



## FORM

# FORM - DEVIATION REQUEST SUBMISSION

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**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](mailto: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.

## Table of Content

1  General Guidelines.....	2
1.1   Applicability.....	2
2  Submission of deviation form .....	2
3  Implementation of deviation decision .....	2
4  Decision summary .....	4
4.1   General information.....	4
4.2   Decision.....	4
4.3   Applicability to other activities .....	4
5 Deviation Request Details.....	6
5.1   Submitted by.....	6
5.2   Details of the entity and its representative submitting the form .....	6
5.3   Background information.....	6
5.4   Project deviation history .....	7
6 Deviation detail .....	7
6.1   Standard document reference.....	7
6.2   Description of the deviation .....	7
6.3   VVB information.....	10
6.4   VVB's assessment .....	10
6.5   Documents: .....	10

## 4 | Decision summary

*To be completed by Gold Standard*

### 4.1 | General information

DEVIATION REFERENCE NUMBER	DEVRQ-245
Date of decision	29/10/2025
Decision	<input type="checkbox"/> <b>Approved</b> [No precondition to apply the deviation decision] <input type="checkbox"/> <b>Conditionally approved</b> [Decision is subject to compliance with the precondition defined below] <input checked="" type="checkbox"/> <b>Not approved</b> [reason for rejection is provided in decision summary]

### 4.2 | Decision

#### 4.2.1 | Decision Summary

The deviation request is not approved as the explained reason was a controllable, foreseeable business strategy, not a force majeure event. The project developer and VVB must follow the "Applicability of Minimum Site Visit Requirements by VVB," that the VVB shall not verify the monitoring period falling three years before the site visit date.

#### 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? <sup>1</sup>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Does this decision set a precedent for future projects with similar circumstances? <sup>2</sup>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<sup>1</sup> 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.

<sup>2</sup> 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.

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Precedent details (if applicable to other activities)

NA

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## 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 <sup>3</sup> :	Sumeet Singhvi
Email ID <sup>4</sup> :	Sumeet@infisolutions.org
Organisation <sup>5</sup> :	Infinite Solutions
Are you an authorized project participant as per the cover letter submitted for this activity?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

### 5.3 | Background information

Type	<input checked="" type="checkbox"/> Project activity	<input type="checkbox"/> PoA GSXXXX	<input type="checkbox"/> VPA
GS ID	GS7078	GS XXXX GS XXXX	GS XXXX GS XXXX
Host country(ies)	India		
Project Title	216 MW <sub>ac</sub> Adani Green Energy (Tamil Nadu) Solar Power Project		
Registry link	<a href="https://registry.goldstandard.org/projects/details/1429">https://registry.goldstandard.org/projects/details/1429</a>		
Scale	<input type="checkbox"/> Microscale (GS) <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale <input type="checkbox"/> Other, if applicable please specify below <i>Insert text here</i>		
Certification Status and corresponding date of latest status	<input type="checkbox"/> Listed	<input type="checkbox"/> Certified design	<input type="checkbox"/> Certified project
	dd/mm/yyyy	dd/mm/yyyy	dd/mm/yyyy
			01/09/2025

<sup>3</sup> Name of the individual representing the entity requesting the deviation

<sup>4</sup> Email ID for further correspondence related to the deviation request

<sup>5</sup> The name of the entity requesting the deviation

Applied version of Standard	<input checked="" type="checkbox"/> GS4GG <input type="checkbox"/> Previous version of Gold Standard			
	Version no.			
	<input type="checkbox"/> 1.0	<input type="checkbox"/> 1.1	<input type="checkbox"/> 1.2	<input type="checkbox"/> 2.2
Transition date, if applicable	From previous GS version to GS4GG		dd/mm/yyyy	
	From another standard to GS4GG		28/04/2022	
	Name of another standard		<input checked="" type="checkbox"/> CDM <input type="checkbox"/> Other Name of the Standard – Insert text here	
Applicable activity requirement	<input checked="" type="checkbox"/> Renewable Energy Activity Requirements <input type="checkbox"/> Community Services Activity Requirements <input type="checkbox"/> Land-use and Forests Activity Requirements <input type="checkbox"/> 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.			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Reference number	Insert Text here		
Status of the deviation	<input type="checkbox"/> Approved	<input type="checkbox"/> Rejected	<input type="checkbox"/> 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No <b>Summary of the findings</b> <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	Site Visit and Remote Audit Requirements and Procedures
	Version	V2.0
	Paragraph	Paragraph no 3.1.2

#### 6.2 | Description of the deviation

Title	Requesting verification due to delayed site visit	
Confirm the nature of changes related to deviation	<input checked="" type="checkbox"/> Temporary (e.g. not expected to occur beyond one monitoring period)	<input type="checkbox"/> Permanent (e.g. deviation from requirements prior to submission for certification)

	Insert Text here (if required) to support the selection	
Relevant monitoring period, if applicable	Start date	01/01/2021
	End date	08/11/2023
Summarise the changes	<p>According to the "Applicability of Minimum Site Visit Requirements by VVB," para 2.2.3 (ii), VVB shall not verify the monitoring period falling before three years of the site visit date.</p> <p>Accordingly, the follow-up visit was required to be completed by 01/08/2024.</p> <p>Exceeding the prescribed timeline, the physical site visit was conducted on 27/03/2025, in addition to the previous visit held on 02/08/2021.</p> <p>As a result, GS-VERs generated from 01/01/2021 to 26/03/2022 cannot be verified by VVB.</p> <p>Even though, a remote site visit was also conducted by the VVB on 06/10/2023 during design certification renewal.</p>	
Reason for deviation	<p>Force Majure Event on account of Organisational Restructuring.</p> <p>The delay in the follow-up site visit was primarily due to restructuring and a change in project ownership due to introduction of a new business partners in the project activity. The project is owned by Adani Green Energy (Tamil Nadu) Limited, now part of Adani Green Energy Twenty-Three Limited a Special Purpose Vehicle (SPV) which is 50:50 joint venture company between Adani Green Energy Limited and Total Energies Renewables Singapore Pte. Ltd. (formerly known as Total Solar Singapore Pte. Ltd).</p> <p>The restructuring involved the amalgamation of multiple subsidiaries into the parent company (Adani Green Energy Twenty-Three Limited), which commenced on October 1, 2022, and was approved by the Ahmedabad Bench of the National Company Law Tribunal (NCLT) on March 19, 2024. The scheme became effective from October 1, 2022, consolidating all assets, liabilities, and reserves of the subsidiaries into the parent entity.(Public Link - <a href="https://www.adanigreenenergy.com/-/media/Project/GreenEnergy/Investor-Downloads/Scheme-of-Arrangement-of-Subsidiary/Scheme-of-Arrangement.pdf">https://www.adanigreenenergy.com/-/media/Project/GreenEnergy/Investor-Downloads/Scheme-of-Arrangement-of-Subsidiary/Scheme-of-Arrangement.pdf</a>)</p> <p>This process temporarily created uncertainty regarding ownership of carbon credits, assets, and operational and financial responsibilities, leading to delays in verification activities. The ongoing discussions with the new business partners and the restructuring caused the verification process inadvertently delayed.</p> <p>In the meanwhile, in order to uphold the project aligned to the Gold Standard regulatory framework and mitigate the risk of credit loss as the design certification renewal deadline approached, management initiated an interim design certification renewal contract in June 2023, which was successfully completed on April 15, 2025. A remote site visit for this purpose was also carried over on Oct 6, 2023. The PD assures that throughout this period, the project remained operational under the regulatory compliances of Central Transmission Unit falling under Indian National Grid, while being active under the Gold Standard framework as</p>	

	<p>well, being continuously active since the initial verification on August 2022.</p> <p>The current monitoring period for the project spans from 01/01/2021 to 08/11/2023, which falls within the first crediting period of 09/11/2018 to 08/11/2023.</p> <p><b>Historical details of Site Visits &amp; Purpose:</b></p> <table border="1" data-bbox="468 415 1426 617"> <thead> <tr> <th>S.no</th> <th>Audit date</th> <th>Mode</th> <th>Purpose</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>25/05/2019</td> <td>Physical site visit</td> <td>Design certification</td> </tr> <tr> <td>2</td> <td>02/08/2021</td> <td>Physical site visit</td> <td>Performance review -1</td> </tr> <tr> <td>3</td> <td>06/10/2023</td> <td>Remote site visit</td> <td>Design certification renewal</td> </tr> <tr> <td>4</td> <td>27/03/2025</td> <td>Physical site visit</td> <td>Performance review -2</td> </tr> </tbody> </table> <p>For the falling duration under current monitoring period, project developer already hosted two site visits one physical and another remote. Hence, the project was continuously operational in GS4GG either for performance review or design certification renewal.</p> <p>Hence, PD would like to formally apply for a deviation and request approval to GSVERs from 01/01/2021 to 26/03/2022, considering the unavoidable circumstances caused by the ownership restructuring and amalgamation process. We believe that this approach aligns with the principles of fair practice and recognizes the efforts made to ensure continued project operation and compliance despite the delays.</p>	S.no	Audit date	Mode	Purpose	1	25/05/2019	Physical site visit	Design certification	2	02/08/2021	Physical site visit	Performance review -1	3	06/10/2023	Remote site visit	Design certification renewal	4	27/03/2025	Physical site visit	Performance review -2
S.no	Audit date	Mode	Purpose																		
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2	02/08/2021	Physical site visit	Performance review -1																		
3	06/10/2023	Remote site visit	Design certification renewal																		
4	27/03/2025	Physical site visit	Performance review -2																		
Proposed resolution	<p>The deviation is requested to allow the project developer (PD) to claim GSVERs for the period from 01/01/2021 to 26/03/2022. The project activity was continuously operational since commissioning and has been generating GS-VERs throughout the period. The project has consistently maintained its operational status under the Gold Standard framework, justifying the request for deviation to recognize the GSVERS generated during this timeframe.</p>																				
Is there any potential temporary or permanent impact of deviation on other aspects of the project?	<p>Select the relevant area:</p> <p><input type="checkbox"/> Project design</p> <p><input type="checkbox"/> Local stakeholder consultation</p> <p><input type="checkbox"/> Safeguarding principles</p> <p><input type="checkbox"/> SDG assessment</p> <p><input type="checkbox"/> Regulatory compliance</p> <p><input type="checkbox"/> Additionality</p> <p><input type="checkbox"/> Applicability of methodology</p> <p><input checked="" type="checkbox"/> Annual emission reduction volume (<i>if yes, fill the table below</i>)</p> <table border="1" data-bbox="468 1695 1426 1942"> <tr> <th>Annual emission reduction/removal before applying deviation</th> <th>Annual emission reduction/ removal after applying deviation</th> </tr> <tr> <td>583,219 tCO<sub>2</sub>e</td> <td>993,112 tCO<sub>2</sub>e</td> </tr> <tr> <td colspan="2"><input type="checkbox"/> any other matrix, please specify...</td> </tr> </table>	Annual emission reduction/removal before applying deviation	Annual emission reduction/ removal after applying deviation	583,219 tCO <sub>2</sub> e	993,112 tCO <sub>2</sub> e	<input type="checkbox"/> any other matrix, please specify...															
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<input type="checkbox"/> any other matrix, please specify...																					
Summary of the impact	<p>If the deviation is not approved, PD to suffer loss on account of GSVERs generated from the project which would lead to the loss of revenue and may also lead to dispute amongst the project developer &amp; the management including the new business partner.</p>																				

### 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 <a href="#">Deviations Request Requirements and Procedures</a> or request is submitted by the VVB.</i>	Yes <input type="checkbox"/> No <input type="checkbox"/> <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.

Document 2.

Document n.

## 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: <ul style="list-style-type: none"> <li>- date of listing, design certification, transition</li> <li>- standard version</li> <li>- specific reference to a requirement deviated from</li> <li>- any previous deviations/design changes approved</li> <li>- Guidance on VVB opinion</li> </ul>
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