



# 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 – dd/mm/yyyy**

21/07/2024

#### **1.2 | Decision**

The Deviation Request is Not Approved.

In line with Scenario 1.b of RC-2023: The design certification renewal request shall be submitted within 6 months from the date of transition review completion or before the end date of year 7 under CDM crediting cycle, whichever is earlier. Transition review was approved on 27/02/2023, which is earlier to the end date of year 7 under CDM crediting cycle. Design renewal request has been submitted on 06/02/2024. Hence the delay as per p.5.1.46 shall be applicable and no credits can be claimed until 06/02/2024.

The Project activity has been deregistered from Verra and the reference to the same is not valid since the transition stream followed is from CDM. Hence the FAR 4 raise during design review will remain and crediting period shall be limited to 10 years.

#### **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_715	
Date of decision	21/07/2024	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	31/05/2024	
Project/PoA/VPA	<input type="checkbox"/> Project	ID - GS5064
	<input type="checkbox"/> PoA	ID - GSXXXX
	<input type="checkbox"/> VPA	ID - GSXXXX
Project/PoA/VPA title	GS 5064: 15 MW Wind Power Project by RSPL Ltd (EKIESL-CDM-May-16-04)	
Date of listing	16/09/2017	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	27/02/2023 (GSCER to GSVER)	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N.A.	
Date of design certification/inclusion (if applicable)	01/01/2018	
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/897">https://registry.goldstandard.org/projects/details/897</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	Deviation Requested against FAR#4, raised in Design Certification closure of the project activity to extend the total crediting period to 15 years as well as allow to claim GS Impact Certifications for the entire 2 <sup>nd</sup> Crediting Period in GSVER stream without any losses of claimable crediting period.	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Para 1b Stated at the Page 4 of the RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG dated 02/06/2023 ( <a href="https://globalgoals.goldstandard.org/standards/R">https://globalgoals.goldstandard.org/standards/R</a>	

	<a href="#">C-2023-Design-certification-renewal-requirements-CDM-projects-transitioning-to-GS4GG.pdf</a> )
Specify the monitoring period for which the request is valid (if applicable)	Start date: 01/06/2019      End date: 10/12/2020
Submitted by	Contact person name: Abhishek Anjan
	Email ID: <a href="mailto:abhishek.anjan@enkingint.org">abhishek.anjan@enkingint.org</a>
	Organisation: EKI Energy Services 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 Design Certification Renewal of the project activity GS 5064 was approved on 23/05/2024, in which FAR 4 was stated as "As per deviation DEV\_511 (not approved), in line with the requirements of para 5.1.46 of principle and requirements, no issuance can be claimed for a period of delay in design certification renewal. Also, the total crediting period is limited to 10 ".

Since the 10 years crediting period as stated on the VERRA webpage of the project ID 1692 (<https://registry.verra.org/app/projectDetail/VCS/1692> ) is a renewable crediting period and not a fixed one , thus the Project Developer is requesting GS to please allow the applicable Crediting Period of the project activity to be of 15 years under GSVER stream.

According to the Para 1b Stated at the Page 4 of the RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG dated 02/06/2023, if a Project is in the last 2 years of CDM crediting period at the time of first submission to GS4GG (Preliminary review), The clause for delay in submission of renewal request beyond the end of year 7 of crediting period as mandated by the Principles and Requirements shall apply to any delay.

Since the crediting period of the project activity is 25/04/2017 to 24/04/2024 under CDM mechanism with project ID – 10363 (<https://cdm.unfccc.int/Projects/DB/Applus1492530362.26/view> ) and the transition review for the project activity was approved on 27/02/2023, thus the project was in the last 2 years of the 1<sup>st</sup> crediting period under CDM at the time of requesting the

transition review. Also, if we consider the 1<sup>st</sup> crediting period as per VERRA mechanism with project ID – 1692 as 11/12/2015 to 10/12/2025, even then the project activity was in the last 2 years of the 1<sup>st</sup> crediting period under the VERRA mechanism as well at the time of requesting the transition review. Thus, clause for delay in submission of renewal request beyond the end of year 7 of crediting period as mandated by the para 1b in RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG dated 02/06/2023 shall apply to this project activity. As the GS submission for the Renewal of crediting period was done for the project activity on 06/02/2024 which is within the 1<sup>st</sup> crediting period expiry date in both CDM as well as the VERRA mechanism. Hence, the Project Developer is requesting to allow claim of GS Impact Certifications for the entire second crediting period without any lossless as well as the entire length of Crediting Period under GSVER stream to be of 15 years instead of 10 years as per the FAR raised which does not seem valid enough as per GS4GG rules and requirements.

3.1.2 | VVB opinion (to be completed by VVB, if applicable): Not Applicable

### 3.2 | Assessment of the deviation:

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

The Design Certification of the project activity was approved on 23/05/2024, in which FAR 4 was stated as “As per deviation DEV\_511 (not approved), in line with the requirements of para 5.1.46 of principle and requirements, no issuance can be claimed for a period of delay in design certification renewal. Also, the total crediting period is limited to 10 “.

Also, the para 5.1.46 of the principle and requirements clearly mentions “Delay in the completion of re-validation beyond the last date of current certification cycle shall result in a reduction of any issuance of Certified Products and/or Impact Statements available during following certification cycle (for example, a delay of 1 year beyond the first cycle shall mean that no Certified Impact Statements shall be issued for the period of delay).”

Since the 10 years crediting period as stated on the VERRA webpage of the project ID 1692 (<https://registry.verra.org/app/projectDetail/VCS/1692> ) is a renewable crediting period and not a fixed one , and hence the crediting period under VERRA mechanism will be as written accordingly in Section 1.6 of the registered VCS PD that “ The project crediting period shall be a maximum of ten years which will be renewed at most twice. “ clearly indicates the validity of crediting period under the VERRA mechanism as stated below–

1<sup>st</sup> crediting period - 11/12/2015 to 10/12/2025  
2<sup>nd</sup> crediting period - 11/12/2025 to 10/12/2035  
3<sup>rd</sup> crediting period - 11/12/2035 to 10/12/2045

Thus, the Project Developer is requesting GS to please extend the Crediting Period of the project activity to 15 years under GS4GG in GSVER stream.

Thus, the Project Developer is requesting to allow for Crediting Period of the Project under GS4GG as described below –

1<sup>st</sup> crediting period - 11/12/2015 to 10/12/2020  
2<sup>nd</sup> crediting period - 11/12/2020 to 10/12/2025

3<sup>rd</sup> crediting period - 11/12/2025 to 10/12/2030

According to the Para 1b Stated at the Page 4 of the RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG dated 02/06/2023, if a Project is in the last 2 years of CDM crediting period at the time of first submission to GS4GG (Preliminary review), The clause for delay in submission of renewal request beyond the end of year 7 of crediting period as mandated by the Principles and Requirements shall apply to any delay.

Since the crediting period of the project activity is 25/04/2017 to 24/04/2024 under CDM mechanism with project ID – 10363 (<https://cdm.unfccc.int/Projects/DB/Applus1492530362.26/view> ) and the transition review for the project activity was approved on 27/02/2023, thus the project was in the last 2 years of the 1<sup>st</sup> crediting period under CDM at the time of requesting the transition review. Also, if we consider the 1<sup>st</sup> crediting period of the VERRA mechanism with project ID – 1692 as 11/12/2015 to 10/12/2025, even then the project activity was in the last 2 years of the 1<sup>st</sup> crediting period under the VERRA mechanism as well at the time of requesting the transition review. Thus, clause for delay in submission of renewal request beyond the end of year 7 of crediting period as mandated by the Principles and Requirements shall apply to any delay. Hence, the Project Developer is requesting to allow GS Impact certifications for the entire 2<sup>nd</sup> Crediting Period in GSVER stream without any loss of claimable crediting period.

It is also to be noted that the requirement for the revision of the crediting period was raised at the time of the transition review of the project activity in which FAR#3 was stated as “Transition project, PoA/CPAs shall follow GS4GG certification cycle for crediting period renewal (e.g. 5 years) in order to issue or convert issued emission reductions to GSVERs under GS4GG. The start date of crediting period for transition project or CPA remains unchanged and shall be the date as registered with other standard. Thus, GS VER CP1 ends on 10/12/2020 considering VCU issued from 11/12/2015. PD shall contract VVB for re validation as per GS-CDM mirrored CP and the total crediting period is limited as 10 years.” Accordingly, the VVB was contracted for the renewal of crediting period for this project activity and accordingly the GS submission was done for the same on 06/02/2024.

Thus, clause for delay in submission of renewal request beyond the end of year 7 of crediting period as mandated by para 1b in the RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG dated 02/06/2023 shall apply to this project activity. As the GS submission for the Renewal of crediting period was done for the project activity on 06/02/2024 which is within the 1<sup>st</sup> crediting period expiry date in both CDM as well as the VERRA mechanism (CDM CP1 end date 24/04/2024 and VCS is 10/12/2025 renewable twice). Hence, the Project Developer is requesting for allowing for verification under the 2<sup>nd</sup> Crediting in GS4GG period without the loss of claimable crediting period.

Also, since the project is already transitioned into GSVER stream, hence the total length of Crediting Period should be of 15 years i.e.

1<sup>st</sup> crediting period - 11/12/2015 to 10/12/2020

2<sup>nd</sup> crediting period - 11/12/2020 to 10/12/2025

3<sup>rd</sup> crediting period - 11/12/2025 to 10/12/2030

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 upon 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 any 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 GSVER’s generated from the project activity are not Over-estimated as a result of deviation and conservativeness are 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 SDG’s claimed during the current monitoring 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.

Thus, Kind request to allow PP to claim the credits for complete monitoring period without loss of any credits.

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

Not Applicable

**3.4 | Documents:**

Not Applicable, if required, the PP can submit any kind of supporting sought by the GS.

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