



TEMPLATE

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

27/10/2024

1.2 | Decision

The Deviation Request is Approved.

The challenges faced by PD in receiving responses from ERM, and communication issues were taken into consideration, which were beyond the control of the PD. In case of the VVB ERM not getting re-approval, PD shall contract another approved VVB. In order to maintain the project's compliance with GS timelines, PD shall note that the verification process shall be completed by 31 March 2025, with no further extension.

The project developer shall note that the decision is based on the information provided in the deviation request form and only against the applicable standard requirement quoted in the form below by the developer. The project developer shall comply with all other applicable standard requirements until unless specifically mentioned in the deviation decision.

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_795	
Date of decision	27/10/2024	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	03/09/2024	
Project/PoA/VPA	<input type="checkbox"/> Project	ID – GS3556
	<input type="checkbox"/> PoA	ID – GSXXXX
	<input type="checkbox"/> VPA	ID – GSXXXX
Project/PoA/VPA title	Panasolar Photovoltaic Project	
Date of listing	June 01, 2018	
GS Standard version applicable	V2.2 CASH	
Date of transition to GS4GG (if applicable)		
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)		
Date of design certification/inclusion (if applicable)	03/11/2019	
Location of project/PoA/VPA	Panama	
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/1340	
Status of the project/PoA/VPA	<input type="checkbox"/> New <input type="checkbox"/> Listed <input checked="" type="checkbox"/> Certified design <input type="checkbox"/> Certified project	
Title/subject of deviation	Verification Frequency Deviations due to substantial delays with project activity registration under Gold Standard	

<p>Specify applicable rule/requirements/methodology, with exact paragraph reference and version number</p>	<p>PRINCIPLES & REQUIREMENTS Version 1.2 5. PROJECT CYCLE (c) VERIFICATION & PERFORMANCE REVIEW (PERFORMANCE CERTIFICATION)</p> <p>5.1.29 Verification must occur at least once during the five-year Certification cycle with the first Verification completed within two years of project Implementation Date or Design Certification, whichever is later. The Project implementation date is defined as the date at which physical activity first becomes operational, for example, the commencement of energy generation or start of distribution of household technology.</p>
<p>Specify the monitoring period for which the request is valid (if applicable)</p>	<p>Start date 05/14/2019 End date 12/31/2023</p>
<p>Submitted by</p>	<p>Contact person name: Enrico Desiata</p> <p>Email ID: enrico.desiata@gmail.com</p> <p>Organization: Panasolar Generation</p> <p>Project participant: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>If yes; VVB name: APPLUS+ Certification (LGAI Technological Center, S.A.)</p> <p>VVB Staff name(s): Raul Gonzalez Mitre</p>
<p>Any previous deviations approved for the same project activity/PoA/VPA(s)?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>

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):

We request that the process of verification of the Panasolar Photovoltaic Project (GS ID 3556) be accepted even though the timeframe has passed the 2 years since the date of the Design Certificate.

The project activity was not able to begin a verification because it took a considerable amount of time to reach the "Gold Standard Certified Project Design Status" (10/16/2023).

There three main reasons for the delay in reaching this status are as follows" (all three beyond our control):

- COVID-19 Pandemic
- Inability to locate the Account Manager of "ERM - Certification and Verification Services"
- Lack of responses from Sustaincert and Gold Standard

ERM initially claimed, without any contractual basis, that the last verification was out of scope because more time had passed than expected to conclude the process, subsequently an additional fee was negotiated to close the process, a fee that was paid. Once the process was resumed, Jonathan Avis, Panasolar's account manager at ERM, did not respond to our requests, until we had to involve Melanie Eddis, Partner – Climate Change in ERM.

Thanks to her intervention, the process was able to move forward until Mr. Avis resigned from ERM and she was the only one who could take the case forward. After a long wait, ERM was able to reactivate the working relationship with Mr. Avis on a contractual basis to complete the project and ERM assigned us Amanda Russell.

Once the process was concluded with ERM, the project proponent encountered very big difficulties with Sustain-Cert and we spent eight months trying to get a response from them. Once work was resumed the projects was certified a verifier has assigned a few months later.

Filename: **PG-EXT-10-2024-**

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.*

.....

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):

a) From PRINCIPLES & REQUIREMENTS, Version 1.2 we couldn't complete the following rule:

5. PROJECT CYCLE

(c) VERIFICATION & PERFORMANCE REVIEW (PERFORMANCE CERTIFICATION)

5.1.29 Verification must occur at least once during the five-year Certification cycle with the first Verification completed within two years of project Implementation Date or Design Certification, whichever is later. The Project implementation date is defined as the date at which physical activity first becomes operational, for example, the commencement of energy generation or start of distribution of household technology.

Project additionality, prior consideration and emission reductions have not been affected by the delays incurred. The project activity has operated as described in the GS Passport and PD with the only difference being that the timeframes for start of project verification and VCU issuance have been affected by delays on the Design registration procedures.

As mentioned before, COVID-19 Pandemic, Inability to locate the Account Manager of "ERM - Certification and Verification Services" and Lack of responses from Sustaincert and Gold Standard, GS4GG verification processes has made it impossible to execute a site visit, and therefore the frequency of on-site visits has been affected.

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.*

.....

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):

Without the deviation request being approved, the project activity will not be able to generate offsets that are needed to cover the purchase of energy from other generators, either in the spot market or through prearranged contacts with other generators with firm power (normally hydroelectric power plants), called Reserve Contracts to provide the client 24 hours of energy. In addition to this, the project activity continued to fund several social programs despite the financial duress endured due to the restrictions and difficulties that are inherent for solar projects in Panama. because of late designed certification registry issues and COVID

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.*

.....

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.)*

- PG-EXT-10-2024
- 2017.09.10-Fwd_ Panasolar GS Validation
- 2018.04-Emails with DOE
- 2018.05-Email with GS
- 2018.10.12-Panasolar docs 2_2
- 2018.11-Email with GS 2
- 2019.07- Emails with DOE-Signed Validation Report
- 2021.11- try to communicate to sustaincert
- 2021.11-new performance review and Jonathan leaving
- 2022.12- Communication with sustaincert - Panasolar
- 2022.12-sustaincert sent email about panasolar project
- 2023.03-Asking for updates to sustain cert
- 2023.09 communication with DOE
- 2023.10-Confirmation of design certificate approval
- 2024.08.Communication sustaincert of next steps after registration

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