



# 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

10/10/2024

#### 1.2 | Decision

The Deviation Request is Not Approved.

PD has already taken a temporary deviation from the registered monitoring plan for SDG 9 for the first monitoring period from 23/02/2019 – 30/11/2020 (MR Version 04, 26/01/2021)

PD shall note that as per p.1.1.1b of Deviation Approval procedure Deviation Approval Procedures- *“Temporary changes to a certified project - which include changes from the registered monitoring plan, the applied methodologies or other standard documents - that are expected not to occur beyond a given monitoring Period”*. However, a deviation is once again requested for the monitoring of the same parameter for the monitoring period from 01/12/2020-30/11/2023. Since the deviation requested continues for the 2nd monitoring period and the revision to the monitoring plan is applicable, PD shall

submit Design Change Request in accordance with the Section 3 and 4 of Design Change Requirements v1.1, since the change is not limited to one monitoring period.

PD shall document the deviation request, its implications, and GS' decision in the appropriate section of the Monitoring Report. The verifying VVB shall, through appropriate means at its disposal, evaluate the Project's compliance with the above-mentioned conditions and provides its opinion in the Verification Report.

SustainCert shall review both the PD's response and the VVB's assessment/opinion of the same and take appropriate steps.

**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_805	
Date of decision	10/10/2024	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	23/07/2024 Minor edits: 07/10/2024	
Project/PoA/VPA	<input type="checkbox"/> Project	ID – GS737
	<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	23/01/2020	
GS Standard version applicable	1.2	
Date of transition to GS4GG (if applicable)	Not applicable	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	Not applicable	
Date of design certification/inclusion (if applicable)	12/11/2020	
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	<a href="https://registry.goldstandard.org/projects/details/2582">https://registry.goldstandard.org/projects/details/2582</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	Temporary change in the registered monitoring plan	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Design Change Requirements, v1.1, paragraph 1.1.3	
Specify the monitoring period for which the request is valid (if applicable)	Start date: 01/12/2020      End date: 30/11/2023 (2 <sup>nd</sup> monitoring period)	

Submitted by	Contact person name: Maria Toro
	Email ID: administracion@efe-sa.com.ar
	Organisation: Empresa Federal de Energía S.A.
	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: Earthood  VVB Staff name(s): Deepika Mahala
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 temporary change from the registered monitoring plan for the second monitoring period (from 01/12/2020 to 30/11/2023). The project developer proposes to demonstrate its contribution to SDG 9 – Industry, innovation and infrastructure through an alternative indicator for the monitoring period. The temporary change is also described in Section B.2.1 in the Monitoring Report for the period.

The following statement was reflected in the PDD: SDG 9 - Industry, innovation and infrastructure: Number of power cuts off in the community of Chamental. Improvement in the electrical infrastructure of the region cause an increase in the quality of life by having a more stable and predictable service with fewer power outages. Chamental is located at the end of the power line (132kV) having fluctuations and imbalance problems. The plants provide robustness to the system. The choice of the number of power outages in the community of Chamental as indicator was based on the comments

received by the stakeholders who perceived stabilization in the provision of electrical energy.

Consequently, EFE S.A. contacted the electricity distribution company of La Rioja S.A. (EDELAR) to obtain statistics on local power outages and observe the improvement manifested by the community, but unfortunately the PD did not have a response to the information requested from the company.

Alternatively, and to comply with the premise stated in the PDD, a temporary indicator was proposed by EFE SA that shows an improvement in the voltage level and less fluctuations (stabilization) of the 132kV network in Chamental. The statistical series (hour by hour from December 1, 2020 to November 30, 2023) was provided by CAMMESA (the wholesale electricity market administrator) and can be seen in the figure below:

Table 1: Average Voltage Levels and Deviation for the monitoring period

<b>Period</b>	<b>Year</b>	<b>Min Voltage Level (kV)</b>	<b>Average Voltage level (kV)</b>	<b>Max voltage level (kV)</b>	<b>Average Voltage Deviation</b>
<b>Dec</b>	<b>2020</b>	126.43	133.53	138.43	2.61
<b>Jan-Dic</b>	<b>2021</b>	126.99	133.56	139.74	2.36
<b>Jan-Dic</b>	<b>2022</b>	128.46	132.23	137.31	1.94
<b>Jan-Nov</b>	<b>2023</b>	128.32	132.48	138.93	2.23
<b>Total Average:</b>					<b>2.28</b>

Prior to the implementation of the project, in January to February 2019 (representing the baseline), both months presented an average voltage level of 130.94kV below 132kV, with a maximum recorded at 131.02kV. In other words, the Chamental base line shows a low tension in the network because it is the end of the line and the importing node. In addition, the average deviation of all the hourly records registered in that two-month period is 2.89 kV. This data is available in the attached file "Chamental 2019-2020.xlsx" and was verified by the VVB during the first performance review, as reported in the Verification Report dated 29/01/2021 available in the GS Registry.

During the years of plant operation, the average voltage increases in relation to the baseline and the average deviation of 2.28 kV, less than the baseline. As a conclusion, there is an evolution towards less volatility in voltage levels and consequently greater stability in the network and provision of electrical energy.

The complete statistical series for the monitoring period is available in the attachment "Chemical dic2020\_2023.xlsx" while the calculation of the averages can be verified in the attachment "ET CHAMICAL DESVIO 2020-2023.xlsx". Also attached is the email exchange between EFE S.A. and CAMMESA requesting the information for this monitoring period and the previous monitoring period ("Email CAMMESA with data until dec2023")

This situation had also occurred in the previous monitoring period and at the time CAMMESA issued a written opinion manifesting the improvements observed in the infrastructure network after the incorporation of the Parque de los Llanos Phovoltaic Power Plant. The letter attached to this deviation request with the file name "Letter CAMMESA dec2020 P-51723-1.pdf" reported the following benefits:

- From the Parque de los Llanos is operating, a better voltage control is observed in the area of the E.T. Chemical, especially since the month of November 2019, where it began to operate in "Tension Control".
- The generation of the plant, by connecting in the E.T. Chemical, reduces (when the solar resource is available) the power transmitted by the 132 kV La Rioja Sur - Patquía - Chemical lines and this contributes to the reduction of transmission losses on the one hand and, on the other, avoids large voltage drops that occur normally when there are large values of transmitted powers.
- Solar generation makes it possible to replace, on occasions, the need to dispatch diesel generation installed in Chilecito and Malligasta.

CAMMESA's opinion is extremely important in the Argentine electricity market because they are the organism in charge of the dispatch and the highest technical authority dependent on the Ministry of Energy.

The Project Developer considers that this indicator is equally robust, if not more, than the indicator committed in the PDD (power outage data) for the demonstration of SDG 9. By robust, the PD means the role of CAMMESA and the detailed, public and audited information that it handles. A local distribution company tends to have a more informal character and access to information is not so easy.



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):

Project developers are entitled to request temporary changes the monitoring plan According to the Design Change Requirements v. 1.1 paragraph 1.1.3:

*Project developers seeking temporary change from design certified monitoring plan or an interim deviation from Gold Standard for the Global Goals (GS4GG) requirements and Methodologies or applicable methodologies for activities prior to project submission for certification with GS4GG, shall follow the Deviation Approval Requirements and Procedures.*

In turn, the proposed temporary change adheres to the following principles required by the Deviation Approval Requirements and Procedures v1.2:

- **Environmental integrity:** the proposed temporary change does not impact certified products and/or statements (GS VERs), therefore there is no chance of overestimation as a result of the deviation. The deviation also does not overestimate the contribution to SDG 9, and the same level of conservativeness is ensured, since the indicator is provided by a reliable, national source.
- **Contribution to the Sustainable Development Goals (SDGs):** the deviation does not change the SDG contributions that the project is designed to achieve. The project developer is proposing to merely demonstrate the same impact, i.e. greater stability and more predictable service in the electricity grid, through an alternative indicator. The indicator is in line with GS4GG requirements for

monitored parameters: (i) it is provided by a reliable and verifiable source, (ii) values are demonstrated for the entire period calculated from hourly data, (iii) the frequency is the same as the proposed indicator in the PDD (annual), and (iv) QA/QC is ensured since the data is provided by the highest technical authority in the Argentinian electricity wholesale market.

- **Safeguarding principles and requirements:** there is no impact to the safeguarding principles assessment, thus the project continues to be in line with the safeguarding principles and requirements of GS4GG.
- **Compliance with host country regulations:** the temporary change represents no conflict with host country regulations.

The temporary change does not impact any of the regular operating or monitoring procedures of the project, and thus does represent a significant impact on the project design and any of its elements (safeguarding principles assessment, SDG assessment, emissions reductions, monitoring frequency, data quality, potential risk or any other relevant aspect). It is merely an alternative indicator fit to illustrate the same impact envisioned in the registered PDD, which is increased stability of the electricity grid in the Chamental community. By preserving the measurement procedure in which the indicator is obtained (from a reliable third party), it essentially conserves the level of accuracy, completeness and conservativeness.

In addition, the project developer confirms that the change occurred due to reasons beyond their control, since the data required for the original indicator (Number of power cuts off in the community of Chamental) depends on a third party, the local distribution company EDELAR, who did not respond to the project developer's request for information. The change is temporary in its nature as the PD will try once again to revert to the original indicator for the remaining of the current crediting period (01/12/2023 to 22/02/2024).

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):

As mentioned above, the temporary change does not impact any of the regular operating or monitoring procedures of the project, and thus does represent a significant impact on the project design.

There is no impact on safeguarding principles assessment, emissions reductions or potential risk of the project.

With regards to SDG assessment, although the project developer is proposing to present an alternative monitoring indicator, the demonstrated impact, which is increased stability in the electricity grid, is the same. The data is presented with the same frequency (annual) and at least the same level of data quality as the registered monitoring plan, since the data is provided by the highest technical authority in the wholesale electricity market in Argentina. The data provided in Table 1 is verifiable as per the aforementioned attachments provided with this deviation request.

#### 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.)*

- Letter CAMMESA dec2020 P-51723-1.pdf
- Chemical dic2020\_2023.xlsx
- ET CHAMICAL DESVIO 2020-2023.xlsx
- Email CAMMESA with data until dec2023.eml (This document is confidential)
- Chemical 2019-2020.xlsx
- Monitoring Report version 04

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