FORM

FORM - DEVIATION REQUEST SUBMISSION

PUBLICATION DATE: **20/05/2026**
VERSION: **6.1**
NEXT PLANNED UPDATE: **15/05/2028**

RELATED DOCUMENTS
– Deviations Approval Requirements and Procedures

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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 help@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 Secretariat

4.1 | General information

DEVIATION REFERENCE NUMBER	DEVRQ-497
Date of decision	14/08/2026
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, subject to the following conditions:

- The project developer shall apply the most conservative (lower) usage rate from the MP4 and MP5 monitoring surveys to the MP5 emission reduction calculations. Where MP4 and MP5 results differ by parameter or cohort, the conservative value shall be applied for each respective parameter.
- The VVB shall verify that the real-time LPG consumption data from the CME's platform confirms continuous and stable or increasing consumption per household during the gap period, corroborating the survey-derived usage rates.
- This deviation is limited to MP5 only and shall not be considered a precedent for future deviations from the annual monitoring survey frequency.
- The CME shall establish and demonstrate to the VVB that corrective measures have been implemented to ensure annual usage surveys are conducted within the required annual interval for all future monitoring periods.

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

The CME 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 CME shall comply with all other applicable standard requirements unless specifically mentioned in the deviation decision. The CME 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

VVB shall confirm that the sampling approach remains statistically valid and representative, and the use of delayed survey data does not result in overestimation of emission reductions

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)	

[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] :	Daria Dyncheva
Email ID[4] :	Daria.dyncheva@circlegas.co.uk
Organisation:[5]:	Circle Gas Limited
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 11330* *GS XXXX*	*GS 11331* *GS XXXX*
Host country(ies)	Kenya		
Project Title	Circle Gas LPG Smart Meter Program - Circle Gas LPG Smart Meter Program in Kenya		
Registry link	**https://registry.goldstandard.org/projects/details/3352**		
Scale	☐ Microscale (GS) ☐ Small scale ☒ Large scale ☐ Other, if applicable please specify below *Insert text here*		

[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

Certification Status and corresponding date of latest status	☐ Listed	☐ Certified design[6]	☒ Certified project[7]	☐ Other *If other, specify here*
	dd/mm/yyyy	*dd/mm/yyyy*	*dd/mm/yyyy*	*dd/mm/yyyy*

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	*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 ☐ Agriculture Activity Requirements ☐ Blue Carbon and Freshwater Wetlands Activity Requirements ☐ Engineered removals 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	#DEVRQ-289		
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 *CL raised by VVB during MP5 performance review requesting clarification on the timing of the usage survey, which was conducted in February 2026, approximately two years after the previous survey (February–March 2024).*		

[6] Design certification date
[7] Date of first issuance approval by Gold Standard

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	Methodology for Metered and Measured Energy Cooking Devices
	Version	V1.2
	Paragraph	p.41

6.2 | Description of the deviation

Title	Delayed annual usage survey during MP5 monitoring period	
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)
Relevant monitoring period, if applicable	Start date	01/04/2024
	End date	01/09/2025
	☐ NA	
Summarise the changes	The applied methodology requires that usage surveys be conducted annually. The previous survey was conducted in February–March 2024 (MP4). The MP5 usage survey was conducted in February 2026, resulting in a gap of approximately two years between surveys. The survey results were applied to the MP5 monitoring report.	
Reason for deviation	The delay in conducting the MP5 usage survey was an administrative oversight. There was no operational or technical impediment to conducting the survey. The CME acknowledges this as a procedural non-compliance and has implemented measures to ensure annual surveys are conducted in all future monitoring periods.	
Proposed resolution	*The CME proposes that the MP5 survey results (February 2026) be accepted as the basis for usage rate calculation for MP5, supported by the following evidence demonstrating that no material change occurred during the gap period:* *1. Usage rate stability: the MP4 and MP5 survey results show near-identical usage rates (in average, <3% difference), supporting the conclusion that no material change occurred during the intervening period.* *2. Continuous consumption monitoring: LPG consumption per household is recorded in real time via the NGI platform. Average consumption per household increased between MP4 and MP5, providing indirect evidence that stove stacking was not increasing during the gap period. M-Gas customer service actively monitors consumption patterns and follows up with customers showing reduced consumption.* *3. Conservative SDG reporting: survey-derived SDG parameters (time savings — SDG 5; health improvements — SDG 3) showed improvement in the MP5 survey relative to MP4. To remain conservative, the CME applies MP4 survey results for these parameters in the MP5 monitoring report, avoiding any potential overstatement*	

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 *(if yes, fill the table below)*

Annual emission reduction/removal before applying deviation	Annual emission reduction/ removal after applying deviation
XYZ tCO_2e	*XYZ* tCO_2e

☒ any other matrix, please specify…
The CME proposes the following alternative monitoring arrangement for the non-conforming period: application of the usage rate derived from the MP5 survey (February 2026) to the MP5 monitoring period. The CME submits that this arrangement does not lead to usage data loss or overestimation of emission reductions.
SDG parameters are reported using MP4 survey results, which is conservative given that MP5 results show improvement.

☐ NA

Summary of the impact	The deviation had no material impact on the accuracy or completeness of reported emission reductions. Usage rates derived from the MP5 survey are statistically consistent with MP4 results, confirmed by continuous NGI consumption data. SDG parameters are reported conservatively using MP4 values.

Insert text here

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. MR_5

Document 2. Form – Deviation Request Submission (completed)

Document 3. VPA-DD

DOCUMENT HISTORY

VERSION NUMBER	RELEASE DATE	DESCRIPTION
6.1	15.05.2026	Editorial and structural changes to the template
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