

# UNECE PPPs Draft Standard for Grid-Connected Renewable Energy

## Public Review

### Log of comments and observations (7 November 2016)

This paper sets out comments received in response to the formal review of the draft standard issued to UNECE on 3 November 2016.

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ID	Draft version number	Line number	Type of comment <sup>1</sup>	Comments	Proposed changes
1	1.0	2-15	Te, ed	<p>Numbering 1.1.1-1.1.4 is not necessary to write in introduction. Because “furthermore” is structural category of rhetorical devices for connecting ideas of energy importance to climate change. Adverb “accordingly” describes and adds a meaning of sentence and question. The next main concise connected ideas are determined in this context of introduction:</p> <ul style="list-style-type: none"> <li>-importance of energy to UN SDGs and climate change treat to development.</li> <li>-importance of renewable energy to attaining UN SDGs.</li> <li>-specific determinant of PPP program for achieving to effective results.</li> </ul> <p>Also RE importance is expressed by only one sentence in introduction. So topics of three parts are not necessary to be written in introduction. Topic of part “The Importance of Renewable Energy (“RE”) to Sustainable Development” is not necessary to write in line 2.</p>	<p>“Energy is crucial for achieving almost all of the Sustainable Development Goals, from its role in the eradication of poverty through advancements in health, education, water supply and industrialization, to combating climate change.”<sup>1</sup>Furthermore, “climate change presents the single biggest threat to development, and its widespread, unprecedented impacts disproportionately burden the poorest and most vulnerable.”<sup>2</sup>Accordingly, access to sufficient, dependable and affordable RE is crucial to attaining the United Nations’ Sustainable Development Goals (“UN SDGs”).</p> <p>In order to achieve an effective result, each PPP program must encompass a process developed to take into account the specific context, determined by (a) effective communication and coordination to stakeholders, (b) appropriate program scope, phases and subprograms, and (c) risk identification, risk analysis and mitigation and effective risk management.</p>
2	1.0	12,13	ed	<p>Effective communication to variety internal and external stakeholders and effective coordination with them is important for the successful PPPs development during the PPPs project cycle, so effective stakeholders’</p>	<p>(a) Effective communication and coordination to stakeholders,</p>

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				coordination and communication is necessary to take into account and to include in determinants for effective results. All stakeholders' management is complicated, so effective coordination is applicable in several stakeholders.	
3	1.0	14, 15	ed	Risks and risk management is a heart of the PPPs and variety forms of risks should be identified and managed effectively for the successful PPPs, so risk management is main determinant. Factors such as risk category and description, status, impact and mitigation measures include in risk matrix.	c) Risk identification, risk analysis and mitigation and effective risk management.
4	1.0	16-74	Ed, te	Specifics of PPPs are determined mainly in this part of introduction by factors such as PPPs as an alternative to 'traditional' public procurement, viability, VFM, selection of PPP project and law and regulatory framework. So topic of second part "The Role of PPPs in Sustainable Development" is not necessary to write in introduction. Also numbering 1.2.1-1.3 is not necessary to write in introduction.	
5	1.0	18-19	ed	Expression of correct sentence is necessary for document.	The SDG 17 revitalizes global partnerships for sustainable development <sup>3</sup> and partnerships between public and private sector as well as civic society.
6	1.0	23-25	ed	Misunderstanding and correct expression is necessary for document. Also risks are allocating to the party that can manage each risk better.	PPP's can mobilize private sector's capacity, capital, technological and operational know-how to develop, design, finance, build, operate and maintain a RE infrastructure projects and private sectors take significant risks during PPP's projects.
7	1.0	22-27	ed	Ideas are connecting, so this context includes in one common paragraph.	PPP's can mobilize private sector's capacity, capital, technological and operational know-how to develop, design, finance, build, operate and maintain a RE infrastructure projects and private sectors take significant high level of risks during PPP's projects. In field of Renewable Energy, the relevant SDGs can conflict with each other, in particular for large-scale RE projects.
8	1.0	28-78	ed	In this context, the next specifics of PPPs are	PPP's have the next specifics:

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				<p>determined for the document on factors such as PPPs as an alternative to ‘traditional’ public procurement, viability, VFM, selection of PPP project and law and regulatory framework:</p> <ul style="list-style-type: none"> <li>-general and distinguishing specifics of PPPs and public procurement,</li> <li>-scenarios for viability,</li> <li>-ensuring value for money,</li> <li>-suitability for PPPs project,</li> <li>-due diligence for law and regulatory framework.</li> </ul> <p>PPPs are financed by debt and equity mainly. Bankability is important for PPPs projects.</p> <p>Logical structure of introduction is consisted of parts such as importance of PPPs, PPP specifics and new approach of the UNECE “People First PPPs”, so topics of three parts are necessary to write in introduction and logical arrangement is clear in this context.</p>	<ul style="list-style-type: none"> <li>• PPPs as an alternative to ‘traditional’ public procurement</li> </ul> <p>In accordance with traditional public procurement, the public sector can choose to fulfil its service delivery mandate on the base of procuring goods and services through direct contracting and financing for a specific good or service, also it can choose to deliver its mandate through a Public Private Partnership model.</p> <p>The distinguishing features of PPPs are the contracting structure which provides for an enhanced allocation of risk between the private and public sector where performance and remuneration thereof are inextricably linked. Moreover, PPPs are mainly financed by debt and equity and where necessary supplementary revenues or support from the budget. Furthermore, PPPs are characterized by their intensive capital and long-term financing which requires effective operational management. The supporting and creating framework of PPPs contractual structure subjected to country’s regulation is necessary for effective operations of private sector.</p> <ul style="list-style-type: none"> <li>• Viability</li> </ul> <p>PPPs can be viable on the following scenarios:</p> <ul style="list-style-type: none"> <li>-Technology, where the service requires external technological expertise and government will not be able to provide it independently;</li> <li>-Quality, where a private partnership would significantly enhance the quality of service compared to what the government could extend independently;</li> <li>-Time, where a private partnership would expedite the project implementation significantly; and</li> <li>-Cost, where there would be a considerable reduction in the project cost and also the service cost with the involvement of a private player.</li> </ul> <ul style="list-style-type: none"> <li>• Value for Money</li> </ul> <p>Ensuring value for money (“VfM”) should be at the core of the public sector’s decision to engage in a PPP infrastructure project. A PPP is a considered a VfM transaction if it generates a net economic benefit for the public in terms of quantity, quality of the service or facility, cost and</p>

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					<p>risk transfer over the project life, relative to the public procurement alternative. Hence, the VfM assessment of a PPP plays a fundamental role in the decision whether a public institution would be willing to enter into PPP agreement<sup>5</sup>.</p> <ul style="list-style-type: none"> <li>• Selection of Appropriate Infrastructure Projects One of challenges faced by Governments is ability to discern the suitability of an infrastructure project for the PPP model. This suggests that notion of `one size fits all` is not applicable for infrastructure projects. Governments should acknowledge that PPPs are not a panacea for all infrastructure development initiatives. It is therefore crucial in planning phase to select infrastructure projects that would be well suited to the PPP model as it would be more likely to ensure success of a project.</li> <li>• Legal and Regulatory Framework In view of the nature and lengthy timeframe to develop PPP projects, it is imperative that interests of both the public and private sector are protected by law. Before investing in a PPP project in a given country the private sector participants will complete a detailed due diligence on legal and regulatory system to ascertain if to invest or not. Standard form of due diligence questionnaire indicates type of legal and regulatory framework concerns and considerations that are frequently raised on PPP projects. The standard form is included in Schedule 4. PPP models, in particular models in developing economies are necessary to develop with perspective of poverty alleviation. Accordingly, the UNECE proposes a new approach-model "People First PPPs" which are fit for the UN SDGs.</li> </ul>
9	1.0	80	ge	<p>Topic is necessary to be clear and exact. All info contained in whole document is focused to the UNECE Standard for Grid-connected RE. The standard is based on the African experiences mainly; countries with transitional economy have distinguishing specifics from African countries.</p>	Objective and Scope

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10	1.0	82, 83, 84	ed	Goal of PPPs are focused to the delivery of available and high quality public services.	This Standard sets out recommendations how host Governments in emerging markets and developing economies (“EMDE”) countries can provide more available and high quality RE services with the relatively low cost:
11	1.0	86	ed	The increasing and attracting private sector participation is necessary for PPPs development.	b) attract and increase private sector participation in RE PPPs;
12	1.0	87	ed	The reducing time and cost is necessary the RE PPPs development.	c) reduce the spending time and costs for the RE PPPs development;
13	1.0	88	ed	Affordability is one of main indicator for the RE PPPs development. Overall goal of PPPs are to provide more available and high quality services that are affordable and better value for money to both government and end-users.	and thereby deliver available and high quality RE services that are affordable and provide better VfM.
14	1.0	92, 93	ed	Idea is necessary to be expressed exact.	Furthermore, as discussed below, each technological generation raises significant specific issues related to technology.
15	1.0	101	ed	Exact word is necessary.	For purpose of this Standard, definition of IEA for Renewable Energy is applied:
16	1.0	110-113	ed	Words with same meaning are applied in this context.	The PPP RE standards are drafted by PPPs specialists, including representatives from civil society organizations (the “Project Team”), report to the UNECE Team of PPP Specialists via the UNECE PPP Secretariat based in Geneva (the “Secretariat”).
17	1.0	116-117	Ed, te	Double topics are not necessary to write in this context.	The Standard is supported by the LIFE Climate Foundation Liechtenstein and endorsed by the Government of Liechtenstein.
18	1.0	119-122	ed	Sentence structure is necessary correct, also connecting ideas are expressed in this part, so same words are not necessary to apply repeatedly in may times.	The Project Team was supported by the Liechtenstein LIFE Climate Foundation based in Vaduz, Liechtenstein. The Government of Liechtenstein has endorsed establishment of the UNECE PPP Excellence Centre for Renewable Energy in Vaduz, in October 25, 2016. The Centre will be hosted by the Liechtenstein LIFE Climate Foundation.

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19	1.0	124-126	ed	People know UN official languages, so correct expression is necessary.	The Standards are based on a detailed survey conducted in 2016. The survey was published in English, French, Spanish and Russian and received responses from more than 200 PPP and RE experts worldwide.
20	1.0	127-131	ed	Sentence clear expression is important. Clear research goal, method, comparison is necessary for making effective documents for PPPs.	The survey was intended to support development of market-sourced and market-tested recommendations and analysis, which will enable decision-makers capacity to understand better and to address views and suggestions of public and private sectors, civic society organizations, investors, commercial banks and development financial institutions and respective challenges and procedural requirements.
21	1.0	132-134	ge	Sentence correct expression is necessary.	Public and private sector's developers were represented equally by 20% and the most of advisors had rendered consulting services to both public and private parties of the project. Civic society was represented well by 22%.
22	1.0	135	Ed, te	Topic of graphic is necessary to be correct and graphic numbering and connection to context is important to express in the Standard.	Main role of renewable energy in development.
23	1.0	137. 138	Ed, te	Sentence correct expression is necessary.	The most percentage of developers and sponsors acknowledged that social inclusiveness and sustainability was an integral part of the PPP structuring approach.
24	1.0	139	ed	Topic of graphic is necessary to be correct and graphic numbering and connection to context is important to express in the Standard.	How is important and/or useful recent adoption of SDGs and forthcoming COP21 for development of new innovative financial mechanisms of renewable energy in emerging markets and transition economies countries?  (1-less important, 5- very important)
25	1.0	141, 142	ed	Topic of graphic is necessary to be correct and graphic numbering and connection to context is important to express in the Standard.	In terms focused to region focus, the most percentage of participants had experience with RE PPP projects in Sub-Saharan Africa. However, other

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					regions were represented well:
26	1.0	144	ed	Topic of graphic is necessary to be correct and graphic numbering and connection to context is important to express in the Standard.	Region with working experience in Renewable Energy
27	1.0	145	ed	Sentence correct expression is necessary.	In accordance with the RE technological use, all participated respondents represented that they worked in all forms of RE.
28	1.0	147	ge	Exact and clear expression is necessary.	Challenges
29	1.0	148, 149	ed	Sentence correct expression is necessary.	In accordance with the survey and Standards, PPP projects challenges are addressed to the using different forms of RE technology.
30	1.0	150, 151	ed	Clear and correct sentence expresses correct meaning.	Accordingly, the Standards offer specific technological recommendations, which enable PPPs practitioners to tailor their project to technological requirements.
31	1.0	162, 163	ed	Expression of exact and correct word is necessary for document. Disallow all forms discrimination is important for emerging countries.	Promote social cohesion, justice and disallow all forms of discrimination based on race, ethnicity, creed and culture;
32	1.0	164, 165	ed	PPPs should contribute to improvements of life quality of people, alleviating poverty and creating sustainable jobs.	Focus to the improving life quality of people, fighting and alleviating poverty and creating local and sustainable jobs; and
33	1.0	174	ge	PPPs should provide people by available and qualitative services.	g) Available and qualitative service delivery
34	1.0	176	ed	People first PPPs are necessary to ensure infrastructure services delivery and development.	The People First RE PPPs will ensure the next:
35	1.0	177, 178	ed	People first PPPs are necessary to ensure the sufficient RE infrastructure delivery to accomplish UN SDGs;	a) Sufficient RE infrastructure delivery necessary to enable and accomplish UN SDGs;
36	1.0	179, 180	ed	People first PPPs are necessary to ensure the RE infrastructure development	b) RE infrastructure development to design standards and build quality for enabling long-term reliable delivery of RE;

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37	1.0	181	ed	People first PPPs are necessary to ensure the RE infrastructure delivery.	c) RE infrastructure delivery:
38	1.0	182, 183	ed	The ensuring RE infrastructure delivery with possible lowest cost is important for the PPPs.	(I) At the possible lowest cost of electricity (taking into account the objectives set out above); and
39	1.0	184	ed	The ensuring RE infrastructure delivery with possible fiscal burden is important.	(II) With possible lowest burden to host Government;
40	1.0	187, 188	ed	RE PPPs have not a conflict of interest with social inclusivity and financial viability. Clear and exact expression is necessary.	RE PPPs have not a conflict of interest with social inclusivity and financial viability rather intertwined prerequisites for a successful operation of a project over its entire lifetime.
41	1.0	195, 210	ed	Definitions of PPPs are vary, some sources defined PPPs as a transaction, another sources defined PPPs as long-term contract. The recognized definitions are in PPPs Guide, WBG and documents of the Institute for the PPPs, US. PPPs are not privatization.	<p>Definition of PPP is vary depending on national or international institution.</p> <p>In accordance with the training document of the Institute for the PPPs, Public Private Partnership is a commercial transaction between an institution and a private party in terms of which the private party either performs an institutional function on behalf of the institution, or acquires the use of state property for its own commercial use.</p> <p>According to the UNECE Guidebook on Promoting Good Governance in Public Private Partnerships, PPP is a form of cooperation between the public and private partner aimed at “financing, designing, implementing and operating public sector facilities and services”.</p> <p>The World Bank Group PPP Guide, PPP is a public-private partnership (PPP) is a long-term contract between a private party and a government entity, for providing a public asset or service, in which the private party</p>

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					bears significant risk and management responsibility, and remuneration is linked to performance.” <sup>1</sup>
42	1.0	217-219	ed	PPPs project is consisted of three main stages: Inception/Feasibility; Procurement and Implementation/development/delivery/exit. PPP contracts and legal contracts management is important in third stage of PPP project. So verb “may be” is not suitable in this context.	PPP is implemented by a dedicated RE PPP program (see special section below), investment agreement, concession agreement, or similar agreements, which constitute of legal contracts between the parties.
43	1.0	220	ed	This part is related to defining specifics of RE PPPs.	5.2 RE PPPs specifics
44	1.0	221, 222	ed	Clear and exact expression of specifics are necessary.	PPP RE projects have specifics to be required multiple transaction agreements and contractual complexity of them.
45	1.0	223-226	ed	Clear and exact expression of specifics are necessary.	Gross-sectorial and gross-institutional stakeholders coordination is key prior to launching a RE PPP program or transaction. This includes of all ministries, government authorities and the utility. Establishment of an office and / or focal point with a clear mandate and authority would be advisable to ensure sustainability of the partnership.
46	1.0	235-236	ed	Uncertain meaning of sentence. certainty is necessary.	A dedicated appropriate RE PPP program is defined by interdependence between state and private sector in the implementation of renewable energy.
47	1.0	237, 238	ed	Uncertain meaning of sentence. certainty is necessary.	If a RE PPP program yields investment at the time and scale repeatedly and delivers a high quality utility service to citizens at an affordable price, then RE PPP project achieves to efficient outcome.
48	1.0	238-241	ed	Uncertain meaning of sentence. certainty is necessary.	RE PPP programs should be developed through a phased approach to allow real cost and risk mitigation for both the host Government and

<sup>1</sup><https://pppknowledgelab.org/ppp-cycle/what-ppp>

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					private sector in order to create real value for end-users.
49	1.0	242-249	ed	Uncertain meaning of sentence. certainty is necessary.	<p>Success of a RE PPP program is not only function what the host Government decides to do, but also how it goes to design the program. This PPP programs have the next aspects:</p> <ul style="list-style-type: none"> <li>(a) Development process of the program is implemented by the host Government from beginning of the program;</li> <li>(b) Permanent and complete stakeholder communication – including local communities, private investors, financiers, grid off-taker, distributor, relevant ministries; and</li> <li>(c) Scope and impact of whole program and individual projects within it.</li> </ul>
50	1.0	250-253	ed	Uncertain meaning of sentence.	Stakeholders are necessary to have knowledge on the RE PPP program, total project cost, its impact on consumer over time case, affordability of electricity for the population and other parties (departments of finance, utilities, private sector as an off-taker, energy intensive users etc.)
51	1.0	254-258	ed	Uncertain meaning of sentence.	The projects or programs investments are considered in RE PPP structure is necessary to include in relevant balance sheet of the country concerned especially where revenues are constrained by regulation and consumer capacity to pay. Therefore impact of RE PPP projects and programs should be subjected to necessary due diligence in respect of a country's ability to meet its obligations under the PPP.
52	1.0	259-265	ed	Uncertain meaning of sentence. certainty is necessary.	Efficient RE PPP program should be embedded in a broader process or integrated plan which includes realistic supply & demand forecasts, least cost planning associated with energy mix, resource assessments, transmission network development and broader power sector development trajectories. It incumbent upon a host Government in

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					launching a PPP program for renewable energy to assess the building blocks of its program, for example, availability of data on resource assessments, transmission risks, and land titles, and design a process that takes its strengths and weaknesses into account.
53	1.0	289-292	ge	Grammar is necessary to be correct.	(a) A single-purpose project company is established and owned by shareholders (often referred to as “Sponsors”), are responsible for design, finance, constructing, operating and maintenance of the power generation facility throughout the project term of agreement;
54	1.0	271-277	ed	Uncertain meaning of sentence. Certainty is necessary.	It requires to be noted that there are currently some prominent examples of highly developed RE PPP frameworks in EMDE countries, at least some of these frameworks could be improved by optimizing the next in order to maximize public benefit:  (a) Allocate risks referred to in paragraph 7.1.1;  (b) Offer the complete suitable project documents required for project finance; and/or  (c) Provide project financiers with sufficient certainty as to expected revenue stream under the PPA.
55	1.0	279-283	ed	Uncertain meaning of sentence. Certainty is necessary.	RE PPP is referred to an independent power projects (“IPPs”). Such PPP-IPP and regular, purely private sector-driven IPP are not uniform. Although the typical IPP structure is considered as a privately sponsored project with nonrecourse or limited recourse project financing, the most IPPs in EMDE do not follow this exact model.
56	1.0	357, 358	ed	Risks are allocating to the parties can manage risk better.	PPPs project risks should be allocated to the party able to manage risks better.

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57	1.0	373, 374	ed	Uncertain meaning of sentence. Certainty is necessary.	Public policy can influence too many important determinants of the capital cost for delivering RE PPPs.
58	1.0	376, 377	ed	Uncertain meaning of sentence, certainty is necessary.	For the REPPPs in EMDE countries, private sector financiers consider the relatively high risk endeavours, which often increase the capital cost to unsustainable and unexpecting levels.
59	1.0	288	ed	IPPs have the general specifics.	The next general features include in IPPs:
60	1.0	382-284	ed	Some form of risks are not fully controlled, but risks are allocating to the party which can better manage risks effectively.	Risk allocation is ideal, if it is allocated to the party which has capacity to manage risks effectively and better and/or to take risk mitigating measures, despite risks are not possible to be fully-controlled.
61	1.0	427-429	ed	Government can take measure to reduce cost for PPPs, so exact expression is necessary.	The Host Government (with DFI and/or MFI support where appropriate) can take the next measures to reduce RE PPP transaction costs, and actual and perceived risks associated with project development, include:
62	1.0	467-469	ed	Right expression of role of independent regulator is important.	Role of independent regulators in electric power sector governance is to acknowledge that financing a renewable-energy power plant requires revenue certainty provided by contractually-agreed long-term tariffs.
63	1.0	471-474	ed	Right expression of RE PPP energy price is important.	In general, depending on electricity sector development of current country, the energy sell price at the RE PPP is, variously (i) fixed price by bilateral contract, (ii) defined over multi-year cycles by a regulator in accordance with tariff regulations, or (iii) daily (or hourly) based price in wholesale electricity market.
64	1.0	475-477	ed	Right expression of financiers risk is important.	Financiers of RE PPPs in EMDE countries typically should not take risk of the regulated or market-determined wholesale electricity tariffs throughout PPP project life cycle, which make the project economically viable.

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65	1.0	482-484	ed	Certainty of expression is necessary.	In the light of the above, the RE PPPs electric power in EMDE countries have common feature, which is required a long-term (typically 20-25 year) contractually agreed tariff and mechanisms both to adjust tariff to various risk occurrences arise.
66	1.0	481	ed	Exact expression of topic is necessary, because paragraph 9 includes roles of regulator, so repeated expression is not required.	Limitation
67	1.0	502-507	ed	Right expression is necessary.	Lenders should be negotiated with the project Sponsors, the host Government and offtaker. Where a host Government envisages the participation of international lenders and multilateral development banks in financing specific projects or RE-PPP programs, they should take care to incorporate requirements of such lenders in their procurement process such as, for example, procurement rules and environmental and social sustainability standards.

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68	1.0	431-433	Technical	Successful countries and utilities use integrated resource planning (IRP), that is a live document, updated annually or so, that includes demand forecasts, technology breakdowns, other system capacity aspects, etc.	Add IRP as another aspect of “Policy Guidelines” and potentially devote space to explain characteristics of a best practice IRP (and its drafting process)

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<b>69</b>	1.0	512	General	What about projects below \$20m? I would be concerned that these are just being discarded.	Add a section on some specific initiatives that need to be considered by countries for small projects (there is small reference to this under Market Innovations but very little): <ul style="list-style-type: none"> <li>- Mini Refits</li> <li>- Portfolio funds for small projects</li> <li>- Others..</li> </ul>
<b>70</b>	1.0	831	Technical	There are technologies missing <ul style="list-style-type: none"> <li>- CSP</li> <li>- Energy storage</li> <li>- Future techs</li> <li>- Hybrid / multi tech projects</li> </ul>	<p>If these exclusions are intentional, it should be stated why they are excluded.</p> <p>If unintentional, similar commentary should be added, as for the other technologies. Some guidance can be provided on how to treat new technologies and hybrid / multi technology projects.</p> <p>In general, it would be good to provide guidance on how to deal with newer technologies, as the power sector moves away from traditional structures and the rate of technical innovation accelerates.</p>
<b>71</b>	1.0	-	General	There is no mention about how governments should think about local content or local R&D (technical)	Offer suggestions, as this is a major issue for governments, especially of larger countries.

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