



**GEF SECRETARIAT REVIEW FOR FULL/MEDIUM-SIZED PROJECTS\***  
**THE GEF/LDCF/SCCF TRUST FUNDS**

GEF ID:	<b>4374</b>		
Country/Region:	<b>Belarus</b>		
Project Title:	<b>Removing Barriers to Wind Power Development in Belarus</b>		
GEF Agency:	<b>UNDP</b>	GEF Agency Project ID:	<b>4462 (UNDP)</b>
Type of Trust Fund:	<b>GEF Trust Fund</b>	GEF Focal Area (s):	<b>Climate Change</b>
GEF-5 Focal Area/ LDCF/SCCF Objective (s):	<b>CCM-3; CCM-3; CCM-3; Project Mana;</b>		
Anticipated Financing PPG:	<b>\$0</b>	Project Grant:	<b>\$3,045,000</b>
Co-financing:	<b>\$17,100,000</b>	Total Project Cost:	<b>\$20,145,000</b>
PIF Approval:		Council Approval/Expected:	
CEO Endorsement/Approval		Expected Project Start Date:	
Program Manager:	<b>Dimitrios Zevgolis</b>	Agency Contact Person:	<b>John O'Brien</b>

Review Criteria	Questions	Secretariat Comment at PIF (PFD)/Work Program Inclusion <sup>1</sup>	Secretariat Comment At CEO Endorsement(FSP)/Approval (MSP)
Eligibility	1. Is the participating country eligible?	Yes.	
	2. Has the operational focal point endorsed the project?	Initially, n endorsement letter dated August 31, 2010 signed by Mr. Tsalko, Minister of Natural Resources and Environmental Protection, was submitted. However, the registered operational focal point is Mr. Kulik, First Deputy Minister of the same ministry. GEFSEC asked the country to clarify. On October 18, UNDP submitted a new letter of endorsement, dated October 4, 2010, signed by Mr. Kulik.	

\*Some questions here are to be answered only at PIF or CEO endorsement. No need to provide response in gray cells.

<sup>1</sup> Work Program Inclusion (WPI) applies to FSPs only . Submission of FSP PIFs will simultaneously be considered for WPI.

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Agency's Comparative Advantage	3. Is the Agency's comparative advantage for this project clearly described and supported?	<p>UNDP has a comparative advantage for TA and capacity building interventions. It is mentioned in the PIF that the project does not deal with large scale investment, however the project outcomes include the construction of at least one pilot wind farm. Please clarify whether GEF funding will be provided for the construction of the farm and if so, describe the actual involvement of the GEF Agency.</p> <p>DZ, Feb 23, 2011: It is clarified that GEF funding will not be used for the actual investment, but for TA activities as the feasibility study and the development of the demo investment. Then it should be noted that the budgeted costs for these TA activities are 25% the investment cost. This is too high by any standards for wind energy investments.</p> <p>DZ, Sep 28, 2011: The proposal is redesigned. Comment addressed.</p>	
	4. If there is a non-grant instrument in the project, is the GEF Agency capable of managing it?	N/A	
	5. Does the project fit into the Agency's program and staff capacity in the country?	<p>The project fits into the general objective of UNDP to assist the country to develop the capacity to mitigate climate change, which is expressed in the CPD. Please provide the program of activities that UNDP is going to implement under this objective, if it exists.</p> <p>No information is provided about the</p>	

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		<p>staff capacity in the country.</p> <p>DZ, Feb 23, 2011: No analytical program of activities is provided other than the output of strengthening the national legal and institutional frameworks for the use of RES. The information provided about the staff capacity in the country is sufficient.</p> <p>DZ, Sep 28, 2011: Please provide an analysis of the specific relevant activities that are included (and financed) by the CPAP for Belarus. Please clarify whether the budget of these activities is equal to the \$600,000 of cofinancing provided by UNDP.</p> <p>DZ, Dec 20, 2011: Clarifications are provided. Comment cleared.</p>	
Resource Availability	6. Is the proposed Grant (including the Agency fee) within the resources available from (mark all that apply):		
	• the STAR allocation?	Yes.	
	• the focal area allocation?	Yes.	
	• the LDCF under the principle of equitable access	N/A	
	• the SCCF (Adaptation or Technology Transfer)?	N/A	
	• Nagoya Protocol Investment Fund		
Project Consistency	7. Is the project aligned with the focal /multifocal areas/ LDCF/SCCF/NPIF results framework?	The project is aligned with the objective CCM-3. However, the financing is not aligned with the outcomes and outputs identified.	

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		<p>DZ, Feb 23, 2011: Financing should be aligned with the revisions under the project design comments.</p> <p>DZ, Sep 28, 2011: Comment addressed.</p>	
	<p>8. Are the relevant GEF 5 focal/multifocal areas/LDCF/SCCF/NPIF objectives identified?</p>	<p>Yes, CCM-3. However, please address comment 8 about the outcomes and outputs.</p> <p>DZ, Sep 28, 2011: Comment addressed.</p>	
	<p>9. Is the project consistent with the recipient country's national strategies and plans or reports and assessments under relevant conventions, including NPFE, NAPA, NCSA, or NAP?</p>	<p>Yes, the project objectives are consistent with the plans of the country.</p>	
	<p>10. Does the proposal clearly articulate how the capacities developed, if any, will contribute to the sustainability of project outcomes?</p>	<p>Not clearly. Firstly, the cofinancing for the capacity building action is lower than the GEF funding, which indicates the lack of commitment from the side of the country. Secondly, it is dubious whether the capacity building needs can be covered by sponsoring the participation of local specialists in international meetings which have little relevance to the actual needs. Thirdly, the involvement of the Ministry of Energy and the Ministry of Economy is not clear; they should have been a part of the executing scheme.</p> <p>DZ, Feb 23, 2011: The first comment has been addressed by tripling the cofinancing for this component, without changing the description of the components. We are concerned about</p>	

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		<p>the flexibility presented in rebudgeting this project component; have the capacity needs been reevaluated and what kind of extra outputs can justify another 400,000 USD to be spent for capacity development? In the agency's response to the first review comments, it is mentioned that the cofinancing for the component 2 relates to the participation of specialists in conferences and seminars that would happen anyway (baseline activity). So this indicates that only the output 2.2 is cofinanced as a baseline activity. If so, then the baseline project is very weak regarding this component.</p> <p>The Ministries of Energy and Economy have been added in the executing scheme.</p> <p>DZ, Sep 28, 2011: Comment addressed.</p>	
Project Design	<p>11. Is (are) the baseline project(s), including problem (s) that the baseline project(s) seek/s to address, sufficiently described and based on sound data and assumptions?</p>	<p>The baseline project description is general: there is no clear connection between the cofinancing provided and the activities that should be considered as the baseline activities.</p> <p>DZ, Feb 23, 2011: A more analytical presentation of the baseline is provided, nevertheless certain issues remain:</p> <p>i. As for Component 1, according to the response to the first review the baseline activities (those that are cofinanced) "relate to the institutional and regulatory framework related to the development of policy documents related to the development of the Country Energy</p>	

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		<p>strategy which would take place anyway." This description is not coherent; are there specific outputs that 900,000 USD of govt. cash will fully finance? Also, the status of enactment of the RE Law should be clarified; this is a submission dated February 2011, it shouldn't have a reference that the Law is "expected to be enacted in 2010." Even the fact-finding mission of UNDP is more than one year old; how is it confirmed that nothing has changed during 2010?</p> <p>ii. In the agency's response to the first review comments, it is mentioned that the cofinancing for the component 2 relates to the participation of specialists in conferences and seminars that would happen anyway (baseline activity). So this indicates that only the output 2.2 is cofinanced as a baseline activity. If so, then the baseline project is very weak regarding this component.</p> <p>iii. Please describe analytically the baseline activities which relate to "the study concerning specification of the existing wind map ..." and the "programs related to wind energy development including measures on construction of concrete installations and co-financing through public funds."</p> <p>DZ, Sep 28, 2011: The comments have not been addressed in the response sheet provided by the agency. However, there are changes in the PIF text that refer to the above comments.</p>	

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		<p>i. According to the barrier analysis provided, the existing RE law does not provide sufficient economic incentives to attract investors. Will the project develop a new feed-in tariff scheme to replace the existing resolution of the Ministry of Economy?</p> <p>ii. Please describe analytically the baseline activities which relate to "the study concerning specification of the existing wind map ..." and the "programs related to wind energy development including measures on construction of concrete installations and co-financing through public funds."</p> <p>DZ, Dec 20, 2011: Clarifications are provided. Comment cleared.</p>	
	<p>12. Has the cost-effectiveness been sufficiently demonstrated, including the cost-effectiveness of the project design approach as compared to alternative approaches to achieve similar benefits?</p>		
	<p>13. Are the activities that will be financed using GEF/LDCF/SCCF funding based on incremental/additional reasoning?</p>	<p>In general yes, however the development of the wind market in the country doesn't depend so much on the actual action of the development of a wind atlas and the needed legislation, but of the market incentives available through the under development RE law. An analysis based on the feed-in tariff expected by the draft RE law should be provided.</p> <p>DZ, Feb 23, 2011: The comment hasn't been addressed sufficiently.</p>	

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		DZ, Sep 28, 2011: Comment addressed.	
	14. Is the project framework sound and sufficiently clear?	<p>Component 1: The outputs of this component are clear, however, considering that this is a 5-year project, it would be expected that the outputs would be more concrete, i.e. instead of guidelines and draft programs, the actual ministerial decisions, by-laws, and final programs should be the actual outputs. Also, specify what is meant by "standard financial evaluation methods" and why secondary legislation is needed for that? The power sector in the country should already have knowledge about tariff-setting methods.</p> <p>Component 2: GEF cannot pay for the output 2.2.</p> <p>Component 3: GEF cannot pay for output 3.3. Also, clarify output 3.1; will wind measurements be financed? Furthermore, outputs 3.2 and 3.5 are similar. Finally, the output 3.4 should be separate as an investment component. GEF contribution to construction should be clearly indicated.</p> <p>It should be noted that the investment part of the project can be successful only if the project delivers the outputs of the 1st and 2nd components, and partially of the 3rd one, in the first two years of the project, since the</p>	



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		<p>engagement with the construction of the pilot plant will require a stable situation in order to attract financing.</p> <p>Also, it is mentioned that the Wind Atlas will be developed in order to meet the requirements of the leading manufacturers of wind turbines. Please explain; the wind turbine manufacturers do not need specific Wind Atlas information, it is the developers who need this info, who in fact usually take their own specific measurements before taking a final investment decision.</p> <p>Also, please clarify if the project includes the cost of measurements at national level, or only for specific sites.</p> <p>DZ, Feb 23, 2011:  Component 1: It is contradicting to clarify that the expected legislation and regulation will be adopted, and at the same time stating that "the GEF project is to develop and submit drafts of legal documents .... and it is the responsibility of the government to adopt them." The GEF project is supposed to be executed by the government so it is a government project; we don't understand why there is need to note a distinction. Also, the WB project will provide recommended draft content of RE legal and regulatory acts, as well as technical standards and requirements related to RE, so it is not clear how much need - and at what cost - will exist for the GEF outputs. In the same context, the statement that "the project will conduct analysis of existing</p>	

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		<p>regulations" should be deleted; both the WB project and the PPG cover this need.</p> <p>Regarding output 1.3, doesn't the existing technical code for stationing and designing a wind power installation provide design and construction guidelines, site selection requirements, EIA, etc? Please be very specific on the missing elements that should be addressed by the GEF project. We should repeat that the GEF shouldn't finance the development of "standard financial evaluation methods." Such methods should be common knowledge and the Ministry of Finance should have already applied them in order to design the existing tariff scheme.</p> <p>Moreover, the outputs 1.4 and 1.5 are overlapping; it is unclear what is the level of the current elaboration of that Programme (which also covers the past 2 years) and what is left to elaborate.</p> <p>Component 2: In the agency's response to the first review comments, it is mentioned that the cofinancing for the component 2 relates to the participation of specialists in conferences and seminars that would happen anyway (output 2.2). Then GEF fully finance the other outputs. This is not acceptable; GEF cannot fully finance the capacity building activities, especially those that concern government institutions.</p> <p>Component 3: GEF cannot support carbon financing activities, so any</p>	

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		<p>relevant reference linked to the pilot wind farm should be deleted. Also, GEF will cover only the development and feasibility costs; these costs cannot be 2mUSD for a 5MW plant!</p> <p>Moreover, it is unclear how it is expected that a project executed by the state will manage to cooperate with a private partner in order to offer these services directly to the private partner. The role of the public and the private partners for these activities should be better described. Moreover, according to the response to the comment 29, a specific private partner is interested in building a plant, and negotiation with Siemens are underway. Is this plant considered to be the demo plant? If so, please explain if the 1.6mUSD that the govt. will offer to the development of this plant is the same with the 1.6mUSD mentioned in the cofinancing scheme, and what is the form of the state participation (grant, equity participation, credit, etc.).</p> <p>Component 4: If the project includes only the cost of measurements at specific sites, how does this activity differ from the activity 3.1 or 4.2? Also, the output 4.2 concerns feasibility studies for another two farms. Then, this output doesn't differ from the outputs 3.1 and 3.2. Also, the costs are incomprehensible; how two feasibilities studies with detailed measurements can cost less than the same activities under component 3. The cost assumptions</p>	

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		<p>should be shared. Finally the reference that the Atlas will be developed to meet the requirements of leading manufacturers of wind turbines remains.</p> <p>DZ, Sep 28, 2011: Component 1: The output 1 concerns the establishment of a Wind Energy Support Unit. GEF cannot pay for the operational costs of this unit and it should be fully sponsored by the government.</p> <p>Part of the previous output 1.3 remains (as output 1.4) without an explanation regarding the missing elements of the existing technical code; please specify them. Regarding the output 1.5, please clarify what is the level of the current elaboration of the Development Programme and what is left to formulate beyond the specific secondary legislation that will be formulated and enforced under output 1.3.</p> <p>Component 2: The output 2.2 is a new addition, but overlaps with the output 3.1.</p> <p>Component 3: The output 3.2 still refers to carbon financing and so does the barrier analysis. The relevant activities (development of PIN and PDD, and the capital grant for the farm) cannot be financed by the GEF if the wind farm receives carbon credits. Please clarify the intentions for the financing of the specific 5MW power plant.</p> <p>Also the component's budget has increased by 50%, however the targeted size of the power plant remains at 5MW.</p>	

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		<p>Since this increase comes mainly from unspecified private financing, please clarify the reasons for the budget modification. The Box 1-1 capital cost estimate for 5 MW does not comply with the proposed budget.</p> <p>Regarding output 3.3, the request for grant financing for the specific investment is expected be supported with an estimation of the total size of grant financing in order to make attractive an investment of this size and under the existing incentives scheme (feed-in tariff). Also, please clarify the size of the capital investment of the government to this investment; please note that grant financing bears costs that cannot be solely covered by the GEF. Also, the development of this grant mechanism seems an one-off operation, instead of a mechanism that will be sustained. It is proposed that the GEF grant financing is pooled with government resources in order to implement the financial support mechanism that is expected to be promoted under the Wind Energy Development Programme for Belarus. It should be noted that the duration of the project (5 years) permits the alignment of the provisions of the wind energy programme and the operation of a financial support mechanism.</p> <p>DZ, Dec 20, 2011: Clarifications are provided. Comment cleared.</p>	

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	15. Are the applied methodology and assumptions for the description of the incremental/additional benefits sound and appropriate?	Yes. Direct benefits are linked with the 5MW pilot.	
	16. Is there a clear description of: a) the socio-economic benefits, including gender dimensions, to be delivered by the project, and b) how will the delivery of such benefits support the achievement of incremental/additional benefits?	Yes.	
	17. Is public participation, including CSOs and indigeneous people, taken into consideration, their role identified and addressed properly?	<p>No. It should be noted that the communities' role in the development of RE in the rest of Europe is important, however this project doesn't involve local communities.</p> <p>DZ, Feb 23, 2011: The local communities role is described as limited to provide consent for the choice of the pilot wind farm.</p>	
	18. Does the project take into account potential major risks, including the consequences of climate change and provides sufficient risk mitigation measures? (i.e., climate resilience)	<p>Risks are identified and they are rated from medium to high. It is not clear how these risks are mitigated by the project. Since the basis of the project is the draft law, the provisions of it will define the outputs of the project (e.g. secondary legislation), so the political risk is relevant to the ambition of the law. Also, the risk about the incentives' commitment cannot be mitigated by just offering consulting services based on EU expertise. EU experts are already involved in consultations with the country under several modalities (EU-Belarus negotiations, Energy Charter treaty, EU projects etc), however so far</p>	

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		<p>this wasn't enough for the development of the renewable energy market in the country. Finally, the risk of low attractiveness of wind investments for the private sector certainly can be partially mitigated by financial incentives provided by the government, but two issues should be noted: (a) there is no specific action described on how the project will "bring in development banks and private banks"; and (b) there is a natural barrier that a project can never mitigate, the resource availability, and the capacity factor for the pilot investment is only 18%. It would be expected that the first investment would happen in the site with the best potential (first-entry advantage).</p> <p>DZ, Feb 23, 2011: Political risks are rated high. This shouldn't be the case for a project that is endorsed by the government, and is going to be executed by the government with the objective to develop the wind power market in the country. If this commitment is taken for granted, then what is the reason for high political risks?</p> <p>The rest of the comment is not addressed sufficiently. regarding the resource availability, since according to the response to comment 29, there are specific companies with interest to construct wind farms in specific regions, then a description of the energy resource in the specific regions can be provided.</p>	

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		DZ, Sep 28, 2011: Comment addressed.	
	19. Is the project consistent and properly coordinated with other related initiatives in the country or in the region?	<p>The coordination with the WB project should be discussed. According to the TOR of the WB project, legislation issues would be addressed, which are also explored by the first component of this proposal. Please clarify how the proposed outputs are additional to those of the WB project.</p> <p>DZ, Feb 23, 2011: According to the response, the GEF project will transform the recommendations of the WB project to regulations. Considering that the WB project provides much input at a lower cost than the GEF funding requested for component 1, we consider that the GEF funding for the Component 1 should be lower. Also, it should be noted that the WB project already provides awareness raising and capacity building activities for the government institutions.</p> <p>DZ, Sep 28, 2011: Comment addressed.</p>	
	20. Is the project implementation/ execution arrangement adequate?	<p>Please refer to comments 11 and 22.</p> <p>DZ, Dec 20, 2011: Comment cleared.</p>	
	21. Is the project structure sufficiently close to what was presented at PIF, with clear justifications for changes?		



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	22. If there is a non-grant instrument in the project, is there a reasonable calendar of reflows included?		
Project Financing	23. Is funding level for project management cost appropriate?	<p>No, PM GEF funding is too high considering the level of PM cofinancing and the volume of the GEF funding.</p> <p>DZ, Feb 23, 2011: Given that the total GEF funding is excessive for the specific project design, the GEF PM funding is also excessive.</p> <p>DZ, Sep 28, 2011: GEF PM funding is less than 5% of GEF grant.</p>	
	24. Is the funding and co-financing per objective appropriate and adequate to achieve the expected outcomes and outputs?	<p>This cannot be assessed by the provided information.</p> <p>DZ, Feb 23, 2011: GEF funding is excessive for the expected deliverables. Policy making activities can cost less, considering the size of cofinancing, while it is hard to assess how much capacity building is needed and its associated cost. As for the GEF funding linked to the third component, 2mUSD of GEF funding should mobilize more direct investment that that associated to a 5MW wind farm.</p> <p>DZ, Sep 28, 2011: Comment addressed.</p>	
	25. At PIF: comment on the indicated cofinancing; At CEO endorsement: indicate if confirmed co-financing is provided.	An unidentified multilateral agency is expected to cofinance the project, without any identified amount. Please explain how this possibility has been decided to be explored; are there any undergoing negotiations?	

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		DZ, Feb 23, 2011: The comment is addressed. Specific information about the possible private investors is provided.	
	26. Is the co-financing amount that the Agency is bringing to the project in line with its role?	100,000 USD out of the core resources of the agency's country office have been preliminarily committed. Please provide indication about the level of resources that UNDP has allocated to climate change mitigation activities under the CPD for Belarus (2011-16), in comparison to the total resources allocated under the CPD.  DZ, Feb 23, 2011: UNDP hasn't allocated any resources to mitigation activities under the CPD for Belarus.	
Project Monitoring and Evaluation	27. Have the appropriate Tracking Tools been included with information for all relevant indicators, as applicable?		
	28. Does the proposal include a budgeted M&E Plan that monitors and measures results with indicators and targets?		
Agency Responses	29. Has the Agency responded adequately to comments from:		
	• STAP?		
	• Convention Secretariat?		
	• Council comments?		
	• Other GEF Agencies?		
<b>Secretariat Recommendation</b>			
Recommendation at PIF Stage	<b>30. Is PIF clearance/approval being recommended?</b>	No. Please revise according to the comments above.  DZ, Feb 23, 2011: PIF clearance is not	

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		<p>recommended. There are major concerns regarding the design and the cost of the project. Before any further submission, the proposal should be discussed with the GEF Sec.</p> <p>DZ, Sep 28, 2011: PIF clearance is not recommended. Before any further submission, the proposal should be discussed with the GEF Sec.</p> <p>DZ, Dec 20, 2011: PIF clearance is recommended. At CEO Endorsement stage please address the items under Box 31.</p>	
	31. Items to consider at CEO endorsement/approval.	<p>At the CEO Endorsement stage please provide the following:</p> <p>(i) Analytical justification and data for the allocation of GEF resources and cofinancing per output.</p> <p>(ii) An analytical list of the missing elements of technical norms and standards.</p> <p>(iii) The evidence (i.e. documented allocation of state funds) of the government's support to the investment support mechanism beyond the lifetime of this project, and the incremental cost analysis that justifies the purpose and the level of the GEF funding for the investment activities (i.e. grant vs. non-grant instrument, and the amount of GEF support), based on the foreseen costs (supported by market data) for the selected wind power plant(s).</p>	
Recommendation at CEO Endorsement/	32. At endorsement/approval, did Agency include the progress of PPG		

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Approval	with clear information of commitment status of the PPG?		
	<b>33. Is CEO endorsement/approval being recommended?</b>		
Review Date (s)	First review*	October 19, 2010	
	Additional review (as necessary)	February 23, 2011	
	Additional review (as necessary)	September 28, 2011	
	Additional review (as necessary)	December 20, 2011	
	Additional review (as necessary)		

\* **This is the first time the Program Manager provides full comments for the project. Subsequent follow-up reviews should be recorded. For specific comments for each section, please insert a date after comments. Greyed areas in each section do not need comments.**

#### REQUEST FOR PPG APPROVAL

Review Criteria	Decision Points	Program Manager Comments
PPG Budget	1. Are the proposed activities for project preparation appropriate?	DZ, Dec 20, 2011: Please adjust the project preparation activities so as to include in their outputs the requested items under Box 31.
	2. Is itemized budget justified?	DZ, Dec 20, 2011: The total budget seems reasonable, however it will be reassessed when the revised PPG request is submitted.
Secretariat Recommendation	<b>3. Is PPG approval being recommended?</b>	DZ, Dec 20, 2011: No. Please revise according to the above comments.
	4. Other comments	
Review Date (s)	First review*	December 20, 2011
	Additional review (as necessary)	

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