

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-406
Date of decision	20/04/2026
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 conditionally approved. The project developer is required to submit the Design change request for the integration of a Battery Energy Storage System (BESS) within 6 months after the relevant PA-Aligned methodology is published.

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

The project developer shall note that the decision is based on the information provided in the deviation request form and only against the applicable standard requirement quoted in the form below by the project developer. The project developer shall comply with all other applicable standard requirements until unless specifically mentioned in the deviation decision. The project developer shall document the deviation request, its implications, and GS' decision in the appropriate section of the project document.

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

The validating VVB shall, through appropriate means at disposal, evaluate that the project's compliance with the above-mentioned conditions and provide VVB opinion in the validation report.

...

4.2.4 | Directions for the Gold Standard, if applicable

The review team shall check the information reported by the project developer and the VVB for appropriateness, accuracy and consistency.

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 :	Kerem Aslan
Email ID ⁴ :	kerem.aslan@life-climate.com
Organisation: ⁵ :	Life İklim ve Enerji Ltd. Sti.
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	GS12276	GS XXXX GS XXXX	GS XXXX GS XXXX
Host country(ies)	North Macedonia		
Project Title	Bitola SPP		
Registry link	https://registry.goldstandard.org/projects/details/4398		
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>If other, specify here</i>
	dd/mm/yyyy	dd/mm/yyyy	28/08/2025 dd/mm/yyyy

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
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	PRINCIPLES & REQUIREMENTS
	Version	v2.1
	Paragraph	para 4.1.49 (c)

6.2 | Description of the deviation

Title	Deviation Request for Extension of 1-Year Design Change Submission Timeline		
	☐ Temporary	☒ Permanent	

Confirm the nature of changes related to deviation	(e.g. not expected to occur beyond one monitoring period)	(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	Dd/mm/yyyy
	End date	Dd/mm/yyyy
Summarise the changes	The project developer requests a deviation from the Gold Standard Design Change requirement to submit a design change within one year from the date the change took effect. The project involves the planned integration of a Battery Energy Storage System (BESS) into a grid-connected solar PV plant, which is expected to affect key elements of the project design, including monitoring, additionality assessment, and emission reduction calculations, and therefore requires a formal design change submission. At the same time, the applicable ACM0002 methodology is expected to be updated under the Paris Agreement alignment framework, and as of the date of this request, the relevant Article 6.4-aligned methodology (A6.4-MEP012-A03) is under public consultation and has not yet been finalized. In this context, the project developer has been closely following these developments and intended to align the BESS-related design change with the forthcoming updated methodology. This approach and its procedural implications were previously presented to Gold Standard through CLRQ-313, where it was confirmed that such a combined approach is permissible, while maintaining the requirement to submit the design change within one year. As the updated methodology has not yet been finalized and the 1-year submission timeline is approaching, this deviation request seeks approval to extend or waive the 1-year requirement for submission of the design change.	
Reason for deviation	The deviation is requested due to the timing mismatch between the requirement to submit the design change within one year and the ongoing development of the Paris Agreement-aligned methodology. The BESS integration impacts several core elements of the project design and is intended to be implemented in alignment with the updated methodological framework; however, the updated methodology has not yet been finalized. Submitting the design change under the current framework would require a subsequent second update once the new methodology becomes available, leading to duplication of validation, review, and documentation processes without improving the accuracy or environmental integrity of the project. The project developer has been closely monitoring these developments and intended to address both elements in a consistent manner; however, due to the continued unavailability of the finalized methodology, the 1-year submission timeline has become a constraint, and therefore a deviation from this requirement is necessary.	

Proposed resolution	The project developer requests approval for a deviation from the requirement to submit the design change within one year from the date the change took effect, specifically seeking an extension or waiver of the 1-year submission timeline. The design change related to the BESS integration will be submitted once the updated methodology becomes available, ensuring alignment with the applicable methodological framework. This approach ensures that the design change is prepared in a complete, accurate, and methodologically consistent manner while avoiding unnecessary duplication of processes.				
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>) <table border="1"> <thead> <tr> <th>Annual emission reduction/removal before applying deviation</th><th>Annual emission reduction/removal after applying deviation</th></tr> </thead> <tbody> <tr> <td>XYZ tCO₂e</td><td> <i>The impact of the BESS integration on emission reductions will depend on operational factors such as curtailment conditions and storage performance.</i> <i>A detailed quantitative assessment will be conducted during the design change process in accordance with the applicable methodology.</i> </td></tr> </tbody> </table> ☐ any other matrix, please specify...	Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation	XYZ tCO ₂ e	<i>The impact of the BESS integration on emission reductions will depend on operational factors such as curtailment conditions and storage performance.</i> <i>A detailed quantitative assessment will be conducted during the design change process in accordance with the applicable methodology.</i>
Annual emission reduction/removal before applying deviation	Annual emission reduction/removal after applying deviation				
XYZ tCO ₂ e	<i>The impact of the BESS integration on emission reductions will depend on operational factors such as curtailment conditions and storage performance.</i> <i>A detailed quantitative assessment will be conducted during the design change process in accordance with the applicable methodology.</i>				
Summary of the impact	Project design: <i>The requested deviation affects only the timing of the design change submission. The BESS system has already been integrated and will be formally reflected in the updated project design upon approval, enabling storage and controlled dispatch of solar PV generation. Its operational impact will be assessed during the design change process.</i> Safeguarding principles: <i>No material adverse impact is anticipated. The BESS operates within the existing project boundary, and all relevant environmental and social aspects will be assessed during the design change.</i> Regulatory compliance: <i>The project is expected to remain compliant with applicable regulatory requirements. The deviation relates only to the timing of submission.</i> Additionality: <i>The inclusion of the BESS component is not expected to result in a significant increase in revenue streams; therefore, its impact on the</i>				

	<i>investment analysis is anticipated to be limited. The project is expected to remain financially additional. Furthermore, no revenue has yet been realized from issued VERs, and expected carbon income has not yet been incorporated into the project cash flow, indicating that carbon revenues remain an important and uncertain financial component. A detailed and conservative additionality assessment will be conducted during the design change process.</i> Applicability of methodology: <i>The applicability of the updated methodology to the integrated project configuration will be assessed at the time of the design change submission.</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.

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