

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 25/05/2023

1.2 | Decision

The deviation request is approved.

To ensure that emission reductions are not overestimated for CP2 (2019-2024), the Project Developer shall:

- a. Recalculate the GHG emission reduction and adjust any emission reduction overestimation due to changes in GEF (if any) from the start of crediting period 2 I.e for year 2019, 2020 and 2021 at the time of the next issuance, based on the estimated values for the grid emission factor.
- b. 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-mentioned conditions 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_424	
Date of decision	25/05/2023	
Precedent (YES/NO)	NO	
Precedent details	NA	
Date of submission	30/12/2022	
Project/PoA/VPA	Project	ID – GS7669
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Wind energy project by KWEPL - 3	
Date of listing	04/06/2020	
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)	15/05/2022 (GSCER to GSVER)	
Date of design certification/inclusion (if applicable)	28/01/2021	
Location of project/PoA/VPA	India	
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/2368	
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	Deviation from 1. Principle and Requirements version 1.2	

	2. 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 2.0 And Section 5.1.45 and 5.1.46 of PRINCIPLES & REQUIREMENTS version 1.2
Specify the monitoring period for which the request is valid (if applicable)	Start date 21/01/2018 End date 31/07/2021
Submitted by	Contact person name: Mr. Sumeet Singhvi
	Email ID: sumeet@infisolutions.org
	Organization: Infinite Environmental Solutions LLP
	Project participant: Yes <input type="checkbox"/> No <input checked="" 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 has been design certified under Gold Standard as GS CDM on 28/01/2021. The Current Project Activity is also CDM registered with CDM ID: 10040. Under CDM project activity has fixed crediting period from 28/10/2014 to 27/10/2024. Transition review from GSCDM to GSVER was approved on 15/05/2022. Thus, under GS4GG the crediting periods are from 28/10/2014 to 27/10/2019 (CP1) and from 28/10/2019 to 27/10/2024 (CP2). PP is claiming GSCERs from 21/01/2018 to 31/03/2019 and GSVERs from 01/04/2019 to 31/07/2021. The project proponent has not claimed credits so far in GS, this is the 1st verification.

According to the section 6.5 under Annex-B of GHG EMISSIONS REDUCTION & SEQUESTRATION PRODUCT REQUIREMENTS version 2.0

"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.

6.5.2 | The first crediting period renewal under GS4GG considers the crediting years that have already been issued with other standards. For example, if a project crediting period start date with standard X is 1st Jan 2019, the project shall renew its crediting period with GS4GG on or before 1st Jan 2024, irrespective of date of transition approval with GS4GG."

And

Section 5(e) of PRINCIPLES & REQUIREMENTS version 1.2

"5.1.45| To maintain Gold Standard Certified Project status beyond five years, a Project must undergo Design Certification Renewal. This process shall begin (defined by the submission of a Renewal opinion by a VVB for Design Review to Gold Standard) no later than the last date of current certification cycle. Note that review of the Design Certification Renewal may complete after the last date of current crediting period. In this case, the renewal date shall be the first day after the end date of the current certification cycle.

5.1.46| Delay in the completion of re-validation beyond the last date of current certification cycle shall result in a reduction of any issuance of Certified Products and/or Impact Statements available during following certification cycle (for example, a delay of 1 year beyond the first cycle shall mean that no Certified Impact Statements shall be issued for the period of delay)."

Note that PP has completed the verification for the monitoring period from 21/01/2018 to 31/07/2021 and Performance Review is undergoing for the same. In light of the challenges described below, we request a deviation to continue the process of Design Certification Renewal and Pre-approval of GSVERs for monitoring period 01/04/2019 to 31/07/2021 which includes both CP1 and CP2.

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):

The Project is Design Certified under GS4GG as GS CDM on 28/01/2021.

Section 6.5.1 under Annex B of GHG EMISSIONS REDUCTION & SEQUESTRATION PRODUCT REQUIREMENTS version 2.0, *"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."* was introduced on 01/04/2021 which is after the date of Design Certification (i.e. 28/01/2021).

Also, Transition Review (GSCDM to GSVER) is approved on 15/05/2022, in which a FAR *"The crediting period start date for the transitioned project will be 28/10/2014. The project shall be renewed after every 5 years and shall be renewed before 27/01/2024."* was raised. However, the verification was already completed for the current monitoring period.

The guideline to mirror the CDM crediting cycle came on 01/04/2021 after date of Design Certification dated 28/01/2021. We received the FAR to conduct RCP in May'2022. Consecutively, we were required to conclude the RCP in 2020 which will be a credit loss as per GS RCP guideline. Further, it is tough for PP to run the project without carbon funds. We request you to kindly approve the deviation and allow us to:

- Continue the process of Design Certification Renewal without credit loss.
- Complete the Performance Review to issue GSCERs from 21/01/2018 to 31/03/2019 and GSVERs from 01/04/2019 to 27/10/2019.
- Pre-approval of GSVERs for period from 28/10/2019 to 31/07/2021 i.e., for the period which covers CP2 under GS4GG, as we have already completed the verification and performance review is undergoing for this period.

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 project proponent has not claimed credits so far in GS this is the 1st verification. The project needs carbon credits to continue its operation. In the absence of carbon credits, the project will not be able to sustain itself.

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 GSCERs and 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:

If required, the project owner can submit any kind of supporting sought by GS.

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