



TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – 27/10/2023

1.2 | Decision

The deviation request is approved provided that:

The VVB:

- demonstrate compliance with paragraph 4.2 of the [COVID Interim Measures](#), providing proper explanation and its opinion in its verification report, and
- raise a FAR in its verification report requesting the PD to make the next physical site visit mandatory.

The PD documents this deviation request decision, its implications, in the appropriate section of the Monitoring 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_551	
Date of decision	27/10/2023	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	06/10/2023	
Project/PoA/VPA	Project	ID – GS11401
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Bhesada Wind Power Project in Rajasthan	
Date of listing	06/06/2022	
GS Standard version applicable	1.2	
Date of transition to GS4GG (if applicable)		
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	12/01/2023	
Date of design certification/inclusion (if applicable)		
Location of project/PoA/VPA	India	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	https://registry.goldstandard.org/projects/details/3422	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input checked="" type="checkbox"/> Listed <input type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Request to approve First Monitoring Period of 33 months with Remote Audit	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Covid 19: Interim Measures, Version 6 Applicable paragraph: 4.1.1 (b)	
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/10/2019	End date 30/06/2022

Submitted by	Contact person name: Mr. Ishan Nagpal
	Email ID: ishan.nagpal@renew.com
	Organisation: ReNew Wind Energy (Rajasthan 3) 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 checked="" type="checkbox"/> No <input type="checkbox"/> If yes; VVB name: LGAI Technological Center, S.A. (hereafter referred to as Applus+ Certification) VVB Staff name(s): Mr. Pankaj Kumar
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:

**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):

A remote inspection was done on 04/07/2022 for combined Design and Performance Review of the project GS 11401 due to current practices at that moment. Though the severity of COVID-19 pandemic was reducing, the apprehension of getting caught up with the infection was prevalent in the host country. Even though the restriction to travel and communication in most part of the country was lifted up, people were still avoiding commuting to places unless it was not of utmost necessary and there was no alternative available to avoid it. Most of service class people were operating from remote locations and were reluctant to travel due to potential health risk. Also, delaying the site visit was not an option as emission reduction purchase agreement (ERPA) was already executed with the buyer. Hence, deviation is requested to approve the Performance Review for Monitoring Period from 01/10/2019 to 30/06/2022 (including both days).

3.1.2 | 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.*

During the time of remote audit, though the severity of COVID-19 pandemic was reducing, the apprehension of getting caught up with the infection was prevalent in the host country. Most of service class people were operating from remote locations and were reluctant to travel due to potential health risk. Also, it was found that PD already made emission reduction purchase agreement (ERPA) with the buyer and they had commitment to deliver GS-VER within some specified time. Hence, the VVB had decided to conduct the remote inspection in absence of severe risks regarding the level of assurance of the assessment process. This was considered feasible and acceptable due to the accumulated experience during the pandemic and the processes to evaluate risks, thus taking into account as positive and feasible the request made by the Project Developer.

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 Para 4.1.1(b) of Covid-19: Interim Measures, Version 6, "If the site visit cannot be postponed due to the significant impact of delaying the site visit on VVB and/or project developer due to timeline/commitment as per validation/verification or GS-VERs delivery agreement, VVB may replace mandatory on-site visits with remote audits. The audit may include but is not limited to validation, verification, the inclusion of VPAs, design change review etc."

As the emission reduction purchase agreement (ERPA) was already executed with the buyer, delaying site visit was not an option. Hence, remote audit was chosen to proceed it on time.

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.*

At the moment of being requested for a remote audit, being explained about the above situation by the Project Developer, the Interim Measures for COVID-19 issued by GS were in the previous version, however, final schedule was delayed due to the availability of the Audit Team and when executed, the version 6 of the document was already in force.

On the other hand, the GS4GG Interim Measures, version 6 permitted to apply deviations under previous versions (i.e. v5) up to 12/09/2022. Despite that considering the internal Technical Review process and final approval review pipeline processing, the documents were submitted to the PD on 30/09/2022 (i.e. above the intended deadline of 12/09/2022), the VVB had originally assumed that the deadline could have been achieved reasonably, and the final set of documents had been produced on 02/09/2022 (Validation) and 03/09/2022 (Verification).

In reference to Interim Measures version 6, Para 4.0, although there were no mandatory travel restrictions by authorities (it was still recommended by VVB policies and practices at that time), on-site inspection cannot reasonably be conducted due to the explained above (e.g. plant personnel operating remotely and reluctant to go to the site).

Considering the aforementioned justification of the non-reasonable chance to conduct the onsite inspection, the VVB conducted the remote inspection taking into account the said document Para 4.1.1 (b) that establishes the following:

If the site visit cannot be postponed due to the significant impact of delaying the site visit on VVB and/or project developer due to timeline/commitment as per validation/verification or GS-VERs delivery agreement, VVB may replace mandatory on-site visits with remote audits. The audit may include but is not limited to validation, verification, the inclusion of VPAs, design change review etc.

The PD has executed an ERPA with the buyer which had stipulated a deadline to deliver the GS-VERs by 30/12/2022. Considering the time duration taken for the normal course for approval procedure, this timeline was even at that time very narrow for the delivery of the GS-VERs.

While conducting the remote audit, the VVB had ensured that the requirements outlined in the clause no. 4.2.2 are adequately taken into consideration and applied to the best of the experience of the VVB doing remote inspections at that time.

The VVB assessed all potential risks associated with the project activity and took necessary steps to mitigate these potential risks derived from a remote inspection. Measures taken in this sense were, inter alia:

- Video conference with the plant owner to confirm the baseline, capacity, date of commissioning, breakdowns and functioning.
- The operation of the WTGs was also checked on this video conference.
- Interviews with maintenance staff including confirmation on trainings and topics included in these trainings. Any challenges faced were also discussed during the video conference and interviews with the relevant stakeholders.

Further, and as part of the process to consider the associated risks for the remote inspection, the VVB noted that the project activity is a wind based renewable energy whose monitoring process is relatively simpler with a single GHG monitoring parameter to record. Physical site visit was already conducted by the appointed DOE, RINA Services S.p.A. (RINA) at the time of validation of CPA inclusion in the PoA and remote audit was also conducted by the appointed DOE, TÜV SÜD South Asia Private Limited (TÜV SÜD) at the time of CDM verification of the project for the monitoring period, 31/03/2016 – 30/09/2019. This prompted the VVB to arrive at a conclusion that performing a remote assessment using ICT means and accumulated experience won't compromise the level of assurance.

Furthermore, a FAR (FAR 1) is raised to conduct physical site visit in the next verification in accordance to RULE UPDATE-Applicability of minimum site visit requirements by VVB dated 16/08/2021.

VVB requested GS for the deviation via mail on 07/06/2023 and GS replied on mail to VVB on 01/09/2023 mentioning that the audit for the verification of the Monitoring Period from 01/10/2019 to 30/06/2022 can be accepted as compliant with GS requirements, as long as:

- 1) VVB is able to demonstrate compliance with para 4.2 of the COVID IM.
- 2) A FAR is raised to make the next site visit mandatory

Since VVB conducted remote audit as mentioned in Para 4.2 of COVID IM(also mentioned in earlier paragraphs) and a FAR was raised to make the site visit mandatory for next verification, it complies with GS requirements.

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):

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):

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

The deviation request has been made to accept remote audit for Monitoring Period from 01/10/2019 to 30/06/2022(both days are included), which is the first Performance Review of this project activity. There is no effect on project design, safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect of the project.

3.4 | 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.)*

1. Deviation Request Form
2. VVB Request Mail for Deviation
3. GS Approval Mail against the Deviation

Version number	Release date	Description
5	11.04.2022	Additional information added: - date of listing, design certification, transition - standard version

		<ul style="list-style-type: none"> - 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