentiating between AC and DC chargers, but the framework could go further. Bringing in additional indicators—such as utilization, cost recovery, or even allowing for regional flexibility where grid constraints are present—would better reflect real-world conditions.	additionality using a project method in countries that are not considered automatically additional. Also, the methodology already requires the subnational assessment of the thresholds for the applicability conditions (state or provincial level). Further data and analysis were included in the appendix to clarify the thresholds.

Q2: VM0038: Do you consider the thresholds under the applicability conditions of the methodology appropriate? Do you agree to differentiate AC chargers from DC fast chargers? If you propose any change, please also provide your rationale and sources of information.

#	Organization	Comment	Verra's Response
		Ultimately, if the goal is to ensure credits are only issued where they are truly needed, then the assessment needs to reflect how these projects actually perform on the ground, not just national averages.	
19	Grutter Consulting and Zeroca	1. Differentiation AC and DC is not considered to be useful. AC public chargers are used for a different purpose and can be very critical to expand EVs especially if home owners do not have a parking space with a dedicated charger. The first wave of EVs is purchased in general by home owners with home chargers. Incentives are required to have e.g. more lamp post or curbside chargers to move the next wave of EVs. 2. The 5% stock benchmark for LDVs is fine. I would refrain from including a sales benchmark and less to formulate it as "or" due to: a). Sales figures are inherently more difficult to get as in general official stats lack. Data is thus far less reliable than reg stats which result in stock data. Some countries e.g. do not register in sales stats the direct vehicle imports which can be very high or only include new vehicle sales and not the import of used vehicles. All vehicles are included in registries thus well established stock data. Sales data no. b). The usage of benchmark 1 OR benchmark 2 gives way for gaming and using the more lenient benchmark. The usage of AND is not recommended due to the inherent difficulty of getting correct and reliable sales data. The experience is that sales data is very difficult to get, whilst stock data is easier c). the 20% average of sales and the 5% of stock do not necessarily match. This assumes basically that LDVs have a life-span of around 12 years. 3. To use a 2.5% stock benchmark for buses and 5% for trucks or LDVs is not considered as justified. It is correct that urban buses have standard routes. Intercity buses, tourism	Thank you for the comments. 1) We agree on 1st and 2nd wave. There is a third wave driven by DCFC to enable longer distances-intercity trips. DCFC have different characteristics (higher costs, different grid infrastructure, etc.) that require a differentiation. 2)a) some countries have statistics on stocks and some others on sales. The methodology includes both to cover all cases. 2)b) "And" is included when there is information on both. If only one data type exists, that is the one to be used. We clarified this in the methodology. 2)c) the relation was based on a regression analysis between stock and sales data from IEA. It is not

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		and other buses which represent in general >80% of bus stocks (the rest being urban public transport buses) might have more or less fixed routes (like LDVs and trucks also) but require a fast charging network and are thus very difficult to electrify, similar to trucks. I would thus suggest to keep 5%. 4. For MCs and 3W the suggestion would be to use also 5% of market stock Overall the suggestion is - a). to maintain for all vehicle categories a 5% market stock as benchmark and not separate levels - b). not differentiate AC and DC - c). Delete the alternative of sales benchmark - d). In case of public and not property (company) charges for HDVs pull together the categories of buses and trucks to HDVs as they use the same chargers and charging infra and face the same problems. The stock share would be 5% which should be calculated by summing EV trucks plus EV buses / total trucks plus total buses (not the average share of the 2 vehicle categories) - e). Either update through Verra the positive list each year or then request the PP to use the latest available data but not older than 2 years for EV stock data available at time of validation. - f). Include explicitly MCs/3Ws	based on assumed lifespan. Further data and analysis were included in the appendix to clarify the thresholds. 3) Thank you for the suggestion. Intercity buses have more standard routes than trucks. E buses have demonstrated higher penetration rates than trucks and we introduced a differentiation to account for this. A project method can be applied for cases that are not included in the positive list. 4) Thank you for the suggestion. 2/3w are considered under AC chargers for the applicability conditions and the 5% stock share applies.
20	Climate Neutral Business Network	See general comments below including 6.New AC 4(1)(b) caps on additionality eligibility	Thank you for the comments. Please see responses to general comments.

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	(CNBN) on behalf of Connecticut Green Bank and other clients	a.Verra proposes to introduce an across-the-board cap on additionality eligibility set at 5% for AC and 7.5% for DCFC, regardless of the financial additionality status applicable at that time and without any basis for appeal. While stakeholders recognize that carbon capital is designed to be accessible for a limited period of time (and prior notice of such a cut off threshold is appreciated), this approach: - i.Has not been given any justification or supporting analysis by Verra which appears a particularly serious omission for such a sweeping new provision - ii.Sets unduly constrained limits situated below the early adopter segment boundary developed by Rogers (2003) and well before the chasm identified by Moore (2014) at 15-16% . - iii.Provides no basis for PP appeal or further justification b.This approach again creates unwarranted jeopardy for existing PPs which relied upon VM0038 v1.0 for their investment decisions. Crediting periods of 21 or 30 years were approved at validation. Regardless, this provision appears to preclude any VCU issuance once this threshold is reached. As a result, Verra's validation decisions can apparently not be trusted or relied upon as time passes – unless Verra clarifies, similarly to # 7 (In Q3 response above), that this provision does not apply to instances validated prior to the publication of VM0038 v 1.1.	Registered projects can continue crediting for the rest of the crediting period using previously approved versions.
21	NA	The thresholds are generally appropriate, but they should be reviewed to reflect real-world usage variations, especially in high-frequency sectors like urban delivery. Suggested Change: Introduce flexible or activity-based thresholds (e.g., based on utilization or energy	Thank you for the comments and the suggestion. We may consider it in a subsequent revision.

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		dispensed rather than fixed limits). Rationale: Fixed thresholds may not capture the high utilization of EVs in commercial applications (e.g., gig delivery fleets), leading to underestimation of emission reductions. More dynamic thresholds would improve accuracy and scalability. Yes, differentiation between AC and DC fast chargers is necessary. Rationale: AC chargers: lower cost, slower charging, lower utilization DC fast chargers: higher cost, faster charging, higher utilization (especially for commercial fleets) Without differentiation, emission reductions and additionality may be misrepresented. DC chargers typically enable greater emission reduction due to higher usage intensity.	
22	Marmota Solutions Inc.	Marmota supports the concept of adding a market-penetration-based applicability condition to strengthen integrity and ensure that work proceeds under a positive list or via a robust project-method pathway as markets mature. That said, the current draft implementation requires revision for internal consistency and practical application:	Thank you for the comments. 1) Thank you for identifying the typos. Those were corrected. 2) and 3) The thresholds in VM0038 serve a different purpose than the positive list in VMD0049.

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		1. Correct internal cross-references (must-have): VM0038's applicability condition incorrectly refers to the positive list of "VMD0048"; it should reference VMD0049. VM0038's additionality section also contains "VM0049" where VMD0049 is intended. These errors should be corrected in final text to avoid validation disputes and inconsistent implementation. 2. Align sales-share logic across VM0038 and VMD0049 (must-have): VM0038's applicability condition requires that EV market penetration be below both the stock-share and sales-share thresholds (e.g., AC: 5% stock and 20% sales; DCFC: 7.5% stock and 30% sales). By contrast, VMD0049 v2.0 explains that sales share is used as a proxy when stock share data are not available (supported by regression analysis), yet the normative table headings use an "or" phrasing that could be misread as permissive even when stock data exist. Verra's prior VMD0049 "new regions/update" guidance similarly describes sales-share as a conservative alternative test used when stock data are not readily accessible, with stock share remaining the determinative metric. Requested edit: Rewrite VM0038's "below both" requirement to match the proxy rule:	The thresholds in VM0038 are for applicability conditions while those in VMD0049 are for additionality, and therefore stricter. They serve different purposes: eligibility vs additionality. We introduced further data and assessments in the appendix to better clarify the differentiation and thresholds.

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		• Use stock share where available; • Use sales share only where stock share is unavailable (with explicit documentation requirements for the data-availability determination). 3. Clarify the relationship between VM0038 applicability thresholds and VMD0049 positive list thresholds (must-have): VMD0049's thresholds for AC/DCFC (2.5%/10% and 5%/20%) and VM0038's separate applicability thresholds (5%/20% and 7.5%/30%) create a two-tier gating system, but the drafts do not provide an explicit narrative explaining the intent and how proponents should interpret the two tiers. This is likely to cause inconsistent application by VVBs and proponents. We also note that a 2.5% threshold is too low to be considered common practice and that Verra should maintain the 5% threshold used in v1 of the Methodology. Requested edit: Add explicit explanatory text stating whether VM0038's thresholds are intended as: • a "project-method eligibility gate" (i.e., where positive list fails, VT0008 is allowed only in lower-penetration markets), and why those thresholds are calibrated at those values; or • a different integrity mechanism.	

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		This clarification is essential for transparency and consistency. Marmota does not object in principle to differentiated treatment by charger type where it reflects genuine differences in additionality drivers and baseline dynamics; however, the current drafts implement differentiation in ways that are not yet sufficiently justified or harmonized across VM0038 and VMD0049. Requested approach (acceptable compromise): • Verra may retain differentiated thresholds only if it (i) publishes quantitative justification, and (ii) harmonizes the stock/sales proxy logic and threshold narrative across both documents so that implementers can apply requirements consistently. • Otherwise, Marmota recommends reverting to a single, uniform penetration threshold to reduce ambiguity and maintain consistent treatment across projects.	
23	Foreseeson Technology Inc	No. We agree with the original 5% threshold used under v1 of this Methodology which was applied to all project types equally. This was both conservative and applied consistently. By contrast, under the proposed modifications, there appear to be several changes to the applicability thresholds and how they are applied, and Verra has not provided any explanation or rationale for these changes. These changes appear to be both inconsistently applied and to treat different projects inconsistently, and we do not therefore agree with the changes. Specifically, we note that the proposed VM0038 is applicable where either the project is in a country in the positive list in VMD0049, or where “the EV market penetration is below	Thank you for your comments. The thresholds in VM0038 and VMD0049 are different because they serve different purposes. The thresholds in VM0038 are for applicability conditions while those in VMD0049 are for additionality, and therefore

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		both the market share and EV sales share thresholds specified below". VMD0049, however, states that the positive list is for countries that meet the market share or sales share "where data on stock share is not available". It therefore appears that there are to be inconsistent rules for applicability depending on the approach taken – using VMD0049, only the stock share must be met, with sales share as an alternate; under VM0038 both the stock share AND sales share must be met. Similarly, the applied thresholds for considering an activity to be additional are inconsistent. VM0038 includes 5% stock share or 20% sales share for AC chargers and 7.5% stock share or 30% sales share for DCFC but VMD0049 includes 2.5% stock or 10% sales for AC and 5% stock or 20% sales for DCFC. Not only is this inconsistent between documents but we do not support the principle of different thresholds for different vehicle types. This also applies to the inconsistent threshold proposed for buses compared to HDVs. Rather, in line with the ISO 14064 principle of consistency, all projects developed under the VM0038 Methodology should be treated the same way to ensure they meet the same thresholds for integrity. In addition, we strongly disagree with reducing the eligibility threshold from the previous 5% in v1 of this Methodology down to the proposed 2.5% for AC chargers or for buses that is in VMD0049. This would be a very low threshold for adoption that will limit the practical application of this Methodology and prevent it from being used in developing markets that still require support. 5% is already conservative. Furthermore, changing the threshold now would unfairly penalize projects in development compared to those that are already registered, and would therefore be against the ISO 14064 principle of consistency. As previously stated, we are not against the Methodology allowing for differentiation between BEVs and PHEVs in terms of additionality (i.e. allowing project additionality to be	stricter. They serve different purposes: eligibility vs additionality. We introduced further data and assessments in the appendix to better clarify the differentiation and thresholds. Further differentiation between BEV and PHEV could be used for a more granular assessment at country level in a future revision.

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		separately assessed for BEVs and PHEVs reaching the same common practice threshold). However, to meet ISO 14064 principles, this would have to be done fairly and consistently, based on relevant data that is able to support the conclusions being drawn. We do not believe that the IEA data is appropriate for this purpose as it does not present a breakdown by EV type, therefore this risks the relevance and accuracy of the Methodology. We also firmly believe that all projects should be evaluated on an equal basis and should use the same 5% threshold that was used in v1 of the Methodology. There is no rationale to support the concept that 'common practice' for one charger or vehicle type ought to be established at a different % threshold of stock share than for any other. Changing the threshold now would unfairly penalize projects in development compared to those that are already registered and would be against the principle of consistency. The same logic applies directly to the proposed differentiation of AC chargers from DC fast chargers in VM0038: the IEA dataset provides no charger-type segmentation, rendering the tiered thresholds (5%/20% for AC versus 7.5%/30% for DCFC) unsubstantiated. We therefore do not agree with this differentiation.	

Q3: Is there any other comment or suggestion you would like to share? If yes, please provide your rationale and sources of information. (Q24-34)

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#	Organization	Comment	Verra's Response
24	Eco Sustainability	1. Integration of Digital MRV (DMRV) and Automated Reporting Suggestion: Transition from manual data submission to automated, API-based monitoring using the Open Charge Point Protocol (OCPP). Rationale: Manual reporting of kWh delivered is prone to human error and high administrative costs. Since most "smart" chargers already communicate via OCPP, the methodology should allow for direct data feeds into registry systems. This increases the "transparency" and "immediacy" of credit issuance. Source: World Bank (2022) "Digital Climate Finance: A Guide to Digitizing MRV"; Gold Standard "Digital MRV Principles." 2. Implementing "Charging Desert" Additionality Suggestion: Introduce a "Sub-regional Positive List" for underserved communities, even if the national average exceeds 5%. Rationale: Under the current VMD0049, if a country like China or the US hits 5% penetration, the whole country moves to the negative list. However, rural areas or low-income urban "charging deserts" still face massive financial barriers. Credits should be allowed in these specific zones to promote social equity (Just Transition). Source: U.S. Department of Energy (DOE) Justice40 Initiative (defining criteria for underserved energy communities); ICVCM Core Carbon Principles (Social and Environmental Safeguards). 3. Dynamic Emission Factors for Grid Impact Suggestion: Move from "Static Annual Averages" to "Marginal or Time-of-Use" grid emission factors.	Thank you for your comments. 1) Thank you for your suggestion. DMRV is part of a separate workstream Verra is already exploring through pilot cases. 2) Thank you for your suggestion. The methodology already requires demonstration of EV share at subnational level. The module does not, but projects may demonstrate additionality through VT0008 or a revision to the positive list. 3) The methodology allows using hourly grid EF consistent with VT0011.

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#	Organization	Comment	Verra's Response
		Rationale: A static annual average grid factor (like eGRID) assumes every kWh has the same carbon impact. In reality, charging during peak hours (when fossil fuel "peaker" plants are running) is more carbon-intensive than charging at noon (when solar is abundant). Using dynamic factors encourages "carbon-aware" charging behavior. Source: WattTime.org "Marginal Emissions Methodology"; Google "Carbon-Aware Computing" Framework. 4. Accounting for "Battery Second-Life" and Circularity Suggestion: Provide credit "bonus" or extended crediting periods for projects that utilize repurposed EV batteries for on-site "Associated Infrastructure" (AI). Rationale: VM0038 allows for on-site batteries. If a project uses "Second-Life" batteries (recycled from older EVs), it significantly reduces the embodied carbon of the project. The methodology should reward this circular economy approach to lower the overall lifecycle footprint. Source: McKinsey & Company "Second-life EV batteries: The newest value pool in energy storage"; EU Battery Regulation (2023) (mandating circularity and recycled content).	4) Thank you for your suggestion. We may consider it in a subsequent revision.
25	Motion Energy	Classification of M0222 as a Minor Revision Motion Energy considers that M0222 should be classified as a major revision rather than a minor revision under the Methodology Development and Review Process v5.1 s.2.5.2. The document history of VM0038 v1.1 confirms changes that fall within the programme's own examples of major revision triggers. The Methodology Development and Review Process v5.1 s.2.5.2 footnote 2 lists modifications to the greenhouse gas quantification approach as an explicit example of a major revision. VM0038 v1.1 makes two material changes to the quantification approach. First, the removal of the time-of-day emission factor pathway means that projects which previously applied time-differentiated emission factors, the most accurate available basis for quantifying emissions from EV charging,	Thank you for your comments. The changes introduced are aligned with a minor revision. Hourly emission factors are allowed as shown in the quantification spreadsheet examples and the use of VT0011 is an improvement to ensure standardization. The scope

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		must now apply a single annual average. This is not a simplification that preserves accuracy; it is a change that directly reduces the accuracy of emission reduction quantification for existing and future projects. Second, the adoption of VT0011 as the mandatory source for grid emission factors restructures how the project emissions calculation is constructed, replacing the more flexible data source framework in v1.0 with a standardized tool reference. The introduction of new applicability conditions at s.4(1)(b) further supports major revision classification. These conditions operate as a hard eligibility gate, projects in markets above the specified thresholds cannot use the methodology at all, regardless of their additionality position. This is not a minor expansion of scope or an improvement to procedures. It is a structural change that materially narrows the methodology's applicability and directly affects existing registered projects at renewal. A major revision would require a concept note, independent expert review, and a formal public consultation process. Given the number and significance of the issues raised in this response, and the direct impact of these changes on existing registered projects, Motion Energy respectfully requests that Verra reconsider the classification of M0222 and process it as a major revision. Sources: Methodology Development and Review Process v5.1, s.2.5.2 and footnotes 2 and 3; VM0038 v1.1 draft, Document History. Transition Arrangements for Existing Registered Instances Neither VM0038 v1.1 nor VMD0049 v2.0 confirms the treatment of instances already validated under v1.0 or that existing validated projects may continue to operate. Verra is requested to confirm in the revision documentation and transition guidance that v1.1 of VM0038 and v2.0 of	of the methodology is not expanded, and the introduction of applicability conditions is related to reducing the risk and enhancing the integrity of the methodology. These conditions are not narrowing the scope of the methodology. Projects may register if the country, state, or province is below the threshold, even if the country exceeds it. General transition arrangements are determined in the VCS Standard. Registered projects may continue using the previous version of the methodology. We appreciate the suggestion to include further information. A new section (GENERAL IMPLEMENTATION)

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		VMD0049 apply only to new instances seeking inclusion from the date of publication, and that existing validated instances continue to issue under the rules applicable at their validation. Motion Energy would welcome further information from Verra on transition arrangements more broadly. Sources: VM0038 v1.1 draft, Document History; VMD0049 v2.0 draft, Document History. Availability of Tracked Changes Documentation Verra published a tracked changes version of the VM0038 v1.1 draft during the consultation period, but it did not appear to be available for the full period. A tracked changes document is a valuable tool for identifying what has changed between versions, and its late publication may have affected some stakeholders' ability to respond comprehensively. Verra is requested to ensure all stakeholders are made aware of the tracked changes document's availability, consistent with Verra's principles of transparency and meaningful stakeholder engagement, and to consider extending the consultation period to allow stakeholders a meaningful opportunity to review it and submit or supplement their responses if they wish to do so. ICVCM Core Carbon Principles Motion Energy would welcome Verra's confirmation of whether the revisions proposed under M0222 are intended to bring VM0038 into closer alignment with the ICVCM Core Carbon Principles, and if so, whether Verra is able to confirm the pathway and timeline for VCUs issued under VM0038 to become eligible for CCP labelling.	containing transition guidance was included. Further information on validity of previous version will be published in the methodology webpage. The tracked changes version is a complementary document that Verra decided to issue voluntarily to facilitate the review. The revision is intended to update and enhance the integrity and robustness of the methodology. It covers new VCS requirements, some of which are related to the ICVCM Core Carbon Principles. Verra cannot provide further information on ICVCM assessment and related timelines that are outside its control. As in any other case, Verra has a quantification procedure for

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#	Organization	Comment	Verra's Response
			existing projects wishing to obtain a CCP label once a methodology is approved by the ICVCM.
26	Climate Bridge International	It is noted that Appendix 1 primarily provides default values for the United States and Canada. It is recommended to expand these default datasets to other key regions such as Asia, Africa, and Europe, or alternatively provide regionally representative proxy factors to enhance global applicability.	Thank you for the comment and suggestion. We agree and may consider it in subsequent revisions.
27	3Degrees Group, Inc.	For the new requirement where the "closed charging networks, the new EVs and the baseline vehicles must be identified. The operating characteristics of both the applicable and comparable fleets must be known and documented. The operating characteristics of both the applicable and comparable fleets must be known and documented." In many cases, the exact replaced baseline vehicle may not be possible to identify or may be a combination of vehicles, due to information availability or time since use. The charger may only be usable by a light-duty or heavy-duty vehicle, and the previous protocol version allowed for a comparison to that. Where this information is not known or not verifiable, there should remain a default or comparable size category to use, even with a default applied.	Thank you for your comment. A combination of specific vehicles can be used, and conservative values must be selected in case of ranges.

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#	Organization	Comment	Verra's Response
28	Amazon Connection Carbon	ACC would like to provide three additional suggestions. First, Verra should reconsider the proposed discount factor for open charging networks, or at least narrow its application to cases of clearly demonstrated overlap with separately credited EV fleet projects. Publicly accessible charging corridors are often the infrastructure that enables EV adoption in the first place, especially in emerging and infrastructure-constrained regions. Applying a broad regional discount to open networks may unintentionally penalize the very projects that create market access and intercity connectivity. In the draft VM0038, the discount factor is applied where EV fleet credits have been issued within the project region, while private or closed networks may more easily retain a discount factor of 1.0. ACC suggests that Verra either exempt open public charging infrastructure where no direct overlap is evidenced, or require a more specific functional-market test before applying the discount. Second, Verra should provide additional practical guidance for projects that combine EV charging with associated infrastructure such as on-site solar and battery storage. ACC supports rigorous accounting and traceability. However, the revised draft introduces more complex metering requirements for associated infrastructure, and these may become a disproportionate implementation barrier for distributed projects in frontier markets if not accompanied by clearer examples and simplified acceptable architectures. ACC recommends that Verra publish practical guidance for smaller and phased projects, including cases where associated infrastructure is added later. Third, ACC encourages Verra to explicitly recognize the strategic role of publicly accessible fast-charging corridors in enabling EV adoption. The International Energy Agency notes that access to public charging is key to supporting mass adoption, and that publicly accessible fast chargers	Thank you for your comments. 1) The methodology already requires assessment for the specific project region and fleet. Evidence to demonstrate that there is no overlap is also eligible if properly justified. Another approach may be considered in subsequent revisions. 2) Thank you for the suggestion. We may consider adding more guidance in a separate document as needed or as part of subsequent revisions. 3) The revised version recognizes the different services AC and DCFC can provide.

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#	Organization	Comment	Verra's Response
		along motorways enable longer journeys and help address range anxiety. In addition, a 2025 Nature Communications study found that if designated highways receive fast-charging stations, coverage can increase dramatically across underserved areas, although rural gaps may still remain. These findings support the view that corridor-based DC fast charging has system-level importance beyond the utilization of an individual site and should not be unintentionally disadvantaged within the methodology. ([IEA][1]) Overall, ACC supports the direction of the revision, including the continued eligibility of Brazil in the positive list, but recommends targeted refinements so that the methodology better reflects how EV charging infrastructure is actually deployed in emerging and geographically unequal markets. This is particularly important in regions where public charging availability is itself the main precondition for EV adoption. ([IEA][1]) [1]: https://www.iea.org/reports/global-ev-outlook-2025/electric-vehicle-charging?utm_source=chatgpt.com "Electric vehicle charging – Global EV Outlook 2025"	
29	Anonymous 1	We appreciate the direction Verra is taking. Strengthening integrity and bringing more consistency into the methodology is important, and these updates are a step in the right direction. At the same time, EV charging infrastructure doesn't develop evenly, especially in emerging markets. What we see on the ground is often very different from what national-level indicators suggest. Cities tend to move faster, but many areas—particularly those with weaker grid infrastructure—are still catching up. A bit more flexibility to recognize these differences would go a long way in making the methodology more reflective of reality.	Thank you for the comments. The methodology already requires demonstration of EV share at subnational level. We appreciate the suggestion to apply different approaches. We may

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#	Organization	Comment	Verra's Response
		It may also help to look beyond fixed thresholds alone. In practice, factors like utilization rates and whether projects can actually recover their costs are just as important in determining if an activity is truly commercially viable. These are the things developers deal with day to day, and they can provide a more complete picture of additionality. Another point that would be helpful is greater transparency on how thresholds are set. Understanding the data and assumptions behind these decisions would make it easier for project developers to align and plan accordingly. Finally, given how quickly the EV space is evolving, it may be worth considering a way to review and update thresholds periodically. Markets are moving fast, and having a framework that can adapt over time would help keep the methodology both relevant and credible. Overall, a slightly more flexible and evidence-based approach would better reflect how these projects actually perform on the ground, while still maintaining strong environmental integrity.	consider it as part of subsequent revisions. We introduced further data and assessments in the appendix to better clarify the differentiation and thresholds.
30	Grutter Consulting and Zeroca	1. Definitions: include in applicable fleets explicitly MCs and 3Ws using battery swap or charging infrastructure (AC or DC) (needs to be applied also to the definition of EV. Not including MCs and 3Ws would harm many developing countries and poorer people from moving to Evs. Also, the current existing methodology is being applied in various registered VCS projects also to MCs and 3Ws 2. Definitions: DC charger. It is unclear why this classification is made in different chargers. This is very much company and country-dependent. it is not used thereafter to determine ERs. For monitoring purposes it is suggested to request for each charger the power output (as is already required with the existing meth) but not to create artificial categories 3. Include in applicability conditions also MCs/3Ws and their chargers or battery swap	Thank you for the comments. 1) and 3) We clarified the eligibility of 2/3W under EV and LDV, and battery swapping systems. 2) We agree it may not be needed and was removed from the methodology.

Q3: Is there any other comment or suggestion you would like to share? If yes, please provide your rationale and sources of information.

#	Organization	Comment	Verra's Response
		equipment 4. Baseline scenario eliminate point b. I would suggest following the decision UNFCCC, CDM EB 62 Annex 12 : "the comparability of baseline and project vehicles may also be demonstrated by identifying matching vehicle categories according to an existing national or international standard". Chargers cannot monitor the vehicles charging. Vehicles should be of the same category (EV and fossil). This is also how the current meth is being applied in practice and it would be helpful to have it stated clearly in the meth to avoid ambiguities	4).The comparison of load or passenger capacity is explicitly stated to ensure the appropriate selection of the applicable comparable fleet.
31	Climate Neutral Business Network (CNBN) on behalf of Connecticut Green Bank and other clients	Please see all comments in General Feedback alongside: 1.The "Minor Revision" designation for M0222 masks the major revision changes proposed consistent with the scope for such revisions under Methodology Development and Review Process v5.1 s.2.5.2. a.Changes are proposed not merely to the countries eligible under v 1.0 VMD0049 positive list % thresholds and/or to the US default MPG/AFEC values (which was the scope of revision required at the 5 year anniversary of VM0038's original publication) but instead include inter alia major revisions including a) change to project activity definition; b) removal of time of day ERs calculations; c) dramatic changes in eligible kwh data sources; d) changes in the positive list threshold structure, introducing variances between categories of charging (AC/DCFC), sectors (bus/truck) and a blended stock/flow metric approach; e) new unilateral ceiling caps on additionality eligibility in a newly introduced AC; f) removal of more accurate sub-jurisdictional additionality provisions to determine regions' positive list eligibility b.These revisions are not minor revisions and imperil the continued VCU issuance from certified projects creating investment jeopardy and risking stranded assets. However unintended, when creating stranded assets, revisions do not constitute a "minor revision" of a methodology.	Thank you for your comments. The changes introduced are aligned with a minor revision. We clarified the project definition in the summary for consistency without changing the applicability description, which stated in the previous version <i>"This methodology applies to project activities which install EV charging systems, including their associated infrastructure, in order to charge EV applicable fleets..."</i>.

Q3: Is there any other comment or suggestion you would like to share? If yes, please provide your rationale and sources of information.

#	Organization	Comment	Verra's Response
		c.If a major revision is to be conducted, the proper process for major revisions should be followed (external experts etc.) per Methodology Development and Review Process v5.1 s.2.5.2 et al. i.If a major revision is to be undertaken, there are serious omissions from Verra's current scope of revisions including further measures to strengthen inventory double counting due diligence which are essential. 7.Based upon communications during the methodology revision process, projects' full crediting periods appear at risk of being unilaterally withdrawn from project instances already validated by Verra unless Verra confirms, consistent with its long-term practice, that: a.VM0038 v 1.0 continues to apply to issuance requests from instances validated prior to v 1.1 publication in order to preserve their full crediting period (since these instances were validated into a project at a time when EV penetration rate thresholds were lower per v 1.0 (additionality stronger) for a full crediting period). i.Thus, the status of countries on the VMD0049 v 2.0 positive list does not invalidate on-going VCU issuance for charging instances validated prior to its publication when valid additionality thresholds were applied during validation and were confirmed (once, upfront) to enable VCU issuance across the full remaining project crediting period. b.VM0038 v 1.0 continues to apply to new instances seeking validation which have start dates prior to v 1.1 publication since the VMD0049 v 1.0 positive list applied at the time these instances' investments began operations (e.g. 2023/24/25) i.This application of v 1.0 to these vintages' additionality assessment is comparable to the parallel VCS requirement which stipulates that the financial base rates applicable in the IRR % calculations for financial additionality testing be sourced from the same year as the new instances' start dates/inclusion into a grouped project (ie be time matched)	Hourly emission factors are allowed as shown in the quantification spreadsheet examples and the use of VT0011 is an improvement to ensure standardization. Sources of electricity are enhanced but we introduced transition guidance for existing projects. The scope of the methodology is not expanded, and the introduction of applicability conditions is related to reducing the risk and enhancing the integrity of the methodology. These conditions are not narrowing the scope of the methodology. Projects may register if the country, state, or province is below the threshold, even if the country exceeds it.

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#	Organization	Comment	Verra's Response
		ii. At a minimum, PPs should be able to bring forward data to demonstrate that during these years, the applicable % threshold conditions were met (see #16). For example, for 2022 through 24 the US Alternative Fuels Data Center has penetration across the US for all EVs (BEV and PHEV) as less than 2.5% (0.5% for PHEV, 1.6% for BEV, so 2.1% for all EVs by 2024) 1. https://afdc.energy.gov/transatlas#/?view=percent&fuel=ELEC&year=2024 c.v 1.1 applies only to validation assessment of new instances with 2026 and later start dates consistent with the threshold data applicable in v 1.1 We understand that these commitments are consistent with Verra's long time practice but we were unable to confirm these understandings during the discussions regarding the VM0038 v1.1 minor revisions so we are raising these commitments again to be confirmed by Verra. 15. Consistent with #7 above, VMD0049 does not make it clear that v 1.0 thresholds apply to instances seeking validation whose start dates are consistent with the time period when v 1.0 was a) applicable; b) most accurate See other comments in General Feedback (numbered #1- 17) In Conclusion: It is abundantly clear from the above feedback that the scope of the VM0038 revisions that Verra is proposing in the M0222 consultation do not represent minor changes but a major restructuring of the methodology. The major changes impact dozens of registered projects and partners validated over the last eight years since VM0038 was published, and will result in significant stranded assets unless the problematic revisions are reversed and Verra provides	General transition arrangements are determined in the VCS Standard. Registered projects may continue using the previous version of the methodology for the rest of their crediting period.

Q3: Is there any other comment or suggestion you would like to share? If yes, please provide your rationale and sources of information.

#	Organization	Comment	Verra's Response
		assurances that the publication of VMD0049 v2.0's new list of eligible countries will not unilaterally cancel previously validated project instances' eligibility to continue to seek VCU issuance throughout their full crediting period and introduce new instances whose start dates align with the positive list in force at the time of their start dates (v 1.0 for 23/24/25 instances). The scope of the minor revision which VM0038 required at its five year publication anniversary was updates to determine which countries were still eligible under the v 1.0 VMD0049 positive and updates to the default MPG and AFEC default factors. Instead Verra has dramatically restructured the positive list approach: it has introduced arbitrary new threshold limits for VCU issuance (for LDV AC and HDV ebus segments at 2.5% market penetration) without any analytical justification at a level that is inconsistent with widely recognized, published sources which establish much higher boundaries for early adoption thresholds (Rogers, Moore and Gold Standard). Verra's combined application of both stock and sales metrics also results in needless internal inconsistencies in the v2.0 positive list (e.g. US L2) and lacks the clarity and nuance across segments adopted by other certifiers. Stranded assets result unless Verra confirms that projects already validated under 1.0 (when additionality credentials very extremely strong) can continue to issue VCUs for instances validated prior to v 1.1 publication throughout their original, validated crediting periods even in countries now deemed to no longer be on VMD0049 v 2.0 positive list. Compounding these unjustified restrictions, Verra has also even failed to apply VM0038 v1.0 and v 1.1 required procedures when applying appropriate applicable fleets to the calculation of positive thresholds for DCFCs (namely BEVs only) resulting in premature deletions of countries' DCFC eligibility from the positive list. The removal of the DCFC default efficiency factor is	

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		similarly restrictive to the point that it undermines entities other than those sourcing smart charger data (for ED and EC) impacting their eligibility including even Verra's newly introduced grid-side metered project data! All these errors must be remedied. However, on a more fundamental level, Verra has also changed a myriad of the methodology's core foundations – which also result, even if inadvertently, in stranded assets. These major foundational revisions include: -the definition of its project activity which limits otherwise essential PP entities across the diverse EV charging ecosystem from eligibility -eliminating the scope of eligible kwh charging data as the key gateways to continued VCU issuance for dozens of projects -the elimination of sub-jurisdictional positive list applications resulting in a stream of false negative results in VMD0049 for states/regions -imposition of new unilateral caps on additionality eligibility, stranding assets for projects which now cannot issue VCUs for their full crediting period despite making investments when additionality conditions were exceptionally strong and validation confirmed credit issuance as eligible for the full crediting period -stripping out all TOD charging provisions at time when electrification technologies need to pay particular attention to how grid stability can be enhanced if their low carbon solutions (including EV charging) are to continue to be more widely adopted. -The appropriation of the intellectual property of VM0038 which was only supplied to Verra under license by EVCCC (hopefully just an inadvertent consequence of using a new VCS methodology template) – again stripping assets from stakeholders' whose contribution to VM0038 was foundational.	

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		These are not minor revisions. They have major impacts on validated projects, risking the suspension of VCU issuance for validated instances and stranding assets seemingly at random based upon inadvertent consequences. At a minimum, Verra has therefore not followed its own procedural requirements for conducting minor revisions as it would expect of any other methodology developer. The proposed M0222 changes are clearly major revisions. Proper procedures and attention must be paid to the serious if inadvertent adverse impacts that the M0222 revisions introduce and further revisions/assurances provided by Verra to avoid unethical stranding of assets for validated projects. On multiple counts, Verra has therefore not followed its own required procedures and has imposed limitations without analytical justification, commentary or consistency with establish publications/peer practices. Serious reconsideration of M0222's proposals is warranted.	
32	NA	Yes, it is recommended to incorporate a usage-based carbon crediting approach for high-frequency electric mobility systems, particularly in gig economy delivery platforms. Suggested Change: The methodology (VM0038) may be expanded to include activity-level emission tracking, such as per kilometer or per delivery-based accounting, instead of relying only on charging infrastructure data. Rationale Current methodology focuses on charging systems, but does not fully capture actual utilization and emission reduction at the vehicle level In sectors like app-based delivery (e.g., Zomato and Swiggy), vehicles operate at very high frequency, resulting in significant cumulative emission reductions	Thank you for the comment and suggestion. We may consider it in a subsequent revision.

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#	Organization	Comment	Verra's Response
		A usage-based model ensures: - More accurate measurement of real emission reductions - Better alignment with ground-level operations - Higher scalability of carbon credit generation Proposed Model (Brief) - Calculate baseline emissions from ICE vehicles (per km/delivery) - Calculate EV emissions based on electricity consumption - Determine net emission reduction per delivery/km - Aggregate reductions across fleet → convert into carbon credits Sources / Basis - IPCC emission factors for fuel and electricity - Carbon Disclosure Project (CDP) guidelines on emission accounting - Observed high utilization patterns in urban delivery systems Conclusion Incorporating activity-based, high-utilization EV models will improve the accuracy, inclusiveness, and real-world applicability of the methodology while enabling scalable carbon credit generation.	
33	Marmota Solutions Inc.	Marmota requests that Verra publish (or reference within the drafts) the quantitative analysis underpinning: (i) charger-type and HDV-mode threshold differentiation, (ii) the calibration of VM0038's higher applicability thresholds vs VMD0049's positive list thresholds, and (iii) the selection and conservativeness of any proxy approaches. While VMD0049 v2.0 Appendix A provides qualitative rationale and a regression correlation range, the drafts do not yet provide sufficient quantitative justification for the specific threshold values and the cross-document inconsistencies, which undermines transparency and risks	Thank you for your comments. The data was extracted from an IEA report and conservative values were selected to ensure robustness. We introduced further data and

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#	Organization	Comment	Verra's Response
		inconsistent application. VM0038 draft allows proof of ownership of emission reductions via agreements with charging system owners and/or direct agreements with EV drivers in closed networks and disclosure in open networks. Marmota supports strengthening this control, but recommends Verra clarify an implementable evidentiary standard aligned with VCS Standard ownership requirements (e.g., ownership arising from contractual rights in the plant/equipment/process generating emission reductions). Requested clarification: • Require enforceable proof of rights/control through the charging system ownership chain (contracts/terms/program rules), as the minimum consistent requirement for all projects; and • Treat direct EV-driver agreements as feasible primarily for closed networks, while allowing disclosure-based controls for open networks (with clear minimum disclosure requirements and audit evidence). This improves legal robustness while remaining practical for public charging contexts. The drafts do not clearly describe an explicit framework for subnational eligibility comparable to VMD0049 v1.0's "smallest region governs" rule and its explicit discussion of concurrent national/subnational/local positive/negative listings (including rural areas). Verra's VMD0049 guidance further states that EV market share data should be updated every five years and provides a cascade approach for national, sub-regional (state), and local (CBSA) determination where variances exist.	assessments in the appendix to better clarify the differentiation and thresholds. A non-exhaustive list of proof of ownership is included to account for country specific regulations and requirements. We clarified EV-drivers agreement for closed networks. Projects that are not located in a country listed in the positive list can apply a project method to demonstrate additionality. We introduced a state-level positive list for the US and clarified the path to include other countries by submitting official governmental data and a MIN to VMD0049. We clarified that VT0011

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#	Organization	Comment	Verra's Response
		Requested edits (must-have): • Reintroduce in VMD0049 v2.0 a clear “smallest region governs” rule and explicit subnational eligibility framework, consistent with VM0038’s new state/province test for AC chargers; and • Define permissible subnational units and evidence standards so project developers and VVBs implement consistently. VM0038 defines the electricity emission factor as following VT0011 and references VT0011 in both the quantification definitions and monitoring tables. VT0011 requires use in conjunction with the most recent CDM TOOL07 and provides OM/BM/CM procedures; for projects increasing electricity consumption from the grid (such as EV charging), VT0011 specifies wOM = 1.0 and wBM = 0.0 (i.e., OM-only). At the same time, VM0038’s monitoring parameter table suggests using published government factors such as EPA regional eGRID emission factors, while also stating “Following VT0011,” creating ambiguity about whether average, regional published factors are deemed compliant with the OM-based VT0011 requirement. This ambiguity should be resolved, particularly because the VCS Standard requires methodologies and any referenced tools/modules to be applied in full (unless an explicit exception applies). Requested edits: Verra should explicitly define an auditable hierarchy for EF determination in VM0038:	must be used for consistency across the VCS Program.

Q3: Is there any other comment or suggestion you would like to share? If yes, please provide your rationale and sources of information.

#	Organization	Comment	Verra's Response
		1. Using published government emission factors as the default, ensuring alignment with national GHG reporting structures, and 2. Where these are unavailable, specifying that project proponents must follow VT0011 to develop suitable emission factors for the project.	
34	Foreseeson Technology Inc	We note that Verra's proposed changes to the Methodology are not supported by any detailed, evidence-based rationale. We believe that any proposed changes to a Methodology, whether by Verra or another party, ought to be clearly explained and justified to meet the ISO 14064 principle of transparency. We note that clause 4) of VM0038 appears to allow for Project Proponents to demonstrate proof of ownership either with an agreement with the charging system owner 'and/or' an agreement with the EV driver. However, to ensure that projects developed under the Methodology can demonstrate full transfer of ownership of any carbon rights, and to ensure consistency between projects, VM0038 must clearly require that all Project Proponents obtain proof of ownership from both the charging station owner and the EV driver. As written, neither VM0038 nor VMD0049 explicitly address the eligibility of projects at a less-than-national level (e.g. states, provinces, territories, etc.). For example, a project in a defined rural geography where there are currently next to no EVs should be eligible (where stock share or sales data is available to support this) even where a country is not on the positive list. This should be enabled by the Methodology as it will support the build out of EV charging infrastructure outside of urban conurbations where the case for financial additionality is strong. This was explicitly addressed in v1 of the Methodology and we recommend that Verra reinstate and clarify explicit provisions for sub-national eligibility in v2. This would ensure transparency for	Thank you for your comments. The data was extracted from IEA report, and conservative values were selected to ensure robustness. We introduced further data and assessments in the appendix to better clarify the differentiation and thresholds. A non-exhaustive list of proof of ownership is included to account for country specific regulations and requirements. We clarified that EV-drivers agreement may be suitable for closed networks.

Q3: Is there any other comment or suggestion you would like to share? If yes, please provide your rationale and sources of information.

#	Organization	Comment	Verra's Response
		all Project Proponents and VVBs, align with the sub-national assessment pathway we recommend under Question 1a for large, heterogeneous jurisdictions (e.g., United States, Canada, India, Brazil), and facilitate grouped projects across diverse geographies. It appears that equation (4) in VM0038 requires that Project Proponents calculate their own Electricity System Emission Factors in line with VT0011. We note that this is an impractical, unnecessary and significant barrier that would make use of this Methodology highly unlikely for most Project Proponents as the data required to do this is typically not available to anyone except governments. We note, however, that the description of $EF_{eli,j,y}$ in Section 9.2. of VM0038 seems to allow for the use of “credible government data sources such as, for the US, the regional eGRID emission factors published by EPA” which appears to be inconsistent with equation (4). To ensure the Methodology is practical, we support the approach in Section 9.2 – to use existing government electricity emission factors – which is consistent with v1 of the Methodology, consistent with national GHG accounting and would meet the principles of relevance and accuracy. We believe that that equation (4) should therefore be amended to make this clear.	The methodology already requires demonstration of market penetration at subnational level. For the module, we introduced a state-level positive list for the US and clarified the path to include other countries by submitting official governmental data and a MIN to VMD0049. Projects that are not located in a country listed in the positive list can apply a project method to demonstrate additionality. We clarified that VT0011 must be used for consistency across the VCS Program.

GENERAL FEEDBACK

General Feedback				
#	Organization	Section	Comment	Verra's Response
35	Eco Sustainability	VM0038 - 1) Summary Description	Feedback: The methodology correctly identifies the core value of EV charging as the displacement of fossil fuel emissions. It effectively bridges the gap between electricity metering and transport services. Critique: It treats EVs solely as "consumers" of energy. In the current energy transition, EVs are increasingly "grid assets." The summary does not account for the carbon value of grid balancing or peak-shaving (V2G/V1G). Source: IEA (2024) Global EV Outlook 2024 (discussing the integration of EVs into power systems).	Thank you for the comment. The contribution of EV as grid asset is considered a co-benefit of the project but not accounted for in the quantification.
36	Motion Energy	VM0038 - 1) Summary Description	VM0038 v1.1 describes the project activity inconsistently across the document. The summary description at s.1 states that emission reductions are achieved as a result of the availability of project charging infrastructure, whereas the applicability conditions at s.4 retain the original formulation — reductions achieved as a result of the electricity delivered by project chargers, and Appendix 4 confirms that baseline emissions are determined based on the monitoring of the electricity supplied to EVs. We view the electricity delivered formulation as the correct one, as it is the basis upon which the entire quantification framework is constructed. The availability framing at s.1 risks implying that credits arise from infrastructure deployment rather than from verified charging activity, which is not how emission reductions are calculated. Verra is requested to align the language across s.1, s.4, and Appendix 4 to reflect this consistently before the revision is finalized. Motion Energy also notes that the comparability requirements for demonstrating that EV	Thank you for your comments. The language in s.1 regarding 'availability' reflects the broader project objective, while s.4 and Appendix 4 detail the quantification basis. Both formulations are compatible. We confirm that comparability requirements apply to all projects and

General Feedback				
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			models in the applicable fleet are comparable to their fossil fuel baseline vehicles appear in v1.1 in a context that could be read as applying only to projects not on the positive list. Verra is requested to confirm that these comparability requirements apply to all projects under the methodology, including those accessing the positive list, and to make this explicit in the drafting. Sources: VM0038 v1.1 draft, s.1 (p.5), s.4 (p.10), Appendix 4 (p.49).	appreciate the identification of a potential misinterpretation. We clarified the language in the methodology.
37	Climate Neutral Business Network (CNBN) on behalf of Connecticut Green Bank and other clients	VM0038 - 1) Summary Description	10.Probably due to the application of a new methodology template, Verra has misrepresented the status of the VM0038 IP which is not owned by Verra but was licensed to Verra for free to use, display, distribute etc. as VM0038 was first published but whose IP is owned by the consortium (EV Charging Carbon Consortium) which, with CNBN, developed, funded and created VM0038. a.Consistent with VCS' standard "Methodology Element Approval Request" v 3 form which the consortium members completed when providing Verra with these permissions in 2018 b.Please remove the Verra IP ownership claims	Thank you for your comments. Verra acknowledges that VM0038 v1 was developed by the EV Charging Carbon Consortium and licensed to Verra. Intellectual property references already recognize ownership by third parties who have licensed their materials to Verra.
38	Eco Sustainability	VM0038 - 2) Sources	Feedback: The methodology is based on CDM AMS-III.C (v15.0). Critique: AMS-III.C has since been updated (v16.0+), and Verra is moving toward a Consolidated Transport Methodology. Relying on a 2018 version of CDM logic limits the methodology's ability to use modern data-tracking tools (like IoT and Blockchain) for emission verification.	Thank you for your comment. The methodology maintains its reference to AMS-III.C v15.0 for consistency with the original development.

General Feedback				
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			Source: UNFCCC CDM Methodology Booklet (2023 Update); Verra Methodology Development Pipeline.	
39	Firefly GHG Consulting	VM0038 - 3) Definitions	6)Suggested editorial: Use of Terms 'Market Share' and 'Stock Share' – The draft documents use 'market share' and 'stock share' as interchangeable terms; however, it would aid clarity if only one of these terms is used consistently in both VM0038 and VMD0049. Currently, 'EV Market Share' is listed as a defined term in VM0038, but 'Stock Share' is not defined; yet VMD0049 frequently uses 'stock' or 'stock share' to match the terminology of the IEA Global EV Outlook. Recommendation: As the positive list in VMD0049 is critical to the Methodology it would be more logical to align with the term 'stock share' as is used in the IEA Global EV Outlook data. The Definitions in VM0038 should be updated to use 'Stock Share' instead of 'Market Share'. This would improve the transparency of the Methodology.	Thank you for your comment. We revised the language across the methodology to distinguish between sales share and stock share.
40	Eco Sustainability	VM0038 - 3) Definitions	Feedback: Definitions for L1, L2, and DCFC are technically accurate and align with SAE standards. Critique: The DCFC classification ends at 500kW. With the rise of heavy-duty electric trucking, the industry is moving toward the Megawatt Charging System (MCS), capable of 1,000kW+. The definitions need to be expanded to include ultra-high-power charging for freight. Source: CharIN (Charging Interface Initiative) MCS Standard Specifications.	Thank you for your comment. The classification was removed given it was a reference but not used in the methodology.
41	Motion Energy	VM0038 - 3)	AFEC and MPG were named defined terms in the definitions section of VM0038 v1.0 but do not appear as definitions in Section 3 of v1.1, despite remaining key	Thank you for your comments.

General Feedback				
#	Organization	Section	Comment	Verra's Response
		Definitions	variables in Equations 1, 2 and 3. Their omission from the definitions section is unexplained and should be corrected. Additionally, both v1.0 and v1.1 apply a conversion factor of 1 gallon = 3.785 litres in the MPG parameter box without identifying this as the US gallon. The imperial UK gallon is 4.546 litres. This ambiguity predates v1.1 but the revision presented an opportunity to resolve it that has not been taken. For projects outside the US and Canada, applying default MPG values without clarity on which gallon measure applies risks material errors in baseline emissions calculations. Verra is requested to reinstate AFEC and MPG as named definitions in Section 3 and to explicitly label the gallon measure used in MPG default values and conversion factors as the US gallon throughout the parameter tables. Sources: VM0038 v1.0, s.3 and s.9.2; VM0038 v1.1 draft, s.3 (p.6) and s.9.2 parameter boxes for AFEC_{i,y} and MPG_{i,y} (p.23 and p.25).	AFEC and MPG definitions were redundant since those are quantification parameters defined in the respective equations and monitoring tables. We clarified the reference to US gallon.
42	Firefly GHG Consulting	VM0038 - 4) Applicability Conditions	2)Proof of ownership – Project Proponents should be required to demonstrate proof of ownership transfer from both the EV charging station owner and from the EV driver. However, as written, M0222 – Draft revision VM0038, Section 4 Applicability Conditions, Clause 4)., is unclear. The first bullet point within this clause ends in 'and/or'. The second bullet point includes separate requirements for closed versus open charging networks. It is consequently unclear if the Project Proponent must demonstrate proof of ownership with both an agreement with the charging system owner and an agreement with the EV driver, or whether only one of these things is sufficient. Recommendation: Re-write this Clause to ensure that a Project Proponent must have obtained proof of ownership from BOTH the charging station owner AND the	Thank you for your comments. Ownership language was updated. A non-exhaustive list of proof of ownership is included to account for country specific regulations and requirements. We clarified that EV-driver agreements are suitable for closed networks.

General Feedback				
#	Organization	Section	Comment	Verra's Response
			EV driver. 3)Eligibility of sub-national regions within countries not on the Positive List – v1 of VMD0049 explicitly noted that projects could be eligible within particular sub-national regions (e.g. states, provinces, territories, etc.) even where a country is not on the positive list, or was on a negative list. This has been removed from the updated version of VMD0049 but under M0222, VM0038, Section 4, Clause 1b) it would appear to still allow for these situations. However, this is no longer explicitly discussed. It would be valuable to clarify that this is still allowed, as this will be important to supporting the roll-out of EV charging infrastructure in more remote/rural parts of countries that may have lower rates of EV ownership and otherwise would be unable to attract such investment. Recommendation: Include a specific note in VM0038 that projects may be developed at sub-national or lower levels provided that the stock/sales share data is available to match this and that all of the same eligibility thresholds are met. This will improve the transparency of the Methodology for all users.	We introduced a state-level positive list for the US and clarified the path to include other countries by submitting official governmental data and a MIN to VMD0049. VM0038, Section 4, clause 1b refers to applicability conditions but not to the additionality demonstration.
43	Eco Sustainability	VM0038 - 4) Applicability Conditions	Feedback: Condition #5 (the 60,000 tCO₂e limit for non-Annex I countries) is the most significant bottleneck. Critique: This condition unfairly penalizes non-Annex I countries (like India or Vietnam) that have significantly improved their data reporting since 2018. It forces large, high-integrity projects into "small-scale" administrative pathways, slowing climate action. Source: ICVCM Core Carbon Principles (CCPs), Principle 7 (Additionality and Scale).	Thank you for your comment. The 60k limit was removed as a general cap in the revised version but kept only for flexibility to small projects.

General Feedback				
#	Organization	Section	Comment	Verra's Response
44	Motion Energy	VM0038 - 4) Applicability Condition s	Drafting error at s.4(1)(a) (p.10) Section 4(1)(a) of VM0038 v1.1 refers to the positive list of VMD0048. This appears to be a drafting error. The methodology was developed in conjunction with VMD0049 Activity Method for Determining Additionality of Electric Vehicle Charging Systems, and the applicability condition at s.4(1)(a) should reference VMD0049, not VMD0048. VMD0048 is a separate Verra module with no connection to EV charging systems. Verra is requested to correct this reference to VMD0049 before the revision is finalized, either through the approval process or via a simultaneous corrections and clarifications notice. Applicability thresholds at s.4(1)(b) (p.10) Our understanding is that the s.4(1)(b) thresholds are there to address the shifting effect identified in Appendix 4, the risk that in higher-penetration markets, new charging infrastructure may serve existing EVs rather than driving new adoption, overstating fossil fuel displacement. This is a legitimate concern and the rationale is acknowledged. Three issues however remain. First, the rationale explains why a threshold exists, not why these particular values were chosen. Both the 5% and 7.5% stock share ceilings fall within the Early Adopter segment as defined by Rogers (2003), well before the chasm Moore (2014) identifies as the transition to mainstream diffusion at around 15 to 16% cumulative market share. At these penetration levels the market remains infrastructure-led, precisely the conditions under which the shifting effect is least likely to be material. No empirical evidence is offered to demonstrate that these specific values represent the point at which the shifting	Thank you for your comments. We corrected the typo. We applied a conservative approach to mitigate the risk of shifting effect. The market share thresholds depend on the type of activity. It is not appropriate to use one overall single value. Further data and analysis were included in the appendix to clarify the thresholds. Thank you for the suggestion to address the risk through a deduction calibrated to penetration levels or enhanced monitoring. We may consider this in a future revision. We agree that closed networks could be exempted from the thresholds in the

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			effect becomes significant. Verra is requested to provide that basis and to consider increasing the thresholds based on empirical evidence. Second, a binary applicability exclusion is a blunt instrument for what is fundamentally an uncertain risk. The shifting effect is more likely in mature markets but is not inevitable, and its magnitude varies considerably by context. Maintaining applicability while managing the risk through conservativeness deductions or enhanced monitoring requirements calibrated to penetration level, would be a more proportionate response than excluding projects entirely. Thirdly, the shifting effect argument does not apply to closed network projects. VM0038 v1.1 defines a closed charging network as one where the applicable fleet is constrained to a specific, identified, and documented sub-set of EVs. In a closed network the EVs using the chargers are new and known; existing EVs from the broader market cannot access them. The methodology already reflects this logic in the double counting discount factor D_y, which explicitly exempts closed and private networks on the basis that they are not exposed to the risk of serving EV fleets with separately issued credits. The shifting effect rests on the same premise and closed networks are equally immune to it. Applying the s.4(1)(b) thresholds uniformly across open and closed network projects excludes closed network projects in higher-penetration markets on the basis of a risk that simply does not arise in their context. Verra is requested to provide the empirical basis for the specific threshold values chosen and to consider increasing them, noting that both current values fall well within the Early Adopter segment where infrastructure-led market conditions	applicability conditions and revised the methodology accordingly. Thank you. Please refer to the response to section 1.

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			persist. Motion Energy also requests that Verra consider whether conservativeness deductions or enhanced monitoring requirements calibrated to penetration level would be a more proportionate mechanism than a binary applicability exclusion. Verra is further requested to exempt closed network projects from the s.4(1)(b) applicability thresholds, or to explain why the shifting effect risk is material for closed networks given the existing Dy exemption. Internal inconsistency in the project activity definition Please refer to Motion Energy's response to Section 1 above, which addresses the inconsistency between s.1, s.4 and Appendix 4 in full. Sources: VM0038 v1.1 draft, s.4(1)(a) (p.10), s.4(1)(b) (p.10), s.8.4 and Appendix 4 (p.49); VCS Methodology Requirements v5.0, s.2.4; Rogers, E.M. (2003) Diffusion of Innovations, 5th edition; Moore, G.A. (2014) Crossing the Chasm, 3rd edition.	
45	Climate Neutral Business Network (CNBN) on behalf of Connecticut Green Bank	VM0038 - 4) Applicability Conditions	6.New AC 4(1)(b) caps on additionality eligibility a.Verra proposes to introduce an across-the-board cap on additionality eligibility set at 5% for AC and 7.5% for DCFC, regardless of the financial additionality status applicable at that time and without any basis for appeal. While stakeholders recognize that carbon capital is designed to be accessible for a limited period of time (and prior notice of such a cut off threshold is appreciated), this approach: i.Has not been given any justification or supporting analysis by Verra which appears a particularly serious omission for such a sweeping new provision ii.Sets unduly constrained limits situated below the early adopter segment	Thank you for your comments. Please refer to the previous responses that clarify these comments.

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	and other clients		boundary developed by Rogers (2003) and well before the chasm identified by Moore (2014) at 15-16% . iii.Provides no basis for PP appeal or further justification b.This approach again creates unwarranted jeopardy for existing PPs which relied upon VM0038 v1.0 for their investment decisions. Crediting periods of 21 or 30 years were approved at validation. Regardless, this provision appears to preclude any VCU issuance once this threshold is reached. As a result, Verra's validation decisions can apparently not be trusted or relied upon as time passes -- unless Verra clarifies, similarly to # 7 (In Q3 response above), that this provision does not apply to instances validated prior to the publication of VM0038 v 1.1. 9.Other deletions and revisions undermine accuracy, consistency, conservativeness and practicality for highly decentralized technologies managed by multiple entities as PP in EV charging ecosystem a.The requirement to apply comparable fossil fuel vehicles to baseline ER calculations is now positioned in financial additionality baseline scenario section rather than applying across any and all baseline scenario and ER calculations regardless of the method applicable for additionality testing. i.Why remove this as an overarching AC condition for all projects? Does the requirement not apply to projects securing additionality through the positive list? This change is not conservative.	
46	Eco Sustainability	VM0038 - 5) Project Boundary	Feedback: The inclusion of "Associated Infrastructure" (AI) like on-site batteries and solar is a major strength, allowing for a "holistic" site-level carbon footprint.	Thank you for your comment. Embodied carbon is outside the scope of the

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			Critique: The boundary excludes "Embodied Carbon" (Scope 3) of the chargers and batteries. As the grid greens, the "embedded" emissions of infrastructure become a larger portion of the total lifecycle. High-integrity credits should move toward Lifecycle Assessment (LCA). Source: ISO 14067: Greenhouse gases — Carbon footprint of products.	methodology and optional under the VCS Program.
47	Motion Energy	VM0038 - 5) Project Boundary	In VM0038 v1.0, Table 1 explicitly listed on-site battery storage and renewables via onsite/direct transmission as separate named rows in the project boundary GHG source table. In v1.1, these are consolidated into a single project row covering electricity consumption of project chargers and associated infrastructure, with no separate entries. On-site batteries and dedicated renewables remain fully permitted under v1.1 and are addressed in Equation 5 and Appendix 2, so this is a presentational rather than a substantive change. However, the absence of explicit entries in the project boundary table may create ambiguity for VVBs assessing project scope. Verra is requested to reinstate explicit rows for on-site battery storage and dedicated renewables in Table 1 to confirm unambiguously their continued inclusion within the project boundary. Sources: VM0038 v1.0, s.5, Table 1; VM0038 v1.1 draft, s.5 (p.11), Table 1 (p.12), s.8.2 (p.16) and Appendix 2.	Thank you for your comments. Consolidation was done to simplify the methodology since the emissions are clearly listed and quantified in the respective section with additional information in the monitoring section and appendix 2.
48	Climate Neutral Business Network (CNBN) on	VM0038 - 5) Project Boundary	9. Other deletions and revisions undermine accuracy, consistency, conservativeness and practicality for highly decentralized technologies managed by multiple entities as PP in EV charging ecosystem g. Removal of batteries on site storage and RE energy from project boundary when they are included in meth scope in other places. This is inconsistent.	Thank you for your comments, On site batteries and renewable energy are

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	behalf of Connecticut Green Bank and other clients			included under associated infrastructure. The consolidation was done to simplify the methodology since the emissions are clearly listed and quantified in the corresponding section with additional information in the monitoring section and appendix 2.
49	Firefly GHG Consulting	VM0038 - 6) Baseline Scenario	4)Baseline Scenario for Projects not using the Positive List – M0222 – Draft revision VM0038, Section 6. The second paragraph notes “For projects that do not apply the positive list, the baseline scenario must be demonstrated based on investment analysis or barrier analysis as per section 7.3 below.” Section 7.3. requires an Investment Analysis or Barriers Analysis, plus a Common Practice Analysis in line with Section 7.4. This is likely to impact two types of projects: 1) projects located in a country that is not on the positive list due to a lack of IEA data (e.g. an EV bus project in Mexico - https://www.iea.org/data-and-statistics/data-tools/global-ev-data-explorer) AND 2) projects located in a country that is not on the positive list due to exceeding national stock or sales share thresholds, but where that project is working at an eligible sub-national level in line with Section 4, Clause 1b) (e.g. an EV project in Canada covering only the Northwest Territories, where only 0.8% of passenger cars are BEV/PHEV – see https://www150.statcan.gc.ca/t1/tbl1/en/cv.action?pid=2310030801).	Thank you for your comment. We appreciate the suggestion to introduce another mechanism to demonstrate additionality for projects not in the positive list. We may consider it in a subsequent revision to simplify the additionality approach.

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			This is methodologically inconsistent and creates a higher burden of proof for certain projects than others. Recommendation: Where projects are being developed not using the positive list, allow Project Proponents to demonstrate additionality by using stock share or sales share data, provided such data is from official government sources or has been collected via a statistically valid survey of stock share or sales share data. Such data to be subject to third-party validation during project registration. This would improve the consistency of the Methodology.	
50	Eco Sustainability	VM0038 - 6) Baseline Scenario	Feedback: The baseline is the operation of comparable fossil fuel fleets. Critique: The default MPG values in Appendix 1 are based on 2015/2016 data. Since 2016, internal combustion engine (ICE) efficiency has improved significantly. Using a 2016 MPG baseline to calculate credits in 2024 results in over-crediting (claiming more avoided emissions than actually occur). Source: US EPA (2023) Automotive Trends Report (showing significant year-over-year MPG improvements in new ICE fleets).	Thank you for your comment. The default values were considered appropriate based on the review of updated statistics and increase use of SUVs with higher power. However, the default values may be updated in a subsequent revision.
51	Motion Energy	VM0038 - 6) Baseline Scenario	Please refer to Motion Energy's response to Section 1 above. Appendix 4 confirms that baseline emissions are determined based on the monitoring of the electricity supplied to EVs, which is consistent with the electricity delivered formulation in s.4 and should be reflected in s.1. The inconsistency between these sections is addressed in full in the Section 1 response.	Thank you for the comment. Please refer to the related response.

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52	Eco Sustainability	VM0038 - 7) Additionality	Feedback: It relies on the VMD0049 "Positive List" for streamlined additionality. Critique: Because VMD0049 is outdated, the additionality claims for many countries in VM0038 are no longer valid. The "Project Method" (for large-scale) is often too expensive for smaller operators to implement, creating a "missing middle" for medium-sized charging networks. Source: BloombergNEF (BNEF) Electric Vehicle Outlook 2023/2024 (demonstrating EV market maturity in regions still on the "Positive List").	Thank you for your comment. The positive list in VMD0049 is being updated as part of this revision to reflect current IEA Global EV Outlook data. The project method remains available for operators of any scale who wish to demonstrate additionality outside the positive list.
53	Motion Energy	VM0038 - 7) Additionality	Please refer to Motion Energy's response to Section 4 above, which addresses the applicability thresholds at s.4(1)(b) in full. These thresholds are directly relevant to the additionality framework as restructured in v1.1, as they operate as a gateway condition that must be satisfied before a project can access either the positive list or the investment and barrier analysis pathways set out in s.7.	Thank you for the comment. Please refer to the related response.
54	Climate Neutral Business Network (CNBN) on behalf of Connecticut Green Bank	VM0038 - 7) Additionality	5.Increased prominence for financial additionality testing which is unsuited to highly decentralized small scale technologies and would risk inconsistent additionality decisions a.Given the stronger emphasis Verra proposes to introduce in VMD0049 with a lower 2.5% stock threshold for L2/ebus, Verra is placing far great weight upon the methodology's financial additionality pathway which is neither a sensible, conservative nor prudent decision. b.Financial additionality assessments are inherently challenging for highly decentralized small scale technologies where costs and policies can vary	Thank you for your comments. The positive list was updated in the current revision to exclude countries that have shown further EV deployment. It now contains more countries that can

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	and other clients		significantly by region and locale. For example, the range of incentives available to EV charging installers illustrates this point – as does the dramatic changes in incentives which can be introduced through time (as US federal incentives were introduced with the IRA and removed a few years later under the Trump administration). Despite these constant fluctuations, throughout this period US EV charging companies were reported as not even reaching cash flow positive positions by the Wall Street Journal: so the overall additionality status of US EV charging infrastructure is clear in financial terms. However, to require the application of financial additionality testing to thousands of charger installations across hundreds of jurisdictions is impractical and risks low quality assessments. This is why Verra has historically emphasized the application of standardized testing for decentralized small scale technologies. i. When VM0038 was first accredited, the policy context for EV charging was dramatically simpler so financial additionality assessment in 2017/18 were more realistic to conduct. c. Verra's new emphasis on financial additionality testing risks adversely impacting the quality of its additionality testing in this sector. d. However, this can be remedied: in its refinements to the application of VM0038 financial additionality testing, VCS adopts a more grounded approach in recognizing that barrier testing can apply to small scale VM0038 projects since barriers are the core foundations for EV charging expansion. This revision, building on VCS' new additionality tools, is a sensible addition. As a result, we recommend this provision be expanded for larger scale projects for highly decentralized technologies like EV charging since financial additionality assessment risks inconsistent applications.	benefit from it, and we also introduced a US states level list. The financial assessment is an alternative approach for those projects that couldn't be included in the positive list.

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			9. Other deletions and revisions undermine accuracy, consistency, conservativeness and practicality for highly decentralized technologies managed by multiple entities as PP in EV charging ecosystem a. The requirement to apply comparable fossil fuel vehicles to baseline ER calculations is now positioned in financial additionality baseline scenario section rather than applying across any and all baseline scenario and ER calculations regardless of the method applicable for additionality testing. i. Why remove this as an overarching AC condition for all projects? Does the requirement not apply to projects securing additionality through the positive list? This change is not conservative.	
55	Firefly GHG Consulting	VM0038 - 8) Quantification of Reductions and Removals	1) Project Emissions, calculation of $E_{FELi,j,y}$ – VM0038, Section 8.2., equation (4) notes that $E_{FELi,j,y}$ is the “Emission factor for the electricity sourced from region j consumed by project charging systems serving applicable fleet i in year y following VT0011 Electricity System Emission Factors (tCO_2e/kWh)”. VT0011 requires Project Proponents to calculate their own electricity system emission factors. This is likely to be impossible for most Project Proponents who will not have access to the emissions data from power generating units that is required to complete these calculations. It is also unnecessary given that many countries regularly publish high-quality national and sub-national electricity emission factors (such as US EPA eGRID factors in the USA, ECCC factors in Canada, etc.). It is also inconsistent with the description of $E_{FELi,j,y}$ in Section 9.2. of VM0038, which states “use credible government data sources such as, for the US, the regional eGRID emission factors published by EPA”.	Thank you for your comment. The use of VT0011 is an improvement to ensure standardization across the VCS Program.

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			Recommendation: Verra to clarify that EF _{eli,j,y} need only be calculated following VT0011 where no credible government emission factors exist, or for EV charging systems that are not connected to the grid (e.g. with dedicated power systems). This will ensure data used is relevant, accurate and consistent with national/sub-national inventories.	
56	Eco Sustainability	VM0038 - 8) Quantification of Reductions and Removals	Critique 1 (ICE Efficiency): The Technology Improvement Rate (IR _i) for Light-Duty Vehicles is set to 1 (no improvement). This is statistically inaccurate. Modern internal combustion engine (ICE) vehicles improve in fuel economy (MPG) by approximately 2–5% annually. By not applying a discount for the improving efficiency of the baseline fleet, the methodology over-credits projects over time. Source: US EPA (2023) Automotive Trends Report (documenting the steady increase in real-world fuel economy for ICE vehicles).	Thank you for your comment. The IR _i set to 1 is applicable where baseline is calculated using annually updated parameters or for LDV default values for a period that is considered appropriate. Current values were considered valid based on the review of updated statistics and increase use of SUVs with higher power.
57	Motion Energy	VM0038 - 8) Quantification of Reductions and Removals	Removal of the time-of-day emission factor pathway (s.8.2, p.16) VM0038 v1.0 included an explicit time-of-day (TOD) pathway for calculating project emissions. VM0038 v1.1 removes this pathway without explanation. The standard project emissions equation now applies EF _{eli,j,y} following VT0011 Electricity System Emission Factors, which produces only annual operating margin, build margin, and combined margin factors. No TOD equivalent of EF _{kwTODi,j,t,y}	Thank you for your comments. The revision was not intended to remove the use of TOD data. This option is part of VT0011 using dispatch data with hourly

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			appears anywhere in the revised methodology. A limited pathway exists under TOOL07 v7.0, accessible by reference through VT0011 s.5, using hourly plant dispatch data to calculate the operating margin. While this introduces some temporal sensitivity, it does not replicate the TOD approach, the method still produces a single annual emission factor and cannot attribute the appropriate emission rate to electricity consumed in any given period. Removing the TOD pathway therefore removes accurate time-differentiated accounting in jurisdictions where appropriate data is publicly available. This also matters for vehicle-to-grid (V2G) applications, where charging events are actively managed to coincide with periods of lower carbon intensity on the grid. For V2G projects the carbon intensity attributed to electricity drawn during those managed charging periods is central to accurately quantifying emission reductions; an annual average emission factor cannot capture this and will produce a less accurate result than a TOD-differentiated approach. TOD emission factors are the most accurate basis for quantifying emissions from EV charging. EV charging is an inherently time-variable activity, applying time-differentiated emission factors directly reflects the actual carbon intensity of electricity consumed at the point of charging, accurately reflecting when charging coincides with periods of higher renewable generation and appropriately accounting for periods of higher fossil-fuel dispatch. Where projects incorporate smart charging or V2G capabilities, this precision matters further: the dispatch data analysis OM under TOOL07 captures some of this indirectly through its consumption-weighting mechanism, but does so through a single annual figure rather than period-specific rates. The TOD pathway is simply the more direct and	emission factors. Examples are included in the quantification sheet. The Dy discount factor parameter box was removed since it is the result of the equation and not a monitored parameter. Please note that the underlying parameters ERCy and ERFy are included.

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			verifiable way to demonstrate the true emissions intensity of charging activities. Verra is requested to reinstate a TOD-equivalent pathway in VM0038 v1.1. Removing it without justification sits uneasily with the goal of accurate emissions accounting, and it materially affects existing registered projects already applying TOD-differentiated emission factors under v1.0. The reinstated pathway should carry a data source framework at least as permissive as that in v1.0. Motion Energy also notes that v1.1 appears to shift the EFkw parameter from a marginal to an average emission factor basis in some parameter contexts, without explanation. This is consistent with the broader pattern of the revision reducing emissions accounting precision, and reinforces the case for reinstating the TOD pathway which provided the most direct route to accurate, time-differentiated carbon intensity measurement. Motion Energy also notes that smart EV charging infrastructure routinely captures granular, timestamped kWh data, and that the TOD pathway provided a direct means of putting this data to use in emissions quantification. Its removal sits in tension with Verra's broader move toward digital MRV, and Motion Energy would welcome clarity on how these directions are intended to be reconciled. Dy discount factor (s.8.4, p.19) The Dy discount factor parameter box appears to have been removed from the monitoring tables in v1.1, despite Dy remaining a term in the net reductions equation at s.8.4. Without a corresponding parameter box, there is no documented monitoring requirement for this variable, creating a potential verification gap. Verra is also requested to confirm whether the Dy parameter box has been intentionally	

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			omitted and, if so, to clarify how monitoring requirements for Dy are to be met under v1.1. Sources: VM0038 v1.0, s.8, Equations 4, 5, 6 and 9; VM0038 v1.1 draft, s.8.2 (p.16), s.8.4 (p.19); VT0011 v1.0, s.5, para. 39; TOOL07 v7.0, ss.2.2 and 6.4.3.	
58	Climate Neutral Business Network (CNBN) on behalf of Connecticut Green Bank and other clients	VM0038 - 8) Quantification of Reductions and Removals	4. Removal of time of day (TOD) ER calculations – with no reference or justification (page reference is example -- all TOD have been stripped from 1.0 so no page ref in 2.0 is applicable) a. Again without reference to this removal of all TOD ER provisions in its minor revision objectives, Verra has stripped an essential component of VM0038 which recognized that EV charging is inherently a time-based activity; that the trend towards more “managed charging” on a TOD basis is a major objective for utilities and a growing trend; that TOD crediting promotes more accurate ER calculations and VCU issuance; and that TOD was introduced to VM0038 v 1.0 in order to “future proof” the methodology since stakeholders recognized that TOD would become more strategically important over time b. Verra's decision to strip TOD crediting now is also very untimely. Utility electric grids are under extreme strain as buildings electrify, transportation electrifies, renewables mainstream – and industries are beginning to adopt AI systems whose data centers are placing unprecedented strain on the grid. The US grid in particular has been repeatedly cited as experiencing intense grid stabilization challenges. TOD charging contributes to promoting grid flexibility and helps re-stabilize local/regional grids (shifting charging to times of day when the grid is under less strain). VCS' EV managed charging projects are delivering grid stabilization benefits using TOD practices at levels of adoption far beyond those	Thank you for your comments. The revision did not remove the use of TOD data. This option is part of VT0011 using dispatch data with hourly emission factors. Examples are included in the quantification sheet. The statement that Verra's analysis indicated a potential $\pm 30\%$ double counting risk is based on a misunderstanding of the analysis and was already clarified during discussions with the commenter. Verra's analysis did not conclude

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			achieved by many leading utilities. This demonstrates the remarkable contribution that managed time of day EV charging can contribute to grid stabilization – upon which expanded renewables, building electrification and AI adoption all depend. c.VCS has therefore not only not justified its removal of TOD VM0038 provisions; its actions appear to be surprisingly out of step with the kind of vision and leadership that stakeholders would expect of Verra since TOD EV charging can so strategically contribute to grid stabilization not only for EV charging practices but also broader electrification/decarbonization efforts in other sectors. 8.Verra has indicated that it will not be addressing comparable double counting adjustments in its revised AMS III C methodology even though its own analysis, reviewed during calls with Verra, indicated that double counting could arise up to +/- 30% of credits (ie up to 30% double counting or up to 30% lower credit issuance by charging projects) . Verra should satisfy itself that the +/- variances of such double counting does indeed reduce the risk to de minimis and explain why this is the case so that stakeholders can consider this logic as part of a public consultation. Otherwise, this risks Verra knowingly endorsing material double/under counting of credits arising between methodologies since +/- 30% variances are not de minimis thresholds.	that such a double counting risk exists. Potential double counting is addressed through the adjustment applied in VM0038, where the corresponding deduction is made, resulting in conservative accounting in most realistic scenarios. Consequently, no equivalent adjustment is currently required in AMS-III.C. Other approaches could be adopted in future revisions if deemed more appropriate.
59	Eco Sustainability	VM0038 - 9) Monitoring	Hierarchy levels 2, 4, and 5 allow for "estimates" and "pilot project data" for non-metered (dumb) chargers. This introduces significant uncertainty and risk of fraud. In a high-integrity market, credits should be based solely on revenue-grade metered data to prevent "phantom" reductions. Source: ICVCM Core Carbon Principles (CCPs), Principle 6 (Robust Quantification).	Thank you for your comments. Monitoring requirements had been modified in the current revision and transition requirements were added.

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			The QA/QC requirements (cross-checking with receipts) are outdated. Modern monitoring should require encrypted digital logs directly from the Charger Management System (CPMS) to ensure data hasn't been tampered with. Source: World Bank (2022) "Digital Climate Finance: A Guide to Digitizing MRV."	
60	Motion Energy	VM0038 - 9) Monitoring	ED and EC data source hierarchies (p.29 and p.30) VM0038 v1.0 provided a structured data source hierarchy in the ED parameter box, guiding project proponents on the priority order for sourcing kWh delivered data. In v1.1 this has been replaced with a single reference to an EV charger meter, without equivalent guidance or justification for the simplification. VVBs and project proponents regularly relied on this hierarchy to confirm appropriate data sourcing; its removal introduces verification uncertainty for this key input and risks inconsistent application across projects. A related simplification affects the EC parameter. In v1.0, the EC parameter box set out a structured data source hierarchy with a clear priority ordering. In v1.1 this has been reduced to a single unelaborated reference to a data source, without retaining or replacing that hierarchy. The structured hierarchy provided a practical compliance reference that VVBs and project proponents relied upon to confirm appropriate sourcing of this key input; its removal without replacement or justification introduces verification uncertainty. Additionally, the Dy discount factor parameter box appears to have been removed from the monitoring tables in v1.1, despite Dy remaining a term in the net reductions equation at s.8.4. Without a corresponding parameter box, there is no documented monitoring requirement for this variable, creating a potential verification gap. Verra is requested to provide the	Thank you for your comments. The monitoring of those parameters was updated to comply with current requirements and technological capabilities. The update increases accuracy and robustness of the quantification. Transition requirements were included for existing projects. Please refer to related responses regarding Dy AFEC and MPG.

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			rationale for the removal of the ED and EC data source hierarchies and to demonstrate that their removal does not compromise verification rigour or introduce inconsistency in how these key inputs are sourced across projects. In the absence of a satisfactory justification, Motion Energy requests that both hierarchies be reinstated in a form at least as detailed as that in v1.0. Verra is also requested to confirm whether the Dy parameter box has been intentionally omitted and, if so, to clarify how monitoring requirements for Dy are to be met under v1.1. AFEC and MPG parameter guidance Please refer to Motion Energy's response to Section 3 above. The US gallon labelling point applies equally to the parameter tables in Section 9.2. Sources: VM0038 v1.0, s.9.2, parameter boxes for EDi,y, ECi,y and Dy; VM0038 v1.1 draft, s.9.2 (p.20), parameter boxes for EDi,y (p.29) and ECi,y (p.30), s.8.4 (p.19).	
61	Climate Neutral Business Network (CNBN) on behalf of Connecticut Green Bank	VM0038 - 9) Monitoring	3. Removal of and limitations to eligible kwh data sources endangering multiple projects' issuance. a. The sourcing of kwh data for EC and ED is now proposed to be restricted to smart meter data or metered data on grid side of the charger (in the EC and ED parameter boxes). No other data sources as originally published in v1.0 appear to be permitted. i. The hierarchy for eligible data sourcing options for ED and EC provided in their parameter boxes in v1.0 which guided where the kwh data is to be sourced has been deleted. The v1.0 list has five eligible data pathways, reflecting the diversity	Thank you for your comments. The monitoring of those parameters was updated to comply with current requirements and technological capabilities. The update increases accuracy and robustness of

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	and other clients		of the EV charging ecosystem of technologies and entities. VM0038 was developed by the EV Charging Carbon Coalition (EVCCC) whose members themselves reflected this stakeholder diversity across the EV charging domain – spanning EV charging networks, green banks, OEMs, utilities, equipment providers and cities -- and was developed with input from almost 100 diverse stakeholders. The parameter box data sourcing pathways reflected their insights regarding how sources for charging kwh data needed to be structured in order to create equitable access and avoid biased barriers to entry for all entities across the EV charging eco-system. There is no justification provided by Verra for this change whilst projects are required to regularly refer to this list in order to confirm appropriate sourcing of this key kwh input data. b.The deletion of this kwh data source list therefore causes unwarranted jeopardy for projects whose data conformed with v1.0 options, have formally been validated by Verra – which confirmed that their data sources were valid – but would now apparently no longer be eligible for VCU issuance since their kwh data sources no longer meet the v 1.1 restrictive parameter box requirements. This proposed change therefore radically undermines the integrity of VCS' original validation decisions across many different projects and renders them ineligible to issue further credits, truncating the crediting periods upon which their EV charging investments relied. Stranded assets again arise. c.As outlined in response #1, the success of the EV charging ecosystem depends upon contributions from a myriad of entities, without whom charging operations cannot take place. These entities – from charging networks, to equipment suppliers, utilities, drivers, charger service management providers and beyond -- all support and expand EV charging/miles travelled in essential ways but may access kwh charging data through all the pathways identified in v1.0 ED and EC parameter	the quantification. Transition requirements were included for existing projects. Please note that DCFC efficiency factor is still included. Please refer to related responses regarding MPG, EFkW, Dy and other referenced parameters.

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			boxes. Verra has already validated many projects which have applied pathways 2,3,4 and 5 – all of which would be impacted by Verra's unjustified deletion (including telematics data which have referred to pathway 3). These proposed deletions would even preclude EV owners from accessing credits using the telematics data in their own EVs. i.Fortunately, however, EV telematics (TM) based data, where kwh data is sourced from the EVs themselves, corresponds exactly to the smart charger's internally metered kwh and is therefore still eligible for crediting. However other data category sources are not so well positioned and would impact validated projects which were taking major risks to invest in EV charging using these pathways at a time when the market was extremely nascent and additionality was robust. d.No reference to these eligible kwh data source changes was made in the VCS minor revision objective and no justification provided by Verra e.This “minor revision” however again risks stranding assets across many VM0038 projects and partners ==> A simple solution is to add VCS's proposed addition – the sourcing of data from grid side utility meter – to the existing v 1.0 list, honoring all Verra's earlier validation decisions. 90Other deletions and revisions undermine accuracy, consistency, conservativeness and practicality for highly decentralized technologies managed by multiple entities as PP in EV charging ecosystem .bDCFC default efficiency factor has been removed from the parameter box for ED.	

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			In practice, there is small variations between DCFC efficiency ratings so the default factor is reasonable and applicable. No justification was given by for the deletion. In practice, many PP entities will not have access to the efficiency ratings for the DCFCs used e.g. for projects where drivers use public chargers across multiple networks (here the make/model of charger is typically not known either). i.The calculation spreadsheet also does not have a parameter for this DCFC efficiency factor. Verra's worked example appears to have applied a DCFC efficiency factor (to the two DCFC worked example lines) but a) a different value has been applied each time; b) there's no traceability for the value provided to establish ED. ii.If Verra is assuming that both ED and EC will be sourced exclusively from smart meters the same concerns arise as in #3 above. iii.Eliminating the DCFC efficiency default factor also renders projects using the grid-side electricity meter as unable to use the methodology since the grid side meter measures EC only. ED can only be derived from grid side meter data by applying the DCFC efficiency default factor – so Verra has inadvertently rendered its new grid side meter projects unable to apply the methodology! c.There is no clarification that default MPGs are based on US gallons not imperial gallons in parameter boxes. This risks inaccurate application to regions using imperial gallons. d.No reference to EFkw as requiring the application of average not marginal factors for calculation. Is this made clear as a requirement in VCS' new VMT tools? Different methodologies specify different requirements for reasons particular to their context. Are these replicated exactly in other VCS tools? To be conservative, this methodology's requirement for average electricity emission factors should be	

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			retained. e.Deletion of reference in parameter boxes for adequate metering systems plan requirements if on site storage batteries or renewables are included (which are required and outlined in VM0038 per inter alia appendix 2) f.Dy parameter box has been deleted even though this parameter still applies in ER calculations. This is inconsistent. Note: relevant pages are given by the applicable parameter box; template only allows for one page to be referenced.	
62	Eco Sustainability	VM0038 - Appendix 2: Guidance for Design of Adequate Metering Systems for AI Projects	The requirement for extensive physical sub-metering ("Upstream" and "Downstream") is physically and financially demanding for project developers. The methodology should be updated to allow for "Virtual Metering" or "Inverter-Integrated Metering" (e.g., using Tesla Powerwall or Siemens inverter data) provided they meet specific accuracy standards (e.g., ANSI C12.20). Source: ANSI C12.20-2015 (American National Standard for Electricity Meters – 0.1, 0.2, and 0.5 Accuracy Classes). While the appendix mentions Vehicle-to-Grid (V2G), it lacks a specific quantification formula for the "Avoided Peak" carbon benefit. An EV discharging back to the grid during a brownout has a higher carbon value than one just sitting idle, but Appendix 2 treats this simply as a "netting out" of energy. Source: IRENA (2023) "Smart Charging for Electric Vehicles" (highlighting the carbon-reduction value of V2X services).	Thank you for your comments. The methodology requires EC and ED to be measured and does not restrict remote data monitoring. V2G is included in the methodology to prevent overquantifying project emissions but the potential impact in reducing emissions further is a co-benefit.

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63	Motion Energy	VM0038 - Appendix 2: Guidance for Design of Adequate Metering Systems for AI Projects	Please refer to Motion Energy's responses to Section 5 above regarding on-site batteries and renewables, and to Section 9 above regarding the ED and EC data source hierarchies. Appendix 2 provides the metering guidance that underpins both of those points. Sources: VM0038 v1.1 draft, Appendix 2; VM0038 v1.0, Appendix 2.	Thank you for your comment. Please refer to the corresponding responses.
64	Eco Sustainability	VM0038 - Appendix 3: Justification of Compatibility with Transition to Net Zero	In 2018, methodologies were not required to explicitly justify their long-term alignment with a 1.5 °C or Net Zero pathway. Feedback: While EV charging is inherently a "Net Zero" technology, the methodology fails to address the "Green Grid" trajectory. Critique: A methodology is only Net Zero compatible if it prevents "Carbon Lock-in." While charging infrastructure supports decarbonization, if a project uses 100% coal-powered electricity without a plan to transition to renewables, its compatibility with a 2050 Net Zero goal is questionable. Rationale: High-integrity credits must ensure that the activity supports the transition to a zero-carbon economy and doesn't just create "slightly less bad" fossil fuel pathways.	Thank you for your comment. The methodology already includes renewable energy as associated infrastructure and remains fully compatible with increasingly cleaner electricity grids over time.

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			Source: IEA (2021) Net Zero by 2050: A Roadmap for the Global Energy Sector; Science Based Targets initiative (SBTi) Foundations for Science-Based Net-Zero Target Setting in the Corporate Sector.	
65	Eco Sustainability	VM0038 - Appendix 4: Uncertainty Assessment	The methodology includes various data points (MPG, kWh, Grid Factors) but does not provide a formal statistical uncertainty deduction. Feedback: The current quantification method ignores the cumulative error of its parameters. Critique: Under VCS Standard v4.7 (Section 3.17), methodologies must provide a "Confidence Deduction" if the overall uncertainty of the emission reduction estimate exceeds a certain threshold (usually 5% to 10%). Parameters with High Uncertainty: MPG Defaults: Using 2016 national averages for specific project vehicles in 2024. Dumb Charger Estimates: Hierarchy levels 2 and 5 in Section 9 allow for estimates, which have a significantly higher margin of error than revenue-grade meters. Grid Factors: Regional averages (eGRID) have inherent statistical variance that is not accounted for in the final credit calculation. Rationale: To ensure that "one credit equals one tonne," the methodology must be conservative by deducting the range of statistical error from the final ERY total.	Thank you for your comments. Dumb charger estimates were removed and grid emission factors requirements are aligned to VT0011. For closed charging networks, EV fleets are known and identified, and the uncertainty related to the performance of the associated vehicles is very low. For open charging networks, uncertainty is addressed through requiring the selection of the highest value when a range is identified (conservative), which

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			Source: IPCC (2006) Guidelines for National GHG Inventories, Chapter 3 (Uncertainties); VCS Standard v4.7.	reduces estimated reductions.
66	Motion Energy	VM0038 - Appendix 4: Uncertainty Assessment	Appendix 4 (p.49) Please refer to Motion Energy's response to Section 4 above, which addresses the shifting effect rationale in Appendix 4 in full. Motion Energy also notes that Appendix 4 confirms that baseline emissions are determined based on the monitoring of the electricity supplied to EVs, which supports the electricity delivered formulation and is inconsistent with the availability framing introduced at s.1. Please refer to Motion Energy's response to Section 1 above on this point. Sources: VM0038 v1.1 draft, Appendix 4 (p.49), s.4(1)(b) (p.10), s.1 (p.5).	Thank you for your comments. Please refer to the corresponding responses.
67	Eco Sustainability	VMD0049 - 1) Summary Description	Critique: The hierarchy rule is strong, but it lacks a "Dynamic Update" mechanism. Source: VCS Standard v4.7, Section 3.16.2 (Methodology Revisions). Verra's own standards require that methodologies be revised to reflect evolving "best practice." Additionally, the Integrity Council for the Voluntary Carbon Market (ICVCM) Assessment Framework (Section 5) emphasizes that additionality must be "continually monitored" rather than static.	Thank you for your comments. The positive list will be updated periodically following the VCS requirements.
68	Motion Energy	VMD0049 - 1) Summary Description	VMD0049 v2.0 removes the sub-jurisdictional assessment framework that existed in v1.0 without acknowledging this in the summary description or document history. The document history describes the change simply as an updated list of regions within the positive list, which does not acknowledge the removal of the sub-jurisdictional framework or provide any rationale for it. Motion Energy considers this to be a material omission. The sub-jurisdictional framework was a substantive mechanism that governed how additionality was determined at the	Thank you for your comments. We updated the positive list, introduced a US states level list and clarified that subnational assessment can

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			project level; its removal is not equivalent to a list update and should be described and justified accordingly. Please refer to Motion Energy's response to Section 18 below for the full argument. Sources: VMD0049 v2.0 draft, Summary Description and Document History; VMD0049 v1.0, s.1.	be done by submitting official governmental data and a revision to VMD0049. We clarified this in the document history.
69	Eco Sustainability	VMD0049 - 2) Sources	Critique: The data sources (2016 IEA/2017 IHS Markit) are obsolete. Source: IEA (International Energy Agency) Global EV Outlook 2024. This report provides the current global penetration rates (e.g., China at 38% sales share in 2023), which directly contradicts the "Positive List" tables in VMD0049 derived from the 2016 IEA data.	Thank you for your comment. The current positive list was updated based on IEA (International Energy Agency) Global EV Outlook 2025
70	Eco Sustainability	VMD0049 - 3) Definitions	Critique: Definitions like "Local Region" (CBSA) are too North America-centric. Source: VMD0049, Appendix A, Page 8 (Definitions of CBSA). This is compared against the VCS Standard v4.7, Section 3.1, which mandates that methodologies must be "globally applicable" and provides criteria for the selection of regional boundaries to ensure consistency across different continents.	Thank you for your comment. The current positive list and data sources were updated.
71	Firefly GHG Consulting	VMD0049 - 4) Applicability Conditions	5)Annual updates to IEA Global EV Data – the IEA is updating the Global EV data annually. Where a project is using the positive lists in VMD0049, it is not clear if a project should assess additionality using only the data published in VM0049 or use the latest version of the IEA Global EV Data. To ensure the Methodology adheres to the principles of accuracy and relevance, any new project developed and submitted for validation should use the latest version of the IEA Global EV Data at the time of submission.	Thank you for your comment. The current positive list is valid until the next update. We may consider updating the approach to a dynamic

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			Recommendation: Include a note in VMD0049 that Table 1 and Table 2 are considered to be automatically updated in line with the latest IEA Global EV Data and that projects should use the data at the time of submission to assess if the country is/not on the positive list. This would improve the accuracy, relevancy and transparency of the Methodology. 7)Suggested editorial: Ordering of data in Tables 1 and 2 – These Tables in VMD0049 are presented in descending order based on stock/sales share information. This makes it harder to use to find if a country is/not in the Table. Recommendation: present Table 1 and 2 in alphabetical order by country. This would improve the transparency of the Methodology.	assessment in future revisions. We reordered the tables in alphabetical order to simplify the use. Thank you.
72	Eco Sustainability	VMD0049 - 4) Applicability Conditions	Critique: The 5% "Total Fleet Stock" threshold is a lagging indicator and potentially too high. Source: ICVCM Core Carbon Principles (CCP) - Principle 7 (Additionality). The ICVCM guidelines for high-quality carbon credits state that additionality must be "conservative." Relying on fleet stock (which takes 15+ years to turn over) rather than sales share allows projects to be deemed additional long after they have reached "Business as Usual" in the new car market.	Thank you for your comment. The updated positive list considers stock share and sales share.
73	Motion Energy	VMD0049 - 4) Applicability Conditions	AC charger positive list threshold VMD0049 v2.0 sets the positive list threshold for AC chargers at 2.5% EV stock share. The only justification offered in Appendix A is that AC chargers are more common in earlier stages of market development. This describes an adoption pattern, it does not explain why 2.5% is the right cutoff point. No empirical evidence, quantitative analysis, or reference to diffusion theory is offered in	Thank you for your comment. We introduced further data and assessments in the appendix to better clarify the

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			support. At 2.5%, the threshold sits at the boundary between the Innovator and Early Adopter segments identified by Rogers (2003), well before the Early Adopter phase has run its course and far from the chasm Moore (2014) identifies as the point at which a technology transitions to mainstream diffusion. Public AC charging infrastructure at this level of penetration is firmly pre-commercial, the market conditions that would make carbon finance unnecessary simply do not yet exist. The threshold also lands hardest on those who need public AC charging most. Households without a private driveway or garage and those in multi-unit dwellings have no home charging alternative, and for these users public AC charging is not interchangeable with DCFC. DCFC carries a materially higher cost per kWh for the end user and is not a practical substitute for routine charging needs. Those in rural and regional areas where grid constraints rule out DCFC have no alternative. Public AC chargers in open networks typically have low power throughput and low revenue per unit, meaning the financial case for deploying them without carbon finance support is weak at low levels of market penetration. The 2.5% threshold removes positive list support at a point where this financial challenge remains real and unresolved, and where the communities most dependent on public AC infrastructure are least able to absorb the consequences. This concern is particularly relevant in emerging and developing economies where grid constraints more frequently limit DCFC deployment. Verra is requested to provide the empirical or analytical basis for the 2.5% threshold, or to reinstate 5% as the positive list threshold for AC chargers,	differentiation and thresholds. We clarified that subnational assessment can be done by submitting official governmental data and a revision to VMD0049 and clarified this in the document history. Thank you for the suggestion. Intercity buses have more standard routes than trucks. E-buses have demonstrated higher penetration rates than trucks and we introduced differentiation to account for this. A project method can be applied for cases that are not included in the positive list.

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			consistent with the level of market penetration at which additionality remains well established under diffusion theory. Removal of sub-jurisdictional assessment framework VMD0049 v1.0 established a framework under which national, sub-regional, and local regions could each be assessed independently for positive list inclusion, with the smallest applicable region governing additionality for each charger. This framework explicitly accommodated the reality that EV adoption is geographically uneven, a country whose national market share exceeds the threshold may still have substantial rural, regional, or lower-income urban areas where penetration remains well below it. The framework also supported a streamlined VVB-validated pathway, confirmed in the Guidance for Applying Activity Method for New Regions, under which project developers could present sub-regional market share data directly to their VVB during validation, enabling positive list inclusion for new regions without waiting for a scheduled module update. VMD0049 v2.0 removes this framework entirely, replacing it with fixed national-level country lists with no sub-regional mechanism and no reference to the streamlined pathway. The document history describes the change simply as updated list of regions within the positive list, which does not acknowledge the removal of the sub-jurisdictional framework or provide any rationale for it. The consequences extend beyond additionality. Under VM0038 v1.1, s.4(1) is framed as an applicability condition, the methodology applies only where either the positive list or the s.4(1)(b) market share thresholds are satisfied, meaning that	

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			projects in sub-regions that sit well below those thresholds may have no route to participate in the methodology. The practical outcome is that rural and regional areas, where EV adoption consistently lags urban centres and where charging infrastructure is most additional, will be entirely excluded from the methodology on the basis of a national or urban-weighted average that does not reflect local market conditions. This is precisely the inequity the v1.0 sub-regional framework was designed to prevent. Verra is requested to reinstate the sub-jurisdictional assessment framework in VMD0049 v2.0 and to confirm that the streamlined VVB-validated pathway set out in the Guidance for Applying Activity Method for New Regions remains available under the revised module. HDV bus positive list threshold VMD0049 v2.0 applies a 2.5% stock share threshold for HDV buses, half the 5% applied to HDV trucks. The sole justification offered in Appendix A is that buses have more stable and predictable routes, returning to a point of origin, which makes EV bus adoption evolve faster than trucks and therefore warrants an earlier withdrawal of positive list support. This rationale has a fundamental scope problem. It describes urban transit buses which are fixed-route municipal services returning to a depot for charging. It says nothing about inter-city and coach operations, which run long-distance open routes	

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			and require en-route public charging infrastructure that depot charging cannot provide. Inter-city coach charging is an open network activity, highly capital intensive, and at an early stage of deployment in most markets. The 2.5% threshold treats these fundamentally different charging contexts identically on the basis of a rationale that applies to one and not the other. The depot-return argument also does not support setting a lower threshold in advance. If transit bus fleets do electrify faster than truck fleets due to their predictable routes and centralized procurement, those markets will reach the 5% threshold sooner and positive list support will be withdrawn at the appropriate point through the normal operation of the module. Pre-emptively halving the threshold is not necessary to achieve this outcome. At 2.5%, the threshold sits at the Innovator/Early Adopter boundary identified by Rogers (2003), well before the chasm Moore (2014) identifies as the transition to mainstream diffusion. Across the full range of HDV bus charging activities covered by the methodology, particularly en-route and open network applications, the conditions that would make carbon finance unnecessary simply do not yet exist at this level of penetration. Verra is requested to raise the HDV bus threshold to 5%, consistent with the truck threshold. If transit bus markets do electrify faster, the threshold will be reached sooner and positive list support will withdraw accordingly. If Verra considers the differential to be justified, it is requested to provide specific empirical and analytical justification that addresses the full range of HDV bus charging activities covered by the methodology, including inter-city and coach operations.	

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			Sources: VMD0049 v2.0 draft, s.4 (p.4) and Appendix A (p.9); VMD0049 v1.0, s.1 and Appendix A; VM0038 v1.1 draft, s.4(1) (p.10); VCS Methodology Requirements v5.0, s.3.5.10(1)(b); Guidance for Applying Activity Method for New Regions; Rogers, E.M. (2003) Diffusion of Innovations, 5th edition; Moore, G.A. (2014) Crossing the Chasm, 3rd edition.	
74	Climate Neutral Business Network (CNBN) on behalf of Connecticut Green Bank and other clients	VMD0049 - 4) Applicability Conditions	11.No clear analysis was provided to support the application of new differentiated positive list % thresholds in the positive list for AC/DCFCs – compounded by inconsistencies in application of Verra's logic supporting differentiated rates, across LDV and HDV sectors a.Verra's application of 2.5% and 5% stock threshold levels appears arbitrary: there's no reference to supporting market data or publications to support these levels (rather than others) if changes to Verra's longstanding single 5% threshold value are to be made i.The same applies to the 10% and 20% AC/DCFC % sales thresholds ii.For example, even Verra's statistical analysis of stock versus sales data has not been referenced relative to the proposed thresholds. b.These % stock thresholds are also inconsistent with and well below thresholds referenced in respected publications for when markets emerge from the “early adopter” phase i.Including market thresholds for the early adopter segment boundary developed by Rogers (2003) and the chasm identified by Moore (2014) at 15-16% penetration levels c.Verra's argument to differentiate DCFCs is that DCFCs “accelerate new EV adoption”. This logic however: i.Misses the point in the VM0038 project activity definition – which is to promote	Thank you for your comments. We introduced further data and assessments in the appendix to better clarify the differentiation and thresholds. We introduced a state-level positive list for the US and clarified the path to include other countries by submitting official governmental data and a MIN to VMD0049. Projects can demonstrate additionality through a project method if they are not in the positive list.

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			EV driven miles over fossil fuel driven miles regardless of whether this arises in EVs purchased now or earlier (when additionality was even stronger); - This is an EV charging methodology not AMS III C which is focused on increased adoption of EV fleets - ii.Also applies to L2s since these are used also for public charging to overcome range concerns, particularly in rural areas where DCFCs are less prevalent; applies particularly to L2s installed at multi-family housing developments where access to charging is notably lacking; applies to L2 residential charging since, with the increase in EV battery sizes and range, L1 charging is now effectively impractical (it takes 3 days to charge on L1 compared to 7-8 hours overnight with an L2 charger) - d.There is no reference or alignment with common practice penetration rates including those with published penetration rates from other certifiers which are based upon the very same early adoption market thresholds that Verra is seeking to apply. For example, Verra's proposed stock thresholds for early adoption cut offs in VMD0049 v 2.0 (2.5% and 5%) are well below even the most conservative thresholds (10%) published by Gold Standard for non LDV/SID countries. Verra also fails to take into consideration threshold distinctions between LDV/SIDs and other countries. - i.Verra does not specify common practice thresholds in its VT0008 as applicable to EV charging. - ii.Gold Standard, however, has published thresholds for early adopter market boundaries during public comment (which are largely sustained) as 15% for stock and 25% for flow based approaches in LDCs/SIDs and 10%/15% respectively in other countries (https://goldstandard.cdn.prismic.io/goldstandard/aN0dvp5xUNkB1XFH_ToolCommonPractice_PC.pdf)	

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			==> The resulting PBs are therefore biased towards a) BEVs; and b) fast public charging only (since no DCFCs are located in residential or many private commercial settings) when L2s also achieve the same outcomes that Verra argued justified the DCFC higher 5% threshold. ==> They also lack alignment and are unduly constraining compared with other credible publications' thresholds for early market adoption (Rogers, Moore, Gold Standard) ==> the same logic applies to the arbitrary allocation of differentiated thresholds to e-bus and e-trucks 12.Verra has been inconsistent in the required application of applicable fleets for L2 and DCFC when deriving their % threshold results. The results for DCFC thresholds are therefore inaccurate and unduly constraining. a.VM0038 v1.1 distinguishes applicable fleets by charger type: AC chargers serve BEVs and PHEVs combined, while DCFCs serve BEVs only. VMD0049 v2.0 appears to apply a single IEA stock share figure to both columns. i.The IEA Global EV Outlook states that its stock share figures refer to both BEV and PHEV unless otherwise specified. b.Verra has therefore applied the wrong applicable fleet (BEV/PHEV combined) to the determination of the DCFC % thresholds. There is no distinctions made in VCS's analysis regarding the stock/sales penetration rates for BEV vs BEV/PHEVs (ie all EVs). VM0038 (both v 1 and 1.1) requires that appropriate applicable fleets' data be applied when establishing the positive list thresholds for L2 and DCFCs – namely applying BEV/PHEV (all EVs) for L2 (since all these EVs can use L2 connectors) and only BEVs for DCFC (since PHEVs cannot use DCFC connectors).	

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			Verra applies the % stock/sales market penetration data from IEA which is based upon all EVs – BEV and PHEV. This data is applicable for the determination of L2 thresholds but the data is not the applicable fleet for DCFC threshold calculations. As a result, countries will be deemed ineligible far too soon since BEV market penetration rates will be below those for the combined PHEV/BEV market. The VMD0049 v2.0 revision references only “EV stock” and “EV sales” but has not applied the correct LDV sub EV fleets for DCFC threshold calculations nor been specific as to which sub fleet (BEV, PHEV, both) was used for each charger segment. Verra has therefore not applied the VM0038 required applicable fleet procedures to its positive list assessment and its results for DCFCs are based upon incorrect foundations (the wrong applicable fleet) resulting in significantly premature elimination of countries’ DCFCs from the positive list. i.Verra might note that, had the proper applicable fleet (BEV only) been applied to DCFC threshold analysis, it would have supported Verra’s interest to see DCFCs remain eligible for a longer period of time c.Proper analysis needs to be conducted and the positive list results remedied. 13.Other inconsistencies arising due to the application of both stock and sales benchmarks a.Inconsistencies arise as a result this dual track system; for example L2s for the US are deemed ineligible. On a stock basis, the US was considered above 2.5% at 2.7% penetration yet the US sales basis is still under 10% at 9%. Given the proposed “either/or” frame for the overall test, the US is still considered ineligible even while EV sales remain below the applicable threshold. b.Gold Standard’s (GS) approach avoids these confusions. Firstly, GS is clear when stock or sales thresholds should apply across different sectors/methodologies:	

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			only one threshold metric is applied in any given sector -- and for EV charging systems GS would apply the stock metric (for an EV focused methodology like AMS III C it applies the sales metric). GS then applies clear % threshold values assigned separately across stock and sales metrics, differentiating between LDV/SIDS and other countries, with cut offs based upon early innovators, early adopters and early majority (take off) stages. The clarity of the GS system avoids the kind of inconsistencies arising in Verra's approach and is far more nuanced and consistent with published research. (https://goldstandard.cdn.prismic.io/goldstandard/aN0dvp5xUNkB1XFH_ToolCommonPractice_PC.pdf) 14. Removal of sub-jurisdictional assessments a. All of the VMD0049 references to making assessments at subregional levels have been removed from v2.0. So all states in the US are treated identically when in reality the EV market penetration rates vary enormously by region. To remove sub-jurisdictional positive list assessments will result in series of false positives and negatives – which is why the subregional considerations were included in the v 1.0 positive list. i. For example, taking a US-wide average national stock rate will mean that states where EVs are more prevalent will be considered additional when the US has less than an average of 2.5% stock for L2s; and when the average exceeds 2.5%, the states where stocks are considerable lower will be false negatives. ii. In the US, the particularly strong EV market penetration rates for CA will skew the US average penetration rate, creating a major inequality for other US states where EV penetration rates lag. This is a particular concern when VCUs cannot even be issued in CA (due to double counting with LCFS credits) – yet CA's penetration	

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			rates preclude VCU issuance across all other US states. - For example, for the US in 2024, the US Alternative Fuels Data Center has the highest penetration rates for CA (4.1% BEV and 1.2% PHEVs) – notably higher than other states (next closest is WA at 2.8% for BEVs). CA also hosts a disproportionately large proportion of EVs (1554k BEVs, 447k PHEVs) out of a US total of 4504k BEVs and 1521k PHEVs) – representing 34% BEVs and 29% PHEVs – or 33% of all EVs. So CA's combined all EV penetration rate of 5.3% unduly skews the overall US rate by applying this high penetration rate at a 33% weighting. Unsurprisingly, no other US states exceeds VMD0049 v1.0 penetration rate of 5% and the vast majority of states also would remain positive even under v 2.0's proposed 2.5% threshold. Subjurisdictional market penetrations should therefore be retained to be accurate and avoid false positive/negatives. (see https://afdc.energy.gov/transatlas#/?view=percent&fuel=ELEC&year=2024) b.The removal of the sophistication of the original v 1.0 positive test cascade across subregions is therefore unduly increasing false positive and negatives. It results in inaccurate positive list assessments for countries where one region unduly skews the result. The subjurisdictional assessments should be restored and be applicable to countries where, like the US, there is credible subregional data (e.g. by state) is available for stocks and/or sales. 17.Same concerns as #2 (see VM0038 Summary) re unilateral changes to the project activity definition, also copied across to VMD0049	
75	Eco Sustainability	VMD0049 - 5)	Critique: Step 1 (Regulatory Surplus) is increasingly difficult to pass due to new global mandates.	Thank you for the comment.

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		Procedure s	Source: EU Regulation (EU) 2023/1804 (Alternative Fuels Infrastructure Regulation - AFIR). This is the specific law that mandates charger deployment across the EU. Under VCS Standard v4.7, Section 3.5.1, any activity required by such a regulation fails the "Regulatory Surplus" test, making the "Positive List" in VMD0049 legally void for these regions.	Regulatory surplus must be performed whether applying the positive list or not.
76	Motion Energy	VMD0049 - 5) Procedure s	Please refer to Motion Energy's response to Section 18 above. The streamlined VVB-validated pathway for sub-regional market share data, referenced in the Guidance for Applying Activity Method for New Regions, is directly relevant to the procedures by which additionality is determined under VMD0049. Motion Energy requests that Verra confirm whether this pathway remains available under v2.0 and, if so, that it be explicitly referenced in the module procedures. Sources: VMD0049 v1.0, s.1; VMD0049 v2.0 draft; Guidance for Applying Activity Method for New Regions.	Thank you for the comment. We clarified a path to include other countries by submitting official governmental data and a MIN to VMD0049. Projects can demonstrate additionality through a project method if they are not in the positive list.
77	Climate Neutral Business Network (CNBN) on behalf of Connecticut Green Bank and other clients	VMD0049 - 5) Procedure s	15.Consistent with #7 above, VMD0049 does not make it clear that v 1.0 thresholds apply to instances seeking validation whose start dates are consistent with the time period when v 1.0 was a) applicable; b) most accurate 16.No clear pathway for proponent-led positive list demonstration a.PPs should be able to bring in their own data for countries where EIA data is demonstrated to be inaccurate but this is not made clear. EIA data can provide a single source of data but more accurate local data sources should be allowed to be put forward by PPs when the EIA data can be demonstrated to be less accurate i.For example, for the US in 2024 the US Alternative Fuels Data Center has	Thank you for the comment. Registered projects may continue using the previous versions for the remainder of their crediting periods. Transitions requirements were included in the methodology and validity of previous versions will be

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			penetration across the US for all EVs (BEV and PHEV) as less than 2.5% (0.5% for PHEV, 1.6% for BEV, so 2.1% for all EVs). This is the most accurate data source for the US and also has the subregional jurisdiction data by state (see #14 above). (https://afdc.energy.gov/transatlas#/?view=percent&fuel=ELEC&year=2024) b.This is particularly important for countries not yet listed since otherwise VCS creates an unreasonable barrier for projects access to the VCM	published in the methodology website. We introduced a State-level positive list for the US and clarified a path to include other countries by submitting official governmental data and a MIN to VMD0049. Projects can demonstrate additionality through a project method if they are not in the positive list.
78	Eco Sustainability	VMD0049 - 6) References	Critique: Failed to provide a "Watch List" for countries approaching maturity. Source: The Integrity Council for the Voluntary Carbon Market (ICVCM) - Section 5.3 (Transition to BAU). ICVCM recommends that methodologies for rapidly scaling technologies include clear "threshold triggers" or watch lists that signal when an activity is likely to be removed from a positive list to maintain market integrity.	Thank you for your comment. The current positive list is valid until the next update. Alternative approaches may be considered in future revisions.
79	Eco Sustainability	VMD0049 - Appendix A: Justificati	Critique: The internal logic of the Appendix (Sales vs. Stock) currently argues against the validity of the Tables. Source: VMD0049, Appendix A, Page 10 (Market Share Tests). The document itself states that "The EV market share proxy determined by sales is a conservative	Thank you for your comment. The current positive list was updated based on IEA

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		on of the Activity Penetration Option	alternative test." Current data from BloombergNEF (BNEF) Electric Vehicle Outlook 2023 shows that using this "conservative proxy" now disqualifies almost all countries originally listed in Table 1.	(International Energy Agency) Global EV Outlook 2025.
80	Motion Energy	VMD0049 - Appendix A: Justification of the Activity Penetration Option	Country coverage and positive list data Motion Energy does not propose the exclusion of any country from the positive list. Our concern is with absences rather than inclusions. A number of countries and regions are absent from the positive list not because their EV penetration exceeds the relevant threshold, but because IEA Global EV Outlook data does not cover them. Pacific Island nations are the clearest example; countries such as Fiji, Vanuatu and Papua New Guinea have negligible EV penetration by any measure but appear in neither Table 1 nor Table 2. Australia's absence from the HDV positive list is similarly likely to reflect a data gap rather than high penetration. We request that Verra introduce a proponent-led pathway under which project proponents may present credible national government data to their VVB to confirm that their jurisdiction falls below the relevant threshold, where that jurisdiction is absent from or ambiguously represented in the module. We also request that Verra clarify how supra-national aggregates such as Asia Pacific and EU27 in Tables 1 and 2 are to be applied at the project level, given that a project is located in a specific country rather than a regional aggregate. Motion Energy supports the principle of differentiating between AC and DC charger types, as this reflects the different applicable fleet definitions in VM0038 v1.1. AC chargers serve BEVs and PHEVs combined, while DCFCs serve BEVs only, which is	Thank you for your comment. The current positive list was updated based on IEA (International Energy Agency) Global EV Outlook 2025, which includes BEV and PHEV. We agree that countries with high penetration of PHEVs and low BEV may not represent a mature EV market. Such countries may submit official governmental data to revise VMD0049 or may wish to apply a project method to demonstrate additionality.

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			consistent with v1.0. However, Motion Energy has two concerns with the implementation addressed in the responses to Section 18 above and Section 22 below. Fleet-specific stock share data VM0038 v1.1 correctly distinguishes the applicable fleet by charger type: AC chargers serve BEVs and PHEVs combined, while DCFCs serve BEVs only. This distinction is material as PHEVs form a significant proportion of the on-road EV fleet in many markets and can substantially affect the penetration rate calculation depending on whether they are included or excluded. VMD0049 v2.0 appears to apply a single EV stock share figure from the IEA Global EV Outlook to both the AC and DCFC positive list columns simultaneously. The IEA Global EV Outlook 2025 states explicitly that unless otherwise specified, the term electric vehicle is used to refer to both battery electric and plug-in hybrid electric vehicles. The stock share figures used in Appendix A are therefore likely BEV+PHEV combined. For the AC charger column this is appropriate, as the applicable fleet is BEV+PHEV. For the DCFC column it is not, the applicable fleet should be BEVs only, and applying a BEV+PHEV combined stock share overstates the penetration of the DCFC-relevant fleet in markets with significant PHEV adoption. In those markets, the DCFC positive list threshold is effectively set against a higher numerator than the methodology intends. Verra is requested to confirm the composition of the EV stock share figure used in Appendix A, to apply fleet-specific penetration calculations consistent with the	

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			applicable fleet definitions in VM0038 v1.1 (BEV+PHEV combined for AC chargers and BEV only for DCFCs), and to permit project proponents to present credible government or quasi-government fleet-specific data distinguishing BEV and PHEV stock where such data provides a more accurate basis for the penetration assessment than the IEA aggregate figure. Sources: VMD0049 v2.0 draft, Appendix A (p.9), Tables 1 and 2; VMD0049 v1.0, Appendix A, Equations 1 and 2; VM0038 v1.1 draft, s.2 and s.4(1)(b) (p.10); International Energy Agency (2025), Global EV Outlook 2025.	
81	Motion Energy	General Feedback	Absence of a proponent-led regional demonstration pathway Under the proposed revision, where a project is not located in a country listed in VMD0049 v2.0 and does not satisfy the s.4(1)(b) thresholds, the only route to additionality is a full investment or barrier analysis under VM0038 v1.1 s.7.3. There is no intermediate pathway allowing a project proponent to demonstrate, using credible government data, that their specific country or region falls below the relevant penetration threshold and thereby access positive list treatment directly. This applies equally to LDV and HDV charger types. This gap is significant. The positive list is derived from IEA Global EV Outlook data, which provides a useful baseline for a generic module-level assessment but is not always the most current or granular source available. Many countries publish vehicle registration and EV penetration statistics through national transport or licensing authorities more frequently and at higher resolution than the IEA captures. Where such data is available and of equivalent or superior quality, a	Thank you for the comments. We appreciate the effort and detailed rationale provided. The current positive list was updated based on IEA (International Energy Agency) Global EV Outlook 2025, as the most complete and uniform global dataset. More granular assessment could be conducted on an ongoing basis as developers submit their intended countries data set to revise the positive list.

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			project proponent should be able to rely on it to demonstrate that the relevant threshold is not exceeded, at national or sub-national level. Preventing this is inconsistent with the broader VCS programme principle, set out in VCS Methodology Requirements v5.0 s.3.4.8, that data shall be from a recognized, credible source, shall be published by a government agency, and shall be from a time period that accurately reflects current conditions. Requiring a project proponent to disregard more accurate and current government data in favour of a fixed module-level dataset is difficult to reconcile with this principle. Pacific Island nations illustrate the problem clearly. No Pacific Island nation appears anywhere in VMD0049 v2.0 – neither in Table 1 for LDV chargers nor in Table 2 for HDV. Their absence is almost certainly a data gap rather than a high-penetration exclusion. These are among the most climate-vulnerable countries in the world, with EV penetration rates that are negligible by any measure. A project proponent in Fiji, Vanuatu, or Papua New Guinea with access to national transport registration data demonstrating that EV penetration is well below the relevant threshold should not be required to treat that data as inadmissible. The failure to provide a pathway for such proponents to use credible national government data withdraws positive list access from markets where carbon finance is most needed on the basis of an IEA data gap rather than any evidence of high market penetration. A further inconsistency arises from the structure of the positive list itself. VMD0049 v2.0 Tables 1 and 2 include both national entries and supra-national regional aggregates such as EU27, Asia Pacific, Europe, Central and South America, and North America. A project, however, is located in a specific country or region – not in a supra-national aggregate. It is not clear how a project proponent	

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			in a country that falls within the Asia Pacific aggregate but does not appear as a standalone entry should apply the positive list. If the aggregate figure is used, it may exclude projects in individual countries where local penetration rates are well below the threshold but the aggregate is driven above it by other markets within the grouping. If the aggregate cannot be relied upon for project-level eligibility, countries not appearing as standalone entries have no positive list route at all. This ambiguity should be resolved, and reinforces the case for a proponent-led pathway allowing project proponents to present country-specific or regional data directly to their VVB regardless of whether their jurisdiction appears as a standalone entry or within a supra-national aggregate. The positive list exists to streamline additionality demonstration where market conditions clearly support it. Enabling project proponents to use more accurate and current government data to access positive list treatment directly reinforces this purpose, it ensures that the positive list reflects the best available evidence of market conditions rather than being constrained by the limitations of a single third-party annual dataset. Verra is requested to introduce a proponent-led demonstration pathway under which a project proponent may present credible government or quasi-government data confirming that their specific country or region's EV market share falls below the relevant positive list threshold, with that demonstration reviewed and confirmed by the project's VVB as part of the validation process. This would be consistent with the approach set out in the Guidance for Applying Activity Method for New Regions and would provide a proportionate and accessible route for projects where the IEA-derived positive list contains errors or does not reflect the	

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			most accurate or current picture of local market conditions. Source: VM0038 v1.1 draft, s.4(1) and s.7.3; VMD0049 v2.0 draft, s.4, Table 1 and Table 2; VCS Methodology Requirements v5.0, s.3.4.8; International Energy Agency (2025), Global EV Outlook 2025; Guidance for Applying Activity Method for New Regions. Motion Energy welcomes the opportunity to comment on M0222 and appreciates Verra's ongoing work to maintain and develop the VM0038 and VMD0049 framework. The points raised in this response are intended to strengthen the revised methodology and module, and to ensure that the transition from v1.0 to v1.1 and v2.0 is grounded in clear evidence, consistent drafting, and equitable access for project developers across all applicable markets. Motion Energy is available to provide further information or to engage in direct discussion with Verra on any of the issues raised. We look forward to Verra's response to this submission.	
82	NA	General Feedback	The proposed revisions to VM0038 and VMD0049 are well-structured and represent a strong step toward improving transparency, standardization, and environmental integrity. The methodology is clear, relevant, and aligned with evolving EV and carbon market trends. Further enhancement can be achieved by incorporating flexibility for different usage patterns and differentiation across charger types and regions, which would improve accuracy and real-world applicability.	Thank you for your comments

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			Overall, the revisions are practical, forward-looking, and highly valuable for supporting sustainable electric mobility.	