

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 12/06/2023

1.2 | Decision

The deviation request to use KPT 2022 for Monitoring period (01/01/2023 – 15/04/2023) is approved if the project developer clearly demonstrates in the monitoring report that:

- a) All the previous KPTs mentioned in the table including the date of performing these KPTs are in line with the methodology's requirement
- b) The project has not received any FAR till now to perform KPT as per the stipulated time.

The project developer shall document the deviation request, its implications, and GS' decision is documented 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-mentioned conditions 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_421	
Date of decision	12/06/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	31/05/2023	
Project/PoA/VPA	Project	ID – GS2898
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Hifadhi Improved cook-stoves in Embu County, Kenya	
Date of listing	06/06/2014	
GS Standard version applicable	2.2	
Date of transition to GS4GG (if applicable)	2019	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	Not applicable	
Date of design certification/inclusion (if applicable)	03/03/2015	
Location of project/PoA/VPA	Embu County, Kenya	
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/508	
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 allow Project Developer to apply the results of KPT conducted in Feb'22 in the current monitoring period, MP10 (01/01/2023 – 15/04/2023)	

Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Para 1.C.c under Section III of "Technologies and Practices to Displace Decentralized Thermal Energy Consumption" methodology ver 1.0, 11/04/2011" related to monitoring frequency of Kitchen Performance Test (KPT) (page 25) https://globalgoals.goldstandard.org/standards/407_V1.0_EE_ICs_Tech_nologies-and-Practices-to-Displace-Decentrilized-Thermal-Energy-TPDDTECConsumption-.pdf
Specify the monitoring period for which the request is valid (if applicable)	Start date 1-Jan-23 End date 15-Apr-23
Submitted by	Contact person name: Camille Stouff Email ID: cstouff@livelihoods-venture.com Organisation: Livelihoods Fund 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:

**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 deviation request is for our Gold Standard Project: **GS 2898 "Hifadhi Improved cook-stoves in Embu County, Kenya"**. The deviation request is to allow the Project Developer to apply the Kitchen Performance Tests (KPT) results in the current monitoring period, MP10 (01/01/2023 – 15/04/2023), from the KPT conducted in Feb'22 for MP8 & MP9.

The Para 1.C.c under Section III of TPDDTEC ver 1.0, state the following related to the monitoring frequency of Kitchen Performance Test (KPT) (refer page 25 of methodology):

c) Project FT Update – Completed every other year, or more frequently

The PFT update is an extension of the project PFT and provides a fuel consumption assessment representative of project technologies currently in use every two years

From the above, we understand that monitoring frequency of the project KPT is every two years, and the Project KPT values are valid for two years and may be applied for before or after period.

Accordingly, PP has conducted Project KPT in the month of Feb'22 and the results have been applied in the following two separate annual monitoring periods:

Monitoring Period	Duration of MP	KPT Applicability
MP 8	01/01/2021 to 31/12/2021	One year before period
MP 9	01/01/2022 to 31/12/2022	One year after period

As the project developer has already applied the KPT results obtained from the KPT conducted in Feb 2022 for MP 8 & MP 9 monitoring period, the Project KPT is due now for MP10 (01/01/2023 to 15/04/2023) monitoring period.

Now the Project Developer would like to highlight to Gold Standard that our project **GS 2898 "Hifadhi Improved cook-stoves in Embu County, Kenya** has 10 years fixed crediting period which ends on 15/04/2023. As the crediting period of the project is already ended and the last monitoring period i.e. MP 10 of the project is only of 3.5 months duration, project developer would like to apply the previous KPT results in the current monitoring period (MP10).

The various reasons for applying the previous KPT values in MP 10 are as follows:

1. As the project already ends on 15/04/2023 and the beneficiaries know that they will not receive free repair & replacement service in the future, hence most of the project beneficiaries will not entertain PP to conduct Project KPT in their households/kitchens. Please note that KPT is a 4-day rigorous activity which requires plenty of beneficiary time & contribution before conducting KPT & also after KPT conducted as well. Hence, PP strongly requested GS to allow them to use previous KPT results for emission reduction calculation and waive of requirement to do KPT for 3.5 month remaining monitoring period.
2. The last KPT in the project is conducted in Feb'22, and valid till Feb'23 (considering one year after period), hence, PP don't expect any change in the project scenario in between March'23- April'23 (1.5-month period) and have strong understanding that the KPT results can be applied in MP 10 as well without any need to redo KPT for 1.5 month remaining monitoring period.
3. Besides, the rainy season in Kenya from April – July will change dramatically the condition to realize the Project KPT and would result in inaccurate data. Indeed, as explained in the Kitchen Performance Test¹ from Clean Cooking Alliance page 4: "Temperature changes between rainy and dry seasons can change the demand for space-heating and pre-harvest and post-harvest seasons can affect either household income or food consumption, which also affects fuel use". It is assumed that waiting for the end of the rain and do the KPT too late after the end of the monitoring period which was 15/04/2023 would not yield comparable data and that we should restart the whole process. The previous KPT have been conducted in February which is considered as a dry season in Kenya and suitable

¹ <https://cleancooking.org/binary-data/DOCUMENT/file/000/000/83-1.pdf>

to perform KPT. Hence, applying the 2022 KPT in MP10 will give conservative results.

4. As explained above, the two monitoring years 2022 & 2023 are almost similar in terms of socio-economic conditions, geographic conditions, baseline, applied methodology, implemented measures/technology(ies) and climatic conditions of the area of implementation. Thus, using the last KPT conducted in Feb'22 for the 2023 monitoring period, would ensure conservativeness and representativeness of the KPT results and of the VERs generated.

Please also note that the practices followed for conducting the KPT is in line with the requirements of applied methodology i.e., TPDDTEC ver 1.0 applicable to the project.

Further, also note that the results achieved from the last KPT has already been verified by VVB during verification of MP8 and also submitted to Gold Standard during performance review of MP 8 monitoring period. Further, PP confirms that the KPT results are demonstrably conservative and will not lead to overestimation of achieved emission reduction in any form.

For all these reasons stated above, as it is not possible to realize the project KPT at this moment due to the end of project life and start of rainy season in Kenya, the present deviation request is made to use the last KPT performed in the month of Feb'22 for the current monitoring period of the project (i.e. 01/01/2023 to 15/04/2023).

Moreover, as explained earlier, the use of the last KPT results for the MP 10 monitoring period would be one time as the project is ended already and there will be no further verification and issuance from the project, and it will also avoid the inconvenience to the project beneficiary.

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.*

Not Applicable

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 is deviating from Para 1.C.c under section III of “Technologies and Practices to Displace Decentralized Thermal Energy Consumption” methodology ver 1.0, 11/04/2011” (page 25). The project developer confirmed that the deviation is well complying with all the other GS4GG requirements and ensured the accuracy, completeness, and conservativeness as laid down by the GS4GG.

The project developer is only requesting GS to allow them to use the values of the KPT which were conducted in Feb’22 and valid till Feb’23 for MP10 monitoring period (01/01/2023 to 15/04/2023) which is the last monitoring period of the project due to end of the project on 15/04/2023.

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.*

Not Applicable

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, safeguarding principles, SDG assessment, Emission reductions, monitoring frequency, data quality, potential risk, or any other

aspects of the project due to this deviation. The project will still abide by all Gold Standard applicable 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.*

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. GS 2898 Hifadhi I MP8 KPT_ver 1.0_08_11_2022
2. GS 2898 MP8 KPT Protocol_2022

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