



# 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

13/02/2024

#### 1.2 | Decision

The Deviation is not Approved.

The design certification renewal request must be submitted within 6 months from the date of transition review completion or before the end date of year 14 year under CDM crediting cycle, whichever is earlier (RULE CLARIFICATION- DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG Ref: Scenario 2b. Project is in the last 4 years of CDM crediting period).

Hence the design certification renewal has to be submitted before 29 October 2022 for GS5860 which is earliest date to claim the VERs for the renewed period from 29/10/2022 to 28/10/2023. The delay was not due to any extraordinary circumstances or force majeure. PD may proceed for design renewal but since the delayed period for renewal is already 1 year, it shall mean that no Certified Impact Statements shall be issued for the period of delay.

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

NO



**TEMPLATE - DEVIATION REQUEST FORM V4.0**

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_599	
Date of decision	13/02/2024	
Precedent (YES/NO)	NO	
Precedent details	NA	
Date of submission	28/12/2023	
Project/PoA/VPA	Project	ID – GS5860
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Baragran Hydro Electric Project, 3.0 MW (being expanded to 4.9 MW)	
Date of listing	N/A	
GS Standard version applicable	GS4GG Version: GS4GG Principles and Requirements 1.2 GS4GG Activity Requirements: RE Activity Requirements 1.4	
Date of transition to GS4GG (if applicable)	10/08/2022	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	14/02/2018	
Date of design certification/inclusion (if applicable)	14/02/2018	
Location of project/PoA/VPA	India	
Scale of the project/PoA/VPA	<input type="checkbox"/> Microscale <input checked="" type="checkbox"/> Small scale <input type="checkbox"/> Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	<a href="https://registry.goldstandard.org/projects/details/1027">https://registry.goldstandard.org/projects/details/1027</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	A Deviation form for the delay in the design certification renewal	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Clause 2.1.3 of the rule update ELIGIBLE CREDITING PERIOD FOR PROJECTS TRANSITIONING TO GS4GG OR SEEKING LABELLING UNDER GS4GG (RU 2020 PR – GHG V1.2)  Clause no 10.6.1 of GHG EMISSIONS REDUCTION &	

	SEQUESTRATION PRODUCT REQUIREMENTS V 2.0
Specify the monitoring period for which the request is valid (if applicable)	Start date 01/01/2021      End date 28/10/2023
Submitted by	Contact person name: PAWAN KUMAR KOHLI
	Email ID: <a href="mailto:kkkhpl@kkkhydropower.com">kkkhpl@kkkhydropower.com</a>
	Organisation: KKK Hydro Power 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 type="checkbox"/> No <input checked="" 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):

The GS Registration date of the subject project activity is on 14/02/2018 with the 2<sup>nd</sup> crediting period of the project activity being considered from 29/10/2015 to 28/10/2022 (renewable twice) in line with clause no. 10.2.3 of GHG EMISSIONS REDUCTION & SEQUESTRATION PRODUCT REQUIREMENTS V2.2. This duration aligns with the Transition Review document, duly approved by GS.

However, During the recent performance review the comments received from GS, pointed to clause 2.1.3 of the rule update ELIGIBLE CREDITING PERIOD FOR PROJECTS TRANSITIONING TO GS4GG OR SEEKING LABELLING UNDER GS4GG (RU 2020 PR – GHG V1.2) dated 13/05/2020, stating the total period of GS project activity 15 years and since the PP has already claimed first 7 years in CDM, it can claim rest 5 years in GS followed by an RCP to complete the crediting period cycle.

However as per the Clause no 10.6.1 of GHG EMISSIONS REDUCTION & SEQUESTRATION PRODUCT REQUIREMENTS V 2.0 which was valid during the time of transition i.e. 01/04/2021, states that " *CDM Project seeking labeling of issued CERs (GSCERs) shall mirror the CDM crediting period renewal cycle for Certification Renewals (e.g. 7 years)* " The PP, aims to adhere to clause 10.6.1 of GHG EMISSIONS REDUCTION & SEQUESTRATION PRODUCT REQUIREMENTS V 2.2, opting to mirror the 7-year CDM crediting period cycle with GS. Consequently, the PP intends to proceed with an RCP for the remaining period from 29/10/2022 to 28/10/2023. The PP was unaware of the 5-year crediting period requirement under GS, and no notification mail from Gold Standard was received to comply with it. This has been noticed during the discussion with VVB in ongoing verification of the project activity and the PP then requested the renewal and the validation for the RCP is currently underway.

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

Not Applicable

### **3.2 | Assessment of the deviation:**

The deviation does not attract any kind of risk to environmental integrity and all the SDG contributions are achieved in line with the registered PDD.

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

KKK Hydro Power Limited owns the subject project activity. The project was initially registered with CDM with 1<sup>st</sup> CP being from 29/10/2008 to 28/10/2015 (eq. 7 years) and the 2<sup>nd</sup> CP being from 29/10/2015 to 29/10/2022 (eq. 7 years), the project was then registered with GS on 14/02/2018 with the same crediting period of 29/10/2015 to 28/10/2022 and thereafter the project has been conducting the periodic verification under GS from the year 2018.

During ongoing verification, it was noted that a requirement in clause 10.6.1 of GHG EMISSIONS REDUCTION & SEQUESTRATION PRODUCT REQUIREMENTS V 2.2 was updated to synchronize the crediting periods of both CDM and GS.

The client, unaware of this requirement, sought clarification from the project developer, and the recent performance review comments received from the GS prompted the Project Proponent to initiate the RCP under GS. The PP then initiated

the renewal of the CP for the remaining year left under the GS Crediting period and appointed a VVB for revalidation and renewal of the crediting period.

Since the project owner was serious about the renewal of the crediting period a commitment to the renewal and timely adherence to GS guidelines, the project owner requests the GS to permit the renewal date to align with the first day after the end of the current certification cycle. This request aims to mirror the CDM Issuance cycle, given the identical crediting periods in CDM and GS. This alignment would enable the labeling of CERs issued by GS for the complete crediting period. The proposed GS crediting period cycle is from 29/10/2015 to 28/10/2022. The project owner seeks approval for GS labeling from 01/01/2020 onwards, without incurring any loss of GS labeled credits due to delays in GS RCP submission.

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

Not Applicable

### 3.3 | Impact of the deviation:

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

The above deviation will not cause any impact on the data quality or attract any potential risk on GS related to any issuance or any other material impact affecting the quality of the project and thus no potential risk is attributed to GS Project activity in particular.

The deviation requested adheres to the Principles and Requirements set forth by GS4GG and complies with:

- **Environmental Integrity**- The GS-CERs generated from the project activity are not overestimated as a result of deviation and conservativeness is ensured.
- **Contribution to Sustainable Development Goals**- SDG contributions that the project is designed to achieve are in line with GS4GG requirements and the above deviation does not have any potential impact upon the certified SDGs claimed during the current crediting period.
- **Safeguarding Principles and requirements**- The deviation does not create any impact upon the safeguarding principles and requirements set forth by GS4GG
- **Compliance with Host Country Regulations**- The project does not create any conflict with Host Country regulations and all the host country regulations are followed.

It is to be noted that the last GS verification audit for the monitoring period from 01/2021 to 31/12/2021 was conducted and the GS verification final documents are submitted to GS for review purposes. There is no any monitoring data gap for the project activity and monitoring is done as per the registered monitoring plan. Thus, deviations does not have any impact on the quality of the project, and all Principles and Requirements set forth by GS4GG are followed by project activity.

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

Not Applicable

**3.4 | Documents:**

Not Applicable

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