



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

08/08/2024

1.2 | Decision

The Deviation Request is Not Approved.

PD has not provided any reason or extraordinary situations for the delay in submission of design renewal. As per the requirements of paragraph 5.1.46 of GS4GG P&R v1.2, no issuance can be claimed for a period of delay in design certification renewal starting from 10/06/2023 until the submission of VVB opinion on design renewal to GS.

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_744	
Date of decision	08/08/2024	
Precedent (YES/NO)	NO	
Precedent details	NA	
Date of submission	14/06/2024	
Project/PoA/VPA	<input type="checkbox"/> Project	ID – GS7535
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	GS7535 10MW Solar Power Project (EnvironmentFirst-213)	
Date of listing	08/03/2019	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	09/12/2022 (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)	08/07/2021	
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	https://registry.goldstandard.org/projects/details/1980	
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 to claim GS Impact Certifications for the entire 2 nd Crediting Period in GSVER stream without any losses of claimable crediting period.	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Scenario 1b Stated at the Page 4 of the RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG dated 02/06/2023 (https://globalgoals.goldstandard.org/standards/RC-2023-Design-certification-renewal-requirements-CDM-projects-transitioning-to-GS4GG.pdf)	

Specify the monitoring period for which the request is valid (if applicable)	Start date: _____ End date: _____
Submitted by	Contact person name: Bhaskar Dutta
	Email ID: bhaskar.dutta@enkingint.org
	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):

According to the Scenario 1b Stated at the Page 4 of the RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG (<https://globalgoals.goldstandard.org/standards/RC-2023-Design-certification-renewal-requirements-CDM-projects-transitioning-to-GS4GG.pdf>) dated 02/06/2023, if a project is/was is in the last 2 years of CDM crediting period at the time of first submission to GS4GG then 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.

The Project Activity GS 7535 completed its transition from GS-CER to GS-VER on 09/12/2022. Since the crediting period under CDM mechanism of the Project with reference ID – 10238 (<https://cdm.unfccc.int/Projects/DB/Applus1451318295.42/view>) is from 31/01/2016 to 30/01/2023 so the project activity currently falls under the scenario 1.b as per the RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG. The crediting period under the GS-VER scheme approved after transition is from 31/01/2016 to 30/01/2021. Also, as per the transition date of 09/12/2022, the project had to do the Design certification renewal till 6 months from the transition approval date or before the end date of year 7 under CDM crediting cycle, whichever is earlier.

Since the Project Developer submitted the final submission documents for design certification renewal to sustain-cert on 05/02/2024 and the delay is due to the delay in asset transfer of the project activity from M/s Jakson Power Private Limited to M/s Terralight Kanji Solar Private Limited on 01/08/2022 and thus due to some unavoidable circumstances the Crediting Period Renewal Process was not initiated on time Thus, the project developer is seeking deviation for the same as the project developer was serious about revenue from GS Impact Certifications and the project developer has

proactively taken steps for the design certification renewal of the project activity which was submitted to GS on 05/02/2024.

Since the end date of CDM crediting period is 30/01/2023, Thus as per scenario 1.b-clause - 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 design certification renewal for the 2nd crediting period from 31/01/2021 to 30/01/2026 is already approved for which the GS submission for the renewal of crediting period (RCP) was done on 05/02/2024.

Kind request to approve this deviation of exemption of loss of claimable period and conduct the GS verifications of retroactive period without loss of claimable period as the GS submission for RCP which is already done on 05/02/2024.

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

3.2 | Assessment of the deviation:

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

Since the Project activity has already submitted the request for design certification approval to GS on 05/02/2024 which was also approved recently. So, According to the Scenario 1b Stated at the Page 4 of the RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG (<https://globalgoals.goldstandard.org/standards/RC-2023-Design-certification-renewal-requirements-CDM-projects-transitioning-to-GS4GG.pdf>) dated 02/06/2023, if a project is/was is in the last 2 years of CDM crediting period at the time of first submission to GS4GG then 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.

It to be noted that the project activity recently got the closure of design certification renewal review on 16/05/2024 for the crediting period 31/01/2021 to 30/01/2026. Also, the Project developer regularly did Annual Reporting for the Project activity on regular basis, the last Annual Report was uploaded on sustain-cert on 21/12/2023. Hence the project developer was always serious about GS-Impact Certifications.

Since the revenue from the GS Impact certifications are very essential for the survival of the project activity and rejection of the deviation will lead to a huge financial loss to the project developer for the monitoring period from 31/01/2021 to 05/02/2024 which will tentatively lead to a loss of 54,298 GS-VERs. This is a very huge loss and it may lead to very serious implications in the current business scenario and sustaining the project activity.

The Project activity has already completed its transition from GS-CER to GS-VER on 09/12/2022. So, the project activity completed its transition process well before the end of year 7 of the CDM crediting period. Since the project developer has proactively done the transition form GS-CER to GS-VER, the project developer is serious about revenue from GS Impact Certifications and thus no loss of credits shall be applied while executing for the subsequent verification of the project activity. The asset transfer of the project activity was from M/s Jakson Power Private Limited to M/s Terralight Kanji Solar Private Limited was done on 01/08/2022 which also lead to significant delay in the design certification renewal of the project activity which was submitted to GS on 05/02/2024.

Thus, GS is requested to to approve this deviation for exemption of loss of claimable period and conduct the GS verifications of retroactive period without loss of claimable period under the GS-VER scheme as per option 1(b) of the subject guidelines, as the GS submission for Renewal of Crediting period is done already done on 05/02/2024.

3.2.2 | VVB opinion (to be completed by VVB, if 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"> - date of listing, design certification, transition - standard version - specific reference to a requirement deviated from - any previous deviations/design changes approved Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption