



DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – dd/mm/yyyy

1.2 | Decision

The deviation request is not approved.

The PD shall comply with section 3.1 of the Site Visit and Remote Audit Requirements and Procedures – V2.0.

Additionally, PD shall be informed that as per Validation and Verification Standard v1.0, §9.1.1, “The VVB shall conduct a thorough and independent assessment of the implementation and the reported emission reductions, SDG Impacts, stakeholder comments/feedback, if any and other monitored information e.g., safeguarding assessment by a design certified project against the applicable GS4GG rules and requirements”. Therefore, it is not possible for a VVB to conduct a verification activity covering a monitoring period in the future.

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_571	
Date of decision	10/11/2023	
Precedent (YES/NO)	No	
Precedent details	N/A	
Date of submission	09/11/2023	
Project/PoA/VPA	Project	ID – GS7737
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	PARQUE DE LOS LLANOS UMBRELLA PROJECT	
Date of listing	January 2020	
GS Standard version applicable	1.2	
Date of transition to GS4GG (if applicable)	n/a	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	n/a	
Date of design certification/inclusion (if applicable)	October 2020	
Location of project/PoA/VPA	Argentina	
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/2582	
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 of site visit requirements	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Site Visit and Remote Audit Requirements and Procedures – V2.0, item 3.1 (Frequency of physical site visits)	
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/12/2020	End date 22/02/2024
Submitted by	Contact person name: Julieta Pereyra	
	Email ID: julieta.pereyra@efe-sa.com.ar	
	Organisation: Empresa Federal de Energia S.A.	
	Project participant: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Validation and Verification body (VVB opinion shall be included,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

where required by the applicable rules/requirements or request is submitted by the VVB).	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:

**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):

The project developer is hereby requesting a Deviation to Gold Standard outside certification review process –PD is submitting this deviation during the monitoring period.

The project is currently starting a new MRV and issuance cycle, with data collection and monitoring report preparation. The crediting period for this Project is from 23/02/2019 to 22/02/2024. The monitoring period would involve from 01/12/2020 up to 22/02/2024 (both days included), in order to encompass from the last verification until the end of the crediting period.

According to the current valid version (2) of the site visit procedure (https://globalgoals.goldstandard.org/112_par_site-visit-and-remote-audit-requirements-and-procedures/):

MINIMUM PHYSICAL SITE VISIT REQUIREMENTS

A. Project Activities

3.1 | Frequency of physical site visits

3.1.1 | At minimum, the VVB shall conduct physical site visit within two years of project start date; and

3.1.2 | Once within every three years after the first physical site visit date

At present, the project had already gone through two site visits, both remotely, on 07/07/2020 (Validation) and on 11/12/2020 (Verification). Physical on-site assessments were not conducted as part of the audit activities because of COVID-19 pandemic and restrictions of mobility in both Brazil and Argentina. The Verification report (pg5) mentions that “an exemption analysis has been carried out in accordance with GS Interim Measures requirement and are available upon request”.

Virtual site visits were conducted in both dates, including interviews with project representatives, presentation of evidence and calculations, a live video tour of the area (guided by the audit team in real time) and pictures were provided, enabling conditions to verify the implementation of the project and the monitoring system / procedures.

Therefore, considering the last site visit date of 11/12/2020 and following the minimum site visit requirements (item 3.1.2), the deadline for a physical site visit would be 11/12/2023.

However, the project developer seeks a deviation in order to be able to postpone the physical site visit date by 3 months only (until 11/03/2024 maximum date), in order to allow a more comprehensive evaluation of the conditions on site for both processes (verification and renewal), ensuring cost-effectiveness and optimal use of time, while guaranteeing the same level of conservativeness.

As backup measure, if the postponement of the site visit is not an option, the project developer would like to confirm that in case a site visit before 11/12/2023 have to be made:

- 1) The project would be able to include the full period (i.e. 01/12/2020 - 22/02/2024) under the scope of the verification without the need of another physical site visit.
- 2) The project would be able to perform the renewal of the crediting period without the need of another physical site visit.

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.*

N/A

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):

By postponing the physical site visits in 3 months only, we understand the project complies with the requirements and maintains its level of accuracy, completeness, and conservativeness. The project is the operation of a solar power plant exporting electricity to the grid. A 3-month period does not represent a significant difference from the regular period.

The project developer ensures that, with the acceptance of the deviation request hereby proposed, the GSVERs will not be overestimated, the SDG contributions that the project is designed to achieve will still be in line with GS4GG requirements and will not be compromised, the project will still be in line with Safeguarding principles and requirements of GS4GG, and the project will not be in conflict with host country regulations.

Also, involving a verification and a renewal of crediting period together in the same physical site visit would allow the auditor to broaden the scope of the site visit and physical checks without jeopardizing any main aspect of the project.

The project developer would like to clarify that the expected total installed capacity (30MW) was used to define this project as "large scale". However, the third phase of the construction of the project (PLPPP III, with 10 MW) did not start yet. The explanation for this is the problematic economic situation of the host country, making the project developer extra cautious in confirming financial decisions. The yearly

inflation rate in the country of more than 40% in 2020 has been steadily increasing, reaching almost 140% this year (2023). Also, current country import severe restrictions leaves EFESA in a very difficult situation for making payments to foreign suppliers (including payment for equipment and services such as VVB fees, GS fees, SustainCert fees, etc.).

Therefore, due to the nature of the grid emission factor and electricity output involved, and due to the project real installed capacity (20MW), the amount of GSVERs monitored during the first monitoring period was, on average for the entire period, approximately 41 tCO₂e/day. By using the same number to project the new monitoring period, we would have the following scenario:

Dates		# Days	Total tCO ₂ e
Monitoring period start date	01/12/2020	-	-
Site visit due date	11/12/2023	1106	45699
Monitoring period end date	22/02/2024	1179	48715
Difference		73	3016

As can be seen above, by postponing the site visit due date from 11/12/2023 to 11/03/2024, it would be allowed the inclusion of only 73 days in the monitoring period, resulting in the increase of around 3000 GSVERs. Even with this inclusion, the monitoring period would involve a total of around 50000 GSVERs. Considering current market values for GSVERs prices for a renewable energy project, VVB costs, travel costs and issuance costs, the cost-effectiveness of the whole process is far then ideal from the project developer perspective.

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.*

N/A

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):

There is no impact in project design, safeguarding principles, SDG, emissions reductions, monitoring frequency, data quality, potential risk, or any other relevant aspect of the project. The project would be merely postponing a physical site visit by 3 months.

The project developer would like to clarify that no major maintenance or QA/QC measures are expected during this 3-month period, with the monitoring system and procedures remaining unchanged.

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.*

N/A

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.)*

Only official rules and regulations of Gold Standard, and public documents available in the Certification Documents section from the project website, were used in this deviation request.

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