

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 17/05/2023

1.2 | Decision

The deviation request is approved.

The Project Developer may follow the proposed crediting period cycle of 7 years for CP1 and 5 years and 3 years for consecutive credit period cycle. However, the total crediting period shall not exceed 15 years under any circumstances. To ensure that emission reductions are not overestimated for the last two years of CP1 compared to what would have been achieved with a 5*3 year crediting cycle of GS4GG, the Project Developer shall:

- a. Recalculate the GHG emission reduction using the GEF approved at the time of renewal of the project for CP2 prior to the next issuance.
- b. Adjust any emission reduction overestimation due to changes in GEF (if any) for the last two years of CP1 that should have been applied for the 6th and 7th year of the crediting period cycle 1 at the time of the next issuance, based on the estimated values for the grid emission factor.

The verifying VVB for CP1's 6th and 7th year shall raise a FAR for the next verification. The VVP conducting verification of CP2 through appropriate means at its disposal shall evaluate the Project's compliance with the aforementioned conditions and provide its opinion in the Validation/Verification Report.

a.

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

2| Background information

Deviation Reference Number	DEV_409	
Date of decision	17/05/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	06/04/2023	
Project/PoA/VPA	Project	ID – GS4533
	<input type="checkbox"/> PoA	NA
	<input type="checkbox"/> VPA	NA
Project/PoA/VPA title	Solar Power Project by Fortum FinnSurya (EKIESL-CDM.February-15-01)	
Date of listing	05/08/2016	
GS Standard version applicable	Principles & Requirements, version 1.2	
Date of transition to GS4GG (if applicable)	NA	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	21/04/2022 (GSCER to GSVER)	
Date of design certification/inclusion (if applicable)	05/08/2016	
Location of project/PoA/VPA	India	
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://platform.sustain-cert.com/public-project/1456	
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	Deviation from 1. GHG Emissions Reduction & Sequestration Product Requirements version 2.0	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Section 6.5 under Annex B of GHG Emissions Reduction & Sequestration Product Requirements version 2.1	

Specify the monitoring period for which the request is valid (if applicable)	Start date: 01/07/2021 End date: 30/06/2022
Submitted by	Contact person name: Mr. Atishay Jain
	Email ID: atishay.jain@fortum.com
	Organisation: Fortum FinnSurya Energy Private Limited
	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 type="checkbox"/> No <input checked="" type="checkbox"/>

3 | Deviation detail

3.1 | Description of the deviation:

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

The project activity is registered under CDM with CDM ID: 10288 and has been design certified under Gold Standard as GS CDM on 05/08/2016. Under CDM project activity total length of crediting period is 21 years (7 years + 7 years + 7 years) with first crediting period from 02/05/2016 to 01/05/2023. The project completed Transition from GSCDM to GSVER on 21/04/2022 with 15 years of total crediting period renewable twice i.e 7 years + 7 years+ 1 year. The duration of first crediting period under GS4GG is parallel to CDM as 02/05/2016 to 01/05/2023.

Currently the project is undergoing Performance Review no. 5 for monitoring period from 01/07/2021 to 30/06/2022 and Crediting Period Renewal no. 1 for CP2 i.e. from 02/05/2023 to 01/05/2030.

According to the section 6.5 under Annex-B of GHG Emissions Reduction & Sequestration Product Requirements version 2.1

"6.5.1| Transition project, PoA/CPAs shall follow GS4GG certification cycle for crediting period renewal (e.g. 5 years) in order to issue or convert issued emission reductions to GSVERs under GS4GG."

Please note that PP has completed the Verification for 5th monitoring period from 01/07/2021 to 30/06/2022 and Performance Review is undergoing for the same. Also, Crediting Period Renewal no. 1 for CP2 i.e. from 02/05/2023 to 01/05/2030 is already requested and 24/03/2023 is confirmed as review start date for the same.

In light of the challenges described below, we request a deviation to continue the process of performance review no. 5 and subsequent verifications for CP1, while raising a FAR to follow GS4GG certification cycle for crediting period renewal (e.g. 5 years) from CP2 onwards.

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

Not Applicable

3.2 | Assessment of the deviation:

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

As per section C.2 of the registered GS PDD version 05 dated 22/02/2022 approved at the time of Transition from GSCER to GSVER, total length of Crediting Period is "15 Years 00 Months (7 years + 7 years + 1 years, parallel to CDM Crediting period)" and the duration of CP1 is 02/05/2016 to 01/05/2023. Hence, 5th Monitoring Period i.e. 01/07/2021 to 30/06/2022 falls under CP1.

Please note that the Crediting Period Renewal currently requested is for crediting period 02/05/2023 to 01/05/2030 (CP2 as per registered GS PDD). We would also like to bring your attention to the point that the 4th MP i.e. 01/08/2020 to 30/06/2021 included period of CP2 (as per 5 years GS4GG cycle) however, GSVERs were issued for the same.

We request you to kindly approve the deviation from section 6.5.1 of GHG Emissions Reduction & Sequestration Product Requirements version 2.1. And

1. Consider CP1 as per the registered PDD i.e. from 02/05/2016 to 01/05/2023;
2. Allow us to complete this performance review and subsequent verifications for CP1;

3. To follow GS4GG certification cycle for crediting period renewal (5 years) from CP2 onwards i.e. total 15 years of crediting period renewable twice (7 years + 5 years + 3 years) from 02/05/2016 to 01/05/2031.

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

Not Applicable

3.3 | Impact of the deviation:

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

The deviation of this project lies in the scope of DEVIATION APPROVAL REQUIREMENTS AND PROCEDURES version 1.2. During the delay period, the project owner has continued to monitor all parameters which were validated and approved during the Design Certification. The above deviation will not cause any impact upon the data quality or attract any potential risk on GS related to any issuance or any other material impact affecting the quality of the project. Thus, no potential risk is attributed to GS Project activity in particular. The deviation requested adheres to the Principles and Requirements set forth by GS4GG and complies with:

Environmental Integrity - The GSVERs generated from the project activity are not overestimated because of deviation and conservativeness is ensured.

Contribution to Sustainable Development Goals - SDG contributions that the project is designed to achieve are in line with GS4GG requirements and the above deviation does not have any potential impact upon the certified SDGs claimed during the current monitoring period.

Safeguarding Principles and requirements - The deviation does not create any impact upon the safeguarding principles and requirements set forth by GS4GG.

Compliance with Host Country Regulations - The project does not create any conflict with Host Country regulations and all the host country regulations are followed.

Project Proponent has already started the process of Design Certification Renewal and will ensure to follow all the guidelines of GS4GG in future. Since the project proponent

has not claimed credits so far in GS4GG and the project will not be able to sustain itself without carbon credits, issuance for current monitoring period is needed to continue its operation.

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

Not Applicable

3.4 | Documents:

1. Transition Review Final Feedback
2. Design Review Final Feedback
3. Performance Review no 04 Final Feedback
4. Registered GS PDD
5. RCP PDD under Design Renewal Review

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