



DEVIATION REQUEST FORM

PUBLICATION DATE **14.1.2021**

Version **4.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 06/12/2021

1.2 | Decision

The applied deviation request is **not approved**. The Gold Standard requirements are that the projects that were under the listing or validation process at the time of launch of GS4GG (01/07/2017) can request for registration/design review with the applied version of the standard before 23/11/2021. The project developer failed to meet this deadline. The GS Secretariat and TAC do not consider reasons provided by the PD sufficient justification for granting an extension to the submission deadline.

1.3 | Is this decision applicable to other project activities under similar circumstances?

No

B. To be completed by the Project Developer/Coordinating and Managing Entity and/or VVB requesting deviation (Submit deviation request form in Microsoft Word format)

2 | Background information

Deviation Reference Number	DEV_206	
Date of decision	06/12/2021	
Precedent (YES/NO)	NO	
Precedent details	N/A	
Date of submission	04/10/2011	
Project/PoA/VPA	Project	ID – GS5921
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	KURTINI Wind Power Plant	
Location of project/PoA/VPA	Host country(ies)	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale - Turkey <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	https://impact.sustain-cert.com/public_projects/1760	
Status of the project/PoA/VPA	<input checked="" type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Request for Exemption	
Specify applicable rule/requirements/methodology and version number	TRANSITION REQUIREMENTS 2.1.4 and 3.1.12	
Specify the monitoring period for which the request is valid (if applicable)	Start date	End date
Submitted by	Contact person name:	
	Email ID:kemal@gte.com.tr	
	Organisation: GTE KARBON	
	Project participant: Yes <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	Yes <input checked="" type="checkbox"/> NO <input type="checkbox"/> If yes; VVB name: Re Carbon Ltd. Auditor name: Will be included in the validation report.	

3 | Deviation detail

3.1 | Description of the deviation:

**Guidance* Use the space below to describe the deviation and substantiate the reason for requesting deviation from applicable rules/requirements. Please include all relevant information in support of the request. You are requested to follow the principles for requesting deviations, given in the [Deviation Approval Procedure/Design Change Requirements](#).*

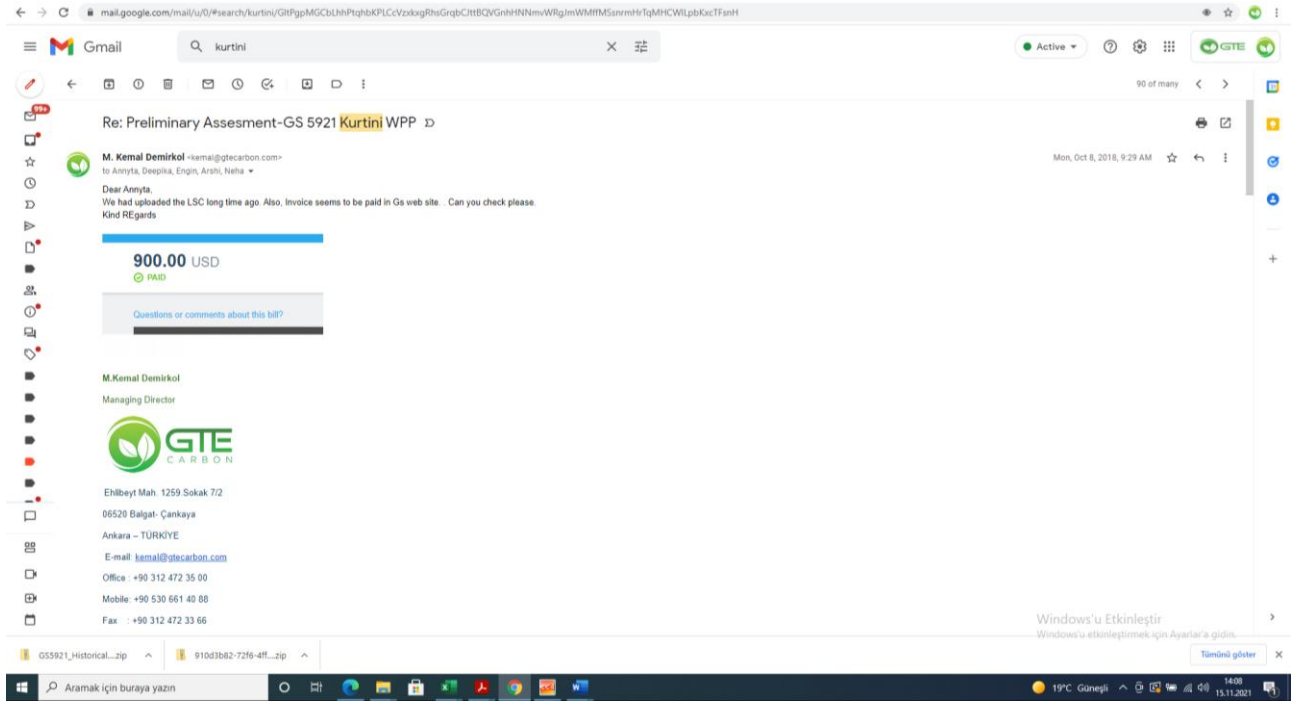
3.1.1 | Deviation detail (to be completed by Project developer):

LSC for the proposed project has been organized on 18/07/2017. Invitation has been sent on 04/07/2017. PDD has been uploaded on March 2018 and Validation workplan has been uploaded to the registry on 04/10/2018 by DOE. PFA has been requested as fast-track (via email sent to GS on 13/04/2018) therefore, DOE has been contracted accordingly.

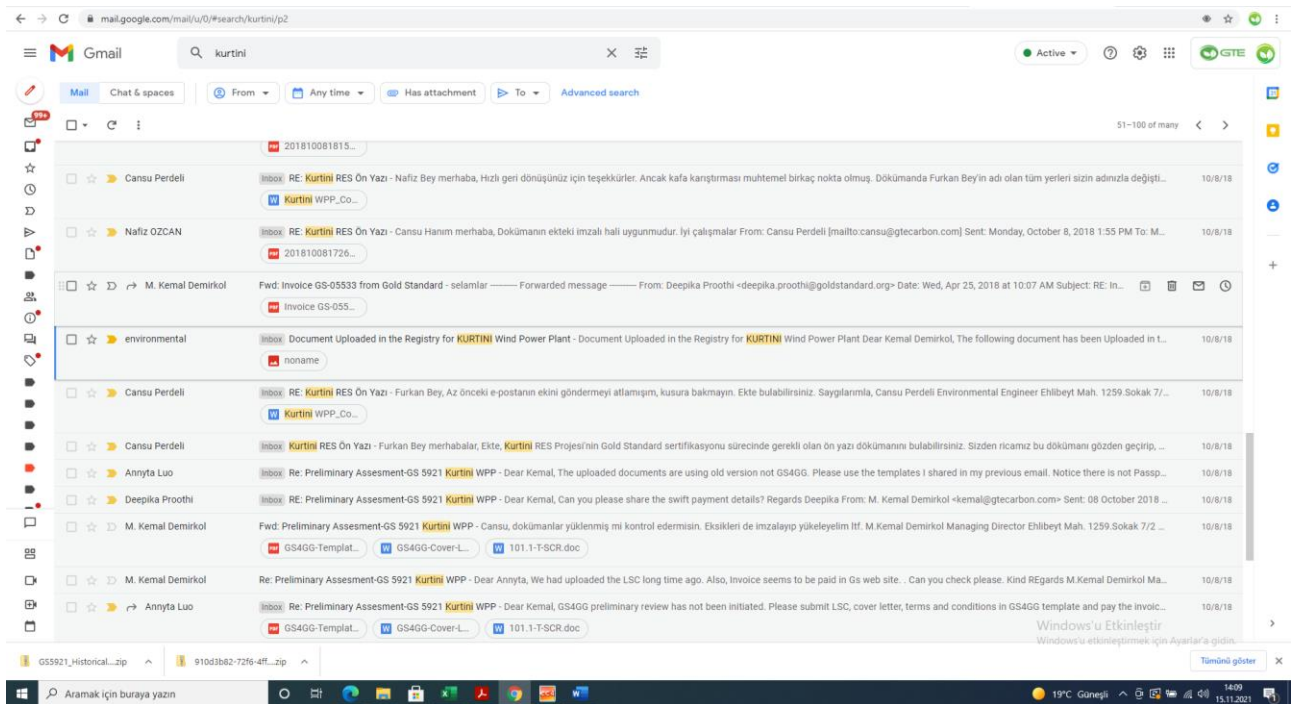
PFA by GS has been requested and invoice has been received however, due to a confusion about payment of the invoice, PFA has not been initiated by GS. Invoice has been initially prepared on behalf of GTE and has been amended by GS. And new invoice has been prepared on behalf of project owner (DENGGE Enerji). Since the status of invoice seems paid in the GS system, GTE and DENGGE has thought it has already been paid and did not take any action.

Meantime, we have started working with DOE and draft validation protocol has been submitted by DOE on 11/06/2018. GTE has also written to GS several times about status of the project and visibility in GTE account.

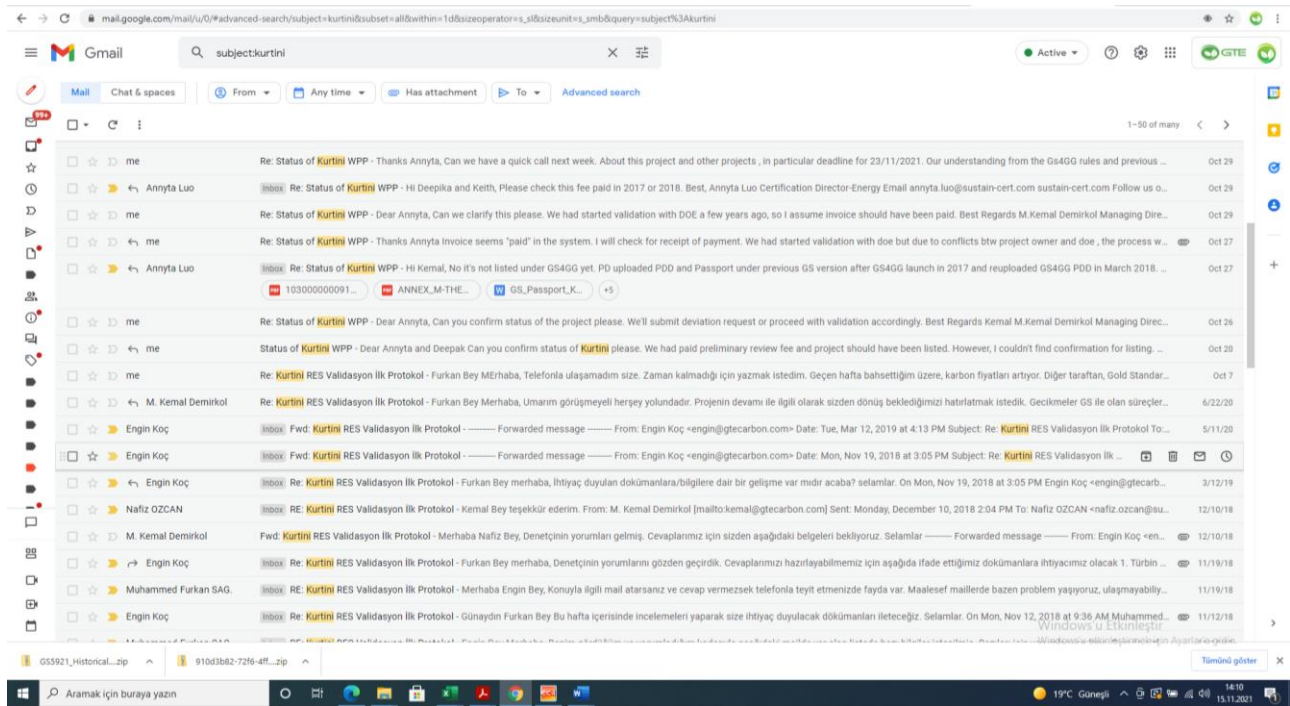
TEMPLATE - DEVIATION REQUEST FORM V4.0



The emails and studies on validation has continued between DOE, GS and GTE as can be confirmed via email dates below.



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First payment has been made to DOE however, due to late payment of DOE's second invoice, project owner has experienced problem with DOE and validation process has been suspended. The conflict has been carried to court and on 25/12/2020, DOE has applied to court thus we couldn't proceed with validation (record for court filing is attached).

As per the rules of GS4GG to finalize validations before 23/11/2017, project owner has shown real and continuous action as can be seen from milestones and evidences below. The confusion about payment of PFA invoice could only be clarified with GS on 04/11/2021. Therefore, we request exemption from this rule to be able finalize validation.

Milestones are given below;

- 18/07/2017- LSC Meeting
- 20/02/2018- DOE agreement
- 12/04/2018- First payment to DOE
- 13/08/2018- GS4GG fast track request
- 04/05/2018- Email from GS for "approved" PDD and Passport
- 09/10/2018-Validation Site Visit with DOE
- 03/10/2018- GS PFA Reminder email

- 11/06/2018- Draft Validation Protocol by DOE
- 26/04/2018-Change in partnership structure
- 25/12/2020- Court filing by DOE

3.1.2 | VVB opinion (to be completed by VVB, if applicable):

VVB opinion is not added since VVB is having a legal case with project owner. Payment record, DOE agreement and evidence for court filing is added.

3.2 | Assessment of the deviation:

**Guidance* Use the space below to describe how the deviation complies with the requirements, and, where applicable, the accuracy, completeness and conservativeness is ensured. Please include all relevant information in support of the request.*

3.2.1 | Deviation assessment (to be completed by Project developer):

The project owner has shown continuous and real action since 2017 to finalize validation. However, due to a misunderstanding about the invoice status and emails from GS saying "approved" for PDD and Passport, PFA could not be completed and the issue was not clarified until November 2021.

Though the validation had started, DOE had conducted site visit and sent draft validation protocol, due to a conflict arising between DOE and project owner, validation could not be completed.

The issue about payment is due to misunderstanding between GS and GTE (and project owner). As the invoice seems "paid", we have emailed to GS several times and due to email from GS saying "pdd" status approved, we have initiated validation process.

We have even requested a fast-track for finalizing validation at earliest time.

3.2.2 | VVB opinion (to be completed by VVB, if applicable):

NA.

3.3 | Impact of the deviation:

**Guidance* Use the space below to describe the impact of the deviation on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project. Please substantiate the impact assessment with relevant and verifiable data/information.*

3.3.1 | Impact assessment (to be completed by Project developer):

Project will not impact safeguarding or SDG assessment as the LSC meeting has been made and submitted to GS.

3.3.2 | VVB opinion (to be completed by VVB, if applicable):

NA

3.4 | Documents:

**Guidance* List of documents provided (note that once a decision has been made by Gold Standard, this deviation form along with supporting documents will be made public on the Gold Standard website. If any of the supporting documents are confidential, please indicate here to ensure they are omitted.)*

Annexes;

- 1. LSC Meeting invitation**
- 2. Fast track PFA request**
- 3. Request for assignment of DOE**
- 4. PDD approval email**
- 5. Invoice**
- 6. Kurtini PFA email**
- 7. KURTINI Invoice paid status**