TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1| Decision

1.1 | Date – 14/06/2023

1.2 | Decision

The project developer's request to apply cross-sampling across three standalone projects to generate a random sample for the stated monitoring period is approved.

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

The verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned conditions and provides its opinion in the Verification Report.

Certification body shall review both the project developer's submission and the VVB's 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_422	
Date of decision	14/06/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	16/05/2023	
Project/PoA/VPA	Project	ID – GS7128
	☐ PoA	ID – GS7513
	☒ VPA	ID – GS7692
Project/PoA/VPA title	VPA 6 Kilifi Borehole Rehabilitation Project, VPA 16 Kilifi Borehole Rehabilitation Project, VPA 28 Coastal Kenya Borehole Rehabilitation Project	
Date of listing	GS7128 - 14/11/2018 GS7513 - 19/06/2019 GS7692 - 21/01/2020	
GS Standard version applicable	TPDDTEC v1	
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)	GS7128 - 03/10/2019 GS7513 - 17/09/2020 GS7692 - 15/07/2021	
Location of project/PoA/VPA	Host country(ies) The Republic of Kenya	
Scale of the project/PoA/VPA	☐ Microscale ☒ Small scale ☐ Large scale	

Gold Standard Impact Registry link of the project/PoA/VPA	GS7128 - https://registry.goldstandard.org/projects/details/1405 GS7513 - https://registry.goldstandard.org/projects/details/1942 GS7513 - https://registry.goldstandard.org/projects/details/1942 GS7692 - https://registry.goldstandard.org/projects/details/2537
Status of the project/PoA/VPA	☐ New ☐ Listed ☒ Certified design ☒ Certified project
Title/subject of deviation	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Technologies and Practices to Displace Decentralized Thermal Energy Consumption Version 1, Annex.III.3., Paragraphs B,D,E.
Specify the monitoring period for which the request is valid (if applicable)	GS7128 Start date 01/07/2021 End date 30/06/2022 GS7513 Start date 09/01/2021 End date 30/06/2022 GS7692 Start date 25/08/2021 End date 30/06/2022
Submitted by	Contact person name: Stephen Morris Email ID: Stephen.morris@co2balance.com Organisation: CO2balance Project participant: Yes ☒ No ☐
Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	Yes ☐ No ☒ If yes; VVB name: VVB Staff name(s):
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes ☒ No ☐

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):

This deviation related to erroneous sampling methods being implemented in the annual monitoring for GS7128, GS7513, GS7692. These three projects completed a Design Change review in January 2022 to convert 48 bundled microscale VPAs on the GS1366 PoA to three standalone small-scale projects. During the annual monitoring for these projects in April 2022, a cross-sampling method between the three standalone projects (GS7128, GS7513, and GS7692) was employed to generate one random sample, combining the user-lists and databases from each project. Survey respondents were selected across the three projects' user lists, resulting in total respondents in each monitoring survey of 135 (Project Survey), 129 (Usage Survey), and 41 (Water Consumption Field Test). The annual monitoring was completed as a combined activity between these three standalone projects, instead of three separate samples for monitoring of each standalone project.

This deviates from the methodology Technologies and Practices to Displace Decentralized Thermal Energy Consumption Version 1, Annex.III.3.

When referring to the Project Survey, paragraph B) states "The monitoring survey has the same sample sizing and data collection guidelines as the baseline survey described in Section II.4"; these baseline requirements in Section II.4 state the minimum sample size for a project is 100 for those of a sample greater than 1,000. Each project in the cross-sampled monitoring exceeds 1,000 end-users in the sample, and thus the project survey requires separate responses of minimum 100 for each project, which has not been met.

When referring to the usage survey, paragraph E) states "The ongoing monitoring requirements are as prescribed in section III of the methodology for monitoring

surveys, usage surveys, leakage assessment, and updating baseline scenarios and NRB baselines." Section III.1.C.a states "The minimum total sample size is 100, with at least 30 samples for project technologies of each age being credited". Therefore, 100 usage survey responses were required for each project, which has not been met.

When referring to the WCFT, paragraph D) states "Guidance from section II.4.C on FT representativeness, sample sizing, and variability is applicable". Section II.4.C refers to Section II.4.7, which states "sample sizes must be greater than 20". Therefore, at least 20 WCFT responses were required for each project, which has not been met.

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):

As per the validated PDDs for each project, the sampling plan states the following "Cross sampling of devices will be applied across all homogenous projects in Kilifi County. Homogenous projects are defined as those that are sharing a common baseline.". The sampling plan implemented for this monitoring period complies with the validated PDD, as the projects can be classed as homogenous as they share a common baseline, and are homogenous in their technology, geography, and end-user demographics.

Furthermore, the projects were once classed as homogenous microscale VPAs bundled under the PoA "GS 1366 Micro Energy PoA". The Design Change to exit the microscale PoA and become standalone only impacted the scale of the project, and thus it can be argued that as all other factors (project implementation) are equal post-Design Change, if the cross-sampling approach for annual monitoring was valid before the Design Change, it remains valid after the Design Change. The design change was also only approved in three months prior to the annual monitoring, with the projects considered homogenous throughout the majority of the monitoring period.

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):

Project Design

The cross-sampling of the three homogenous standalone projects had no impact on the project design. Activities were carried out as normal, and safe water was provided to end-users.

Safeguarding Principles Assessment

The cross-sampling of the three homogenous standalone projects had no impact on the safeguarding principles, with no changes to the approved responses in the validated VPA-DD.

SDG Assessment

The cross-sampling of the three homogenous standalone projects had no impact on the SDG assessment. The project continued to provide reductions in tCO2e/y (SDG13), decrease household smoke (SDG 3), save time on firewood collection (SDG 5), and provide additional people with safe water (SDG 6).

Emissions Reductions

The cross-sampling of the three homogenous standalone projects had no impact on emissions reductions. Results from the annual monitoring were more conservative than what was observed for GS7128 in its previous monitoring period, and thus the values in the parameters used to calculate emissions reductions were more conservative. This implies the cross-sampling across the three standalone projects had little impact on calculating emissions reductions.

Monitoring Frequency

The cross-sampling of the three homogenous standalone projects had no impact on the monitoring frequency. The projects were sampled in line with requirements.

Data Quality

The cross-sampling of the three homogenous standalone projects had no impact on the data quality. As highlighted above, the results from the cross-sampled annual monitoring were more conservative than the previous monitoring period for one of the homogenous projects, GS7128 (GS7513 and GS7692 had not previously had monitoring as this verification is for Monitoring Period 1).

Parameter	GS7128	Cross-sampled (GS7128, GS7513, GS7692)
Up,y (Usage Rate)	95%	85%
Tp,y (hours per day)	0.45	0.92
Qp,y (Quantity of safe water supplied in the project scenario)	11.97 (capped at 7.5)	14.74 (capped at 7.5)

Notes
Up,y is more conservative than the previous MP value
Tp,y is more conservative than the previous MP value
Qp,y is higher, however both values are well above the capped value of 7.5.

Risks

The cross-sampling of the three homogenous standalone projects created no additional risks compared to if the projects were sampled individually.

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.)*

Version number	Release date	Description
5	11.04.2022	Additional information added: - 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