

1. The title “Showerhead Aeration Technology” and the proponent states that this methodology is associated with flow restriction aeration device which fixes between a shower hose and a showerhead. This is mystifying in that “aeration” is the introduction of air into the water stream. This is done in tips on the ends of faucets and in showerheads designed with this function. I’m not aware of any capability to aerate shower water before the water enters the showerhead. Most likely, this proponent speaks of an insert that restricts the diameter of the flow opening – a restrictor only.

2. It is my understanding that VCS supports CDM methodologies where feasible. The proponent states that CDM meth AMS-II.M could not be sufficiently revised because it is restricted to (a) residential buildings and (b) low-flow devices which permanently replace baseline faucets.

Concerning (a): The UNFCCC EB record appears to be restricted to residential buildings only because that is what the proponent for that methodology requested because that was the type of project the proponent was pursuing. There’s no reason the AMS-II.M couldn’t be expanded simply removing the restriction to residential buildings.

Concerning (b): There is a UNFCCC clarification of AMS-II.M that explains the meaning of ‘permanently replace baseline faucets’. Under the clarification, inline devices are allowed and faucets do not themselves need to be replaced. It is allowed that the inline device may be entirely removable, but the installed device must not be able to be disassembled and disabled so as to remove the efficiency function. The agency’s point, I think, is to disallow the common faucet tips that have in them easily removable flow restrictor washers.

3. The greatest CDM modification with this proposal is the change in baseline and project measurements from CDM AMS-II.M. For every measurement the proposal would provide for an alternative of using an assumption supported by geographically specific available and reputable references. The UNFCCC EB rejected this type of option, requiring metering of a statistically representative sample for all methodology parameters, such as baseline flow rate, project flow rate, water temperature, and water volume use. The agency found that “studies” were not rigorous and subject to a significant amount of guessing. (Who takes a watch into shower and times themselves?) The language in this proposed meth. would significantly reduce the credibility of any assumed water savings.

Why not just address the residential restriction and leave everything else the same? This proposal would greatly weaken (water down, haha) the integrity provided by AMS-II.M.