

TEMPLATE

# DEVIATION REQUEST FORM

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PUBLICATION DATE **11.04.2021**

Version **5.0**

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## A. To be completed by Gold Standard

### 1 | Decision

**1.1 | Date – 31/05/2023**

**1.2 | Decision**

The deviation request is approved considering there has been no increase in electricity production in the project.

The project developer shall ensure:

- a. the addition of new turbines does not change the total capacity of the project stated in the registered PDD.
- b. the maximum energy generation claimed is capped at the estimated annual electricity production in registered PDD and excludes any new generation capacity that was not approved or is not part of the registered PDD.

The project developer shall document the deviation request, its implications, and GS' decision in the appropriate section of the GS Monitoring Report (for the relevant MP).

The verifying VVB shall, through appropriate means at its disposal, evaluate the project's compliance with the above condition and provide its opinion in the Verification Report.

SustainCert shall review both the project developer'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_413	
Date of decision	31/05/2023	
Precedent (YES/NO)	NO	
Precedent details	NA	
Date of submission	08/05/2023	
Project/PoA/VPA	Project	ID – GS3334
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Dilek Wind Power Plant	
Date of listing	25/02/2015	
GS Standard version applicable	V 2.2	
Date of transition to GS4GG (if applicable)	N/A	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N/A	
Date of design certification/inclusion (if applicable)	27/07/2017	
Location of project/PoA/VPA	Turkey	
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	<a href="https://registry.goldstandard.org/projects/details/554">https://registry.goldstandard.org/projects/details/554</a>	
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	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Paragraph 2.1.2, GS4GG Design Change Requirements  Paragraph 4.1.49, Principles and requirements  Paragraph 3. Design changes occurring after registration, V2.2_ANNEX- AA: Gold Standard Procedures for Approval of Design Change	
Specify the monitoring period for which the request is valid (if applicable)	Start date 15/01/2020      End date 14/01/2022	

Submitted by	Contact person name: Ahmet Akdemir
	Email ID: aakdemir@kaleenerji.com.tr
	Organisation: Kale Enerji Üretim Sanayi A.S.
	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: Recarbon  VVB Staff name(s): Fikriye Seda Atabek
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:

The Project Proponent requests the approval of design change as per Paragraph 3. Design changes occurring after registration, v.2.2 ANNEX-AA:Gold Standard Procedures for Approval of Design Change; which is active at the time of registration and occurring of design change.

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

Dilek Wind Power Plant has been registered as 24 MW installed capacity with 10 Nordex N117/2400 turbines, each having a capacity of 2.4 MWm/2.4Mwe in 27/07/2017. The project is operational since 24/07/2015. The total capacity of the project is stated as 27.5 MWm/ 27.5 MWe in the generation license at the time of GS registration. The project owner declared their plans to reach this capacity with an additional 3.5 MWm/MWe turbine in the registered PDD as well. Please see Section A.1 of the registered PDD and page 19 of the Validation Report.

Since the project is registered under GS version 2.2, the Project Proponent followed the requirements in V2.2\_ANNEX- AA: Gold Standard Procedures for Approval of Design Change that states:

#### "3. Design changes occurring after registration

The guidelines apply in the case when a PP alerts The Gold Standard about a design change with respect to a project that has been registered, or in case the DOE contracted to perform the verification identifies that the project has not been implemented according to the registered PDD at the time of verification. The DOE shall identify and inform the PPs of any concerns related to the conformity of the project and its operation with the registered PDD.

The procedures are also applicable if the permanent changes have occurred after the implementation of the project as per the registered PDD and issuance of credits have also taken place. "

There was no time period identified for the design changes to be reported to GS, rather VVB could report the design change.

Two turbines were raised within the same project boundary and were operational on 25/10/2018. One of the additional turbines has 2.4 MWm/2.4 MWe capacity while the other one has 2.4MWm/1.1 MWe capacity. Total added capacity remains as 3.5MWe but the number of turbines has changed from 1 to 2.

However, the design change requirements were updated on 24 October 2019 by the introduction of GS4GG version and new Principles and Requirements. As per Paragraph 4.1.49, the request for approval of design change shall be submitted within one year of the start date of the proposed technology/measure. We request deviation from the requirement and the approval of design change.

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

Please see verification report.

### **3.2 | Assessment of the deviation:**

Deviation does not have a major impact on any project aspects including applicability of the methodology, compliance with the registered monitoring plan, scale of the project, safeguarding assessment, stakeholder consultation, sustainable development impact, applicable legal requirements etc.

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

The capacity increase has already been mentioned in the registered PDD and the impact on additionality has been assessed by the VVB. Please see Design Change request submitted and Section 4.1 of the Verification Report by the VVB.

The latest GS Design Change requirements 3.1.1 identifies the permanent change as impacting the certified project design with regards to one or more of following project aspects, but not limited to; applicability of the methodology, compliance with the registered monitoring plan, scale of the project, safeguarding assessment, stakeholder consultation, sustainable development impact, applicable legal requirements etc. The change in number of turbines or increase in the capacity does not affect any of the mentioned aspects.

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

Please see Section 4.1 of the Verification report, response to FAR02 raised during preliminary review:

**"FAR02:** The project activity will be registered under 24 Mwe installed capacity comprising the indicated 10 units on the registered PDD. The verifying DOE to assess the erection of 11th turbine during site visit and desk top review as granted by the electricity generation license and ensure the monitoring comprises the electricity generation of the registered turbines only. If another turbine and/or turbines will be included in the project activity, GS to be notified by the PP and a design change review to be conducted.

**Current VVB evaluation:** In the license document, it is seen that annual projected generation was 65,170 MWh/year since the first license issuance (70,000 Mwh from license and %6.9 from feasibility report). The initially planned number of turbines was (10 X 2400 kW + 1 X 3500 kW), in total 27500 kW. In 05/04/2017, license is revised for (11 X 2400 kWm/2400 kWe + 1 X 2400 kWm/1100 kWm), in total 27500 kW. No application had been done to GS but as the capacity did not change and only the number of turbines changed, VVB therefore closes this FAR. The change has no effect on the additionality, applicability or scale of the project.

Additional capacity and increased electricity generation has been included in the project IRR calculations. The cost of additional turbines with a capacity of 4.8 MWm is estimated based on the unit price of EUR/MW of the project cost. Without adding the



extra construction costs, the resultant IRR decreased to 7.22% from the original 7.90 % in the PDD. This is under the benchmark 10.28%.”

### 3.3 | Impact of the deviation:

No impacts are foreseen on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project.

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

No impacts are expected to the project implementation. The impact on additionality is limited and assessed to be in line with the requirements by the verifying VVB.

The new turbines are within the project boundary, connected to the same grid and metered by the same power meters.

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

Please see Verification Report

### 3.4 | Documents:

- Design Change Memo dated 27/03/2023
- Final Verification Report dated 30/03/2023
- Registered PDD
- Final Validation Report

Version number	Release date	Description
5	11.04.2022	<p>Additional information added:</p> <ul style="list-style-type: none"> <li>- date of listing, design certification, transition</li> <li>- standard version</li> <li>- specific reference to a requirement deviated from</li> <li>- any previous deviations/design changes approved</li> </ul> <p>Guidance on VVB opinion</p>

4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption