SUMMARY OF PUBLIC CONSULTATION

VMR0017 Grid-connected electricity generation from renewable sources (ACM0002 Revision), v1.0

A draft of *VMR0017 Grid-connected electricity generation from renewable sources (ACM0002 Revision), v1.0* was open for public consultation between June 26, 2025 and July 28, 2025. This document includes a list of all comments received and the developer's response.

KEY QUESTIONS

Q1: What combinations of countries or regions and renewable energy technologies are under-served by carbon markets, and could accelerate climate impact with the proposed revision?

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#	Organization	Comment	Developer's Response
1	Viviid Green	1. Wind Energy in India and South Asia India has over 302 GW of wind potential, yet only ~46 GW has been harnessed. Unlike solar, wind faces higher upfront capital costs, longer project development cycles, and greater financing challenges—especially in rural and hilly regions. These issues are compounded by India's low GNI per capita (~$2,410) and large unmet energy demand. Without carbon finance to de-risk investments, new wind capacity	Commenter seems to agree with proposed geographic expansion. Commenter has highlighted some special RE situations (pt 2-4) that present a strong case for additionality due to existing barriers. For pt 1 a case can be made to contrary - wind installed capacity in India is amongst the highest in the world (5/6th place), the market has matured and the growth rate is expected to reduce, but some challenges still exist (like manufacturing costs and grid congestion/curtailment) which might or might not

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		additions have slowed to <2 GW/year despite policy intent. Other South Asian countries with viable wind corridors—such as Pakistan, Sri Lanka, and Nepal—also remain under-supported due to small market sizes, lack of concessional finance, and limited registry engagement. 2. Distributed Renewable Projects in Africa In countries such as Nigeria, Ethiopia, Mozambique, and DRC, distributed renewable energy (DRE) projects—especially microgrids and hybrid wind-solar systems—offer high-impact climate and livelihood benefits. Yet, due to small project sizes and perceived complexity in monitoring/reporting, these remain underrepresented in carbon markets. 3. Offshore and High-Altitude Wind in Latin America Countries such as Colombia, Peru, and Brazil (northeast) have unexploited high-altitude or offshore wind potential. These projects often involve complex logistics, permitting, and environmental assessments, which discourage private investment in the absence of carbon revenue or risk-mitigation instruments. 4. Renewable Heat and Bioenergy in Southeast Asia	require carbon finance support to be overcome. Some barriers include lack of finance, lack of govt support, small markets, difficult geographic accessibility/logistics and MRV complexity. These could potentially be used as one element for additionality demonstration by projects.

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		In countries like Indonesia, Vietnam, and Philippines, biomass-based cogeneration and small-scale renewable heat systems (e.g., solar dryers, improved boilers) remain under-credited despite being viable alternatives to fossil-fuel-based heat. These are often not covered under standard renewable methodologies, and suffer from MRV complexity.	
2	Anonymous 1	Developing Nations and Least Developed Countries (LDCs) represent a significantly under-served area within carbon markets for the deployment of renewable energy technologies. Countries like India, with established frameworks such as the Central Electricity Authority (CEA)'s annually updated emission factor database, demonstrate the potential for these nations to readily participate and contribute substantially to climate impact reduction. Leveraging such existing data can unlock significant carbon finance for renewable energy projects in these regions. A key consideration for renewable energy projects in carbon markets is the potential doubt surrounding additionality and baseline setting. To address these concerns effectively, we suggest that Verra implement a mechanism for the regular re-evaluation of each project activity. This re-	Commenter seems to agree with proposed geographic expansion. Suggests regular re-evaluation of additionality, which is above and beyond the CP renewal requirements under the VCS. This is a standard level consideration and probably not at the methodology level. As such, this should not be considered for this methodology revision. Commenter has mentioned some niche and up-and-coming technologies that are worth considering in the future.

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		evaluation should be based on the most up-to-date tools and methodologies available. This approach would ensure that projects continue to demonstrate genuine emissions reductions over time and maintain the integrity of the carbon credits generated. Note, We're seeing exciting new technologies like Solar Ponds and others (Building-Integrated Photovoltaics (BIPV); Concentrated Solar Power (CSP); Agrivoltaics (Solar Sharing)) innovative renewable energy solutions coming up. These could be game-changers in certain regions and might be really well-suited for specific needs in developing countries. Shouldn't the carbon market be helping these cutting-edge solutions take off too? And here's another thought – with most countries now putting forward their climate plans (NDCs), wouldn't it be awesome if more of them followed India's lead and made their Emission Factor data public? It'd be like having a central go-to spot for this information. This not only makes things clearer for everyone but would also seriously boost the supply of high-quality renewable carbon credits out there. Just a thought that could really make a difference!	
3	Jenweedie (Pty) Ltd	None. Renewable energy is now the most cost-effective way to bring energy online.	Commenter seems to disagree with proposed geographic expansion.

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		If the project makes financial sense without carbon revenue—which most grid-connected renewables now do—then awarding credits would violate additionality and distort the market. Is the project unlocking energy access where there is none? Is it paired with adaptation, agriculture, or water resilience? If not, carbon markets are no longer needed—and should not be used to reward what is already profitable.	Cites RE as being cost effective and no longer requiring carbon finance for deployment.
4	GREENIPATH AG	The proposed revision directly targets these gaps by expanding eligibility for grid-connected renewable energy projects to all low-, lower-middle-, and upper-middle-income countries. In practice, this reopens the door for carbon credit support to a range of country-technology combinations that were previously excluded but are critically needed. Notably, the revision introduces a list of eligible countries (by World Bank income category) for key technologies – solar photovoltaic (PV), onshore/offshore wind, and geothermal power – replacing the old blanket restriction. These technologies, deployed in the right regions, can have outsized climate and development benefits if given financial support:	Commenter seems to agree with proposed geographic expansion but with a caveat (summarized below) that acts as a safeguard. Caveat: The need for carbon finance finds a stronger justification for the combinations of developing-country locations and renewable technologies that have seen little investment – such as solar PV and wind in low-income countries or higher-cost technologies like geothermal and offshore wind in middle-income countries.

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		Solar PV and Wind in Sub-Saharan Africa, Central Asia, and Latin America: Many countries in Africa, developing Asia (including Central Asia), and Latin America have abundant solar and wind resources but very low installed capacity due to high upfront costs and financing barriers. Carbon revenues could help bridge the viability gap for projects in these markets. For example, utility-scale solar farms or wind parks in countries with weak investment support (e.g., parts of Africa, South Asia, or Central Asia) are underrepresented in current carbon markets. Including them could accelerate clean power roll-out and displace diesel or coal generation. Geothermal projects in developing economies: Geothermal energy has huge potential in countries along the East African Rift or in Southeast Asia. However, drilling and development are capital-intensive and risky, meaning these projects have historically seen little carbon market support. By explicitly including geothermal as an eligible technology, the revision could stimulate projects in Kenya, Indonesia, and other geothermal-rich countries where this potential remains underutilized due to financial barriers. Offshore wind in emerging markets: Countries like Vietnam, South Africa, and	

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		Brazil have vast offshore wind potential but have struggled to initiate projects due to high capital costs. Under the revised scope, offshore wind in these nations can qualify for credits, potentially accelerating investment in a technology that might otherwise take much longer to scale in developing regions. Overall, combinations of developing-country locations and renewable technologies that have seen little investment – such as solar PV and wind in low-income countries or higher-cost technologies like geothermal and offshore wind in middle-income countries – are prime targets. These are "hitherto underserved regions" where carbon finance can be the tipping point to launch clean energy projects. By expanding eligibility, the revision is expected to channel funding to projects that reduce emissions and support sustainable development, accelerating climate impact in areas that need it most. As Verra states, this change is meant to promote installations "in regions where it is crucially needed, thereby catalysing the clean energy transition."	
5	Auren Comercializadora de Energia LTDA	Brazil is a prominent example of a middle-income country with significant renewable potential that remains underserved by the carbon market. Despite its predominantly	Commenter seems to agree with proposed geographic expansion. Mentions that carbon markets are crucial for RE

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		renewable electricity mix, the marginal cost of generation expansion is high, and the investment environment has deteriorated significantly in recent years. Since 2019, the country has faced real interest rates above 10% per year, in addition to the end of subsidies and structural incentives that previously supported large renewable projects. Technologies such as solar, wind, and storage have become more expensive to deploy, especially in regions with limited infrastructure. Even in countries with high shares of renewable energy, strict or exclusionary criteria can prevent new projects from accessing climate finance. In Brazil, continued clean energy expansion is essential for energy security, green job creation, and a just transition. In this context, the voluntary carbon market is critical to ensure the continuity of renewable energy investments, maintain a 100% renewable matrix, and promote sustainable development.	deployment in countries like Brazil which enjoy good RE penetration but suffer from high marginal generation costs, poor investment environment and dwindling govt. support.
6	ABEEólica	Despite having a predominantly renewable electricity mix, Brazil—and South America more broadly—remains underserved by global carbon markets. Strict or exclusionary eligibility criteria often prevent new wind, solar, and storage projects from accessing climate finance, even in regions where clean energy expansion is both viable and necessary. This gap undermines	Commenter seems to agree with proposed geographic expansion. Highlights the key challenges faced by the RE industry in Brazil (and countries in similar economic bracket) and the need for carbon finance support. These might or might not require carbon finance support to be overcome. However, BESS projects present a stronger case for additionality due to barriers like high capital

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		climate action and sustainable development in countries already contributing significantly to global decarbonization. Including renewable energy and storage projects in voluntary carbon markets, through robust and transparent certification mechanisms, is essential to mobilize investments, accelerate emissions reductions, and promote a just and inclusive energy transition. Brazil stands out as a global renewable energy leader, yet the sector faces mounting challenges. While the country often has a surplus of renewable generation, new projects are increasingly constrained by curtailment—reductions in output due to infrastructure limitations. Curtailment has become a significant vulnerability, driven by grid congestion, oversupply during peak generation without matching demand, or systemic constraints such as maintenance, limited storage, or low operational flexibility. This risk undermines financial viability by reducing access to financing, lowering internal rates of return (IRR), extending payback periods, and deterring investors—particularly in high-curtailment-risk regions. Since 2019, Brazil's investment environment has weakened: real interest rates have surpassed 10% annually, and	costs, low market penetration, lack of skill/capacity and govt support/regulations.

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		essential subsidies and incentives have been phased out. Legislative and regulatory changes—such as Laws 14,120/2021 and 14,300/2022—are reducing financial support for new renewable projects, challenging economic feasibility and threatening clean energy expansion and its climate benefits. These conditions have significantly increased the costs of deploying solar PV, wind, and energy storage, especially in regions with limited logistical or electrical infrastructure. Even in countries with strong renewable penetration, stringent eligibility rules frequently block access to climate finance. In Brazil, advancing clean energy remains critical for energy security, green job creation, and a fair transition. Therefore, including renewable and storage projects in voluntary carbon markets—with strong certification—is vital to ensuring continued investment, preserving a 100% renewable matrix, and fostering sustainable development. The proposed revision of ACM0002 is especially timely, as it broadens eligibility to upper-middle-income countries—such as Brazil, per World Bank classification—enabling greater access to carbon finance for wind and solar projects. In Brazil's case, this methodology may also soon be recognized in the regulated carbon market	

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		(SBCE), which allows offsets only from accredited methodologies, likely including both VERRA and CDM. Broadening the geographic and technological scope could unlock investment in underutilized sectors and accelerate climate impact in countries with high mitigation potential but persistent institutional and financial barriers. Given these challenges, the revision of ACM0002 is a crucial opportunity to adapt to evolving realities and ensure that climate finance continues to support one of the world's most renewable-heavy energy markets. Expanding eligibility to upper-middle-income countries such as Brazil and others in Latin America and the Caribbean helps add value to renewable projects and maintain investor confidence. This, in turn, would accelerate the integration of renewables into national grids and significantly contribute to global emissions reductions. Additionally, while Brazil has a strong foundation in hydro, wind, and solar, new operational challenges are emerging. One of the most urgent is the need for firm capacity to manage rapid increases in electricity demand—known as load ramps. This is further complicated by the intermittency of renewable sources, especially during low solar irradiation or wind conditions. Many of Brazil's aging	

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		hydro and wind plants will soon require retrofitting or repowering to maintain efficiency and reliability. Furthermore, projects that integrate renewable generation with battery energy storage systems (BESS) still face major barriers across Brazil, including high costs, lack of regulatory clarity, limited skilled labour, and technical challenges. Yet, these projects are vital to safely integrate variable renewable energy into the grid and accelerate the retirement of fossil-fuelled plants. In both retrofit and BESS integration cases, revenue from carbon credit issuance could be essential to project feasibility. These efforts also promote job creation and help avoid new high-emission plant construction, contributing directly to reduced overall emissions.	

Q2: Does the proposed revision, along with recent enhancements to the VCS program, provide sufficient safeguards to integrity concerns related to renewable energy crediting? Please clarify your reasoning.

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7	Viviid Green	The proposed revision, along with recent VCS enhancements, introduces valuable integrity safeguards such as improved additionality criteria, clearer grid emission baselines, and income-based eligibility tiers. These steps are essential and broadly sufficient if implemented rigorously. However, we recommend technology-specific scrutiny, especially for middle-income countries like India where some technologies (e.g., solar) may no longer require support, while others like wind remain clearly additional due to cost, financing, and deployment barriers. Ensuring credibility will depend on differentiated treatment of technologies based on market maturity—not only country income. The revised safeguards should enable that nuance.	The proposed revision and the VCS enhancement provide sufficient safeguards but there is a caveat. However, the commenter suggests introducing technology-specific scrutiny to ensure that non-additional projects in specific countries don't pass through the pipeline. Verra may consider this feedback.
8	Anonymous 1	Yes. but always one has to evolve and correct themselves.	The proposed revision and the VCS enhancement provide sufficient safeguards.

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		We are late in fighting Climate Change but shouldn't delay much and contribute as much and fast can.	No action needed.
9	Jenweedie (Pty) Ltd	No. The proposed revision reopens a category that has already received over a decade of support through CDM, early VCS methodologies, and other offset systems. From 2004 through 2019, grid-connected renewable energy projects were consistently eligible for carbon finance. That period was enough to help scale the technology, bring down costs, and unlock market confidence. By 2020, solar and wind had become the lowest-cost forms of new electricity worldwide. Reintroducing crediting now—after 15+ years of carbon market support—without strict conditions risks serious integrity breaches: Additionality is no longer defensible: These projects are now commercially viable and often policy-driven. Double counting risks are high in countries where grid decarbonization contributes to NDCs. Market distortion is inevitable: Funding will flow to easy, profitable projects instead of those that are hard, local, and	Commenter indicates the proposed revision and the VCS enhancement do not provide sufficient safeguards. The proposed expansion is not appropriate. We appreciate this comment, but the argument does not seem strong enough to merit further action.

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		underfunded. The recent VCS updates do not close these gaps. Without narrow and enforceable conditions (e.g. community ownership, energy access, clear co-benefits), this revision will undermine trust in carbon markets and worsen the very credibility crisis Verra is trying to solve.	
10	GREENIPATH AG	Yes, the proposed revision – combined with recent enhancements to the VCS program – introduces several safeguards that significantly strengthen the integrity of renewable energy credits. These changes directly tackle key concerns that have historically undermined renewable energy projects, particularly additionality (whether projects truly need carbon finance to proceed) and accurate emissions accounting. Here's why the safeguards are likely sufficient: • Stricter Additionality Requirements: One major criticism of previous methodologies was that they were not rigorous enough in demonstrating additionality. In fact, in 2024, the Integrity Council for the Voluntary Carbon Market (ICVCM) refused to grant high-quality status to several renewable energy credits because they failed to meet additionality requirements, meaning many projects could have occurred without carbon finance. Verra's	The proposed revision and the VCS enhancement provide sufficient safeguards. No action needed.

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		recent enhancements address this by introducing new additionality tools (VT0008 and VT0009) designed to meet ICVCM's Core Carbon Principles. These tools enforce much stricter tests: for example, Investment Analysis requires developers to demonstrate that carbon credits will decisively improve the project's financial performance to make it viable. This eliminates the possibility of over-crediting projects that are already financially viable. • Geographic and Eligibility Guardrails: The revision limits eligibility to regions where additionality is more plausible. By restricting renewable energy crediting to low- and middle-income countries, it ensures credits are issued only in regions where carbon finance can help overcome significant financial barriers. Verra explicitly notes that this expansion is focused on regions "where carbon finance can help bridge the viability gap." This approach acts as a safeguard to prevent credits for non-additional projects that would have happened anyway. • Updated Emission Accounting Tools: Integrity concerns are not only about whether a project is needed but also about accurately quantifying the emissions avoided. The VCS program has updated its grid emission factor tool (VT0011), which replaces the outdated CDM grid factor tool (Tool 07). This tool recalculates baseline grid emissions using more conservative	

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		assumptions that better reflect current realities. It places more weight on the emissions of recently built power plants, ensuring that projects don't over-credit by claiming reductions that would have occurred without the project. This update ensures that emissions reductions are accurately measured and conservatively calculated. • Frequent Baseline Renewals and Reviews: Verra is moving toward shorter crediting periods and requiring periodic baseline updates for all projects. This ensures that credits remain valid over time and reflect real-world emissions reductions. If the grid gets cleaner or circumstances change, projects will have to renew their baseline to reflect the updated conditions, preventing over-crediting of projects as grids decarbonize. • Stronger Validation and Verification Oversight: Verra has strengthened its oversight of Validation and Verification Bodies (VVBs), ensuring that stricter rules are consistently applied. Every project will undergo rigorous third-party validation and verification, ensuring that additionality and emissions accounting standards are upheld at every stage. This enhanced monitoring of VVBs is critical to maintaining the integrity of credits issued under the new methodology. • Alignment with ICVCM's Best Practices: The proposed revision aligns with ICVCM's	

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		updated guidance, particularly on additionality and grid emission factor accounting. Verra's alignment with ICVCM's Core Carbon Principles and submission of the revised methodology for ICVCM assessment demonstrates its commitment to high integrity. If ICVCM grants high-integrity status to the revised methodology, it will validate the safeguards as effective. Reasoning: Taken together, these safeguards ensure that only genuinely additional projects receive credits, and that emissions reductions are accurately quantified. The updated tools and oversight mechanisms directly address previous weaknesses, such as over-crediting and insufficient financial scrutiny. By limiting eligibility to regions with real financial barriers and ensuring stronger emissions accounting, the revision ensures that the credits issued under this methodology meet the high standards required for credibility in the voluntary carbon market.	
11	Auren Comercializadora de Energia LTDA	The replacement of CDM tools with updated VCS tools improves methodological quality, especially in the criteria for additionality and quantification. However, regulatory uncertainty remains a major concern. The possibility of retroactive changes or future exclusions raises legitimate concerns among developers and investors.	The proposed revision and the VCS enhancement provide sufficient safeguards. No action needed.

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		It is essential that Verra adopts clear and consistent effective dates to avoid retroactive adjustments that could undermine the credibility, liquidity, and predictability of projects already registered, which have undergone multiple validations and verifications under the VCS program. Safeguards must guarantee the renewal of crediting periods without imposing additional burdens or changes that erode market confidence. Simultaneously, it is critical that the program enables the timely registration of new renewable energy projects, particularly through the changes proposed in Table 1 (VCS STANDARD). Rules for both the renewal of existing projects and registration of new ones must be prioritized to ensure continuity of assets and prevent market fragmentation.	
12	ABEEólica	The proposed revision introduces important updates to renewable energy crediting; however, we believe some improvements are necessary to better reflect real market conditions. The replacement of CDM tools with updated VCS tools enhances methodological quality, especially in additionality and quantification criteria. Nonetheless, regulatory uncertainty remains a key concern. The risk of retroactive changes or future exclusions	The proposed revision and the VCS enhancement provide sufficient safeguards. The proposed change in the applicability is not acceptable as direct connection between the power plant and BESS is crucial to ensure operational linkages and dependencies and ensure both systems were part of the same investment decision and can operate as a singular unit/in tandem. Therefore, the condition should not be revised. No action needed.

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		creates legitimate apprehension among developers and investors. Verra must establish clear and consistent effective dates to prevent retroactive adjustments that could harm the credibility, liquidity, and predictability of already-registered projects that have undergone multiple validations and verifications under the VCS program. Safeguards should ensure the renewal of crediting periods without imposing new burdens or changes that diminish market confidence. At the same time, it is critical to facilitate the timely registration of new renewable energy projects, particularly via the changes proposed in Table 1. Rules for both renewal of existing projects and registration of new ones must be prioritized to maintain asset continuity and avoid market fragmentation. The proposed revisions also significantly improve integrity safeguards for renewable crediting. By addressing outdated baselines, increasing conservatism, and aligning with international standards, the program aims to ensure high-quality carbon credit issuance. This is especially important for Brazil and South America, regions with strong renewable leadership. Brazil, for instance, generated 90% of its electricity from low-carbon sources in 2024.	

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		Wind and solar reached 24% of the mix, surpassing its 2030 targets, with over 30 GW of wind capacity by 2023 and 53.9 GW of solar by February 2025. Still, the region faces challenges: Brazil's renewable curtailment is expected to average 8% over the next decade, and Latin America received only 5% of global private clean energy investment—despite Brazil capturing 65% of that regional share in 2021. Expanding eligibility to upper-middle-income economies would enable this capacity to contribute more credibly to global mitigation, overcoming current cost and infrastructure barriers. Suggested Revisions Applicability Conditions "For activities involving the integration of a renewable energy power plant with a battery energy storage system (BESS), the BESS and the power plant are located on the same site, directly connected to each other (we recommend removing 'directly connected to each other'), and share a common connection to the grid. Both facilities are owned and operated by the same entity and are part of the same investment (financial) decisions." There are multiple technical configurations for integrating BESS with solar or wind	

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		generation, including setups behind the meter with shared inverters or post-meter systems sharing a common step-up substation. In both cases, the systems use a dedicated (restricted access) transmission system. Requiring a "direct connection" creates ambiguity and could conflict with evolving battery regulations in Brazil. We suggest that sharing the same restricted access grid infrastructure should suffice for compliance. Additionality – 5.3.2 "39. In case of Greenfield power plant, or retrofit to an existing solar photovoltaic or wind power plant with a BESS, to assess the economic attractiveness of the project activity, the project participants shall use the highest possible tariff that they may receive by supplying the electricity to the grid. Only in exceptional cases, where project participants can justify showing data on the load/consumption and generation pattern of the project activity, may other tariffs be applied." The phrase "highest possible tariff" introduces subjectivity, particularly in Brazil, where there are multiple contract types, including availability-based models, which make the definition of such a tariff unclear. To ensure clarity and traceability, we suggest incorporating local regulated auction prices as a benchmark. Revised	

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		wording: Proposed Alternative Wording: "39. In case of Greenfield power plant, or retrofit to an existing solar photovoltaic or wind power plant with a BESS, to assess the economic attractiveness of the project activity, the project participants shall use the highest possible tariff that they may receive, which may also consider local energy auction tariffs, by supplying the electricity to the grid. Only in exceptional cases, where project participants can justify showing data on the load/consumption and generation pattern of the project activity, may other tariffs be applied."	

Q3: What improvements to the proposed revision would you recommend to accelerate climate action and the energy transition, while upholding utmost integrity in the credits?

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13	Viviid Green	To accelerate climate action while upholding integrity, Verra should: Differentiate by Technology Maturity: Wind energy, unlike solar in India, still faces significant viability gaps. Methodologies must reflect this technology asymmetry in additionality testing and baseline setting. Incorporate Just Transition Indicators: Include metrics for energy access improvement, regional equity, and job creation to ensure credits deliver social as well as environmental impact. Streamline MRV for High-Impact Geographies: Simplify monitoring for wind projects in underserved regions while ensuring transparency—reducing cost barriers without compromising credibility. Enable Blended Finance Linkages: Allow crediting methodologies to integrate with concessional finance structures, helping projects unlock capital where carbon revenues alone are insufficient. These targeted revisions will reinforce the	The first point concerning differentiating by technology maturity can be considered. The rest are either already covered under the VCS (like just transition/SDG or MRV) or are not relevant to the VCS (like blended finance).

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		integrity of the VCS while mobilizing finance where it's most urgently needed.	
14	Anonymous 1	1. Those who already have credits verified and issued (before Dec2025), allow them to trade within next 1-2 years, and let them continue receive carbon finance till end of there crediting period. 2. For fresh issuance, the project activity must not have received any benefits from government in sense of low tariffs, subsidy to execute the project. Check on allowance and approval of loan assigned to the project owner or activity owner.	Point 1 is understood, and point 2 will be considered as part of additionality demonstration assessment by VVB and then Verra. No action needed.
15	Jenweedie (Pty) Ltd	Verra has played a critical role in scaling carbon finance globally. Grid-connected renewable energy is no longer constrained by carbon markets. The key barrier is not lack of finance—it's structural distortion of $7 trillion annually in fossil fuel subsidies that skew everything from national energy planning to consumer access. We've also seen how geopolitical shocks—like Russia's invasion of Ukraine—did more to decarbonise Europe's energy mix in one year than two decades of voluntary crediting or COP declarations. Truth hurts. To uphold integrity:	Verra can consider points 3 and 4. Points 1 and 2 are less impactful and already partially covered in the VCS standard.

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		1. Limit eligibility to RE projects with high-impact co-benefits—particularly around food security, water access, and climate resilience. 2. Prioritise community ownership and local benefit-sharing. Credit revenue should strengthen local economies, not just corporate margins. 3. Exclude projects with strong existing incentives (e.g., feed-in tariffs, government procurement programs) to avoid stacking benefits. 4. Update additionality criteria for the post-Paris reality. If the project would proceed anyway—through deregulation, cost parity, or market logic—it does not need carbon finance. Verra is uniquely positioned to show what credible, post-2020 carbon markets can look like. But to do that, we must resist the urge to revert to what was once useful, and instead focus on what is truly transformational now. We broke the Paris Agreement before	

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		PACM even came online.	
16	GREENIPATH AG	While the proposed revision is strong, a few further enhancements could accelerate climate action and ensure integrity in the credits: • Refine and Continuously Update Eligibility Criteria: Verra should periodically re-evaluate which countries and technologies qualify for renewable energy crediting. Although the current revision focuses on low- and middle-income countries, conditions in these countries may change rapidly. Dynamic eligibility reviews, based on renewable capacity, policy developments, and income status, could ensure that credits remain targeted to regions with the greatest financial need. This would also help prevent market oversupply and ensure credits are issued only where truly needed. • Enhance Host Country Involvement and Avoid Double Counting: To ensure integrity, the program should more explicitly align with host country climate strategies. Requiring host countries to provide attestations that the emission reductions won't be counted towards their Nationally Determined Contributions (NDCs) would prevent double-counting of emission reductions. While current VCS rules don't mandate corresponding adjustments for voluntary credits, integrating projects with NDC accounting	Verra can consider point 1 for the next revision. Point 2 (host country authorization) is a standard level consideration and is not relevant at the methodology level. Point 3 is already being considered but it is not part of this methodology revision. The first half of point 4 has already been implemented as part of additionality oversight, and the latter half is not VCS prerogative and thus not relevant. Point 5 is already covered. Point 6 is not relevant to this methodology revision.

Q3: What improvements to the proposed revision would you recommend to accelerate climate action and the energy transition, while upholding utmost integrity in the credits?			
#	Organization	Comment	Developer's Response
		could ensure that credits reflect genuine global emissions reductions. • Promote High-Impact and Community-Based Energy Projects: To speed up the energy transition, Verra could prioritize distributed renewable energy projects (e.g., solar home systems, mini-grids) in least-developed regions, offering simplified methodologies or bonus credits for projects with clear sustainable development benefits. These projects often have clear additionality and address both climate and development needs. Prioritizing such projects can boost energy access and accelerate the energy transition, particularly in underserved communities. • Strengthen Transparency and Public Disclosure: Transparency is key to building trust in the carbon credit market. Verra could require public disclosure of additionality financial analyses and credit retirements to allow third parties to verify assumptions. Additionally, increasing the visibility of who buys these credits and for what purpose could attract more reputable buyers, accelerating climate finance. Requiring transparent reporting will enhance market confidence and drive more climate action. • Special Cases for Project-Based Analysis: While the revision primarily targets middle-income countries, certain special cases may require a more flexible approach. For instance, geothermal	

Q3: What improvements to the proposed revision would you recommend to accelerate climate action and the energy transition, while upholding utmost integrity in the credits?			
#	Organization	Comment	Developer's Response
		projects, offshore wind projects in specific regions could benefit from a project-based analysis, considering the high costs and competitive tariff mechanisms in some countries. This would ensure that even in high-cost contexts, these critical projects receive tailored support, helping to overcome economic challenges and preventing important projects from being excluded. This flexibility can foster broader participation in the renewable energy transition. • Inclusion of Waste Heat Projects and Energy Efficiency: Similarly, extending the scope to include waste heat recovery projects, particularly in oil and gas regions, could be highly beneficial. These sectors are underserved but have substantial potential to drive emissions reductions, especially in regions with high industrial emissions but limited access to financing. Supporting such projects would promote both environmental sustainability and economic development, further accelerating the global energy transition.	
17	Auren Comercializadora de Energia LTDA	We recommend three key improvements: • First, the inclusion of clear non-retroactivity clauses to ensure regulatory predictability and protect already-registered projects. The transition between methodology versions, such as ACM0002, must be carefully managed to avoid disruption, ensuring compliance with prior	Point 1 - Protection of already registered projects will be ensured through the methodology switch being required during the CP renewal process only. There will be no retroactive application of requirements. A suitable grace period for listed projects will ensure that such projects are fairly treated and protected from regulatory changes. Point 2 - this is already being pursued.

Q3: What improvements to the proposed revision would you recommend to accelerate climate action and the energy transition, while upholding utmost integrity in the credits?			
#	Organization	Comment	Developer's Response
		commitments to clients and stakeholders. A balanced transition window should be established, with specific exceptions for projects in advanced development stages. • Second, explicit alignment with the Core Carbon Principles (CCPs) of the ICVCM and CORSIA requirements, ensuring credit integrity and international acceptance. • Third, consideration of economic challenges in middle-income countries like Brazil, where the absence of public incentives and the high cost of capital make carbon finance an essential instrument for scaling up clean energy investments. Additionally, we recommend that Table 1 be framed as a tool for enabling rather than restricting investment, reflecting the economic and financial conditions of countries where renewable energy expansion is increasingly difficult without access to climate finance. As Verra's own 2024 publication emphasizes, the voluntary carbon market must be positioned as a strategic enabler of energy transition and sustainable infrastructure development.	Point 3 - this will be considered as part of the project level additionality assessment The current version of tool 1 is meant to empower the methodologies to define project eligibility for RE projects with additionality being demonstrated through the use of the new and improved VCS tools. No action needed.
18	ABEEólica	In terms of integrity, it would be beneficial for Verra to conduct follow-up activities on certified projects and seek ways to ensure that these projects are registered with relevant governmental bodies responsible for energy or climate management in the countries where the credits are issued.	BESS rentals are not being considered under this methodology revision. The current applicability conditions will not be revised. All other points have either been responded to above or are already covered as part of the VCS project review process, are a standard level consideration and not relevant to this methodology revision.

Q3: What improvements to the proposed revision would you recommend to accelerate climate action and the energy transition, while upholding utmost integrity in the credits?			
#	Organization	Comment	Developer's Response
		The creation of an additional Verra label recognizing sustainable practices—and highlighting project-specific contributions such as compliance with the SDGs, as well as the assessment and management of nature-related risks—could help differentiate these credits and add value to them in the market. Just like in some other standards, we believe that introducing mechanisms to add value to credits generated by this type of methodology would also encourage more companies to invest in renewable sources. For example, you could include labels based on how many UN Sustainable Development Goals (SDGs) were met during the monitoring period. These labels could have three or four stages to incentivize the fulfilment of more SDGs, thereby increasing the value of the credits generated by that project. Considering the large spectrum of possible projects comprising renewable power plants and BESS, we propose the adaption of the following statement (section 2.1 – Scope): "For activities involving the integration of a renewable energy power plant with a battery energy storage system (BESS), the BESS and the power plant are located on the same site, directly connected to each	No action needed.

Q3: What improvements to the proposed revision would you recommend to accelerate climate action and the energy transition, while upholding utmost integrity in the credits?			
#	Organization	Comment	Developer's Response
		other, and share a common connection to the grid. Both facilities are owned and (we recommend replacing ''owned and'' by ''possessed and'') operated by the same entity and are part of the same investment financial (we recommend removing ''financial'') decisions." This alteration allows the certification of projects that involve BESS rentals – a business model that promotes relevant technology substitution in many Brazilian regions, given the high prices of storage systems worldwide. We also recommend three key improvements: • First, the inclusion of clear non-retroactivity clauses to ensure regulatory predictability and protect already-registered projects. The transition between methodology versions, such as ACM0002, must be carefully managed to avoid disruption, ensuring compliance with prior commitments to clients and stakeholders. A balanced transition window should be established, with specific exceptions for projects in advanced development stages. • Second, explicit alignment with the Core Carbon Principles (CCPs) of the ICVCM and CORSIA requirements, ensuring credit integrity and international acceptance. • Third, consideration of economic challenges in middle-income countries like	

Q3: What improvements to the proposed revision would you recommend to accelerate climate action and the energy transition, while upholding utmost integrity in the credits?			
#	Organization	Comment	Developer's Response
		Brazil, where the absence of public incentives and the high cost of capital make carbon finance an essential instrument for scaling up clean energy investments. Additionally, we recommend that Table 1 be framed as a tool for enabling rather than restricting investment, reflecting the economic and financial conditions of countries where renewable energy expansion is increasingly difficult without access to climate finance. As Verra's own 2024 publication emphasizes, the voluntary carbon market must be positioned as a strategic enabler of energy transition and sustainable infrastructure development. Finally, we propose a few technical refinements: • To improve the process, it would be interesting to introduce clearer benchmarks process calculation for renewable energy technology projects (e.g., regional). This would allow them to be presented and compared more effectively. Due to a lack of data (e.g., in retroactive projects), this process still does not follow a pattern. • Incorporate clear requirements for corresponding adjustments between countries. • Require an even deeper analysis of the financial, technological, and regulatory	

Q3: What improvements to the proposed revision would you recommend to accelerate climate action and the energy transition, while upholding utmost integrity in the credits?			
#	Organization	Comment	Developer's Response
		barriers a project faces, demonstrating that carbon credits are truly necessary to overcome these obstacles.	
19	Associação Brasileira das Empresas Geradoras de Energia Elétrica - Abrage	A relevant improvement to the proposed revision would be the inclusion of hydroelectric power projects in the geographic applicability expansion of ACM0002. Hydropower is a critical renewable energy source for many countries underserved by carbon markets and represents a strategic opportunity to leverage carbon finance in support of energy access and infrastructure development, particularly in lower-middle income and upper-middle income economies. In Brazil, for instance, hydropower plays a central role in the energy mix, and its inclusion could catalyse investments in modernization and low-impact projects aligned with the country's energy transition goals. As hydro is already covered under the methodological scope of ACM0002, there appears to be no justification for its exclusion and the rationale for this decision is not provided in the proposed revision. Furthermore, the updated VCS Standard in row 1 of Table 1 also includes the exception of "where no geographic applicability conditions are described in the applied methodology" for grid-connected electricity generation. Including hydro in the proposed expansion would therefore enhance the consistency	This has already been addressed in comment no. 24 below. No action needed.

Q3: What improvements to the proposed revision would you recommend to accelerate climate action and the energy transition, while upholding utmost integrity in the credits?			
#	Organization	Comment	Developer's Response
		of the revision and help ensure that the benefits of carbon finance reach a broader range of clean energy technologies and geographies.	

Q4: Are there any weaknesses or omissions that concern you in the proposed revision? Please clarify your reasoning.

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#	Organization	Comment	Developer's Response
20	Viviid Green	The proposed revision still treats country-level income as a primary determinant of additionality, without adequately accounting for technology-specific viability gaps within those countries. In India, while solar may be commercially viable, wind energy faces clear cost, policy, and financing barriers—especially in underserved states.	The assessment of the suitability of projects to achieve carbon finance is composed of two levels - eligibility and additionality. The country income level determinant is an eligibility consideration while the technology specific viability and other conditions are an additionality level consideration. This ensures that only projects that require carbon finance to sustain filter through and get registered under the VCS. No action needed.

Q4: Are there any weaknesses or omissions that concern you in the proposed revision? Please clarify your reasoning.			
#	Organization	Comment	Developer's Response
		By not differentiating between technologies within middle-income countries, the revision risks reinforcing existing market distortions. A more nuanced approach—factoring in both country and technology maturity—is essential to ensure that genuinely additional, high-impact projects like wind in India are not excluded.	
21	GREENIPATH AG	Despite the strengths of the proposed revision, a few potential weaknesses and omissions should be addressed: • Risk of Residual Non-Additionality in Certain Contexts: Extending eligibility to upper-middle-income countries could allow some projects that are effectively business-as-usual to qualify for carbon credits. This poses a risk of over-crediting, especially if technology costs decline or government incentives already cover the cost of renewable projects. Financial analysis could sometimes be optimistic, allowing projects that would have happened anyway to claim credits. Continuous monitoring and more rigorous scrutiny of financial assumptions by validators are crucial to mitigate this risk. • No Explicit Mention of NDC Accounting / Double Counting Safeguard: The revision does not fully address how double-counting between the voluntary market and national commitments will be prevented. If a renewable project sells credits internationally while the host country also counts the same emission reductions	Point 1 - the two level assessment process, discussed in comment no. 20 above will ensure no non-additional projects filter through. Point 2 - this is a standard-level consideration and not relevant to this methodology revision. Point 3 - the two assessment process will ensure only additional projects get registered which will be a check against project over-registration and resulting credit oversupply. Point 4 - this is already covered as part of the VCS standard's SDG impact and safeguarding requirements. Point 5 - PDs are required to substantiate their reported data and assumptions during the additionality assessment. This is further validated by both the VVB and Verra's review team. The more stringent additionality demonstration process allows better detection of gaming/overestimations and preventing such projects to continue through the project pipeline. No action needed.

Q4: Are there any weaknesses or omissions that concern you in the proposed revision? Please clarify your reasoning.			
#	Organization	Comment	Developer's Response
		toward its NDC, the climate benefit is effectively claimed twice. A corresponding adjustment to national emissions would prevent this. Verra should explicitly include this safeguard to ensure global climate integrity. • Potential Market Oversupply and Quality Perception Issues: The revision could lead to an oversupply of renewable credits as more projects are eligible. If too many projects are registered, the supply of credits could flood the market, potentially lowering prices and making it easier for companies to offset emissions rather than reducing them internally. Verra should introduce mechanisms to manage credit supply, ensuring that credits entering the market meet high standards and are not perceived as "low quality." • Local Impact and Sustainability Considerations: The revision primarily focuses on carbon accounting, but it lacks specific guidance on social and environmental safeguards. Large renewable projects can have negative impacts, such as community displacement or biodiversity loss. Verra should include specific criteria to ensure that renewable energy projects are not only climate-positive but also socially responsible. Including stronger community engagement and environmental protections would ensure the methodology contributes to equitable and sustainable climate action. • Reliance on Self-Reported Data and	

Q4: Are there any weaknesses or omissions that concern you in the proposed revision? Please clarify your reasoning.			
#	Organization	Comment	Developer's Response
		Financial Assumptions: The integrity of the new additionality approach depends on self-reported data and financial assumptions provided by project developers. There is a risk that proponents may present their projects in the most favourable light, potentially inflating projected costs or underestimating revenues. While the new tools are more rigorous, enhanced third-party verification and greater transparency in financial reporting would help ensure that only genuinely additional projects are credited.	
22	Auren Comercializadora de Energia LTDA	The main concern is the lack of explicit legal and regulatory safeguards for projects that will be developed under the new version of the methodology. Without clear provisions ensuring continued eligibility and validity of credits already issued, investors face a high risk of future devaluation. This undermines the voluntary carbon market's credibility and its role as a reliable climate finance mechanism, especially in countries such as Brazil. In addition, overly conservative baseline adjustments and rigid eligibility criteria may exclude feasible renewable energy projects in middle-income countries. In Brazil, the cost of expanding generation is high, and financing is limited. Baselines must reflect real market dynamics and actual emissions displacement, including marginal emission factors and regional financial constraints. We also emphasize the need for clear	Protection of already registered projects will be ensured through the methodology switch being required during the CP renewal process only. There will be no retroactive application of requirements. A suitable grace period for listed projects will ensure that such projects are fairly treated and protected from regulatory changes. The other issues are covered as part of standard or methodological requirements. No action needed.

Q4: Are there any weaknesses or omissions that concern you in the proposed revision? Please clarify your reasoning.			
#	Organization	Comment	Developer's Response
		technical guidance in the revised methodologies to avoid diverging interpretations, particularly on issues like project start dates and crediting period definitions.	
23	ABEEólica	The main concern is the lack of explicit legal and regulatory safeguards for projects that will be developed under the new version of the methodology. Without clear provisions ensuring continued eligibility and validity of credits already issued, investors face a high risk of future devaluation. This undermines the voluntary carbon market's credibility and its role as a reliable climate finance mechanism, especially in countries such as Brazil. In addition, overly conservative baseline adjustments and rigid eligibility criteria may exclude feasible renewable energy projects in middle-income countries. In Brazil, the cost of expanding generation is high, and financing is limited. Baselines must reflect real market dynamics and actual emissions displacement, including marginal emission factors and regional financial constraints. We also emphasize the need for clear technical guidance in the revised methodologies to avoid diverging interpretations, particularly on issues like project start dates and crediting period definitions.	The first part of the feedback has already been addressed in comment no. 22 above. TOOL01 has been revised to VT0008 where these concerns have been addressed. These concerns will also be addressed as part of the project review process. VT0010 has replaced TOOL05 which has been clearly stated in the revised methodology. No action needed.

Q4: Are there any weaknesses or omissions that concern you in the proposed revision? Please clarify your reasoning.			
#	Organization	Comment	Developer's Response
		The application of TOOL 01 for the Demonstration and Assessment of Additionality poses a relevant concern: for projects fitting the guidelines described in Step 4b (Common Practice Analysis for Measures Listed in Step 4a), it would be important to consider distinctions based on aspects such as the influence of other incentives, resources and prices, and labour force and expertise. Therefore, we propose either an improvement of the tool itself, or a specific reference in the new methodology stating that these aspects could be used to analyse distinctions among new and existing projects Finally, there is still a lack of clarity regarding the applicability of TOOL05, mainly in wind and solar projects. Its use is not consistent across all registered projects.	
24	Associação Brasileira das Empresas Geradoras de Energia Elétrica - Abrage	A significant omission in the proposed revision is the exclusion of hydroelectric projects from the expansion of geographic applicability under ACM0002, without any accompanying justification. Hydropower is already part of the methodological scope of ACM0002 and remains a critical component of the energy mix in many countries, especially in regions where energy access, infrastructure investment, and decarbonization efforts are highly dependent on the modernization and	Hydro power plants are only eligible in non-LDCs in line with the VCS Standard's Table 1 requirements. Hydro projects are not included in the proposed exceptions and are getting a stricter treatment under the VCS due to the following reasons: - Hydro projects, especially large-scale ones, can have significant environmental and social impacts, including deforestation, displacement of communities, and alteration of river ecosystems. - Many hydro projects are already economically viable

Q4: Are there any weaknesses or omissions that concern you in the proposed revision? Please clarify your reasoning.			
#	Organization	Comment	Developer's Response
		expansion of low-impact hydro projects. The exclusion of hydropower from the expanded applicability undermines the revision's stated objective of supporting clean energy deployment in underserved regions through carbon finance. In addition, the absence of any rational or technical analysis to justify this exclusion limits the transparency of the proposed revision. This omission is particularly relevant considering the provision added to Row 1 of Table 1 of the VCS Program that allows for geographic applicability conditions to be specified in the methodology to take precedence over the default eligibility for project activities. To ensure methodological integrity and promote equitable access to carbon finance across a full range of clean energy technologies, it is essential that Verra either include hydropower into the list of eligible technologies for geographic expansion under ACM0002.	without carbon finance, increasing the risk of non-additionality. The hydro power sector has already achieved maturity in many countries like China, Brazil and India. - Hydro projects with reservoirs emit methane from reservoir surfaces, which contributes to global warming and complicates GHG emissions accounting. No action needed.
25	Individual Consultant	In a renewable energy power plant integrated with a battery energy storage system (BESS), is there a minimum required capacity (as a percentage) for the BESS relative to the capacity of the renewable energy plant?	No, there is no such capacity requirement (although this was considered at one point). Any combination of BESS and power plant is applicable if it complies with the relevant eligibility criterion. The new additionality requirements (and the VCS tools) will help filter out non-additional projects. No action needed.

GENERAL FEEDBACK

Section 1 - Summary Description

Section 1 - Summary Description			
#	Organization	Comment	Developer's Response
26	Viviid Green	Executive Summary India stands at a critical intersection of development and decarbonization. While solar photovoltaics (PV) has grown rapidly due to declining costs and streamlined policy support, wind energy has stagnated, despite its strategic value to the grid and vast untapped potential. This asymmetry is not accidental—it is the result of India's unique development context, demographic pressures, and infrastructure deficits. This submission advocates for the reintegration and prioritization of wind energy projects in India under Verra's Verified Carbon Standard (VCS) Program. Based on real-world data and policy evidence, we argue that continued climate finance—especially through market-based mechanisms like carbon credits—is essential to bridging this growing technology gap and enabling a just energy transition. _____ 1. India's Unique Context and the Energy Fulfilment Gap India, home to over 1.4 billion people, faces a paradox: while it is the third-largest energy consumer globally, it still grapples	Commenter seems to agree with proposed geographic expansion. Have attempted to make a case for wind power but the argument does not seem strong enough and uses outdated/incorrect data. For instance, the installed capacity for wind in India stands at >50GW, which has increased since by ~16GW since 2017 (CAGR of ~5%, against a global CAGR of ~10% in that period). This slower growth rate is expected for mature markets like India. No action needed.

Section 1 - Summary Description			
#	Organization	Comment	Developer's Response
		with deep energy poverty. • 25 million households remain unelectrified (NITI Aayog), and many others suffer from unreliable access. • Per capita electricity consumption is only 1,200 kWh/year, one-third of the global average. • GNI per capita stands at just $2,410 (World Bank, 2023)—highlighting the limited affordability for large-scale private energy investments. This under-fulfilment of basic energy needs calls for public-good-driven investment, where renewables—especially wind—can play a pivotal role. Yet, without tailored support, wind cannot compete with solar in terms of pace or cost. _____ 2. Divergence Between Wind and Solar Development • Solar PV Surge: From just 2.6 GW in 2014, solar has grown to over 72 GW by 2024, driven by falling module prices and massive public procurement. • Wind Stagnation: Wind capacity stands at ~46 GW, with <2 GW added per year since 2017 (MNRE, NIWE). • Potential Untapped: India has over 302 GW of wind potential at 100m hub height, yet less than 15% is currently utilized. This divergence stems from: • Higher CAPEX and longer gestation for wind. • Logistical complexity: turbines are large,	

Section 1 - Summary Description			
#	Organization	Comment	Developer's Response
		site-specific, and require difficult terrain access. • Policy shifts: Auctions have driven tariffs down to uneconomic levels for wind developers, particularly in non-solar-rich states. _____ 3. Wind Energy's Strategic Role • Grid Reliability: Wind complements solar—generating power during monsoon months and nighttime hours. • Geographic Equity: Wind potential is high in states like Gujarat, Tamil Nadu, Karnataka, and Rajasthan—regions that often face grid instability or curtailment. • Rural Employment: Wind supports 1.5–2.0 FTE jobs/MW during construction and 0.3–0.5 FTE jobs/MW during O&M (CEEW). • Diversification of Supply: Over-reliance on solar risks seasonal mismatches in power supply; wind helps distribute generation over time. _____ 4. Cost Barriers and Financing Constraints • CAPEX: Wind projects cost ₹6.5–7.5 crore/MW, nearly double that of solar (₹3–4 crore/MW). • Tariffs: With tariff caps at ₹2.77/kWh, developers face wafer-thin margins, deterring investment. • High Capital Cost: Average debt financing rates for renewable projects in India are	

Section 1 - Summary Description			
#	Organization	Comment	Developer's Response
		12–14%, far higher than in OECD countries. • Supply Chain: India's wind supply chain depends on a few OEMs, with import duties and raw material volatility increasing project risk. Without carbon revenue or concessional capital, wind projects cannot recover upfront costs—especially in less developed parts of India where the need is greatest. _____ 5. Why India Needs Special Consideration India should not be treated the same as countries where market parity between solar and wind has been achieved. India's case is distinct: • Massive unmet demand and low income. • Deep regional disparity in energy access. • Structural financing constraints for infrastructure. • High climate vulnerability, ranking 7th globally (Germanwatch, 2023). Thus, India requires continued, differentiated support for wind through carbon finance mechanisms that can unlock capital, catalyse innovation, and de-risk projects.	
27	Anonymous 1	About us: CarboShank Solutions is a coming new company in the domain of climate change with a fresh energy of thought leadership and doing what is required most. One Carbon at a time!	Comment is not useful for improving this revision.

Section 1 - Summary Description			
#	Organization	Comment	Developer's Response
		We can propose Verra working on exciting new* technologies like Solar Ponds and others (Building-Integrated Photovoltaics (BIPV); Concentrated Solar Power (CSP); Agrivoltaics (Solar Sharing)) innovative renewable energy solutions coming up. (*these are not new but less popular in the world at commercial level. We can help at the best capacity of us. CarboShank Solutions trading@carboshanksolutions.com admin@carboshanksolutions.com	
28	ABEEólica	This revision represents a positive step forward and, if implemented effectively, could strengthen environmental integrity and broaden access to carbon finance. However, Verra must ensure that methodological transitions are stable and equitable, and that Table 1 supports, rather than restricts, clean energy investment. Middle-income countries like Brazil, with significant renewable potential but increasingly complex financing conditions, must remain central to the solution. Ensuring their inclusion will help meet global climate targets, support sustainable development, and maintain the credibility of the voluntary carbon market. In addition, we suggest evaluating the possibility of centralizing, within the	Commenter seems to agree with proposed geographic expansion. The grid emission factor feedback is relevant for VT0011 and not this methodology.

Section 1 - Summary Description			
#	Organization	Comment	Developer's Response
		standard, the calculation of grid GHG emission factors in order to ensure greater transparency and integrity in the process that underpins the final issuance of carbon credits in each country. This calculation, to be carried out by the Verra team, should take into account the specific characteristics of each country, ensuring that there is a proper incentive for investment in low-carbon projects, particularly in countries with high emission levels.	

Section 4 - Applicability Conditions

Section 4 - Applicability Conditions			
#	Organization	Comment	Developer's Response
29	Individual Consultant	For project activities involving the integration of a renewable energy power plant with a battery energy storage system (BESS), both are not always part of the same investment (financial) decision. Sometimes, project developers install the BESS after the renewable energy plant is already in place, without any prior investment (financial) decision covering both components. Hence, the applicability condition should either be removed or	Where the power plant and the BESS are not part of the same investment decision then it is hard to prove whether BESS (and the project as a whole) was considered for carbon financing. This requirement should not be revised as it is crucial to maintain the prior consideration aspect of additionality. No action needed.

Section 4 - Applicability Conditions			
#	Organization	Comment	Developer's Response
		revised.	

Section 6 - Baseline Scenario

Section 6 - Baseline Scenario			
#	Organization	Comment	Developer's Response
30	GREENIPATH AG	Revising Assumptions on Technology Costs: Technology Learning Curves: When calculating baselines, assumptions on technology costs should be updated based on learning curves and market trends. This would better capture the decreasing costs of renewable technologies (e.g., solar, wind) and avoid overestimating the cost barriers to new projects. Reviewing Grid and Fossil Fuel Trends: Tracking Fossil Fuel Use: The baseline analysis should also consider the rate of fossil fuel usage decline and the growth of renewables on the grid. For example, areas with a rapid transition away from coal or gas would have lower baseline emissions, and this needs to be factored into project calculations.	These aspects are considered during a project's demonstration of additionality which includes a sensitivity analysis. This however is an ex-ante demonstration in line with VCS standard requirements. No action needed.

Section 7 - Additionality

Section 7 - Additionality			
#	Organization	Comment	Developer's Response
31	GREENIPATH AG	Incorporating Updated Financial Analyses: To assess the additionality of projects more rigorously, baseline financial analyses should incorporate more sophisticated financial models that account for financing conditions, local risks, and costs of capital. This would help ensure that only projects truly dependent on carbon finance are awarded credits. Adjusting for Policy Shifts: The baseline should reflect major policy changes that could affect the viability of projects, such as new renewable energy subsidies, carbon pricing, or energy transition goals. This would ensure that projects that are supported by government incentives but still need carbon finance are not excluded.	These aspects are considered during a project's demonstration of additionality (to the extent required) which includes a sensitivity analysis. This however is an ex-ante demonstration in line with VCS standard requirements. No action needed.
32	Auren Comercializadora de Energia LTDA	This revision represents a positive step forward and, if implemented effectively, could strengthen environmental integrity and broaden access to carbon finance. However, Verra must ensure that methodological transitions are stable and equitable, and that Table 1 supports — rather than restricts — clean energy investment. Middle-income countries like Brazil, with significant renewable potential but increasingly complex financing conditions, must remain central to the solution. Ensuring their inclusion will help meet	Commenter seems to agree with proposed geographic expansion. No action needed.

Section 7 - Additionality			
#	Organization	Comment	Developer's Response
		global climate targets, support sustainable development, and maintain the credibility of the voluntary carbon market.	

Section 8.1 - Quantification of Reductions and Removals - Baseline Emissions

Section 8.1 - Quantification of Reductions and Removals - Baseline Emissions			
#	Organization	Comment	Developer's Response
	GREENIPATH AG	Regarding Grid Emission Factors for Countries Without Published Data: To ensure the integrity and consistency of baseline emissions for countries lacking published grid emission factors, Verra should consider adopting a flexible approach for calculating default values. This approach could include the use of regional averages or global averages, particularly for low- and middle-income countries. Default values could also be based on the country's energy mix, with adjustments for fossil fuel reliance versus renewable energy share. In the absence of localized data, Verra could adopt emission factors from similar	This feedback could be relevant for VT0011 but not for the M0333 methodology.

Section 8.1 - Quantification of Reductions and Removals - Baseline Emissions			
#	Organization	Comment	Developer's Response
		grid profiles in comparable countries and provide a range of values (best-case to worst-case scenarios) to account for uncertainties. Additionally, it would be beneficial to allow for periodic updates as more data becomes available and to work with international organizations like IEA and IRENA to establish standardized default factors for countries lacking specific data. This approach will help maintain conservative and accurate baselines, ensuring the credibility of carbon credits while supporting projects in underserved regions.	