

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 – 06/09/2023

#### 1.2 | Decision

The Deviation request is not approved.

The Crediting period of current PoA has expired in February 2023, therefore it is not justifiable to include VPAs with previous version of PoA as per [Rule Clarification Applicability criteria](#).

The Project Developer shall apply for PoA renewal and may include the two VPAs (GS7731 and GS7732) as per the latest version of the PoA. (Design and inclusion shall be as per latest PoA design document that will be registered for crediting period 2) and may get it revalidated as per the [PoA Renewal guidelines](#).

Considering the history of PoA, it shall be allowed to continue without any gap and two VPAs can submit for retroactive issuance up to maximum 2 years from February 2023 or the project start date whichever it earlier.

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-mentioned conditions and provides its opinion in the Verification Report.

**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_479	
Date of decision	06/09/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	07/07/2023	
Project/PoA/VPA	Project	N/A
	<input checked="" type="checkbox"/> PoA	ID – GS5304
	<input checked="" type="checkbox"/> VPA	ID – GS7731, GS7732
Project/PoA/VPA title	<ul style="list-style-type: none"> <li>• PoA <ul style="list-style-type: none"> <li>○ GS5304 M-KOPA Solar Lighting PoA</li> </ul> </li> <li>• VPAs <ul style="list-style-type: none"> <li>○ GS7731 GS5304 MKOPA Solar Lighting Programme of Activities – Kenya VPA 5 by Natural Capital Partners</li> <li>○ GS7732 GS5304 MKOPA Solar Lighting Programme of Activities – Kenya VPA 6 by Natural Capital Partners</li> </ul> </li> </ul>	
Date of listing	26/03/2021	
GS Standard version applicable	GS4GG	
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)	Design certification review started: January 5, 2022	
Location of project/PoA/VPA	Kenya	
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	<ul style="list-style-type: none"> <li>• <a href="https://registry.goldstandard.org/projects/details/2576">https://registry.goldstandard.org/projects/details/2576</a></li> <li>• <a href="https://registry.goldstandard.org/projects/details/2577">https://registry.goldstandard.org/projects/details/2577</a></li> </ul>	

Status of the project/PoA/VPA	<input type="checkbox"/> New <input checked="" type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project
Title/subject of deviation	VPAs inclusion for CP1 of the Programme of Activities
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	<p>From Rule Clarification</p> <p><b>CLARIFICATION ON APPLICABILITY OF POA VERSION FOR NEW VPAS INCLUSION (RU 2020 – P&amp;R - POA)</b></p> <p>The Programme of Activity Requirement states that a CPA/VPA may be submitted for inclusion to the PoA at any time during the duration of the PoA by the CME (paragraph 3.1.7.).</p> <p><i>All new VPAs submitted for inclusion after end date of a crediting period of PoA shall follow the latest version of the PoA available at the time of submission for inclusion. For example, if a new VPA was listed before the end of 1st Crediting period of PoA, but submitted for inclusion after the start of 2nd crediting period of PoA, the VPA must be designed and included as per PoA Design Document version registered for 2nd crediting period.</i></p>
Specify the monitoring period for which the request is valid (if applicable)	N/A
Submitted by	<p>Contact person name: Eddy Melendez</p> <p>Email ID: <a href="mailto:eddy.melendez@climateimpact.com">eddy.melendez@climateimpact.com</a></p> <p>Organisation: Natural Capital Partners (now Climate Impact Partners)</p> <p>Project participant: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>If yes; VVB name:</p> <p>VVB Staff name(s):</p>
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):

**Climate Impact Partners requests a deviation of the Programme of Activity Requirements to submit for inclusion (complete Design Review Certification) two new VPAs (GS7731 & GS7732) under the CP1 version of the PoA after the CP has ended.**

The active VPAs (GS 5314 and GS 5317) reached the maximum number of VERs to be included in the small-scale threshold at the end of 2019. This made it necessary to register two new VPAs in Kenya to accommodate these technologies and continue the project's ultimate goal: reach out to all end-users in rural Kenya and provide them with clean and renewable electricity.

Climate Impact Partners initiated the process with preliminary reviews for two new VPAs (GS7731 and GS 7732) on February 4, 2020, expecting to complete the design certification process in 2020. Unfortunately, in March, 2020, COVID-19 arrived in Kenya, making it very difficult for M-KOPA Solar Technologies to provide support locally to properly design the new VPAs and complete a Local Stakeholder Consultation (requested as a finding of the preliminary review). With the delays in 2020, the project continued the process and finalized the preliminary review in March 2021, moving to a design review that started in January 2022 due to complications to gather stakeholders and perform the physical meeting in late 2021.

In 2022, Climate Impact Partners was doing several staff allocations and changes within the organization, with a recent merger that started in June 2021 and did not finalize

until the brand was released in March 2022. Besides this, the contract with M-KOPA Solar Technologies was in the process of renegotiation. Both activities (merger and new contract negotiation) caused a delay in the registration process for the two new VPAs in Kenya.

Inclusion for both VPAs (GS 7731 and GS 7732) planning and activities so far were done with the certainty that the crediting period observed for the PoA GS 5304 in the Gold Standard Registry was expected to conclude in February 2024. In mid-2023, it was confirmed with the SustainCERT team that there was a mistake in the registry, and CP1 had concluded in February, 2023.

**The Project Developer would like to finalize the design review as soon as possible and include technologies for VPA5 (GS7731) and VPA6 (GS7732) on the PoA registered for crediting period 1, since the registered VPAs have already reached their maximum small-scale threshold. There is an urgency not continue missing technologies that could be added retroactively. The project needs to complete the inclusion first and then work immediately on the PoA's renewal of the crediting period.**

The PD will upload all communications with the SustainCERT team to confirm the intention/evidence of finalizing this process in 2020.

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.*

**N/A**

### **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 deviation will not have any impact on the emission reductions of the project. By comparing both versions of the methodology, it can be observed that the parameters and equations remain the same, with the only difference being that in ERs section the part of the first three years getting 100% of operational fraction has been deleted. The latest version of the methodology confirms this in paragraph 37:

*"37. For project lamps that will claim emission reductions for up to seven years, ex post monitoring surveys to determine percentage of project lamps distributed to end users that are operating and in service shall be conducted during the third year of the crediting period. While the percentage of project lamps that are operating and in service can be assumed to equal 100 per cent in year 1, 2, and 3, the result of ex post monitoring survey undertaken during the third year shall be used in years 4, 5, 6 and 7 as per paragraph 33."*

The project continues to assess the operational fraction for ALL technologies with more than three years since the installation date, which has proven to be more conservative than the proposed approach of the methodology (surveys with sampling requirements of 90% confidence interval and 10% marginal error). Please refer to the following comparison table:



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Section	AMS-III.AR v.8.0 (Most Recent version)	AMS-III.AR v.5.0 (CP1 Version)
Baseline Emissions	<p>28. Baseline emissions are calculated as follows:</p> $BE_y = DV \times GF_y \times DB_y$ <p style="text-align: right;">Equation (3)</p> <p>Where:</p> <p><math>BE_y</math> = Baseline emissions per project lamp in year y (t CO<sub>2</sub>e)</p> <p><math>GF_y</math> = Grid Factor in year y,</p> <ul style="list-style-type: none"> <li>• Equal to 1.0 when charging option defined in paragraph 3(a) is used;<sup>5</sup></li> <li>• Equal to 1.0 if the project activity is for off-grid households/communities those which does not have grid access or less than 12 hours grid availability per day on an annual average basis;</li> <li>• Otherwise it is equal to 1.0 minus the fraction of time grid is available to the target households and communities/users in the region of project activity</li> </ul> <p><math>DB_y</math> = Dynamic Baseline Factor (change in baseline fuel, fuel use rate, and/or utilization during crediting period) in year y. Calculated as either: Option 1: default of 1.0 in the absence of relevant information; Option 2: value of <math>1.0 + FFg</math> where <math>FFg</math> is the documented national growth rate of kerosene fuel use in lighting from the preceding years (use the most recent available data for three or five years average (fraction))</p>	<p>21. Baseline emissions are calculated per equation (3):</p> $BE_y = DV \times GF_y \times DB_y$ <p style="text-align: right;">Equation (3)</p> <p>Where:</p> <p><math>BE_y</math> = Baseline emissions per project lamp in year y (t CO<sub>2</sub>e)</p> <p><math>GF_y</math> = Grid Factor in year y,</p> <ul style="list-style-type: none"> <li>• Equal to 1.0 when charging option defined in paragraph 3(a) is used;<sup>8</sup></li> <li>• Equal to 1.0 if the project activity is for off-grid households/communities (defined as no grid access or less than 12 hours grid availability per day on an annual average basis);</li> <li>• Otherwise it is equal to 1.0 minus (the fraction of time grid is available to the target households and communities/users in the region of project activity)</li> </ul> <p><math>DB_y</math> = Dynamic Baseline Factor (change in baseline fuel, fuel use rate, and/or utilization during crediting period) in year y. Calculated as either: Option 1: default of 1.0 in the absence of relevant information; Option 2: value of <math>1.0 + FFg</math> where <math>FFg</math> is the documented national growth rate of kerosene fuel use in lighting from the preceding years (use the most recent available data for a three or five years average (fraction))</p>

<p><b>Project Emissions</b></p>	<p><b>5.4. Project emissions</b></p> <p>30. There are no project emissions (<math>PE_y = 0</math>) if the project lamp charging mechanism utilized is as defined in:</p> <ul style="list-style-type: none"> <li>(a) Paragraph 3(a); or</li> <li>(b) Paragraph 3(b) if the mini-grid or distributed generation system is entirely powered by renewable energy generation unit(s).</li> </ul> <p>31. There are project emissions if the project lamp charging mechanism utilized is as defined in:</p> <ul style="list-style-type: none"> <li>(a) Paragraph 3(c); or</li> <li>(b) Paragraph 3(b) if the mini-grid or distributed generation system is not entirely powered by renewable energy generation unit(s); or</li> <li>(c) Paragraph 3(d) if the mini grid or distributed generation system is not entirely powered by renewable energy units or the regional or national grid is connected to one or more fossil fuel powered units.</li> </ul>	<p><b>5.4. Project emissions</b></p> <p>23. There are no project emissions (<math>PE_y = 0</math>) if the project lamp charging mechanism utilized is as defined in:</p> <ul style="list-style-type: none"> <li>(a) Paragraph 3(a); or</li> <li>(b) Paragraph 3(b) if the minigrid or distributed generation system is entirely powered by renewable energy generation unit(s).</li> </ul> <p>24. There are project emissions if the project lamp charging mechanism utilized is as defined in:</p> <ul style="list-style-type: none"> <li>(a) Paragraph 3(c); or</li> <li>(b) Paragraph 3(b) if the minigrid or distributed generation system is not entirely powered by renewable energy generation unit(s).</li> </ul>
<p><b>Emission Reductions</b></p>	<p><b>5.5. Emissions reduction</b></p> <p>33. Annual emission reductions are calculated as follows:</p> $ER_y = \sum_{i,j} N_{i,j} \times (BE_{y,i} - PE_{y,i,j}) \times (OF_{y,i,j}) \quad \text{Equation (5)}$ <p>Where:</p> <ul style="list-style-type: none"> <li><math>ER_y</math> = Emission reductions in year <math>y</math> (t CO<sub>2</sub>e)</li> <li><math>N_{i,j}</math> = Number of project lamps distributed to end users of type <math>i</math> with charging method <math>j</math></li> <li><math>OF_{y,i,j}</math> = Percentage of project lamps distributed to end users that are operating and in service in year <math>y</math>, for each lamp type <math>i</math> and charging method <math>j</math>.</li> </ul> <p>34. The emission reductions shall be considered from the date of distribution of the project lamps to end-users.</p>	<p><b>5.5. Emissions reduction</b></p> <p>26. Annual emission reductions are calculated as:</p> $ER_y = \sum_{i,j} N_{i,j} \times (BE_{y,i} - PE_{y,i,j}) \times (OF_{y,i,j}) \quad \text{Equation (5)}$ <p>Where:</p> <ul style="list-style-type: none"> <li><math>ER_y</math> = Emission reductions in year <math>y</math> (t CO<sub>2</sub>e)</li> <li><math>N_{i,j}</math> = Number of project lamps distributed to end users of type <math>i</math> with charging method <math>j</math></li> <li><math>OF_{y,i,j}</math> = Percentage of project lamps distributed to end users that are operating and in service in year <math>y</math>, for each lamp type <math>i</math> and charging method <math>j</math>. Assumed to be equal to 100 per cent for years 1, 2 and 3, and equal to the value determined in paragraph 30, for years 4, 5, 6 and 7<sup>9</sup></li> </ul> <p>27. The emission reductions shall be considered from the date of distribution of the project lamps to end-users.</p>

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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):

The proposed deviation does not negatively impact the project design, safeguarding principles assessment, SDG assessment, emission reductions, monitoring frequency, data quality, potential risk, or any other relevant aspect of the project.

A few explanations can be observed below:

Category	Rationale
<b>Environmental Integrity</b>	The expected GS VERs to be certified within the new VPAs to be registered, will not be overestimated, as mentioned in the section below: all calculations and parameters to be used remain the same within the different versions of the methodology.
<b>Contribution to SDGs</b>	The project's contribution to SDGs aligns with GS4GG requirements, and results are not compromised. The new VPAs will continue with the same monitoring plan, including measuring the impact of 8 SDGs (1.1, 1.4 (2), 3.9, 7.1, 8.2, 8.5, 13, and the deviation will not impact the results of each of these parameters.

<b>Safeguarding principles and requirements</b>	The new VPAs will continue with the same design, in line with the safeguarding principles and requirements of GS4GG.
<b>Compliance with host country regulations</b>	The proposed deviation only requests to include two new VPAs under the first crediting period, and does not conflict with any regulation in Kenya.
<b>Monitoring Frequency and Data Quality</b>	The monitoring methodology remain the same in both versions of the methodologies, and there will be no impact by registering the two VPAs within the CP1 methodology approved.

### 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.)*

List of emails shared with SustainCERT to evidence the intention of the PD to register the project before the end of the CP1 (Preliminary review initiation and termination, and design review start).

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