

PROJECT REVIEW REPORT

Project ID	678
Project Name	16.45 MW bundled grid connected renewable energy project in Tamil Nadu, India
Program(s)	VCS
Project Proponent	Arvind. A. Traders
Methodology	ACM0002 "Grid-connected electricity generation from renewable sources" version 15.0
Sectoral Scope(s)	Scopes 1 : Energy Industries (renewable /non-renewable)
Validation/Verification Body (VVB)	TÜV SÜD South Asia Pvt Ltd
Assessment Criteria	VCS Standard, v4.0
Date of First Issue	9 th March 2022
Date of Final Issue	16 th June 2022

Summary:

An accuracy review of the 16.45 MW bundled grid connected renewable energy project in Tamil Nadu, India verification approval request has been conducted by Verra in accordance with Section 4.3 of the *Registration and Issuance Process*.

The accuracy review has raised 5 assessment findings and 6 minor findings, detailed below. The VVB, in coordination with the project proponent, is hereby required to provide a response to the assessment findings presented in Section 1. The 5 assessment findings must be addressed to the satisfaction of Verra. The VVB need not address the minor findings during this review. Please note, however, that where Verra finds consistent minor findings by the VVB in future reviews, minor findings shall be escalated to assessment findings.

This project review report will be made publicly available. Confidential information may be provided as separate attachments.

1. ASSESSMENT FINDINGS

Finding 1

As per section 1.9 of the *VCS Monitoring report template V4.0*, where applicable, the PP is required to indicate whether the project is registered under any other GHG programs and, where this is the case, provide the registration number and details of any GHG credits claimed under such programs.

However, it was found that this project is also registered with CDM as of 4th Jan 2011 with Project ID 3406. (<https://cdm.unfccc.int/Projects/DB/TUEV-RHEIN1265822233.39/view>).

The VVB and PP are required to include this information in the relevant sections of the VR and MR respectively. Further, the VVB is required to justify why this information was not verified at the time of verification. In addition, this the VVB is also required to assess how double counting will be avoided in this case and share the evidence of the same with Verra.

VVB Response:

The information regarding the CDM registration has been included in the Verification and monitoring report.

Verra Response:

The relevant sections of the MR and VR were updated and found to be OK. This finding is now closed, and no further action is required.

Finding 2

As per section 4.1.8 of VCS standard V4.0, "In addition to the requirements set out in ISO 14064-3:2006, the level of assurance shall be reasonable, with respect to material errors, omissions and misrepresentations, for both validation and verification."

However, Section 2.3 of the VR states that only two personnel were interviewed during the remote site-visit.

The VVB is required to justify how reasonable a level of assurance was attained by interviewing only two personnel. Further, VVB should also clarify why no stakeholders were interviewed during the remote site visit.

Further, the VVB is required to assess to change in ERRs from ex-ante vs ex-post and report the deviation.

VVB Response:

The VVB has interviewed the main PP who is responsible for the implementation, monitoring and stakeholder related issues. There were no issues from any of the stakeholders. VVB has mentioned the change in ERs from ex ante to ex post,

Verra Response:

As per section 2.3 of the VR, stakeholder related issues are not indicated in the subjects discussed during the remote interview process. Therefore, the VVB is required to clarify how was it able to verify the impact of the project during activity on stakeholders during its implementation.

Further, the VVB is required to clearly state in section 5, why the ex-post ERs were higher than the ex-ante ERs for year 2009 and 2012. The PP is also required to include this information in section 5.4 of

the MR. **This finding requires further action and remains open.**

VVB response 2

The impact of the project during activity on stakeholders during its implementation has been discussed in section 2.3 and 4.2.2. The reason for increase in ERs has also been explained under section 5 of the verification report.

Verra Response:

The relevant sections of the VR were updated and found to be OK. This finding is now closed, and no further action is required.

Finding 3

As per *VCS Verification report template V4.0*, section 2.5 should describe the process for the resolution of any findings (corrective actions and clarifications or other findings) raised by the verification team during the verification and, where applicable, outstanding forward action requests from the validation or previous verifications and state the total number of corrective action requests, clarification requests and forward action requests and other findings raised during the verification.

However, section 2.5 of the submitted validation report does not include the process adopted for resolution of findings.

The VVB is required to describe the process of resolution of findings raised.

VVB Response:

Section 2.5 has been revised in the verification report.

Verra Response:

The revisions made in section 2.5 of the VR are still not in line with the VCS Verification report template V4.0 instructions. According to which, the PP is required to include the process which is adopted for resolution of findings by the VVB. Therefore, the VVB is required to state in this section what is the criteria based on which they term or raise a finding as a CAR/CL/FAR. **This finding requires further action and remains open.**

VVB response 2

The process adopted for resolution of findings by the VVB has been explained under section 2.5 of the VR.

Verra Response:

The relevant section VR was updated and found to be OK. This finding is now closed, and no further action is required.

Finding 4

As per *VCS Verification report template V4.0*, section 4.1 should identify the following:

- whether the project has participated or been rejected under any other GHG programs since validation or previous verification.
- Whether the project has received or sought any other form of environmental credit or has become eligible to do so since validation or previous verification.
- Whether the GHG emission reductions or removals generated by the project have become included in an emissions trading program or any other mechanism that includes GHG allowance trading.
- Sustainable development contributions.

However, section 4.1 of the submitted verification report does not include the above information.

Therefore, the VVB is required to include this in section 4.1 of the verification report.

VVB Response:

Section 4.1 has been revised in the verification report.

Verra Response:

The VVB has stated in section 4.1, “The project participants obtained all clearances from stakeholders hence no legal risks are anticipated. The project activities contribution towards sustainable development in terms of society, environment, technology and economy (both direct and indirect impacts) are stated below:”

The VVB is required to clarify how was the clearance of the project from all relevant stakeholders assessed.

Further the VVB has left the information on SDG impacts of the projects open ended by stating that the impacts are stated below. However, this sentence is not followed by any details about these impacts.

Therefore, section 4.1 of the VR should further be updated to be in line with the template requirements. **This finding requires further action and remains open.**

VVB response 2

The SDG impacts of the projects has been explained under section 4.1 of the VR.

Verra Response:

The relevant section VR was updated and found to be OK. This finding is now closed, and no further action is required.

Finding 5

As per *VCS Verification report template V4.0* section 4.2.2 should summarize any stakeholder input received during ongoing communication with local stakeholders. Assess whether the project proponent has taken due account of all and any input and provide an overall conclusion regarding local stakeholder input.

The VVB mentions in section 4.2.2 of the VR that PP has maintained a feedback/complaint register at the site office. Local stakeholders can anytime lodge their grievances if any in the register over the operational lifetime of the project.

However, the list of documents reviewed as mentioned in Appendix 1 of the VR does not include the

feedback/complaint register. Therefore, the VVB is required to justify how was this verified.

VVB Response:

The list of documents has been updated in the Verification report.

Verra Response:

The list of documents has been updated and found to be OK. This finding is now closed, and not further action is required.

2. MINOR FINDINGS

Finding 1

Please adjust the following minor findings in the project description document:

- 1) In section 1.3 of the MR title of the contact person is missing. Please update the same in the MR.
- 2) Please clearly state in section 1.6 of the MR that the crediting period is fixed for 10 years.
- 3) The PP is required to change the font style and size as per VCS Verification report template V4.0.
- 4) The signoff from the appropriate VVB office corresponding with accreditation is missing. Please include the same in the validation report.
- 5) In section 4.2 of the MR (page 16), there is an inconsistency in the value of the net electricity supplied to the grid, that in one place it states 208,879.86 and in another it states 280,879.86 MWh. Please correct the same.
- 6) Please include the year wise electricity supplied to the grid and the corresponding GHG emissions in section 5.1 of the MR and also share the ER calculation sheet.

PP/VVB Response:

- 1) Title of contact person has been included in section 1.3 of updated MR.
- 2) Fixed Crediting Period of 10 years has been mentioned in section 1.6 of updated MR.
- 3) Font has been changed.
- 4) Signoff has been included.
- 5) The value of net electricity supplied to grid has been corrected in Section 4.2 of MR and the correct value is 208,879.86 MWh.
- 6) Year wise electricity supplied to the grid has been mentioned in section 5.1 of updated MR. Also, the ER Sheet has been shared.

3. ASSESSMENT CONCLUSION

On 9th March 2022 Verra concluded a review of the verification approval request for project 16.45 MW bundled grid connected renewable energy project in Tamil Nadu, India and raised the 5 assessment findings detailed above.

On 23rd March 2022 Verra submitted the review report to the VVB TÜV SÜD South Asia Pvt Ltd and the project proponent Arvind. A. Traders.

On 16th June 2022 Verra closed all findings.