

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 27/09/2023

1.2 | Decision

The deviation request is approved considering the project developer has taken the necessary steps to complete the process on time.

SustainCERT is requested to issue the invoice, and the project developer should make the payment within the defined timeline.

Project developer shall document the deviation request, its implications, and GS' decision in the appropriate section of the PDD.

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 Validation 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_521	
Date of decision	27/09/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	11/09/2023	
Project/PoA/VPA	Project	ID – GS12072
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Energy Efficiency measures at Commerzone KRC Tower of Sustain Properties Pvt. Ltd. at Madhapur, Hyderabad	
Date of listing	Not Listed Yet	
GS Standard version applicable	Principles and Requirements, v1.2	
Date of transition to GS4GG (if applicable)	Not Applicable	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	Not Applicable	
Date of design certification/inclusion (if applicable)	Not Applicable	
Location of project/PoA/VPA	India	
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	Project not listed yet	
Status of the project/PoA/VPA	<input checked="" type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Deviation request from 4.1.49 (b) of Principles and Requirements.	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Principles and Requirements: 4.1.49 (b) – Retroactive projects shall submit the required documents for preliminary review (time of first submission) within one year of the project start date.	

Specify the monitoring period for which the request is valid (if applicable)	Start date: N/A End date: N/A
Submitted by	Contact person name: Mr. Shabbir Kanchwala
	Email ID: skanchwala@kraheja.com
	Organization: Sustain Properties Private Limited
	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:

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

Deviation is requested from Principles and requirements para 4.1.49 (b) – “Retroactive projects shall submit the required documents for preliminary review (time of first submission) within one year of the project start date.”

We would request you to allow a deviation for the project and initiate preliminary review for the same.

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

Not Required

3.2 | Assessment of the deviation:

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

The proposed project activity was submitted for preliminary review with all documents on 12-January-2023 due to problems in the account set up. It took almost 4 months to establish the sustain-cert account properly. The start date of the proposed project activity was 23-January-2022. The documents were submitted for preliminary review within 1 year of the project start date. However, the project participant was not able

to initiate the payment for the same as there was a delay from sustain-cert end to arrange the docs that were required for remittance of the payment. The timeline from opening GS Account to payment initiation is as follows:

Description	Time delay	
Mail sent to Deepika to Open New account for Sustain Properties Pvt Ltd-13/09/2022	2 month	Gold standard
Mail received from Deepika for additional documents on 19/09/2022		
Detail shared with Gold standard Registry for account creation on 03/10/2022		
Doc approved by GS on 20/10/22		
Invoice received for account creation on 01/11/2022		
To Process payment NO PE letter received on 21/11/2022		
Payment to Gold Standard done on 26/12/2022		
Confirmation from Deepika regarding sustain properties Pvt Ltd on 13/01/2023		
Account activated & access given on 04/01/2023		
Doc uploaded for preliminary review on 17/01/2023		
Invoice from Sustain-cert received on 16/01/2023	3 month	Sustain cert
Documents to process remittance received on -22/02/2023		
Confirmation regarding TDS from Sustaincert on 27/4/23		
Payment to Sustaincert done on 09/05/23		
	5 month	

From the above chronology, it is evident that it took lot of time (almost 5 months) to upload the project docs for listing, which was not expected. Due to long delay in arranging documents for remittance, the fees for preliminary review was not processed in time. We would request you to allow deviation from 4.1.49 (b) of Principles and Requirements for the proposed project to initiate the preliminary review as now all the documents have been submitted and payment is done.

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

Not Required

3.3 | Impact of the deviation:

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

The proposed activity was not able to make payment on time due to delay in receiving documents required for remittance. There will be no 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.

Further we would like to mention that the proposed project activity has been commissioned recently. PP will submit all documents and supportive related to the project activity to the VVB accordingly.

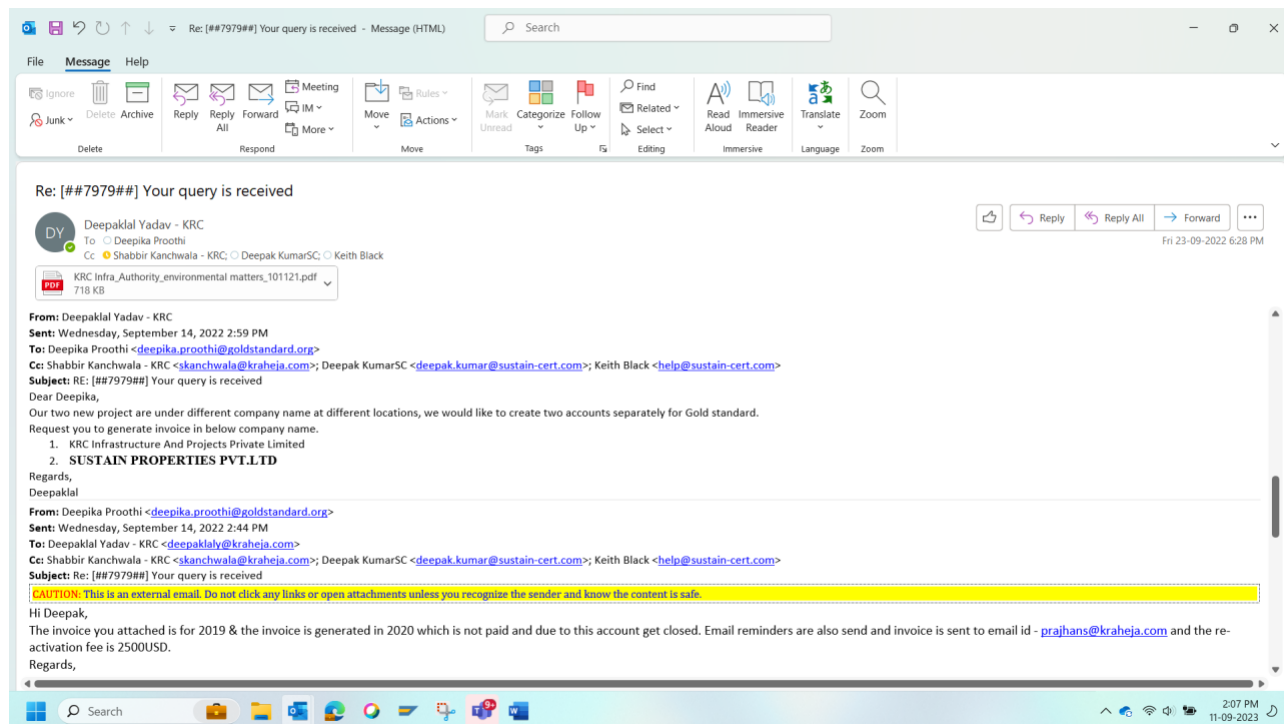
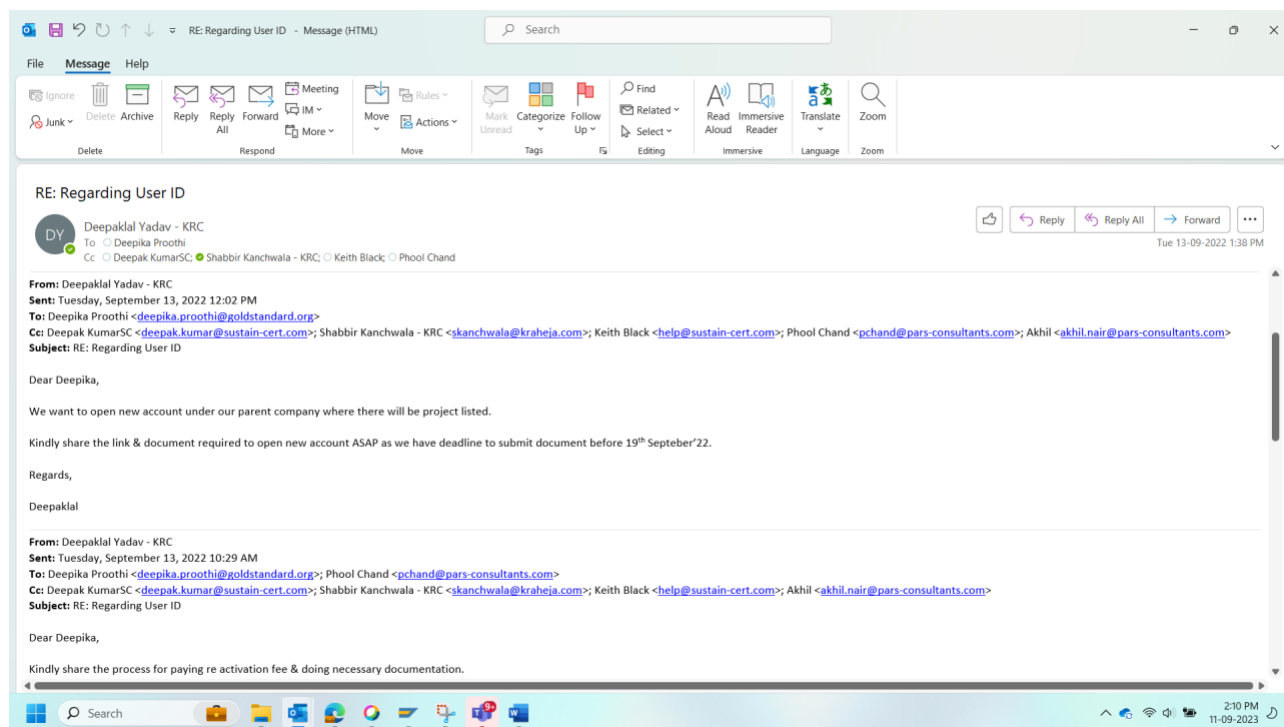
3.3.2 | VVB opinion (to be completed by VVB, if applicable):

Not Required

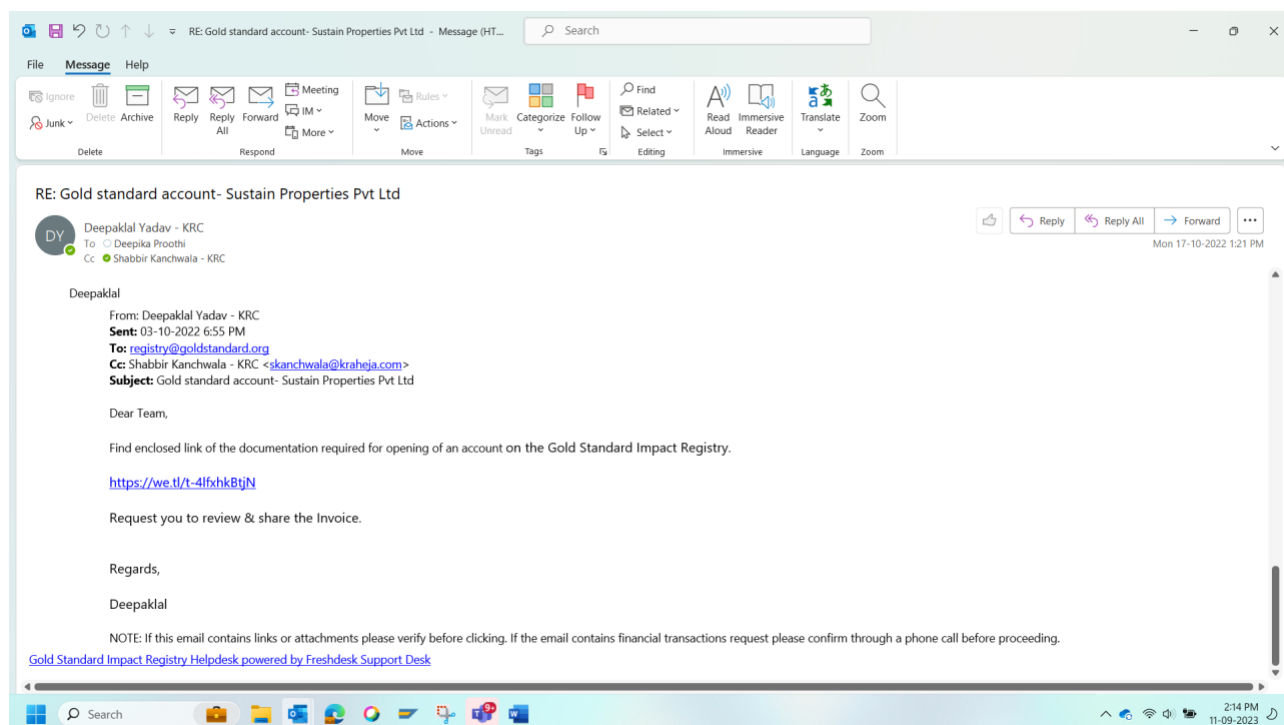
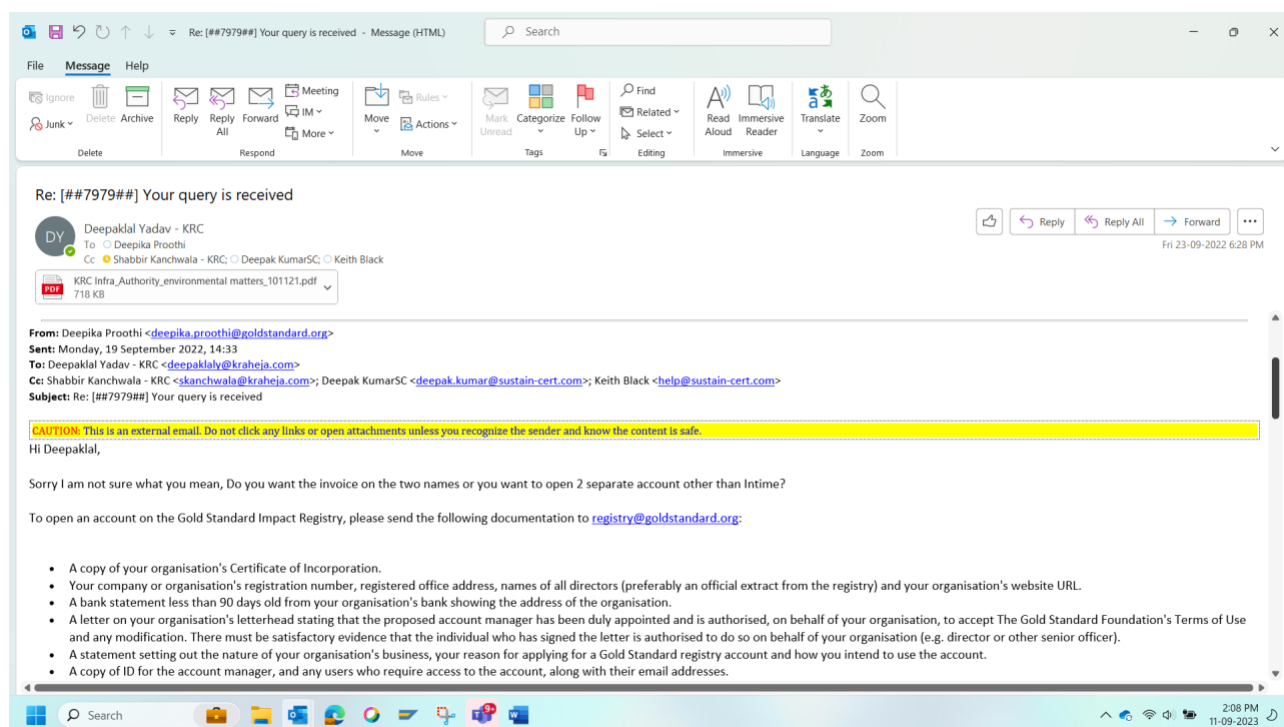
3.4 | Documents:

Screenshots of email conversation among PP-GS-Sustain-Cert.

TEMPLATE - DEVIATION REQUEST FORM V4.0



TEMPLATE - DEVIATION REQUEST FORM V4.0



TEMPLATE - DEVIATION REQUEST FORM V4.0

Re: Gold standard account- Sustain Properties Pvt Ltd

Deepika Proothi <registry@goldstandard.org>
To: Deepakal Yadav - KRC
Cc: Shabbir Kanchwala - KRC; pchand@pars-consultants.com

You replied to this message on 10-10-2022 2:54 PM.
If there are problems with how this message is displayed, click here to view it in a web browser.

CAUTION: This is an external email. Do not click any links or open attachments unless you recognize the sender and know the content is safe.

Hello Deepakal ,

Thanks for the document and have approved both the account. I have just sent out an invoice from our finance system which needs to be paid to complete the application. Once this is paid, we'll provide access to the account.

In the meantime, you can sign up as a user to the registry at registry.goldstandard.org, and click "login" followed by "sign up". You'll need to verify your email address, and then login. Once these steps are done, and the invoice is paid, we'll approve your user login and attach it to the account.

Regards
Deepika

On Tue, 18 Oct at 10:23 AM, Deepakal Yadav - KRC <deepakaly@kraheja.com> wrote:
Dear Deepika,
Find comment below regarding the queries raised:
Point no1: not yet received the statement stating brief about company and reason for apply for Sustain Properties account
We have shared attached statement of our Parent Company i.e KRC (K Raheja Corp) for Sustain & KRC Infra Project Pvt Ltd, kindly let me know if you require statement specific to Sustain Properties.
Point no2: the invoice/utility bill share for both company have different address as mentioned in registered document.

Address mentioned on company Certificate is where book of account record is maintained.

Re: Gold standard account- Sustain Properties Pvt Ltd

Deepika Proothi <registry@goldstandard.org>
To: Deepakal Yadav - KRC
Cc: Shabbir Kanchwala - KRC; pchand@pars-consultants.com

You replied to this message on 26-12-2022 10:10 AM.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Invoice GS-11813.pdf
89 KB

CAUTION: This is an external email. Do not click any links or open attachments unless you recognize the sender and know the content is safe.

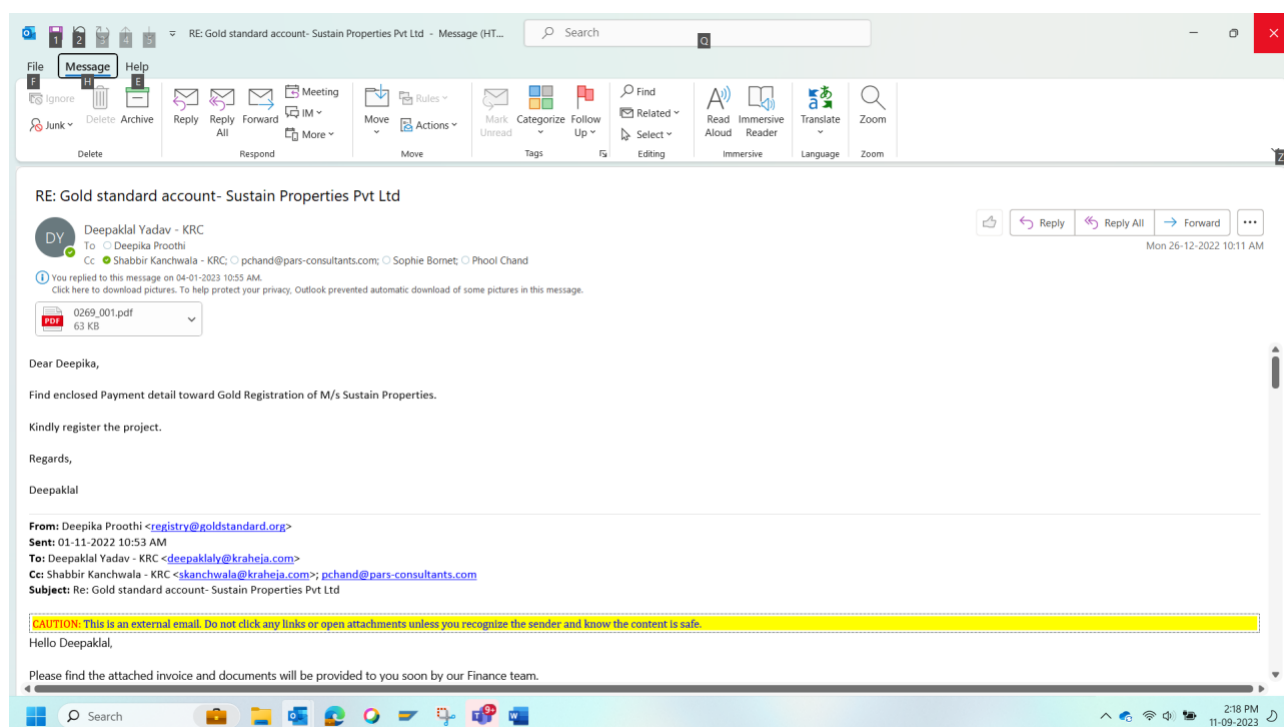
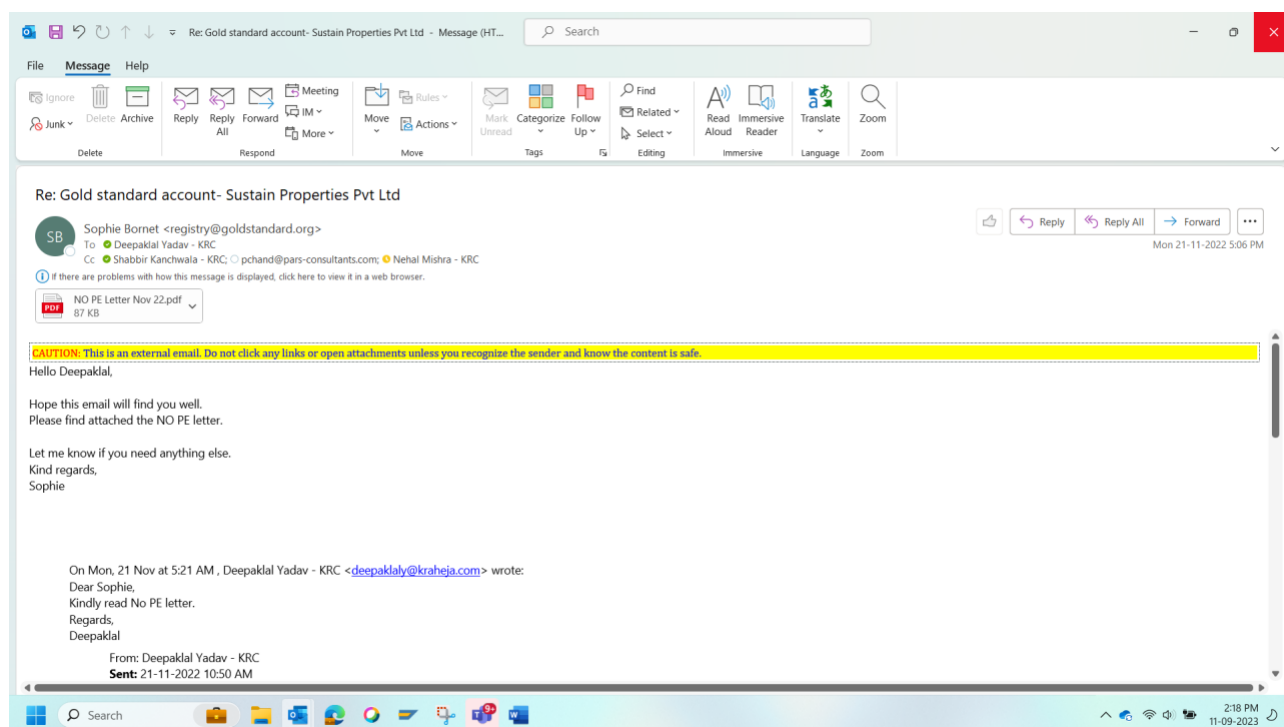
Hello Deepakal,

Please find the attached invoice and documents will be provided to you soon by our Finance team.

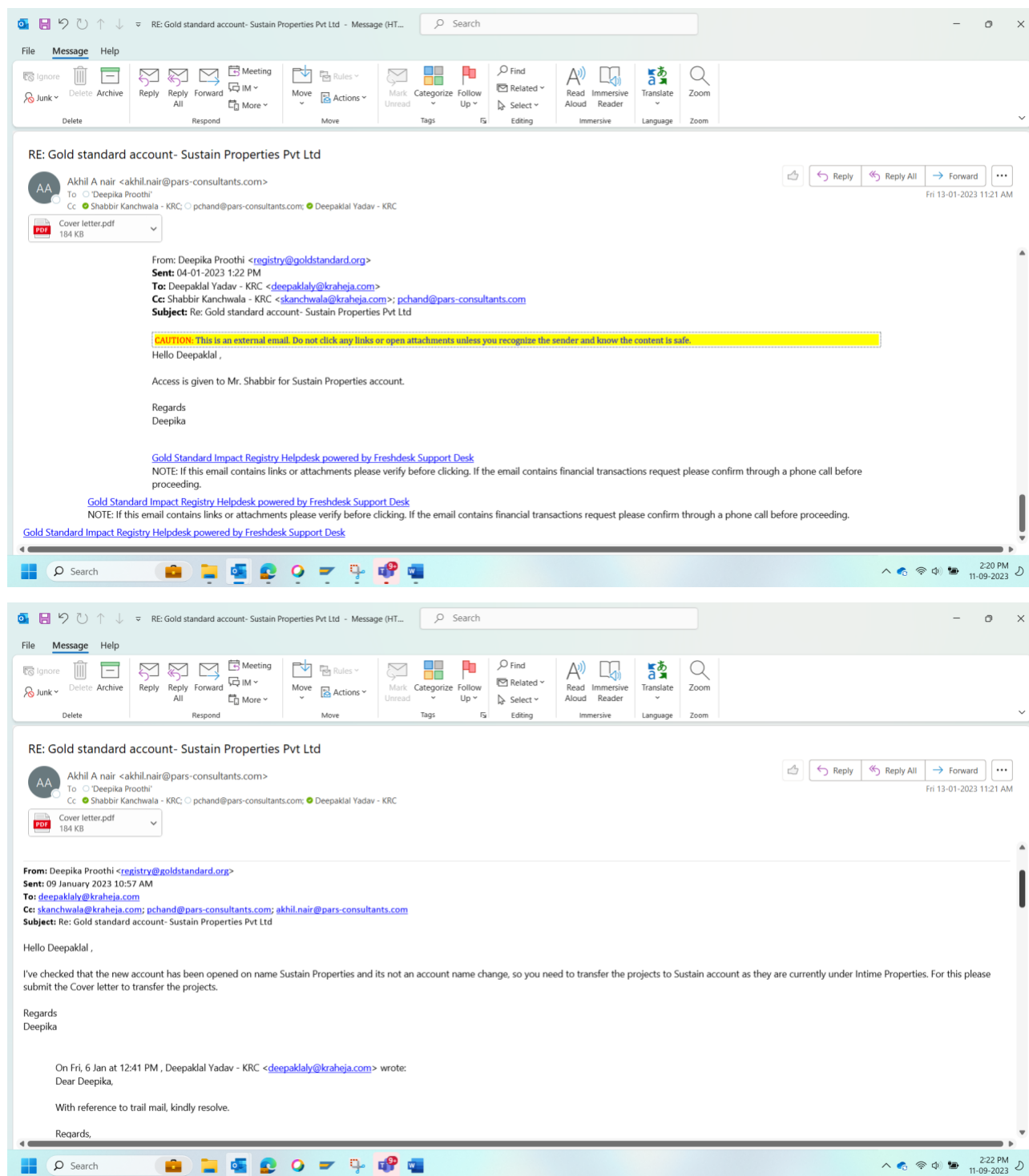
Regards
Deepika

On Mon, 31 Oct at 12:30 PM, Deepakal Yadav - KRC <deepakaly@kraheja.com> wrote:
Dear Deepika,
We have received Invoice for 1) K Raheja Infrastructure, awaiting Invoice for Sustain Properties @ Hyderabad Project.
In order to process the payment for KRC Infrastructure we require below document:
1) TRC for 2022 required
2) No PE letter is required.
3) Form 10F
Regards,
Deepakal

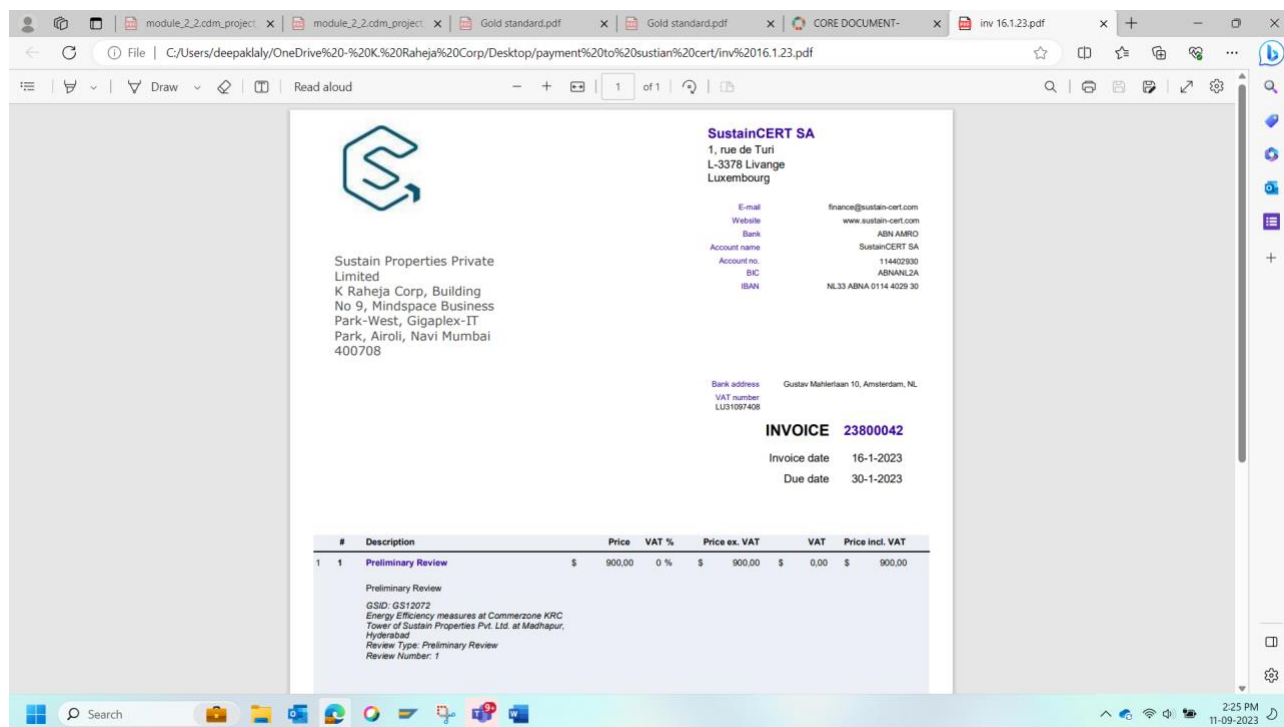
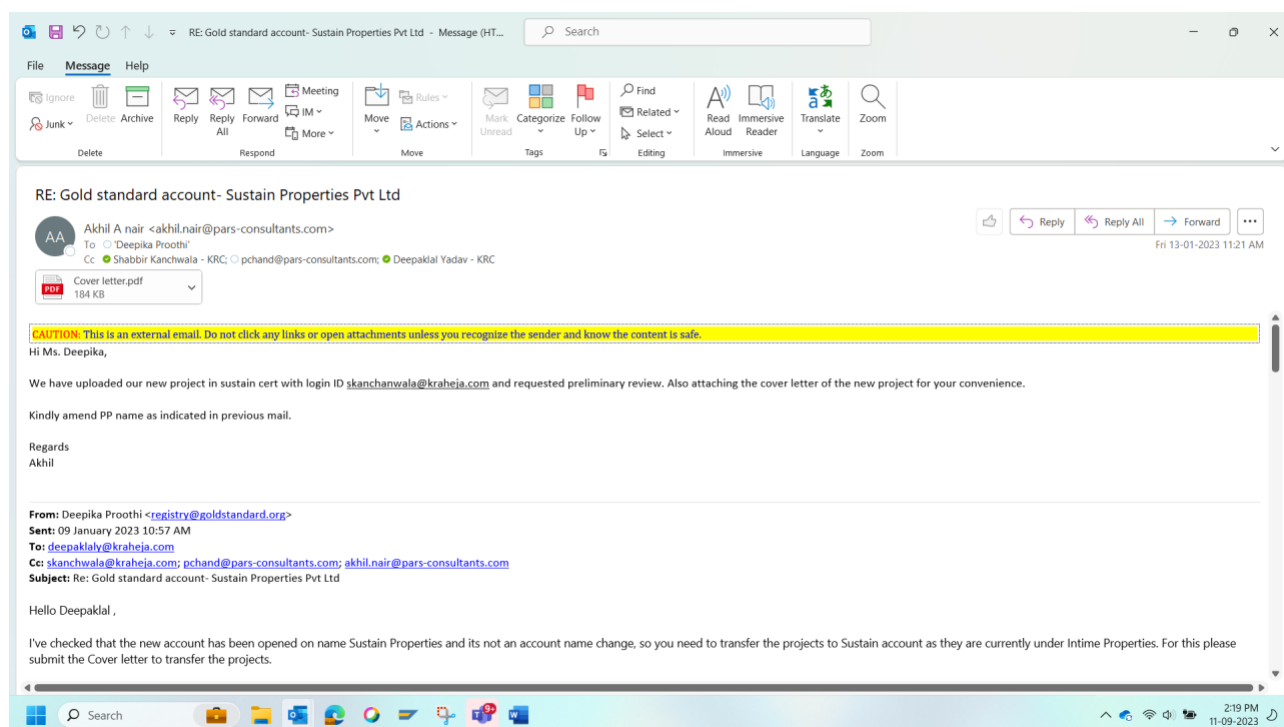
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Re: SustainCert - Message (HTML)

File Message Help

Ignore Delete Archive Reply Reply Forward Meeting IM More Move Actions Mark Unread Categorize Follow Up Find Related Select Read Aloud Immersive Reader Translate Zoom

Re: SustainCert

Finance <finance@sustain-cert.com>
To: Deepakal Yadav - KRC
Cc: akhil.nair@pars-consultants.com; Shabbir Kanchwala - KRC; deepika.proothi@goldstandard.org; help@help@sustain-cert.com; Phool Chand; Deepak Kumar

You replied to this message on 27-02-2023 11:40 AM.

Form 10F_Signed 202-23 (2).pdf 389 KB
TRC 2022 - India & Lux (1).pdf 249 KB

CAUTION: This is an external email. Do not click any links or open attachments unless you recognize the sender and know the content is safe.

Hi Deepakal,
Pls find attached Form 10F of SustainCERT S.A. So far as TRC is concerned, we have TRC for 2022 only which has already been shared. 2023 TRC is yet to be received.

Thanks
Jatin

From: Deepakal Yadav - KRC <deepakal@krajia.com>
Sent: Wednesday, February 22, 2023 12:24 PM
To: Finance <finance@sustain-cert.com>
Cc: akhil.nair@pars-consultants.com <akhil.nair@pars-consultants.com>; Shabbir Kanchwala - KRC <skanchwala@krajia.com>; deepika.proothi@goldstandard.org; help@help@sustain-cert.com; Phool Chand <pchand@pars-consultants.com>; Deepak Kumar <deepak.kumar@sustain-cert.com>; Shabbir Kanchwala - KRC <skanchwala@krajia.com>
Subject: RE: SustainCert

Dear Team,
Awaiting form 10F & TRC for making remittance.
Regards,
Deepakal

From: Deepakal Yadav - KRC
Sent: 13-02-2023 1:10 PM
To: Finance <finance@sustain-cert.com>
Cc: akhil.nair@pars-consultants.com; Shabbir Kanchwala - KRC <skanchwala@krajia.com>; deepika.proothi@goldstandard.org; help@help@sustain-cert.com; Phool Chand <pchand@pars-consultants.com>; Deepak Kumar

Re: SustainCERT invoice 23800511 - Message (HTML)

File Message Help

Ignore Delete Archive Reply Reply Forward Meeting IM More Move Actions Mark Unread Categorize Follow Up Find Related Select Read Aloud Immersive Reader Translate Zoom

Re: SustainCERT invoice 23800511

Finance <finance@sustain-cert.com>
To: Deepakal Yadav - KRC
Cc: Shabbir Kanchwala - KRC; Phool Chand; Akhil

If there are problems with how this message is displayed, click here to view it in a web browser.

CAUTION: This is an external email. Do not click any links or open attachments unless you recognize the sender and know the content is safe.

Hi Deepakal,
I hope this email finds you well. SustainCERT is required to be paid in full in order to mark the invoice as paid and review to begin. In case you determine any withholding tax, the same is to be borne by payer.

Thanks
Jatin

From: Deepakal Yadav - KRC <deepakal@krajia.com>
Sent: Wednesday, April 26, 2023 9:36 AM
To: Finance <finance@sustain-cert.com>
Cc: Shabbir Kanchwala - KRC <skanchwala@krajia.com>; Phool Chand <pchand@pars-consultants.com>; Akhil <akhil.nair@pars-consultants.com>
Subject: RE: SustainCERT invoice 23800511

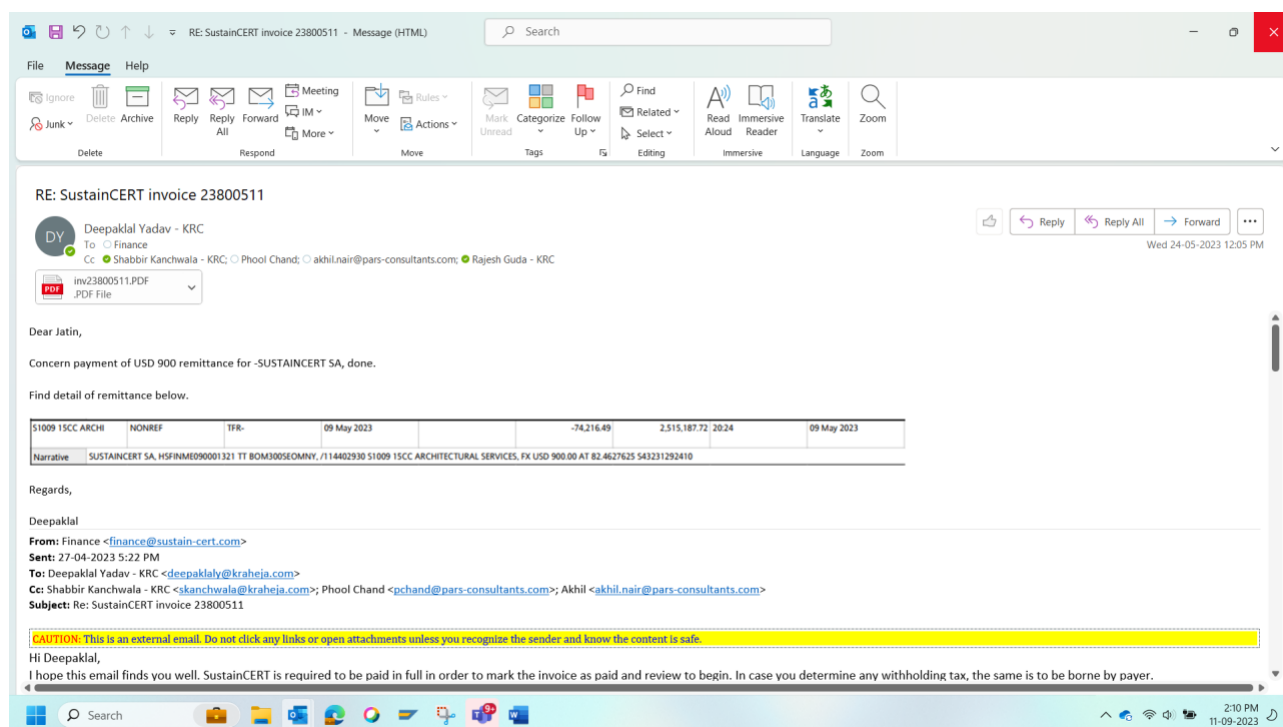
Dear Jatin,

There will be TDS of 20.8%, Kindly confirm the same will be bear by Sustain cert.

Regards,
Deepakal

From: Finance <finance@sustain-cert.com>
Sent: 17-04-2023 10:27 AM
To: Deepakal Yadav - KRC <deepakal@krajia.com>

TEMPLATE - DEVIATION REQUEST FORM V4.0



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