

## UNECE PPPs Draft Standard for Renewable Energy – Public Review Log of comments and observations

This paper sets out comments received in response to the formal review of the draft standard issued to UNECE on 7 December 2017.

Nr / Date	Originator	Comments	Proposed changes
01/ 5-Feb-2018	Evelina Trutnevyte	The difference between people-first and traditional PPPs is emphasized as “allocation of a significant portion of that risk to the private sector”. However, risk is only one dimension in PPPs. Other dimensions are also the ability to mobilize capital (PPP as an advantage over public projects) or sharing the return (where PPP is not necessarily an advantage).	Refer not only to risk, but also to return and capital
02/ 5-Feb-2018	Evelina Trutnevyte	For first bullet point, the term ‘technology: ... ’ does not include expertise and know-how	Write ‘Technology and know-how: ...’
03/ 5-Feb-2018	Evelina Trutnevyte	The part (f) overlaps with (c) and (d)	Remove (f) and integrate hunger-related concerns into (c) and gender concerns into (d)
04/ 5-Feb-2018	Evelina Trutnevyte	The primary focus seems to be on electricity, but it could also be extended to other energy uses, such as heating, cooling or transport	Write “electricity, heating, cooling or transport demands”
05/ 5-Feb-2018	Evelina Trutnevyte	The strength and novelty of people-first PPPs come from the link between PPPs and SDGs. However, in this list of five bullet points there is only one last and relatively vague reference to SDGs (point no. 5) that primarily speaks only about large projects and social impacts.	Make point 5 into an explicit reference to multi-dimensional SDGs because it is the strength of these guidelines/standard
06/ 5-Feb-2018	Evelina Trutnevyte	For REFITs, it is not explicitly told how these would be different in people-first PPPs and traditional PPPs	Specify that people-first PPPs for REFIT would have additional SDG-related requirements to meet in order to qualify for REFIT
07/ 5-Feb-2018	Evelina Trutnevyte	Not only the impacts on consumers should be looked at, but also on all affected communities and stakeholders (e.g. relocated populations)	Replace “consumers” with “the communities and consumers”

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08/ 5-Feb-2018	Evelina Trutnevyte	The strength and novelty of people-first PPPs are their alignment with SDGs. Yet, the guidelines/standard focus much more on how PPPs could be set up (which is applicable to the traditional PPPs too) and are relatively general on how the alignment with SDGs could be achieved. The SDG dimension should be fleshed out in much more detail and not to appear as a small ‘add-on’ on the traditional PPP.	Strengthen and describe in much more detail the dimension of moving towards SDGs in the people-first PPPs so that the difference between traditional and people-first PPPs would be clearer.
09/ 5-Feb-2018	Evelina Trutnevyte	The dimension of long-term monitoring and observation of people-first PPPs is missing, e.g. in order to be able to evaluate the effectiveness of such a mechanism not only in terms of the number of projects or energy produced, but also in terms of progress towards SDGs	Discuss the need for monitoring and evaluation
10/ 19-Feb- 2018	David Donnelly	This section is too generic and not specific to RE.	Add: In many countries, RE projects can be implemented as Independent Power Projects when there is prior legislation and regulation permitting electricity suppliers (or transmission and distribution companies) or agencies on their behalf to purchase electricity from independent power generators. However, bespoke arrangements are required in circumstances where the RE project is not utility scale, e.g. for off-grid or community based projects.
11/ 19-Feb- 2018	David Donnelly	The listed priorities are actually common to all soundly procured PPPs	Add priorities that are indeed specific to ‘people first’ e.g. local employment and training, affordable payment schemes, powering community health and education facilities
12/ 19-Feb- 2018	David Donnelly	Lowest tariff is not necessarily best value for money	In cases where the best value for money tariff (maximising reliability and whole life cost) is higher than some in the local community can afford, tariff plans are adapted match the different capacities to pay of different income groups.
13/ 19-Feb- 2018	David Donnelly		Insert after the parentheses “, and the utility has a good track record in procurement and reliable operation of its generation assets ...

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14/ 19-Feb- 2018	David Donnelly	typo	Words missing at end of sentence
15/ 19-Feb- 2018	David Donnelly	typo	“REFIT”
16/ 19-Feb- 2018	David Donnelly	Order of sections I, II, and III. I read to the end in several sittings and at the end could not identify the purpose and next steps: The “Standard” is used in line 21 without first defining or explaining what it is	Reorder sections I, II, III as II, III, I. re-title section currently called “Introduction” as “Background”. In the first section (the current section II) add a paragraph on the status and derivation of the Standard – in its current draft form, propose next steps for adoption and in its final form, its approval and adoption.
17/ 19-Feb- 2018	David Donnelly	Although covered later on, reference to fiscal and economic constraints would help here	Note that irrespective of the procurement strategy chosen, its successful implementation will depend on the availability of long-term finance. Availability of long-term finance depends not only on project or programme or power sector specific features, but crucially on the fiscal and economic position of the country which will ultimately determine the volume and scale of projects which are feasible. This is explored in more detail in [lines ] below. .
18/ 19-Feb- 2018	David Donnelly	Suggest some extra bullet points	<ul style="list-style-type: none"> <li>• The assessment of the affordability of the programme and its value for money versus alternatives (technologies, non-PPP alternatives etc.)</li> <li>• Leadership, vision and buy-in: clear endorsement of the programme at the highest levels in government, to ensure political and administrative commitment to implementing the programme</li> </ul>

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19/ 19-Feb- 2018	David Donnelly	Suggest additional wording (this from an article I wrote in Clean Energy Pipeline Africa guide 2015)	“In such economic conditions, new projects must make their case on the basis of net economic benefit. They must demonstrate that they are cheaper than the marginal cost of supply from alternative sources, which, in a network with endemic load-shedding, equates to the cost of back-up supply. In off-grid or grid expansion cases, the project’s levelised cost of electricity needs to be lower than the wider economic and social benefits of access to electricity for the end-user. For industrial users, self-generation brings reliability of supply and cost certainty. The challenge is to create structures which match payback for the project to the realisation of the user benefits, and which can capture those benefits to secure revenues for the project.”
20/ 19-Feb- 2018	David Donnelly	Unclear drafting	Replace “should” with “could otherwise”
21/ 19-Feb- 2018	David Donnelly	Point could be expanded	After “PPP transactions” insert “to ensure that economic and social gains decisively exceed the cost to end-users, offtakers, and governments”
22/ 19-Feb- 2018	David Donnelly		After (“deemed availability”) insert “and performance, so that the project is paid for the output which it can deliver rather than its utilisation, i.e. the output which hit is required to despatch”
23/ 19-Feb- 2018	David Donnelly	Conclusion?	A Conclusion section would be helpful to remind readers of the purpose of the Standard.