

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2022**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 12/08/2022

1.2 | Decision

The deviation approval is subject to successful compliance with the following requirements -

- a. The deadline of the design change approval documentation submission to the Gold standard has been extended from one-year of the start date of the proposed technology/measures (design change component) (only applicable to the current request only). Thus, PD is now allowed to submit the request for design change approval along with the VVB opinion by the end of this year i.e., 31st December, 2022 to the GS.
- b. PD shall ensure that they have obtained the VVB's opinion on the design change within one year of the start date of the proposed technology/measures (design change component) i.e., before 05/10/2022.

However, PD shall ensure that the overall capacity of the hybrid technology remains same as the initial capacity of the project i.e., 128 MW and there is no increase in the installed capacity of the project.

The PD shall document the deviation request, its implications, and GS' decision in the appropriate section of the GS PDD. The validating VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned conditions and provides its opinion in the Validation Report.

SustainCert shall review both the PD's response and the VVB's assessment/opinion of the same and take appropriate steps.

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_287	
Date of decision	12/08/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	09/08/2022	
Project/PoA/VPA	Project	ID – GS1138
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	KANGAL WEPP 128 MW	
Date of listing	18/03/2013	
GS Standard version applicable	GS Version 2.2 VER	
Date of transition to GS4GG (if applicable)	-	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	-	
Date of design certification/inclusion (if applicable)	25/07/2022	
Location of project/PoA/VPA	Turkey, Sivas	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	https://registry.goldstandard.org/projects/details/93	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input checked="" type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Design Change Extension	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	ACM0002 Version 17.0	

Specify the monitoring period for which the request is valid (if applicable)	Start date	End date
Submitted by	Contact person name: Nilsun Akpınar	
	Email ID: nilsun.akpinar@makienerji.com.tr	
	Organisation: Kangal Elektrik Enerji Üretim ve Ticaret A.Ş.	
	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 type="checkbox"/> No <input checked="" type="checkbox"/> If yes; VVB name: VVB Staff name(s):	
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

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):

The registration process of “Kangal WEPP 128 MW (GS1138)” project concluded on 25/07/2022. The Project has been registered as a large-scale wind power plant with 128 MW installed capacity. While registration process continuing, PO has decided to invest 50 MW solar power plant as a hybrid technology on 05/10/2021 (start date - financial agreement date for hybrid solar power plant investment). The solar part of the project is now under construction and planned to be put in operation by end of Q1 2023. According to Turkish regulations, total installed capacity of hybrid projects cannot be higher than initial capacity, therefore installed capacity will be capped with 128 MW even after 50 MW solar capacity will be operational. As a result, the installed capacity of the plant will not change, however, as solar energy will substitute wind energy during day-time total annual energy generation will increase.

According to GS's Design Change rules, project shall include VVB opinion during application of design change approval, however, as expected electricity will increase in this case, a new IRR analysis for additionality demonstration shall be performed, which could only be possible once initial IRR analysis is approved by Gold Standard. As project registration of GS1138 is finalized just two week ago on 25/07/2022, we could only now started to design change documentation so there will be very limited time (less than 2 months) to get a VVB validation before end of 1 year period, which will be very difficult to get this decision in such short time due to holiday season and extensive workloads of the VVBs nowadays.

Based on above explanation and justifications, with this deviation request form, we kindly request you to apply for design change of Kangal WPP (GS1138) without a VVB opinion (all other documents requested in a to c articles of rule 2.1.4 of [Design Change Requirements](#) will be provided) before end of 1 year period of start date of the design change **and submit VVB opinion a month after the initial submission date.**

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

**Guidance* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

.....

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):

As per Section 4.1.49 (c) of Principles & Requirements document, a project with a Certified Design requesting to include a new technology/measure shall submit the request for approval of design change to Gold Standard within one year of the start date of the proposed technology/measures. If our request is accepted, the project will complete its design change process without being liable to 1 year requirement

(05/10/2022) for VVB opinion and with submitting other design change documents that are requested by GS and get successfully applied to Gold Standard.

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

**Guidance* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

.....

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):

In the case of the project being liable to the articles 4.1.49 (c) of the Principles & Requirements document, it will lose its right to get applied to Gold Standard due to not being able to complete the VVB opinion required until the specified date for 1 year requirement (05/10/2022) by the reason of VVBs' work densities, holiday season and this limited time.

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

**Guidance* If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.*

.....

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.)*

Version number	Release date	Description
----------------	--------------	-------------

5	11.04.2022	<p>Additional information added:</p> <ul style="list-style-type: none"> - date of listing, design certification, transition - standard version - specific reference to a requirement deviated from - any previous deviations/design changes approved <p>Guidance on VVB opinion</p>
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption