

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE 11.04.2021

Version 5.0

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 $31^{\rm st}$ 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

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)

Cemel Hydro bundle consists of thee small scale hydro power plants, each of the activity is around 7MW. Due to reduced precipation 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.

TEMPLATE - DEVIATION REQUEST FORM V4.0

Deviation Reference Number	DEV_548		
	06/11/23		
Date of decision	· · ·		
Precedent (YES/NO)	No		
Precedent details	NA		
Date of submission	16/10/2023		
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	GS4GG		
applicable			
Date of transition to GS4GG (if applicable)	_		
Date of transition to Gold	-		
Standard from another			
standard (e.g. CDM) (if			
applicable)			
Date of design	11/04/2023 (CP Renewal approval)		
certification/inclusion (if			
applicable)	Host country/ice) Turkiyo	
Location of project/PoA/VPA	Host country(ies) -Turkiye		
Scale of the	☐ Microscale		
project/PoA/VPA	☐ Small scale☒ Large scale		
Gold Standard Impact	_	noldstandard org/projects?g=cemel&	
Registry link of the	https://registry.goldstandard.org/projects?q=cemel&page=1		
project/PoA/VPA	P 3.3 -		
Status of the	□ New		
project/PoA/VPA	□ Listed		
	☐ Certified desig	n	
	□ Certified proje	ct	
Title/subject of deviation	Extension Reque	st for Design Change Submission	
-	Date		
Specify applicable			
rule/requirements/methodol			
ogy, with exact paragraph			
reference and version			
number	Start date	End date	
Specify the monitoring	Start date	Liiu uate	
period for which the request is valid (if applicable)			
is valid (ii applicable)			

TEMPLATE - DEVIATION REQUEST FORM V4.0

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	Yes □ No ⊠ VVB is not selected yet. If yes; VVB name:
VVB).	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 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):

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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.

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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):

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):

Guidance If required by SustainCERT or Gold Standard for this particular deviation, please add here the VVB's opinion.

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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.)

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