A. To be completed by Gold Standard

SSE

1 | Decision

1.1 | Date – 06/11/2023

1.2 | Decision

The deviation request is approved. However, the project developer shall ensure that the submission of design change is done by 31st March 2024. If the design change request is not submitted by this date, the project developer must apply for another deviation to be eligible. The VVB validating the design change must check the appropriateness and accuracy of the information provided using the evidence at their disposal and document their opinion in the validation report. CB to cross-check VVB’s reporting.

1.3 | Is this decision applicable to other project activities under similar circumstances?

No
Cemel Hydro bundle consists of three small scale hydro power plants, each of the activity is around 7MW. Due to reduced precipitation and flow, actual generation is lower than estimated figures. As per the latest legislation of the energy market regulatory authority (EPDK) of Turkey, utilization of auxiliary energy sources have been allowed for existing power plants for better utilization of grid capacity allocated to those plants. Hence, without exceeding the electrical capacity (MWe), existing power plants can secondary generation plants (i.e. a hydro power can install wind turbine or solar panel) however, at anytime, total power fed to the grid can not exceed allocated MWe capacity.

Cemel Hepp has also applied for installing solar panel to generate electricity from solar in the absence of flow in the river. Application has been approved by EPDK conditional to approval of EIA and other permissions in June 2022. Agreements for panels have been signed in early February (2023) to secure panel supply. However, since the project is located within the boundaries of two different districts, it takes longer than expected and thus permissions are not completed yet. Permissions in one of the districts have been completed however, permissions in second district are going on. Therefore, EIA, land development plan and final generation license are not issued yet. Since the coordinates, capacity, etc can change during these process, we can not initiate (or at last not finalize) validation before February 2024.

As per the GS rules, we should apply within one year of start date of the capacity extension (start date is 02/2023) however, permissions are not expected to be finalized before February 2024 whereas commissioning is expected in mid2024 or Q3 of 2024.

We therefore request extension of one year deadline rule for our project and request extension until September 2024.
2 | **Background information**

Cemel Hepp is operational since 04/10/2023. Project is a impoundment type HEPP with no diversion of flow through channel or tunnel. Project has guaranteed initial permissions for installation of solar panel however, permissions could not be completed yet therefore, although the start date of the project is February 2023 as per GS definition, it is not likely to obtain all permission before that date and finalize validation.
<table>
<thead>
<tr>
<th><strong>Deviation Reference Number</strong></th>
<th>DEV_548</th>
</tr>
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<tbody>
<tr>
<td><strong>Date of decision</strong></td>
<td>06/11/23</td>
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<tr>
<td><strong>Precedent (YES/NO)</strong></td>
<td>No</td>
</tr>
<tr>
<td><strong>Precedent details</strong></td>
<td>NA</td>
</tr>
<tr>
<td><strong>Date of submission</strong></td>
<td>16/10/2023</td>
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| **Project/PoA/VPA**           | Project ID – GS1208  
- PoA ID – GSXXXX  
- VPA ID – GSXXXX |
| **Project/PoA/VPA title**     | CEMEL HYDRO BUNDLE |
| **Date of listing**           |         |
| **GS Standard version applicable** | GS4GG |
| **Date of transition to GS4GG (if applicable)** | - |
| **Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)** | - |
| **Date of design certification/inclusion (if applicable)** | 11/04/2023 (CP Renewal approval) |
| **Location of project/PoA/VPA** | Host country(ies) - Turkiye |
| **Scale of the project/PoA/VPA** | Microscale  
- Small scale  
- Large scale |
| **Gold Standard Impact Registry link of the project/PoA/VPA** | https://registry.goldstandard.org/projects?q=cemel&page=1 |
| **Status of the project/PoA/VPA** | New  
- Listed  
- Certified design  
- Certified project |
| **Title/subject of deviation** | Extension Request for Design Change Submission Date |
| **Specify applicable rule/requirements/methodology, 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: M. Kemal Demirkol
Email ID: Kemal.demirkol@gte.com.tr
Organisation: GTE

Project participant: Yes ☒ No ☐

Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).

Yes ☐ No ☒
VVB is not selected yet.
If yes;
VVB name:

VVB Staff name(s):

Any previous deviations approved for the same project activity/PoA/VPA(s)?

Yes ☐ No ☒

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):

GS rules requires submission of design changes within one year of project start date. Due to the constraints at time of preliminary approval, project owner has signed panel agreement however unexpected delays in permissions have made it impossible to acquire all permissions and carry out/finalize validation. As we need to submit permissions for land development, EIA, generation license etc., we can not finalize validation and submit within one year.

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

NA

......
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):

As per the local regulations and GS requirements, it is impossible to comply with the GS requirements, due to the one year deadline rule.

3.2.2 | 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.

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):

Completion of EIA and other permissions are required for assessment of SDGs, ER, final capacity and location of the project. Since EIA process is still going on, finalization of this permissions is also needed for a proper SDG assessment.

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

<table>
<thead>
<tr>
<th>Version number</th>
<th>Release date</th>
<th>Description</th>
</tr>
</thead>
</table>
| 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 |