

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2022**

Version **5.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 25/08/2022

1.2 | Decision

The requested deviation is approved. In-line to para 10.2.3 of [GHG EMISSIONS REDUCTION & SEQUESTRATION PRODUCT REQUIREMENTS](#) the PD is allowed to convert the CDM CERs to GS CERs for the period from 01/08/2020 to 31/12/2020. The period from 01/08/2020 to 31/12/2020 is accounted under the overall GS CP of the 19 VPAs considered under this deviation request.

FAR for verifying VVB:

The verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned requirement and provide its opinion in the Verification 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_291	
Date of decision	25/08/2022	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	15/08/2022	
Project/PoA/VPA	Project	ID – GSXXXX
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input checked="" type="checkbox"/> VPA	ID – GS 10903 to GS 10921 (19 VPAs)
Project/PoA/VPA title	<p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 005</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 006</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 007</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 008</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 009</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 010</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 011</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 012</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 013</p> <p>Up Energy Improved Cookstoves Programme, Uganda – CPA No 014</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 015</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 016</p>	

	<p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 017</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 018</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 019</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 020</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 021</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 022</p> <p>Up Energy Improved Cookstoves Programme, Uganda - CPA No 023</p>
Date of listing	30/12/2020
GS Standard version applicable	3.0
Date of transition to GS4GG (if applicable)	-
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	01/01/2021
Date of design certification/inclusion (if applicable)	23/09/2021
Location of project/PoA/VPA	Uganda
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input checked="" type="checkbox"/> Small scale <input type="checkbox"/> Large scale
Gold Standard Impact Registry link of the project/PoA/VPA	https://registry.goldstandard.org/projects/details/2887
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input checked="" type="checkbox"/> Certified project
Title/subject of deviation	Request to convert CDM CERs to GS CERs for the period from 01/08/2020 to 31/12/2020 for GS VER registered VPAs.

Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Methodology: AMS-II. G. Energy Efficiency measures in thermal applications of non-renewable biomass version:5.0
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/08/2020 End date 31/12/2020
Submitted by	Contact person name: Anantha Karthik Rajagopalan
	Email ID: anantha@upenergygroup.com
	Organisation: UpEnergy Group
	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](#).*

UpEnergy is submitting a deviation request for requesting revision to GS4GG crediting start date from 01/01/2021 to 01/08/2020 and convert CDM CERs to GS CERs, which may be subsequently converted to GS VERs.

All VPAs part of this deviation is registered as GS VER project from 01/01/2021 but would like to request CDM CERs to GS CERs conversion for the period prior to registration. The VPAs are currently in second round review with Sustain-CERT for the issuance of the monitoring period 22/07/2021 to 31/12/2021. Sustain-CERT had asked

us to seek deviation request to include the period prior to 01/01/2021 for GS CER issuance.

Since the project is registered as GS VER with this deviation request, we would seek Gold Standard's support for one-time conversion of CDM CERs to GS CERs for the period 01/08/2020 to 31/12/2020.

The overall GS4GG crediting period of 15 years will be followed from the CDM start date.

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

The monitoring period from 01/08/2020 to 31/12/2020 was issued CDM CERs and PP wish to convert CDM CERs to GS CERs and then subsequently convert them to GS VERs. All the projects are registered currently as GS VER project starting from 01/01/2021 which we request temporary provision to convert CDM CERs to GS CERs from 01/08/2020 to 31/12/2020.

The GHG emission reductions & sequestration product requirements allow to convert CDM CERs to GS CERs. Since the project is registered as GS VER project the request is to issue GS CERs/VERs upon cancellation of CDM CERs for the VPAs prior to the GS VER period. The overall GS4GG crediting period cycle of 15-years will be complied from the CDM crediting period start date.

The VPAs are currently in second round review with Sustain-CERT for the issuance of the monitoring period 22/07/2021 to 31/12/2021. Sustain-CERT had asked us to seek deviation request to include the period prior to 01/01/2021 for GS CER issuance. The Sustain-CERT open feedback is as below:

"As per the email communication, 'In case that we get a VVB confirmation for vintage 2020 and vintage 2021 that the project complied with GS requirements in both MPs and that the amount for each MP is verified, then the next step is to request a deviation to include a previously not requested vintage in an ongoing review process, meaning changing several aspects including the GS crediting period start date.' CME shall share the requested deviation decision."

VVB assessment opinion confirm that both GS CER (vintage-2020) and GS VER (vintage-2021) period comply with GS requirements. The same VVB verified the

projects under CDM and have also provided SDG assessment for the period in the GS verification report.

Hence, we request GS to allow for one-time issuance of GS CERs/VERs of the CDM CERs for the GS4GG registered VPAs for the period from 01/08/2020 to 31/12/2020. We are ready to submit cancellation certificate of CDM CERs and pay the conversion fees that are applicable for GS CERs/VERs.

In applying this deviation, UpEnergy had adhere to the following core GS principles

Environmental Integrity : This deviation does not result in any overestimate of GS CERs

Contribution to Sustainable Development (SDG) Goals: The Sustainable Development Assessment has been carried out at VPA equivalent level. The VPAs are already registered as GS VER so complying with GS4GG principles for SD Assessment.

Safeguarding principles and Requirements: Safeguarding Principles Assessment has been carried out at VPA equivalent level and registered with GS4GG.

Compliance with host country regulations: The scope of this deviation work extensively studied all the host country regulation part of the PoA geographic boundary and found to be compliant.

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.*

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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 CPA/VPAs with transition start date is shown in the below table. The transition is approved as on date mentioned below as the GS VERs have been issued for the monitoring period 01/01/2021 to 21/07/2021. But as explained in above section 3.1.1, the GS4GG product requirement allow only CDM CERs to GS CERs conversion and the open feedback from Sustain-CERT team to request for deviation to issue GS CERs for the period prior to 01/01/2021.

CPA /VPA Reference Number	Transition start date or GS4GG crediting start date(previous)	GS CERs/VERs conversion request period
9956-P1-0005-CP1/10903	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0006-CP1/10905	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0007-CP1/10905	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0008-CP1/10906	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0009-CP1/10907	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0010-CP1/10908	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0011-CP1/10909	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0012-CP1/10910	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0013-CP1/10911	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0014-CP1/10912	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0015-CP1/10913	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0016-CP1/10914	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0017-CP1/10915	01/01/2021	01/08/2020 to 31/12/2020

9956-P1-0018-CP1/10916	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0019-CP1/10917	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0020-CP1/10918	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0021-CP1/10919	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0022-CP1/10920	01/01/2021	01/08/2020 to 31/12/2020
9956-P1-0023-CP1/10921	01/01/2021	01/08/2020 to 31/12/2020

The VPAs are currently in second round review with Sustain-CERT for the issuance of the monitoring period 22/07/2021 to 31/12/2021. Sustain-CERT had asked us to seek deviation request to include the period prior to 01/01/2021 for GS CER issuance. The Sustain-CERT open feedback is as below:

"As per the email communication, 'In case that we get a VVB confirmation for vintage 2020 and vintage 2021 that the project complied with GS requirements in both MPs and that the amount for each MP is verified, then the next step is to request a deviation to include a previously not requested vintage in an ongoing review process, meaning changing several aspects including the GS crediting period start date.' CME shall share the requested deviation decision."

VVB assessment opinion confirm that both GS CER (vintage-2020) and GS VER (vintage-2021) period comply with GS requirements. The same VVB verified the projects under CDM and have also provided SDG assessment for the period in the GS verification report.

Hence, we request GS to allow for one-time issuance of GS CERs/VERs of the CDM CERs for the GS4GG registered VPAs for the period from 01/08/2020 to 31/12/2020.

CME will ensure to provide all the supporting documents for conversion of CDM CERs to GS CERs/VERs including cancellation of CDM CERs and pay the necessary conversion fees. We request GS to consider our request as we have a buyer delivery commitment by mid-of September 2022.

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.*

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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):

There is no impact on the project design (for VER), safeguarding principles, SDG assessment, data quality, monitoring frequency, emission reduction calculation, potential risk or any other aspects of the project due to this deviation. There is no negative impact or over-estimation of emission reductions from the project. The PoA will abide by the "Deviation Approval Requirements and Procedures" and other GS requirements

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.*

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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.)*

- 1. VVB Verification report- GS4GG (including SDG assessment for the period 01/08/2020 to 31/12/2020)**
- 2. CDM DOE Verification report for the period (01/08/2020 to 31/12/2020)**

Version number	Release date	Description
5	11.04.2022	Additional information added: <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 Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption