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.

Table of Content

4| Decision summary

To be completed by Gold Standard

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVRQ-248
Date of decision	29/10/2025
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 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?[1]	☐ Yes ☒ No
Does this decision set a precedent for future projects with similar circumstances?[2]	☐ Yes ☒ No

[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.

Precedent details (if applicable to other activities)

NA

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] :	Sumeet Singhvi
Email ID[4] :	Sumeet@infisolutions.org
Organisation:[5]:	Infinite Solutions
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	GS7140	*GS XXXX* *GS XXXX*		*GS XXXX* *GS XXXX*
Host country(ies)	India			
Project Title	Solar Project by Parampujya Solar Energy Pvt. Ltd.			
Registry link	https://registry.goldstandard.org/projects/details/1435			
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below *Insert text here*			
Certification Status and corresponding date of latest status	☐ Listed	☐ Certified design	☐ Certified project	☒ Other Performance Certificate
	dd/mm/yyyy	*dd/mm/yyyy*	*dd/mm/yyyy*	12/07/2022

[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

Applied version of Standard	☒ GS4GG				
	☐ Previous version of Gold Standard	Version no.			
		☐ 1.0	☐ 1.1	☐ 1.2	☐ 2.2
Transition date, if applicable	From previous GS version to GS4GG			*dd/mm/yyyy*	
	From another standard to GS4GG			26/04/2022	
	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 *Insert name here*				

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 *Summary of the CL, CAR, FAR not more than 200 words. Include reference to document, page number*		

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 number 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	☒ Temporary (e.g. not expected to occur beyond one monitoring period)	☐ 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	15/11/2023
Summarise the changes	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. Accordingly, the follow-up visit was required to be completed by 26/07/2024. Exceeding the prescribed timeline, the physical site visit was conducted on 04/04/2025 and 05/04/2025, in addition to the previous visit held on 27/07/2021. As a result, GS-VERs generated from 01/01/2021 to 03/04/2022 cannot be verified by VVB. Even though, a remote site visit was also conducted by the VVB on 12/10/2023 during design certification renewal.	
Reason for deviation	Force Majure Event on account of Organisational Restructuring. 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). 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 - https://www.adanigreenenergy.com/-/media/Project/GreenEnergy/Investor-Downloads/Scheme-of-Arrangement-of-Subsidiary/Scheme-of-Arrangement.pdf) 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. 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 March 05, 2025. A remote site visit for this purpose was also carried over on Oct 12, 2023. The PD assures that throughout this period, the project remained operational under the	

<table>
<tr><td></td><td>regulatory compliances of Central Transmission Unit falling under Indian National Grid, while being active under the Gold Standard framework as well, being continuously active since the initial verification on August 2022.

The current monitoring period for the project spans from 01/01/2021 to 15/11/2023, which falls within the first crediting period of 16/11/2018 to 15/11/2023.
Historical details of Site Visits & Purpose:
<table>
<tr><th>S.no</th><th>Audit date</th><th>Mode</th><th>Purpose</th></tr>
<tr><td>1</td><td>22/05/2019 & 24/05/2019</td><td>Physical site visit</td><td>Design certification</td></tr>
<tr><td>2</td><td>27/07/2021</td><td>Physical site visit</td><td>Performance review -1</td></tr>
<tr><td>3</td><td>12/10/2023</td><td>Remote site visit</td><td>Design certification renewal</td></tr>
<tr><td>4</td><td>04/04/2025 & 05/04/2025</td><td>Physical site visit</td><td>Performance review -2</td></tr>
</table>

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.
Hence, PD would like to formally apply for a deviation and request approval to GSVERs from 01/01/2021 to 03/04/2022, 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.</td></tr>
<tr><td>Proposed resolution</td><td>The deviation is requested to allow the project developer (PD) to claim GSVERs for the period from 01/01/2021 to 03/04/2022, 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 credits generated during this timeframe.</td></tr>
<tr><td>Is there any potential temporary or permanent impact of deviation on other aspects of the project?</td><td>Select the relevant area:
☐ Project design
☐ Local stakeholder consultation
☐ Safeguarding principles
☐ SDG assessment
☐ Regulatory compliance
☐ Additionality
☐ Applicability of methodology
☒ Annual emission reduction volume (if yes, fill the table below)
<table>
<tr><th>Annual emission reduction/removal before applying deviation</th><th>Annual emission reduction/ removal after applying deviation</th></tr>
<tr><td>127,485 tCO_2e</td><td>272,927 tCO_2e</td></tr>
<tr><td></td><td></td></tr>
</table>
☐ any other matrix, please specify…</td></tr>
</table>

Summary of the impact	If the deviation is not approved, PD to suffer loss on account of Credits generated from the project which would lead to the loss of revenue and may also lead to dispute amongst the project developer & the management including the new business partner.

6.3 | VVB information

Is a VVB opinion on the deviation request required? *VVB opinion shall be included, where required by the requirements under [Deviations Request Requirements and Procedures] or request is submitted by the VVB.*	Yes ☐ No ☐ *If answer is yes, fill the information in section 6.4 below.*

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: - 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