



# DEVIATION REQUEST FORM

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PUBLICATION DATE **11.04.2021**

Version **5.0**

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## A. To be completed by Gold Standard

### 1 | Decision

#### 1.1 | Date – 08/11/2023

#### 1.2 | Decision

The deviation request is approved. However, the project developer shall ensure that the submission of design change is done by 30<sup>th</sup> June 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**

### **2| Background information**

>> Cerit 90 MW WPP Project is developed by Pakmem Elektrik Üretim Sanayi ve Ticaret A.Ş (hereafter referred as the project developer) at around Çağlayancerit town in Kahramanmaraş, Turkey. The project is reducing national energy deficit and development of local industries as it allows the use of local sources for energy generation to meet the increasing demands. A 49-year electric power generation license for the proposed wind farm (License No. EÜ/3034-10/1791) was obtained from Energy Market Regulatory Authority (EMRA).

The project was initially planned to have a total capacity of 90 MWe/92.7 MWm with 25 wind turbines (16x3.6 MWm/3.6 MWe + 9x3.9 MWm/3.6 MWe). As per the new regulation, auxiliary power units can be installed provided that electrical installed capacity (MWe) of the main energy source is not exceeded. On 20/05/2022, Energy Market Regulatory Authority (EMRA) approved an amendment in the previous generation license,<sup>1</sup> for addition of an auxiliary solar power generation with total capacity of 69,9997 MWm (13.4289 MWm +56.5708 MWm) to the system and at On January 18, 2023, EMRA allowed a capacity extension with an additional 3 wind turbines that have 7 MWe installed capacity each and a total capacity of 21 MWe. However, during the purchase time there has been a small change in the installed capacity of the 3 turbines as 5.9 MWe installed capacity each and a total capacity of 18 Mwe. The latter amendment is approved to be added to the current license. However, due to the emergency of the state in that particular region due to the earthquake happened in February 2023, the amended license is not acquired yet. Cerit WPP has been allowed to install new wind turbine generators and solar panels as auxiliary power units and a new generation license has been issued as 183.6997 MWm/108 MWe installed capacity<sup>23</sup> while estimated total annual electricity generation has been issued as 432 GWh. The

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<sup>1</sup> [CERİT RES LİSANS \(1\).pdf](#)

<sup>2</sup> [supply and installation cerit 2023\\_compressed \(1\).pdf](#)

<sup>3</sup> [pakmemceritqes.zip](#)

amended generation license will be provided to VVB and GS at the time the license is published.

Deviation Reference Number	DEV_565	
Date of decision	08/11/2023	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	16/10/2023	
Project/PoA/VPA	<input checked="" type="checkbox"/> Project	ID – GS1348
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	CERIT 90 MW WPP	
Date of listing	01/01/2018	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	07/06/2021	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	-	
Date of design certification/inclusion (if applicable)	30/06/2020	
Location of project/PoA/VPA	Host country(ies) -Turkiye	
Scale of the project/PoA/VPA	<input checked="" type="checkbox"/> Microscale <input type="checkbox"/> Small scale <input checked="" type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	<a href="https://platform.sustain-cert.com/public-project/217">https://platform.sustain-cert.com/public-project/217</a>	
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	Design Change Submission Date Extension Request	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	DESIGN CHANGE REQUIREMENTS, Para 2.1.2 footnote (A certified design project requesting to include new technology/measures shall submit the request for approval of design change to Gold Standard within one year of the start date of the proposed technology/measures (design change component). If the developer fails to submit the request for approval within one year, the design change component shall not be eligible for Gold Standard Certification. Refer to Paragraph 4.1.49(c), Principles and requirements.	

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 <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 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:

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

CERIT WPP is operational since 19/10/2018 and have been registered as GS and completed several issuances already. Project is located within the boundaries of Kahramanmaraş Province of Turkey, which is the center of major earthquakes that struck Turkey in 6<sup>th</sup> of February 2023.

Project has been granted provisional permission to increase capacity from 90 MWe to 108 MWe via additional wind turbines and solar panels. Company has initiated procedures to acquire amended generation license, permissions and meantime has signed agreement for turbines in December 2022 which is identified as project start date.

However, due to the devastating earthquake in Maraş in February 2023 ( <https://reliefweb.int/report/turkiye/kahramanmaras-earthquakes-turkiye-and-syria-31-may-2023> ) , permissions and installation have been delayed since many institutions including government agencies have not recovered yet.

Although, VVB has been contracted and the site visit has been conducted in (09/10/2023), most of the documentation and permissions requested by the VVB are not available yet. Therefore, we request additional time until end of 2024 for submission of design change documents to GS/SC.

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

The VVB has conducted an onsite audit as stated above.

As per the Presidential Decision No. 6785 of February 8, 2023 *“According to Article 119 of the Constitution and subparagraph (a) of the first paragraph of Article 3 of the Extraordinary State Law No. 2935, at 01.00 on Wednesday, 8/2/2023 in the provinces of Adana, Adiyaman, Diyarbakır, Gaziantep, Hatay, **Kahramanmaraş**, Kilis, Malatya, Osmaniye and Şanlıurfa. It was decided to declare a state of emergency for three months starting from February 8, 2023<sup>4</sup>”.*

VVB has verified the amendments made in the Generation License of the Project Activity dated 19/01/2011, License No. EU/3034-10/1791. It has been confirmed that the Project Activity has received approval on 20/05/2022 from the Energy Market Regulatory Authority (EMRA) for addition of an auxiliary solar power generation with total capacity of 69.9997 MWm (13.4289 MWm +56.5708 MWm) to the system and on 18<sup>th</sup> January 2023, EMRA approved a capacity extension of the Project Activity with an additional 3 wind turbines having 7 MWe capacity each.

VVB has also verified the Supply and Installation Agreement signed between the PP and the Contractor for Wind Turbines dated 21/12/2022. The Proforma Invoices for the construction of the Solar Power Plant were also verified by the VVB. It was observed onsite that the implementation of the Project Design Change could not occur due to “State of Emergency” situation in Turkey and commissioning of the solar panels and wind turbines could not be received by the PP in due timeline and is expected to be received by May 2024. Therefore, the PP is seeking a deviation for the submission of the Project Activity in 2024 which was initially anticipated to be on December 2023.

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<sup>4</sup> <https://perma.cc/D8F2-AWK8>

**3.2 | Assessment of the deviation:**

3.2.1 | Deviation assessment (to be completed by Project developer):

Design change requirements specifies submission of request within one year of start date. However, due to the earthquake disaster, public agencies have also been affected and prioritized vital services needed for recovery. As this is a force majeure event, it will take at least several months for recovery of public services in the region.

As this is beyond the control of project owner and since the VVB needs to validate design change documents, additional time is needed to comply with GS requirements.

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

The VVB opinion has been provided in Section 3.1.2 above.

**3.3 | Impact of the deviation:**

3.3.1 | Impact assessment (to be completed by Project developer):

Project is not expected to have any impact on SDG, safeguarding etc. Finalization of permissions and assessments will enable better analysis of SDGs.

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

The VVB opinion has been provided in Section 3.1.2 above.

**3.4 | Documents:**

Version number	Release date	Description
5	11.04.2022	Additional information added: <ul style="list-style-type: none"> <li>- date of listing, design certification, transition</li> <li>- standard version</li> <li>- specific reference to a requirement deviated from</li> <li>- any previous deviations/design changes approved</li> </ul>

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