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

<table>
<thead>
<tr>
<th>Deviation Reference Number</th>
<th>DEV_521</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of decision</td>
<td>27/09/2023</td>
</tr>
<tr>
<td>Precedent (YES/NO)</td>
<td>No</td>
</tr>
<tr>
<td>Precedent details</td>
<td>NA</td>
</tr>
<tr>
<td>Date of submission</td>
<td>11/09/2023</td>
</tr>
<tr>
<td>Project/PoA/VPA</td>
<td>Project ID – GS12072</td>
</tr>
<tr>
<td></td>
<td>☐ PoA ID – GSXXXX</td>
</tr>
<tr>
<td></td>
<td>☒ VPA ID – GSXXXX</td>
</tr>
<tr>
<td>Project/PoA/VPA title</td>
<td>Energy Efficiency measures at Commerzone KRC Tower of Sustain Properties Pvt. Ltd. at Madhapur, Hyderabad</td>
</tr>
<tr>
<td>Date of listing</td>
<td>Not Listed Yet</td>
</tr>
<tr>
<td>GS Standard version applicable</td>
<td>Principles and Requirements, v1.2</td>
</tr>
<tr>
<td>Date of transition to GS4GG (if applicable)</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Date of design certification/inclusion (if applicable)</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Location of project/PoA/VPA</td>
<td>India</td>
</tr>
<tr>
<td>Scale of the project/PoA/VPA</td>
<td>☐ Microscale</td>
</tr>
<tr>
<td></td>
<td>☒ Small scale</td>
</tr>
<tr>
<td></td>
<td>☐ Large scale</td>
</tr>
<tr>
<td>Gold Standard Impact Registry link of the project/PoA/VPA</td>
<td>Project not listed yet</td>
</tr>
<tr>
<td>Status of the project/PoA/VPA</td>
<td>☒ New</td>
</tr>
<tr>
<td></td>
<td>☐ Listed</td>
</tr>
<tr>
<td></td>
<td>☐ Certified design</td>
</tr>
<tr>
<td></td>
<td>☐ Certified project</td>
</tr>
<tr>
<td>Title/subject of deviation</td>
<td>Deviation request from 4.1.49 (b) of Principles and Requirements.</td>
</tr>
<tr>
<td>Specify applicable rule/requirements/methodology, with exact paragraph reference and version number</td>
<td>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.</td>
</tr>
</tbody>
</table>
### Deviation detail

#### 3.1 Description of the deviation:

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

Deviations 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:

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

We want to open new account under our parent company where there will be project listed.

Kindly share the link & document required to open new account MSAP as we have deadline to submit document before 15th September’22.

Regards,
Deepak

Deepak Kumar – Senior Manager - Climate Security and Sustainable Development

---

Subject: RE: Regarding User ID

Dear Deepika,

Kindly share the process for paying no activation fee & doing necessary documentation.

Regards,
Deepak

---

Subject: [RE: #373769] Your query is received

Dear Deepak,

Our two new project are under different company name at different locations, we would like to create two accounts separately for Gold standard. Request you to generate invoice in below company name.

1. ABC Infrastructure And Projects Private Limited
2. SEYFAIN PROPERTIES PVT LTD

Regards,
Deepak

---

Subject: [RE: #397090] Your query is received

Dear Deepak,

The invoice you attached is for 2019 & the invoice is generated in 2020 which is not paid and due to this account get closed. Email reminders are also send and invoice is sent to email of prabhanshukaranjcom and the re-activation fee is 250000GA.

Regards,
Climate Security and Sustainable Development
Re: Gold standard account - Sustain Properties Pvt Ltd

Deepak Yadav <deepalakshaye@tatacliq.com> wrote:

On Mon, 31 Oct at 12:30 PM, Deepak Yadav - KRC <deepalakshaye@tatacliq.com> wrote:

Hello Deepshikha,

We have received Invoice for 11 K Kalaheo Infrastructure, awaiting Invoice for Sustain Properties @ Hydexam Project.

In order to process the payment for KRC Infrastructure we require below document:

1) TEC for 2022 required
2) No P letter is required.
3) Form 109

Regards,

Deepshikha

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

Re: Gold standard account - Sustain Properties Pvt Ltd

Deepak Yadav - KRC <deepalakshaye@tatacliq.com> wrote:

Hi, Deepshikha,

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

Regarding:

On Thu, 20 Oct at 12:23 AM, Deepshikha Pradhani - KRC <deepalakshaye@tatacliq.com> wrote:

Hello Deepshikha,

Thanks for the document and have approved both the accounts. 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 will 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 'login 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,

Deepshikha

On Tue, 18 Oct at 10:23 AM, Deepshikha Pradhani - KRC <deepalakshaye@tatacliq.com> wrote:

Dear Deepshikha,

Find comment below regarding the queries raised:

Point no1: not yet received the statement briefing about company and reason for apply for Sustain Properties account
We have shared attached statement of our Parent Company i.e KRC - K Kalaheo Corp. for Sustain @ KRC Hydexam 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.

Climate Security and Sustainable Development
Template - Deviation Request Form V4.0

From: Deepika.Punith <_registry@goldstandard.org>
Sent: 09-01-2023 12:21 PM
To: Deepak Yadav <KRC <deepak@kohima.com>
Cc: Shabillu Kachho <KRC <shabillu@pars-consultants.com
Subject: Re: Gold standard account- Sustain Properties Pvt Ltd

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

Hello Deepak,

Access is given to Mr. Shabillu for Sustain Properties account.

Regards,
Deepika

Gold Standard Impact Registry Helpdesk powered by Freshdesk Support Desk
NOTE 1: If this email contains links or attachments, please verify before clicking. If the email contains financial transactions request, please confirm through a phone call before proceeding.

Gold Standard Impact Registry Helpdesk powered by Freshdesk Support Desk

From: Deepika.Punith <_registry@goldstandard.org>
Sent: 09-01-2023 10:21 AM
To: Deepak Yadav <KRC <deepak@kohima.com>
Cc: Shabillu Kachho <KRC <shabillu@pars-consultants.com
Subject: Re: Gold standard account- Sustain Properties Pvt Ltd

Hello Deepak,

I’ve checked that the new account has been opened on name Sustain Properties and it’s not an account name change, so you need to transfer the projects to Sustain account as they are currently under Inline Properties, for this please submit the Cover letter to transfer the projects.

Regards,
Deepika

On 09-01-2023 at 12:41 PM, Deepak Yadav <KRC <deepak@kohima.com> wrote:

Dear Deepak,

With reference to trial mail. Kindly resolve.

Regards,
Hi Mr. Sheeba,

We have uploaded our new project in sustain cert with logid 10618190 and requested preliminary review. Also attaching the cover letter of the new project for your convenience.

Gently amend PP name as indicated in previous mail.

Regards,
Abhil

-15.01.2023 11:23 AM

Hi Abhil,

I've checked that the new account has been opened on name Sustain Properties and its not an account name change, so you need to transfer the projects to Sustain account as they are currently under Intime Properties. For this, please submit the cover letter to transfer the projects.
Hi Cheepukad,

Per attached Form 32F of SustainCERT S.A. as far as TRC is concerned, we have TRC for 2022 only which has already been shared. 2023 TRC is yet to be received.

Thanks,

Satish

---

Hi Cheepukad,

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,

Satish

---

Hi Cheepukad,

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,

Satish
**DEVIATION REQUEST FORM V4.0**

---

**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