



Gold Standard[®]
for the Global Goals

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 19/12/2023

1.2 | Decision

The deviation request is not approved.

The project shall undergo design certification renewal, with the crediting period starting from 23/07/2020 (immediately after end date of previous CP) but no credits (and SDG Impacts) can be claimed from 23/07/2020 till the date of submission of design certificate renewal for 2nd CP.

The project developer shall :

- a. Ensure a continuity in the Project's monitoring activities is maintained and PD is able to justify that no monitoring gaps exist (especially for SDG parameters) within the Monitoring Period(s). However, if gap(s) exist, the project shall

justify that conservative approach(es) have been applied in line with section 3 of the Deviation Approval Requirements and Procedures (version 1.1) and overarching GS principles (as applicable).

- 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 condition 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_538	
Date of decision	19/12/2023	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	29/09/2023	
Project/PoA/VPA	Project	ID – GS4532
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	WIND POWER PROJECT IN MAHARASHTRA STATE, INDIA	
Date of listing	09/10/2016	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	30/05/2018	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	09/10/2016	
Date of design certification/inclusion (if applicable)	01/06/2016	
Location of project/PoA/VPA	Host country(ies): 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	https://platform.sustain-cert.com/public-project/851	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input type="checkbox"/> Certified design <input checked="" type="checkbox"/> Certified project	
Title/subject of deviation	Deviation Request for re-validation to start 2 nd CP without a reduction of any issuance of Certified Products due to the delay period and successive verification	
Specify applicable rule/requirements/methodology,	NA	

with exact paragraph reference and version number	
Specify the monitoring period for which the request is valid (if applicable)	Start date End date
Submitted by	Contact person name: Vipul Sahu
	Email ID: vipul.sahu@enkingint.org
	Organisation: EKI Energy Services Limited
	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:

The project has been design certified under Gold Standard on 09/10/2016. The crediting period of the project of the project activity is from 24/07/2015 - 23/07/2025 (Fixed).

The same crediting period appears on the project page of the GS registry as well as the approved Monitoring and verification Report of the last verification.

If we consider, 5 years of crediting period cycle, the 1st crediting period expired on 23/07/2020. The last verification for the Monitoring period was 08/09/2018 to 31/12/2020 which was finished on 10/08/2022.

According to para 5.1.45 of PRINCIPLES & REQUIREMENTS Version 1.2 Requirements, 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 the current certification cycle i.e., 23/07/2025 as per the crediting period mentioned in the above documents.

However, neither the client nor it has been informed by Gold Standard about the applicability of five-year crediting period cycle under design certification renewal for the project. The project proponent did not find any necessity to recheck the crediting period i.e., 24/07/2015 - 23/07/2025 (Fixed) as the same period was approved by the GS in the last verification documents.

Also, as per the Scenario 4: "Project with fixed crediting period (10 years) is submitted for preliminary review" of "DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG," published on 02.06.2023, sub-scenario 4.b "Project is in the last 5 year of CDM crediting period at the time of first submission to GS4GG (Preliminary review)" which states that "Design certification renewal is not required"

The project proponent has seriously implemented all requirements of the project as of now and the revenue of the GS credits plays an important role in sustaining the project. Any loss of the crediting period which the client was not at all aware about the design certification renewal guidance makes a negative impact on continuing the project and the same can be demonstrated to the VVB during the verification process.

Since there was no fault or delay by the project proponent in applying the design renewal certification thus, requested to proceed with revalidation and successive verification of the WIND POWER PROJECT IN MAHARASHTRA STATE, INDIA, starting the 2nd crediting period as of 24/07/2020.

We shall demonstrate the impact of the project due to the loss of the credits and its revenue to VVB. A FAR can be recommended by GS for VVB to confirm the same.

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

The deviation does not attract any kind of risk upon environmental integrity and all the SDG contributions are achieved in-line with the registered PDD.

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):

In reference to the project activity owned by Mahalaxmi Commercial Services Private Limited (MCSPL), which initially attained Design Certified Status on 09/10/2016 with a crediting period of 24/07/2015 - 23/07/2025 (Fixed) during the certification process, and periodic verification carried out accordingly, the project owner has shown a genuine commitment to the renewal of the crediting period while complying with GS guidelines.

The project owner has now requested to the Gold Standard (GS) for Environmental Excellence to allow the renewal date to be set as the first day immediately following the end date of the current certification cycle. Consequently, the proposed GS crediting period cycle would run from 24/07/2020 to 23/07/2025. In line with this request, the project owner seeks permission for revalidation and successive verification (applicable crediting period from 24/07/2020 to 23/07/2025 and verification from 01/01/2021 onwards) without any forfeiture of GS-labelled credits due to potential delays in GS RCP (Renewal of Crediting Period) submission.

This request aligns with the principles outlined in the RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG, published on 02.06.2023. In particular, when addressing Scenario 4, Sub-scenario 4.b, which specifically pertains to projects with a fixed crediting period of 10

years submitted for preliminary review during the last 5 years of their CDM crediting period to GS4GG, it is pertinent to note that according to the provided timing criteria, Design certification renewal is not mandated. This aligns with the project owner's request for continued certification within the GS framework without undue disruption.

The project proponent's request for an extension of the project's certification and crediting period is based on several pertinent factors:

1. **Lack of Notification:** The project proponent was not adequately informed by the Gold Standard about the specific requirement for a five-year crediting period cycle under design certification renewal. This lack of communication may have contributed to the oversight in initiating the renewal process.
2. **Previous Approval:** It is noteworthy that the project proponent's argument states that the crediting period was previously approved by the Gold Standard during the last verification. This suggests that the project was compliant with Gold Standard requirements at that time.

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):

No effect is expected on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project.

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

Not Applicable

3.4 | Documents:

Not Applicable

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

		Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption