

# Guarantee Mechanism for Renewable Biogas in India

Review PIF and Make a recommendation

## Basic project information

**GEF ID**

11068

**Countries**

India

**Project Name**

Guarantee Mechanism for Renewable Biogas in India

**Agencies**

World Bank

**Date received by PM**

3/16/2023

**Review completed by PM**

5/11/2023

**Program Manager**

David Elrie Rodgers

**Focal Area**

Climate Change

**Project Type**

FSP

# GEF-8 PROJECT IDENTIFICATION FORM (PIF) REVIEW SHEET

## 1. General Project Information / Eligibility

a) Does the project meet the criteria for eligibility for GEF funding?

b) Is the General Project Information table correctly populated?

Secretariat's Comments

DER/TK: Yes.

DER/TK: May 11, 2023. On General information: the project title in Portal is slightly different than in LoE ? please use in Portal the same title as in LoE for now ? after PIF approval, the title can be modified if needed.

Agency's Comments

WB 5/15/23:

We have changed the title in the portal to align with the LoE.

## 2. Project Summary

**Does the project summary concisely describe the problem to be addressed, the project objective and the strategies to deliver the GEBs or adaptation benefits and other key expected results?**

Secretariat's Comments DER/TK: Yes.

Agency's Comments

## 3 Indicative Project Overview

**3.1 a) Is the project objective presented as a concise statement and clear?**

**b) Are the components, outcomes and outputs sound, appropriate and sufficiently clear to achieve the project objective and the core indicators per the stated Theory of Change?**

Secretariat's Comments

DER/TK: Yes. Please address the following questions:

1. As noted in several other boxes, the precise financial structure and co-financing in component 1 needs clarifications.
2. Please identify the performing agency and potential executing partners for component 2, technical assistance, if those partners are known at this time. If they are known, please describe their institutional capacity. If they are not known, please identify the Agency selection criteria.
3. Please identify the source of the component 2 co-financing.
4. The general topic of bioenergy is summarized, but the specific technology pathways and prioritization for investment are not clear. Please clarify the intention of project design team - will specific high GHG impact technology options be prioritized? How will that be reflected in the investment selection?

DER/TK: May 11, 2023

1. Thank you for the detailed information. Comment cleared
2. SIDBI will also perform the TA. Comment cleared.
3. Comment cleared.
4. Focus is only on biogas generation from waste. Comment cleared.

### Agency's Comments

WB 5/10/23:

1. The precise financial structure and co-financing in Component 1 is provided in detail as per Note prepared for response to Sl. No. 6 below
2. The implementing entity for the technical assistance (TA) will be SIDBI. SIDBI has a proven track record in implementing similar risk-sharing facilities and working with the World Bank. As an example, SIDBI has successfully implemented the GEF grant funded Partial Risk Sharing Facility (PRSF) on energy efficiency in India where they were an implementing entity for the World Bank project.
3. The potential source of component 2 co-financing which is under discussion is the World Bank's Energy Sector Management Assistance Program (ESMAP).
4. The bioenergy referred in the project is strictly waste to energy projects which have high GHG impacts due to abatement of methane as well as reduction in crop burning. The project pathway is strictly focused on generation of bioenergy produced by anaerobic decomposition of organic waste including agricultural waste, municipal waste, and industrial waste streams such as sugarcane press mud. Such waste to bioenergy production offers a decentralized, renewable alternative to displace fossil fuels while significantly reducing methane (a potent GHG) emissions, creating an alternate monetary stream for the waste that otherwise is burnt in open fields or sent to landfills.

**3.2 Are gender dimensions, knowledge management, and monitoring and evaluation included within the project components and appropriately funded?**

Secretariat's Comments

DER/TK: Yes. Gender and knowledge management are identified. The proposed M&E amount seems reasonable and is shown as provided by co-financing.

Agency's Comments

**3.3 a) Are the components adequately funded?**

**b) Are the GEF Project Financing and Co-Financing contributions to PMC proportional?**

**c) Is the PMC equal to or below 5% of the total GEF grant for FSPs or 10% for MSPs? If the requested PMC is above the caps, has an exception (e.g. for regional projects) been sufficiently substantiated?**

Secretariat's Comments

DER/TK: Yes. However, please clarify the co-financing sources and amounts below:

1. Where does the technical assistance co-financing come from? Is this the "Donor Agency" listed in the Sources of Co-financing? Please identify.
2. Is SIDBI providing any co-financing? Where is that indicated?
3. The commercial lending (through the PFIs) and equity stakes of beneficiaries should be identified and counted as co-financing.
4. The proposed PMC is zero which is appropriate for a Blended Finance project.

DER/TK: May 11, 2023

1. Comment cleared.
2. Comment cleared.
3. Comment cleared.

Agency's Comments

WB 5/10/23:

The sources of co-financing have been updated in the portal.

1. TA co-financing is being sought from the Energy Sector Management Assistance Program (ESMAP), a multi-donor trust fund administered by the World Bank.

2. SIDBI will not provide co-financing. The Risk Sharing Facility (RSF or Facility) is designed to be a self-sustaining facility housed within SIDBI i.e. all the operating costs of the facility are covered by the sub-guarantee fee charged by SIDBI to the PFIs who are

using the guarantees as a credit enhancement or extra security for loans to Biogas developers. SIDBI's role is to work with the WB to set up the facility, use their own staff to run the facility, build the pipeline, and manage the portfolio and make sure the losses are managed appropriately. There is no direct recourse to SIDBI's own balance sheet under the RSF. However, after the 15 year period of the RSF, SIDBI and GoI could choose to extend the RSF through their own capital. The following are the revenues and costs of the RSF:

3. Co-financing table has been updated to include expected \$165 million equity stake from project developers and \$385 million from participating financing institutions.

#### **4 Project Outline**

##### **A. Project Rationale**

##### **4.1 SITUATION ANALYSIS**

**a) is the current situation (including global environmental problems, key contextual drivers of environmental degradation, climate vulnerability) clearly and adequately described from a systems perspective?**

**b) Are the key barriers and enablers identified?**

##### **Secretariat's Comments**

DER/TK: Yes, however see question in box 3.1 on technology pathways and selection criteria.

DER/TK: May 11, 2023. Comment cleared

##### **Agency's Comments**

WB 5/10/23:

The project pathway is strictly focused on generation of bioenergy produced by anaerobic decomposition of organic waste including agricultural waste, municipal waste, and industrial waste streams such as sugarcane press mud. Such waste to bioenergy production offers a decentralized, renewable alternative to displace fossil fuels while significantly reducing methane (a potent GHG) emissions, creating an alternate monetary stream for the waste that otherwise is burnt in open fields or sent to landfills.

##### **4.2 JUSTIFICATION FOR PROJECT**

**a) Is there an indication of why the project approach has been selected over other potential options?**

**b) Does it ensure resilience to future changes in the drivers?**

**c) Is there a description of how the GEF alternative will build on ongoing/previous investments (GEF and non-GEF), lessons and experiences in the country/region?**

**d) are the relevant stakeholders and their roles adequately described?**

Secretariat's Comments DER/TK: Yes.

Agency's Comments

## **5 B. Project Description**

### **5.1 THEORY OF CHANGE**

**a) Is there a concise theory of change that describes the project logic, including how the project design elements will contribute to the objective, the expected causal pathways, and the key assumptions underlying these?**

**b) Are the key outputs of each component defined (where possible)?**

Secretariat's Comments DER/TK: Yes.

Agency's Comments

### **5.2 INCREMENTAL/ADDITIONAL COST REASONING**

**Is the incremental/additional cost reasoning properly described as per the Guidelines provided in GEF/C.31/12?**

Secretariat's Comments

DER/TK: Yes, however, the level of concessionality for the GEF reserve fund has not been fully justified. Please see box 5.5

DER/TK: May 11, 2023. Thank you for the helpful explanation. Comment cleared.

Agency's Comments

WB 5/10/23:

An affordable GEF-8 NGI (guarantee) is significantly important for lowering the RSF cost to the PFIs as they are deemed to pass the sub-guarantee fee through their loan pricing. Having a lower RSF cost implies that borrowers (the Biogas plant developers) will face

lower sub-guarantee fees and a lower all-in cost of financing for the development of Biogas plants. Current Government of India and World Bank Policies have limited scope to reduce fees as each institution is charged a recurring fee of 60bps. If the GEF Guarantee fee were to even increase to 50 bps, the sub-guarantee fee paid by the borrowers would have to increase to 155 bps in order to ensure the same principals and structure holds. Market feedback has provided clear feedback that this is too high of a cost for participants to bear. Therefore, the high concessionality of the GEF is an important tool in making the facility sustainable.

### **5.3 IMPLEMENTATION FRAMEWORK**

**a) Is the institutional setting, including potential executing partners, outlined and a rationale provided?**

**b) Comments to proposed agency execution support (if agency expects to request exception).**

**c) is there a description of potential coordination and cooperation with ongoing GEF-financed projects/programs and other bilateral/multilateral initiatives in the project area**

**d) are the proposed elements to capture and disseminate knowledge and learning outputs and strategic communication adequately described?**

#### Secretariat's Comments

DER/TK. As noted in box 3.1, please describe the agencies and partners that will implement technical assistance and their capacity.

DER/TK: May 11, 2023. Comment cleared.

#### Agency's Comments

WB 5/10/23:

The implementing entity for the technical assistance (TA) will be SIDBI. SIDBI has a proven track record in implementing similar risk-sharing facilities and working with the World Bank. As an example, SIDBI has successfully implemented the GEF grant-funded Partial Risk Sharing Facility (PRSF) on energy efficiency in India where they were an implementing entity for the World Bank project.

**5.4 a) Are the identified core indicators calculated using the methodology included in the corresponding Guidelines (GEF/C.54/11/Rev.01)?**

**b) Are the project's indicative targeted contributions to GEBs (measured through core indicators)/adaptation benefits reasonable and achievable?**

Secretariat's Comments DER/TK: Yes.

## Agency's Comments

**5.5 NGI Only: Is there a justification of financial structure and use of financial instrument with concessionality levels?**

## Secretariat's Comments

DER/TK: Not at this time. Please address the following questions.

1. The chart justification of financial structure provides significant detail, but the presentation is confusing.
2. At one point the chart shows GEF as "Default Loss Pool #2". Another chart shows GEF as "1st Loss Guarantee." The chart with blue arrows does not match the chart with Waterfall chart. Please clarify.
3. Recognizing that SIDBI operates the RSF, who will hold the PFI Loan Portfolio? How much lending is expected? The types and names of entities, and the amount should be reported in the term sheet, and claimed as co-financing.
4. Is the overall project value USD 550 million? Or is that the estimated commercial loans mobilized? If so, what is the total project value?
5. Will SIDBI offer any co-financing? If so, that should be listed. If not, why not?
6. The proposed earnings in the form of fee for the GEF portion is 10 bps. Please clarify the fees proposed to be earned by the RSF which is used for the "Default Loss Pool #1" and the fee earned by the WB Guarantee which is identified as "Default Loss Liquidity Pool #3". Please justify the differences among the various fees. Without further justification, 10 bps seems remarkably low.
7. The co-financing, both in terms of World Bank loan and leveraged investments needs to be clarified.
8. The term sheet reports that "SIDBI shall pay to GEF...". This should be revised to indicated payments will go through the Implementing Agency.
9. The term sheet describes that "no principal repayment." This differs from our understanding of a second loss tranche. Further the project document describes the following: "The proposed GEF-8 NGI (guarantee) and IBRD guarantee are not expected to be called or triggered unless extreme downturn scenarios materialize." A sensitivity analysis of various loss scenarios should be applied to the GEF tranche and presented in the revised project.
10. In theory, if the reserve fund has a balance remaining after the end of the facility, year 15, then all remaining funds - that is, the principal - should be reflowed through the IBRD to the GEF Trust Fund. A proposal that requests GEF to recover zero principal would not be competitive in the GEF Blended Finance Window.

DER/TK: May 11, 2023

1. Comment cleared.

2. Comment cleared.



3. Very helpful. Comment cleared.

4. Very helpful. In the co-financing table, please use "investment mobilized" for the \$165 million entry.

5. Very helpful. We hope that SIDBI does bring this sector along as a full business line after the completion of the project. Comment cleared.

6. Comment cleared

7. Comment cleared

8. Comment cleared

9 and 10. This is a very helpful analysis. Just to confirm, with an 8.6% default rate, the GEF principal in the reserve fund would be exhausted and reflows would be fees only, no principal. With reflows in the base case at US\$2.3m which is based on a highly conservative default rate of 7% which is more than double the default rate of BB rated borrowers (this is the floor rating of borrowers and projects eligible to avail of the RSF). At the time of CEO endorsement, we will expect a more detailed analysis of the fee structure, estimate default rate, and reflow analysis for base case, worst case, and best case scenario.

### Agency's Comments

WB 5/10/23:

1. The team has modified the proposal and the chart (figure 3) to provide more clarity on the structure and use of GEF funds.

2. Same as above

3. SIDBI will be the implementing entity of the RSF and hold the portfolio of RSF Sub-Guarantees. The PFIs will be lenders of record and be the entities issuing the loans to the CBG developers. Each PFI Loan will be held by the issuing bank, while the guarantee to backstop that loan will be held by SIDBI.

4. The overall project capex is estimated to be \$550 million. Of this 70% is commercial debt from commercial bank/PFIs (\$385 million) and 30% is equity from the CBG project developers (\$165 million). The RSF guarantee will be used to backstop 65% of the repayment of the commercial debt.

5. SIDBI is the program implementing entity responsible for building the project pipeline, evaluating projects, negotiating and signing the sub-guarantees to the PFIs, and monitoring the portfolio. SIDBI will not be providing their own guarantee or capital to the facility at this stage, but may choose to capitalize and continue the facility after the 8 year

availability period. Biogas is a new business line for SIDBI, the GEF NGI and IBRD Guarantee help unlock the sector and prove commerciality at which point SIDBI can provide their own capital.

6. The low guarantee fee is critical to ensure the sub-guarantee fee to the borrowers is affordable. Kindly refer to the response to comment 4

7. The team has clarified the co-financing in the portal. The IBRD Guarantee which is used to capitalize the guarantee is \$150 million. The commercial debt issued net of the guarantee is \$235 million and the equity all of which is unguaranteed is \$165 million.

8. This has been addressed in the term sheet.

9. The current base case presented in the GEF Proposal. The proposal has been corrected to reflect the base case in which there will be a draw on the GEF NGI funds and the reflow expectation. A cumulative default rate of greater than 8.6% would mean that GEF NGI would not be returned and the IBRD Guarantee would be called.

10. In the event of a drawdown on the GEF NGI during the life of the facility, the structure assumes that any cash available in the facility at the end of year 15 will be reflowed back to GEF up to the amounts drawn. The reflows in the base case at US\$2.3m which is based on a highly conservative default rate of 7% which is more than double the default rate of BB rated borrowers (this is the floor rating of borrowers and projects eligible to avail of the RSF).

WB 5/15/23:

4. This has been corrected in the portal.

9 and 10. Yes this is the correct interpretation. Kindly see some more clarity on each of the points you mentioned below. This will be further elaborated and confirmed at CEO Endorsement. The team stands ready to discuss further with the GEF team.

**Estimated Default Rate:** The estimated default rate is based on the current SME default rates as assessed by CRISIL. The project eligibility criteria will include a floor credit rating of BB which corresponds to a default rate of 3.43%. However, to account for the nascency in the sector, and based on feedback from SIDBI and banks, it would be prudent to plan for a rate that is double that of standard SMEs hence, the 7% default rate.

**Sub-Guarantee Fee:** The sub-guarantee fees charged are set at a level that covers the guarantee fees to GoI, World Bank, admin costs for SIDBI, and 7% cumulative losses. The sub-guarantee fee is capped at 150bps based on market feedback on what would be affordable to borrowers. Discussions indicate that 150bps recurring fee and 100 bps upfront fee is the upper limit of what the market can bear, while allowing for sufficient demand for the facility.

**Reflow Analysis:** The Reflows are based on the assumptions above. Given the assumptions on the default rate, the cost of the IBRD and GoI guarantee fees, admin costs which are based on prior examples, and the upper limit on the sub-guarantee fee, the model indicates reflows of \$2.3m to be sent back to GEF at the end of the facility life in the base case. The worst case scenario would be that there are no reflows and the losses are so high to the level that the IBRD Guarantee would be called. The best case scenario would be that there are no losses and therefore, no calls on the GEF NGI or the guarantee (which has so far been the experience of the PRSF project under implementation by SIDBI).

## **5.6 RISKS**

- a) Are climate risks and other main risks relevant to the project described and addressed within the project concept design?**
- b) Are the key risks that might affect the project preparation and implementation phases identified and adequately rated?**
- c) Are environmental and social risks, impacts and management measures adequately screened and rated at this stage and consistent with requirements set out in SD/PL/03?**

Secretariat's Comments DER/TK: Yes.

Agency's Comments

## **5.7 Qualitative assessment**

- a) Does the project intend to be well integrated, durable, and transformative?**
- b) Is there potential for innovation and scaling-up?**
- c) Will the project contribute to an improved alignment of national policies (policy coherence)?**

Secretariat's Comments DER/TK: Yes.

Agency's Comments

## **6 C. Alignment with GEF-8 Programming Strategies and Country/Regional Priorities**

- 6.1 Is the project adequately aligned with focal area and integrated program strategies and objectives, and/or adaptation priorities?**

Secretariat's Comments

DER/TK: Please consider the following issue:

1. To stay closely aligned with GEF focal area requirements as noted in Objective 1.2 of the GEF-8 CCM Focal Area Strategy, consider prioritizing selection of bioenergy investments that support decentralized clean and affordable energy solutions, focusing on micro- and mini-grid systems in rural and peri-urban areas. Investments that support replacement of fossil-fuel methane with bio-methane for heating, transport, cooking, fertilizer production, or similar uses are also encouraged. Investments that prioritize bioenergy for grid-scale electricity generation or promote additional demand of fossil fuels should be discouraged.

DER/TK: May 11, 2023. Comment cleared.

#### Agency's Comments

WB 5/10/23:

The project supports the GEF-8 CCM Programming Directions objective 1.1, efficient use of raw materials and circular economy by supporting technologies that better utilize biomass waste resources, lower fugitive methane emissions and generating a slate of lower-carbon products, primarily fermented organic manure and renewable biogas as a substitute for fossil fuels in transport and industrial applications.

The project investments strictly prioritize generation of bioenergy produced by anaerobic decomposition of organic waste including agricultural waste, municipal waste, and industrial waste streams such as sugarcane press mud.

The project is closely aligned with the Government of India (GoI) priorities as demonstrated by several initiatives such as SATAT scheme and 5% blending targets of bio-methane in gas grid replacing fossil fuel usage.

**6.2 Is the project alignment/coherent with country and regional priorities, policies, strategies and plans (including those related to the MEAs and to relevant sectors)**

Secretariat's Comments DER/TK: Yes.

#### Agency's Comments

**6.3 For projects aiming to generate biodiversity benefits (regardless of what the source of the resources is - i.e. BD, CC or LD), does the project clearly identify which of the 23 targets of the Kunming-Montreal Global Biodiversity Framework the project contributes to and how it contributes to the identified target(s)?**

Secretariat's Comments NA

#### Agency's Comments

**7 D. Policy Requirements**

**7.1 Is the Policy Requirements section completed?**

Secretariat's Comments

DER/TK. Yes, but gender and CSO aspects should be strengthened.

DER/TK: May 11, 2023. Comment cleared.

Agency's Comments

WB 5/10/23:

The gender and CSO aspects are strengthened in the revised proposal.

**7.2 Is a list of stakeholders consulted during PIF development, including dates of these consultations, provided?**

Secretariat's Comments DER/TK: Yes.

Agency's Comments

**8 Annexes**

**Annex A: Financing Tables**

**8.1 Is the proposed GEF financing (including the Agency fee) in line with GEF policies and guidelines? Are they within the resources available from (mark all that apply):**

**STAR allocation?**

Secretariat's Comments

NA

Agency's Comments

**Focal Area allocation?**

Secretariat's Comments

NA

Agency's Comments

**LDCF under the principle of equitable access?**

Secretariat's Comments

NA

Agency's Comments

**SCCF A (SIDS)?**

Secretariat's Comments

NA

Agency's Comments

**SCCF B (Tech Transfer, Innovation, Private Sector)?**

Secretariat's Comments

NA

Agency's Comments

**Focal Area Set Aside?**

Secretariat's Comments

NA

Agency's Comments

**8.2 Is the PPG requested within the allowable cap (per size of project)? If requested, has an exception (e.g. for regional projects) been sufficiently substantiated?**

Secretariat's Comments DER/TK: The PPG requested is zero which is appropriate for a Blended Finance Project.

Agency's Comments

**8.3 Are the indicative expected amounts, sources and types of co-financing adequately documented and consistent with the requirements of the Co-Financing Policy and Guidelines?**

Secretariat's Comments

DER/TK: No. As noted in several other boxes, please list all co-financing sources and amounts including:

1. Any technical assistance
2. Any commercial lending amounts. The actual lender institutions may not be known and names do not have to be listed.
3. Any equity from beneficiaries. This can be an estimate based on minimum equity requirements used as selection criteria for loan eligibility.
4. Any donor agency
5. Any IBRD loan

DER/TK: May 11, 2023. Thank you for updating the table. Comment cleared.

Agency's Comments

WB 5/10/23:

These have now been added to the portal entry. However, the equity providers will be the CBG project developers who are required to put 30% of the capex as equity in order to seek debt financing supported by the RSF. The commercial lenders that could be potential PFIs have also been listed.

#### **Annex B: Endorsements**

**8.4 Has the project been endorsed by the country? (ies) GEF OFP and has the OFP at the time of PIF submission name and position been checked against the GEF database?**

#### Secretariat's Comments

DER/TK: Yes. The letter has been submitted and signed. Some minor calculation errors have been noted. Please provide corrected letter before the PIF clearance deadline of May 17.

DER/TK: May 11, 2023. The corrected LOE has been provided. Comment cleared.

#### Agency's Comments

WB 5/10/23:

Updated LoE has been provided.

**Are the OFP endorsement letters uploaded to the GEF Portal (compiled as a single document, if applicable)?**

Secretariat's Comments DER/TK: Yes.

#### Agency's Comments

**Do the letters follow the correct format and are the endorsed amounts consistent with the amounts included in the Portal?**

Secretariat's Comments DER/TK: Yes.

#### Agency's Comments

**8.5 For NGI projects (which may not require LoEs), has the Agency informed the OFP(s) of the project to be submitted?**



Secretariat's Comments DER/TK: Yes.

Agency's Comments

**Annex C: Project Location**

**8.6 Is there preliminary georeferenced information and a map of the project's intended location?**

Secretariat's Comments DER/TK: Yes.

Agency's Comments

**Annex D: Safeguards Screen and Rating**

**8.7 If there are safeguard screening documents or other ESS documents prepared, have these been uploaded to the GEF Portal?**

Secretariat's Comments DER/TK: Yes.

Agency's Comments

**Annex E: Rio Markers**

**8.8 Are the Rio Markers for CCM, CCA, BD and LD correctly selected, if applicable?**

Secretariat's Comments DER/TK: Yes.

Agency's Comments

**Annex F: Taxonomy Worksheet**

**8.9 Is the project properly tagged with the appropriate keywords?**

Secretariat's Comments DER/TK: Yes.

Agency's Comments

**Annex G: NGI Relevant Annexes**

**8.10 Does the project provide sufficient detail (indicative term sheet) to take a decision on the following selection criteria: co-financing ratios, financial terms and conditions, and financial additionality? If not, please provide comments. Does the project provide a detailed reflow table to assess the project capacity of generating reflows? If not, please provide comments. Is the Partner Agency eligible to administer concessional finance? If not, please provide comments.**

Secretariat's Comments

DER/TK: Please see box 5.5. The term sheet and reflow tables should be aligned with the revised project document.

DER/TK: May 11, 2023. At the time of CEO endorsement, please enhance the reflow table to delineate between total, principal, and earnings in the last three rows of Annex G.2

Agency's Comments

WB 5/10/23:

Both the term sheet and reflow tables have been updated.

WB 5/15/23:

Noted. This will be addressed at CEO Endorsement.

## **9 GEFSEC Decision**

**9.1 Is the PIF and PPG (if requested) recommended for technical clearance?**

Secretariat's Comments

DER/TK: This project has received a preliminary screening under the Blended Finance Call for Proposals that closed February 27, 2023. The project has merit but requires revisions. The attached review sheet includes the results of the preliminary screening.

Additional review and comment on the financial aspects of the project will be developed through consultation with the GEF Advisory Group of Financial Experts. Revised projects should be submitted in a timely manner and will be considered along with all other projects being submitted for the June 2023 work program.

DER/TK: May 11 2023. Thank you for the extensive response to technical comments. This project is ready for technical clearance. Please address very minor comments in box 1 and 5.5 (4) and revert.

DER/TK: May 15, 2023. Thanks for the quick turnaround. Please carefully check the PIF/PCN uploaded document also reflects the changed title and fix to the co-financing table. The most recent version PIF in the Portal is dated May 11, 2023.

DER/TK: May 15, 2023. Thank you for the quick upload. This project is recommended for technical clearance.

#### Agency's Comments

WB 5/15/23:

These comments have been addressed. Thank you.

#### **9.2 Additional Comments to be considered by the Agency at the time of CEO Endorsement/ Approval**

#### Secretariat's Comments

Provide a more detailed analysis of the fee structure, estimate default rate, and reflow analysis for base case, worst case, and best case scenario.

Please enhance the reflow table to delineate between total, principal, and earnings in the last three rows of Annex G.2 using actual amounts, not percentages or text.

#### Agency's Comments

WB 5/15/23:

These comments are noted and will be addressed at CEO Endorsement. Thank you.

#### Review Dates

	PIF Review	Agency Response
<b>First Review</b>	<b>3/24/2023</b>	

	<b>PIF Review</b>	<b>Agency Response</b>
<b>Additional Review (as necessary)</b>	<b>4/18/2023</b>	<b>5/11/2023</b>
<b>Additional Review (as necessary)</b>	<b>5/11/2023</b>	<b>5/15/2023</b>
<b>Additional Review (as necessary)</b>	<b>5/15/2023</b>	
<b>Additional Review (as necessary)</b>		