

FORM

FORM - DEVIATION REQUEST SUBMISSION

PUBLICATION DATE: 12/11/2024

VERSION: 6.0

NEXT PLANNED UPDATE: 12/11/2026

RELATED DOCUMENTS

– [Deviations Approval Requirements and Procedures](#)

CONTACT DETAILS

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1| General Guidelines

1.1 | Applicability

- 1.1.1 | This form is to be completed for projects (project activities/PoAs/VPAs) seeking deviation or is/are at a risk of deviating from any [applicable requirements](#), GS4GG-specific requirements listed in the applicable [Methodologies](#) or any other deviations occurring in any of the various aspects of the project.
- 1.1.2 | Refer to the latest version of [Deviation Request Requirements and Procedures](#) for detailed information on the procedures and requirements.
- 1.1.3 | This form can be used in the following instances i.e.,
 - a. Deviation from GS4GG requirements and/or applicable methodologies prior to submission for certification with GS4GG.
 - b. Temporary changes to a certified project - which include changes from the registered monitoring plan, the applied methodologies or other standard documents - that are expected **not** to occur beyond a given monitoring period.
- 1.1.4 | For any permanent changes to a design certified project, the requirements set in [Design Change Approval Requirements and Procedures](#) shall be followed.

2| Submission of deviation form

- 2.1.1 | This form shall be submitted in Microsoft Word (.doc) format to Gold Standard at deviations@goldstandard.org
- 2.1.2 | Forms with incomplete/inaccurate information shall not be considered for review and shall be returned to the applicant.

3| Implementation of deviation decision

- 3.1.1 | The decision prescribed in this form shall be considered by the entity applying for deviation for further course of action.

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4| Decision summary

To be completed by Gold Standard

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVREQ-225
Date of decision	30/09/2025
Decision	☐ Approved [No precondition to apply the deviation decision] ☐ Conditionally approved [Decision is subject to compliance with the precondition defined below] ☒ Not approved [reason for rejection is provided in decision summary]

4.2 | Decision

4.2.1 | Decision Summary

The request for exemption from paragraph 4.1.49 and 4.1.50 of GS4GG Principles and Requirements is **not approved** due to lack of valid justification. The submission to GS was not made within one year of the project start date, and the prior consideration submission to UNFCCC on 24/06/2024 also occurred more than one year after the project start date of 15/06/2022.

Reference information:

The project was submitted to UNFCCC on 24/06/2024 by the consortium of Mundo Verde Climate SA, Tepelen Group Holding Limited, Gaia Climate Finansal Danışmanlık Hizmetleri ve Ticaret A.Ş.: https://unfccc.int/process-and-meetings/the-paris-agreement/paris-agreement-crediting-mechanism/A64_prior_consideration/pc-list

Title of the prior consideration notification (PCN)	PCN ID	Entities involved	Host parties involved	Date of submission	Date of publication*	Link
Khonobod 1-2 Solar Pow...	PA/pc_00352	3	1	24Jun2024	13Sep2024	Learn More
KUNGRAD 1-2-3 WIND Po...	PA/pc_01506	3	1	21Apr2025	23Apr2025	Learn More
Navoi 1-2 Solar Power PL...	PA/pc_00353	3	1	24Jun2024	13Sep2024	Learn More
Samarkand 1-2 Solar Po...	PA/pc_00354	3	1	24Jun2024	13Sep2024	Learn More
Reducing Gas Leakages ...	PA/pc_00192	2	1	10Jun2024	04Sep2024	Learn More
Electric Mobility Progra...	PoA/pc_00057	1	1	14Oct2024	21Jan2025	Learn More
KILN IMPROVEMENT IN K...	PA/pc_01237	1	1	30Jun2024	25Sep2024	Learn More
Zarafshan Wind Farm	PA/pc_00088	1	1	07May2024	13Aug2024	Learn More

4.2.2 | Directions for the project developer/CME, if applicable

N/A

4.2.3 | Directions for the Validation and Verification Body (VVB), if applicable

N/A

4.2.4 | Directions for the Gold Standard, if applicable

N/A

4.3 | Applicability to other activities

Is this decision applicable to other projects under similar circumstances? ¹	☐ Yes ☒ No
Does this decision set a precedent for future projects with similar circumstances? ²	☐ Yes ☒ No
Precedent details (if applicable to other activities)	
NA	

¹ If this is marked yes, this means that any other project (PoA/VPA/PA) in similar situation may apply the decision of this deviation to their project as well. The project developer/VVB may quote this deviation decision in the relevant certification documents. This is relevant to only the projects which have already entered the certification cycle with GS4GG.

² If this is marked yes, it means the decision is valid to all the future projects which will enter the certification cycle with the similar situation. This is relevant to all the projects which are not yet design certified with GS4GG or have not submitted their documents for preliminary review yet.

5| Deviation Request Details

To be completed by the entity requesting deviation - (Project Developer/Coordinating and Managing Entity and/or VVB)

5.1 | Submitted by

- ☒ Project developer
☐ CME
☐ VVB
☐ Other (specify...)

5.2 | Details of the entity and its representative submitting the form

Item	Information
Name ³ :	Muge Afacan Ural
Email ID ⁴ :	mafacan@gaiacclimate.com
Organisation: ⁵ :	GAIA Climate (tam ad)
Are you an authorized project participant as per the cover letter submitted for this activity?	☒ Yes ☐ No

5.3 | Background information

Type	☐ Project activity	☐ PoA GSXXXX	☐ VPA
GS ID	GSXXXX GSXXXX	GS XXXX GS XXXX	GS XXXX GS XXXX
Host country(ies)	Uzbekistan		
Project Title	Samarkand 1-2 SPP		
Registry link			
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below <i>Insert text here</i>		
Certification Status and corresponding date of latest status	☐ Listed	☐ Certified design	☐ Certified project ☒ Other <i>All documents for Preliminary</i>

³ Name of the individual representing the entity requesting the deviation

⁴ Email ID for further correspondence related to the deviation request

⁵ The name of the entity requesting the deviation

			Review have been presented with this deviation request. Shall the deviation request be approved, we will upload all documents onto the GS Registry.	
	dd/mm/yyyy	dd/mm/yyyy	dd/mm/yyyy	XX/XX/XXXX
Applied version of Standard	☒ GS4GG			
	☐ Previous version of Gold Standard	Version no.		
		☐ 1.0	☐ 1.1	☐ 1.2
Transition date, if applicable	From previous GS version to GS4GG		dd/mm/yyyy	
	From another standard to GS4GG		dd/mm/yyyy	
	Name of another standard	☐ CDM		
		☐ Other Name of the Standard – Insert text here		
Applicable activity requirement	☒ Renewable Energy Activity Requirements			
	☐ Community Services Activity Requirements			
	☐ Land-use and Forests Activity Requirements			
	☐ Other <i>Insert name here</i>			

5.4 | Project deviation history

Is there any deviation request(s) for the same project activity/PoA/VPA(s) that was submitted to GS previously? If yes, below information.			☐ Yes ☒ No
Reference number	Insert Text here		
Status of the deviation	☐ Approved	☐ Rejected	☐ Under review
Were there any findings (CL, CAR, FAR) raised during any certification step (preliminary review, design and/or performance review etc.) that are relevant to this deviation request?	☐ Yes ☐ No		
	Summary of the findings <i>Summary of the CL, CAR, FAR not more than 200 words. Include reference to document, page number</i>		

6| Deviation detail

To be completed by the entity requesting deviation (Project Developer/Coordinating and Managing Entity and/or VVB)

6.1 | Standard document reference

Standard document reference	Title	GS4GG Principles and Requirements
	Version	V2.1
	Paragraph	para 4.1.49 and 4.1.50

Standard document reference	Title	GS4GG Renewable Energy Activity Requirements
	Version	V2.1
	Paragraph	Para 4.5.3

6.2 | Description of the deviation

Title	The Samarkand 1-2 SPP Project "Project" is seeking deviation approval with related to Renewable Energy Activity Requirements para 4.5.3, stating projects shall meet the prior consideration requirements in accordance with para 4.1.49 and 4.1.50 of GS4GG Principles and Requirements which state retroactive project submitted at a date late than one year from the project start date will not be eligible for GS certification. Deviation approval decision is sought for project's listing initiation and consequent project certification.	
Confirm the nature of changes related to deviation	☐ Temporary (e.g. not expected to occur beyond one monitoring period)	☒ Permanent (e.g. deviation from requirements prior to submission for certification)
	A deviation from GS4GG requirements prior to submission for certification with GS4GG has been sought.	
Relevant monitoring period, if applicable	Start date	Dd/mm/yyyy
	End date	Dd/mm/yyyy
Summarise the changes	This deviation request has been made in line with Deviation Request Requirements and Procedures v2.0 para 1.1.1(a) as the Project is seeking "a deviation from standard requirements and/or applicable methodologies prior to submission for certification with GS4GG." According to GS4GG Principles and Requirements v2.0 and Renewable Energy Activity Requirements, a project shall meet prior consideration requirements and is required to be initially submitted within one year after the project start date. The start date of the Samarkand SPP project is 15/06/2022; which means the project was supposed to be submitted latest on 15/06/2023 for preliminary review. Therefore, we are requesting a deviation approval to resume our effort for project certification with GS4GG.	

Reason for deviation	Uzbekistan's updated NDC on October 9, 2021, set an ambitious target of a 35% reduction in GHG emissions per unit of GDP by 2030 compared to 2010 levels through renewable energy expansion, improved energy efficiency, and modernization of industrial and agricultural sectors. The Tepelen Group (Project Owner or PO) in Uzbekistan, officially based in Tashkent, was founded in May 2021 for electricity production through thermal power plants. In alignment with Uzbekistan's renewable energy strategy, which aims to increase renewable energy's share to 25% by 2030, the Project Owner made an unorthodox decision and changed its business strategy to enter the renewable energy sector and began foundational work on the Samarkand 1-2 SPP project in early 2022. By the end of 2021, solar and wind energy accounted for only 1% of Uzbekistan's total generation capacity. In 2022, the PO could only secure some partial financing through banks and was unaware of potential carbon financing opportunities. In the meantime, the Project Owner decided to commit to an ambitious 1,000 MW renewable energy investment plan. On June 15, 2022, the PO signed the EPC contract for the 30 MW Samarkand 1-2 SPP and commenced construction. The Project became operational on September 25, 2023, but securing financing for annual O&M costs as well as the upcoming 500 MW Khonobod 1-2 SPP and 500 MW 1-2 Navoi SPP remained a financial challenge, which also delayed the rest of the investment plan. In mid-2023, while exploring financing options, the PO identified carbon financing opportunities and engaged Mundo Verde Climate, a Switzerland-based climate consultancy, signing a consultancy agreement in January 2024. However, as Mundo Verde Climate decided to withdraw from carbon project development, the firm became ineligible to fulfill its obligations. Consequently, in late 2024, Tepelen Group initiated discussions with GAIA Climate and officially assigned GAIA Climate as the new Project Developer (PD) in December 2024 to undertake the carbon certification process. Following an initial technical assessment (conducted only after signing an NDA), it became clear that a deviation request was necessary for Samarkand 1-2 SPP to reinstate it into the GS certification cycle, as the prior consideration requirement had not been met. In addition, the initial submission deadline for the GS Preliminary Review (June 15, 2023) had also been missed. The technical evaluation of the Samarkand 1-2 SPP project estimates an expected reduction of 26,025 tCO₂e per annum, generating substantial financial benefits over a 15-year period. Given Tepelen Group's 1,000 MW solar investment plan, carbon financing will play a critical role in

	mitigating financial risk and reinforcing the company's commitment to its renewable energy investments. As mentioned above, Tepelen Group diverted its limited resources from thermal power investments to renewable power projects and it is critical for the company to showcase the carbon revenue not only to its investors and creditors but also to all stakeholders in Uzbekistan to encourage divestment from fossil fuels. Therefore, we formally request a deviation to allow the project to qualify for GS certification, which would significantly support the Project Owner's efforts in advancing renewable energy projects. To demonstrate our commitment to GS requirements, we have conducted the Local Stakeholder Consultation Meeting (LSCM) on 26/02/2025 in accordance with the Stakeholder Consultation and Engagement Guidelines. Additionally, we are presenting all Preliminary Review documents along with our deviation request. Should this deviation be approved, we will immediately submit all documents to the GS Registry and pay the Preliminary Review Fee to initiate the review process.
Proposed resolution	As the nature of the deviation request is permanent, there is no other alternative solution other than deviation approval to resume project certification. The documents presented along with the deviation request are documents to be uploaded to GS Registry for Preliminary Review, which substantiate the project's environmental integrity, contribution to the Sustainable Development Goals (SDGs), adherence to safeguarding principles, and compliance with host country regulations. GAIA Climate will ensure the accuracy, completeness and conservativeness of ER calculations. GAIA Climate believes in Gold Standard's role in sustaining integrity and high quality in the voluntary carbon markets. With extensive experience in registering projects under Gold Standard, GAIA remains committed to compliance with GS principles. Deviation approval of Samarkand 1-2 SPP project will not only grant the possibility of project registration and a consequent substantial financial generation to the Project- but will also encourage further investment in Uzbekistan's renewable energy sector. GS will have also strengthened its presence and impact in Uzbekistan, reinforcing its global leadership as a climate advocate.
Is there any potential temporary or permanent impact of deviation on other aspects of the project?	Select the relevant area: ☒ Project design ☒ Local stakeholder consultation ☒ Safeguarding principles ☒ SDG assessment ☒ Regulatory compliance ☒ Additionality ☒ Applicability of methodology ☒ Annual emission reduction volume <i>(if yes, fill the table below)</i>

	Annual emission reduction/removal before applying deviation Annual emission reduction/removal after applying deviation
	0 tCO₂e 26,025 tCO₂e
	☐ any other matrix, please specify...
Summary of the impact	<i>As the nature of the deviation request is permanent, there is no other alternative solution other than deviation approval to resume project certification.</i>
Insert text here	

6.3 | VVB information

Is a VVB opinion on the deviation request required? <i>VVB opinion shall be included, where required by the requirements under Deviations Request Requirements and Procedures or request is submitted by the VVB.</i>	Yes ☐ No ☐ <i>If answer is yes, fill the information in section 6.4 below.</i>
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6.4 | VVB's assessment

The below information is to be completed by VVB, if applicable.

VVB's assessment of deviation request	Please confirm the nature of deviation.	
VVB's assessment of impact of deviation request		
VVB recommendation		
VVB details	VVB name:	
	Auditor name(s):	
	Email (s):	

6.5 | Documents:

6.5.1 | List of documents provided (*note that once a decision has been made by Gold Standard, this deviation form will be made public on the Gold Standard website. Kindly refrain from including any confidential information in the form.*)

Document 1. PDD Document

Document 2. IRR Excel Sheet

Document 3. Emission Reduction Excel Sheet

Document 4. Common Practice Analysis Excel Sheet

Document 5. SDG Impact Tool

Document 6. LCSM Report

Document 7. Agreement between Tepelen Group and Mundo Verde Climate SA

Document 8. Agreement between Tepelen Group and Gaia Climate Finansal
Danışmanlık Hiz Tic AŞ

DOCUMENT HISTORY

VERSION NUMBER	RELEASE DATE	DESCRIPTION
6.0	12.11.2024	Editorial and structural changes to the template
5.0	11.04.2022	Additional information added: - date of listing, design certification, transition - standard version - specific reference to a requirement deviated from - any previous deviations/design changes approved - Guidance on VVB opinion
4.0	14.01.2021	Editorial changes
3.0	16.07.2020	Editorial changes
2.0	03.05.2018	Editorial changes
1.0	01.07.2017	Initial adoption