



**Verified Carbon
Standard**

“AES SAURASHTRA WINDFARMS”



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Summary:

LGAI Technological Center, S.A.(Applus+ Certification) has performed the verification of the project “AES SaurashtraWindfarms.” VCS ID 1039, against VCS Standard Version 4.3. The scope of verification includes confirming the implementation of the monitoring plan of the registered VCS PD (version 02) dated 16/02/2013 and the application of the monitoring methodology “Grid-connected electricity generation from renewable sources”, ACM0002, Version 12.3.0.

The verification is consisted of three phases: i) desk review of the project; ii) on-site visit and interviews with project stakeholders; iii) resolution of outstanding issues and the issuance of the final verification report and opinion. The overall verification, from Contract Review to Verification Report & Opinion, was conducted following Applus+ certification internal quality procedures.

During the verification process 04 CARs, 01 CL and 00 FARs were raised. All the findings have been closed satisfactorily and the same has been discussed in Appendix 4.

Applus+ certification confirms that the monitoring system is in place and the emission reductions are calculated without material misstatements. The emission reductions from the project activity “AES SaurashtraWindfarms” in India during the period 01-September-2012 to 31-August-2018(including both days) amount to 411,162tonnes of CO₂e.

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1 INTRODUCTION

1.1 Objective

Tata Power Renewable Energy Limited has contracted LGAI Technological Center, S.A. (Applus+ Certification) to perform the periodic verification of the 'AES Saurashtra Windfarms' in India (hereafter called project). This project has already been registered as a VCS project (VCS ID 1039). The objective of this verification is a thorough and independent assessment of registered project activities against the applicable VCS requirement by the VVB. The verification process shall determine whether the proposed project activity complies with the requirements of latest VCS guidelines, applicability conditions of the selected methodology, relevant host country regulations and guidance issued by the VCS Board.

1.2 Scope and Criteria

The scope of verification is to assess the claims and assumptions made in the VCS monitoring report (MR) against the VCS criteria, including but not limited to, VCS standard, applied methodology and other relevant rules and requirements established for VCS project activities. The verification of this project was based on the registered project description & monitoring report /4/ and supporting documents submitted by the project proponent to the verification team. The documents were reviewed against the following guidance and protocols:

VCS standard Version 4.3, Issued: 19-September-2019; updated: 22-June-2022 /16/

Approved baseline and monitoring methodology ACM0002 ver. 12.1.0 "Consolidated baseline methodology for grid-connected electricity generation from renewable sources"/14/

VCS Program Guide, Version 4.2, dated 19-September-2019; updated: 22-June-2022 /17/

CDM VVS for project activities version 03.0 /22/

CDM PS for project activities version 03.0 /21/

The Verification is not meant to provide any consulting towards the project participants. However, stated requests for clarification and/or correction actions request may have provided inputs for improvement of the project design.

1.3 Level of Assurance

The verification team verified the complete monitoring data for all the parameters of the monitoring plan and confirms that the reported emission reductions are free from any type of material errors. Therefore, Applus+ certification confirms that the verification is conducted with reasonable level of assurance.

1.4 Summary Description of the Project

The project activity involves electricity generation by wind farm electric convertors and supplying the generated electricity to the state Grid. The project being a renewable energy generation activity, it leads to removal of fossil fuel dominated electricity generation. The project activity results in reductions of greenhouse gas (GHG) emissions that are real, measurable, and verifiable and also plays beneficial role in the mitigation of climate change.

During the time of registration the total installed capacity of the project was 39.2 MW wind farm project in Gujarat states of India. The project activity involves development, supply, commissioning and operation of 49 Wind Turbine Generators (WTGs) of rated capacity 800 kW each. The make of the machines used in the wind farm is Enercon E-53.

The project shall result in replacing anthropogenic emissions of greenhouse gases (GHG's) estimated to be approximately 80,385 tCO₂e per year. The emission reductions from the project activity "AES Saurashtra Windfarms" in India during the period 01-September-2012 to 31-August-2018 (including both days) amount to 411,162 tonnes of CO₂e.

The project activity was commissioned on 07-June-2011, and is in operation since then. The generated power from this project activity is supplied to the Indian grid & the project participant has signed Power Purchase Agreement (PPA) for 25 years period, with Gujarat UrjaVikas Nigam Limited (GUVNL). This information was verified during on-site assessment and found to be in line with the details provided in the registered PD /01/. The emission reductions from the project activity during the period 01-September-2012 to 31-August-2018 (including both days) amount to 411,162 tonnes of CO₂e.

2 VERIFICATION PROCESS

The registered VCS project is undergoing periodic verification under VCS, the approach adopted to ensure the quality of emission reductions is described in the following sections.

2.1 Method and Criteria

Verification was conducted using Applus+ Certification procedures in line with the requirements CDM validation and verification standard for project activities, Version 03.0 for the project activity and “VCS standard version 4.3 and program guideline version 4.2” and is conducted using standard auditing techniques to assess the correctness of the information provided by the project participants. Before the assessment begins, members of the team covering the technical scope(s), sectoral scope(s), and relevant host country experience for evaluating the VCS project activity are appointed. The project activity does not fall under category “grouped projects”, hence any sampling methods not to be employed by the validation/verification body for the verification of GHG emission reductions or removals generated by the project.

Applus+ certification assessed and determined whether the proposed implementation and operation of the project activity, and the steps taken to report emission reductions comply with the criteria and relevant guidance provided by the VCS Board. The validation/verification process consist of the following three phases;

- A desk review of the VCS PD and VCS MR
- On-site visit and follow up interviews with project stakeholders
- The resolution of outstanding issues and issuance of final report and opinion

2.2 Document Review

The verification is performed primarily as a document review of the approved revised VCS PD, previous MR and Verification report and associated documents as stated in detail in appendix 1 of this document. The assessment is performed by a verification team using a protocol. The cross checks between information provided in the Monitoring report, VCS PD and information from sources other than those used, if available, the team’s sectoral or local expertise and, if necessary, independent background investigations.

2.3 Interviews

An on-site inspection has been performed by the assessment team. The representatives of the PPs and onsite staff of PP were interviewed on 08-July-2022 i.e. personnel responsible for monitoring of the project activity, data collection and management, and QA/QC procedure. The details of the people interviewed are mentioned in the table below:

S N	Name	Organization
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1.	Mr. Suresh baria	Associate Manager,PP Representative//Tata Power Renewable Energy Limited
2.	Mr.Anil Kumar Nayakallu	Advisor/Consultant// EKI Energy Services Ltd.
3.	Mr.Barun Sharma	Advisor/Consultant// EKI Energy Services Ltd.

The topics covered during interview ranges from general features and implementation of project to technical details of the project like calibration details, monitoring and measuring system and data collection, recording and archiving procedures. The assessment was drawn based on the feedback received during interview coupled with the documentation and on-site observations.

2.4 Site Inspections

As discussed in the above section, physical site inspection is done for the current verification.

It is noteworthy that no sampling plan for verification is applied as 100% data is verified for the current monitoring period. Most of the reference document referred by the assessment team (above table) are either issued /endorsed by grid utility (SEB) Indian Grid, a government agency, hence is deemed authentic.

The assessment team has also used documents such as validation report/2.2/ available publicly. Furthermore, the project activity already verified under VCS previously and currently undergoing periodic VCS verification. Hence, based on the information's available through approved documents (VCS verifications), it can be confirmed that project is implemented and being operated as described in the registered PD/1.1/.

The assessment team has verified sufficient appropriate audit evidences, to reduce audit risk to an acceptably low level as requisite to achieve reasonable level of assurance for the current verification.

2.5 Resolution of Findings

The objective of this step is to identify, discuss and conclude on the issues related to the monitoring, implementation and operations of the registered project activity that could impair the capacity of the registered project activity to achieve emission reductions or influence the monitoring and reporting of emission reductions. This is done based on the desk review and on-site assessment. The verification team prepares and/or updates a verification protocol (internal document) that records the conformities and non-conformities, which may be of following types;

CAR (Corrective Action Request) is raised if one of the following occurs:

- Non-compliance with the monitoring plan, the methodology or the standardized baseline are found in monitoring and reporting and has not been sufficiently documented by the project participants, or if the evidence provided to prove conformity is insufficient;
- Modifications to the implementation, operation and monitoring of the registered project activity has not been sufficiently documented by the project participants;
- Mistakes have been made in applying assumptions, data or calculations of emission reductions that will impact the quantity of emission reductions;
- Issues identified in a FAR during validation to be verified during verification or previous verification(s) have not been resolved by the project participants.

Clarification request (CL) is raised if information is insufficient or not clear enough to determine whether the applicable CDM requirements have been met. During the verification process 04 CARs, 01CL and 00 FARs were raised. All the findings have been closed satisfactorily and the same has been discussed in Appendix 4. All CARs and CLs raised by the Applus+ certification during verification shall be resolved prior to submitting a request for issuance.

FAR (Forward Action Request) is raised during verification if the monitoring and reporting require attention and/or adjustment for the next verification period.

All the findings that are raised and communicated to project participant during the verification are included under Appendix 4. The section also includes the response, if provided, by the project participants and an assessment by the verification team if it was closed out or otherwise.

2.5.1 Forward Action Requests

The project activity is undergoing periodic verification under VCS; there were no FARs raised during the validation or previous verification/2.1/.Also during the current verification no FAR is raised.

2.6 Eligibility for Validation Activities

Not applicable, as Applus+ holds the accreditation to perform validation activities in this Sectoral Scope.

3 VALIDATION FINDINGS

3.1 Participation under Other GHG Programs

The project activity is registered under the VCS only (VCS Project ID 1039). The project proponent has provided a self-declaration in this regard which confirms that project proponent will not claim Emission reductions for current monitoring period **01-September-2012 to 31-August-2018(including both days)** under any other GHG program except VCS, hence accepted by the assessment team.

Audit team checked the REC Mechanism database of India and found that the project activity is not accredited / registered under REC mechanism. Further, declaration for the same is checked and found correct by the assessment team. Also assessment team checked the following registries to confirm the same. The details of the registries checked are as follows:

1. <https://www.recregistryindia.nic.in/>
2. <http://www.goldstandard.org/>

Rejection by other GHG programs

VVB has crossed check the same through other GHG interfaces and found consistent. A declaration has been submitted by PP to VVB confirming the same. Thus, this was further confirmed through a declaration/14/ submitted by the PP and hence accepted by the assessment team.

The details of the registries checked are as follows:

1. <https://www.recregistryindia.nic.in/>
2. <http://cdm.unfccc.int/>
3. <http://www.goldstandard.org/>
4. <https://verra.org/verra-standards-and-programs/>

The Project has no intend to generate any other form of GHG-related environmental credit for GHG emission reductions or removals claimed under the VCS Program. Renewable energy certificates are available for trading in the host country However, the same is not availed by the Project Proponent. The undertaking regarding the same is submitted by the PP which is acceptable to the assessment team and assessment team also checked the REC web site (<https://recregistryindia.nic.in/>) and found the declaration/14/ to be correct.

3.2 Methodology Deviations

There is no methodology deviation identified since project registration and also during the current monitoring period.

3.3 Project Description Deviations

Deviation 01:

The PP has reported a permanent deviation in registered monitoring plan as the parameters viz., $EG_{clustermeter,Export}$, $EG_{clustermeter,Import}$, $EG_{GETCO,Export}$ & $EG_{GETCO,Import}$ were included in the registered monitoring Plan at the time of project registration stage. The PP has justified that the Government Agency & discom, GEDA/GETCO changed their procedure and now they are directly issuing the share certificate & these parameters are not coming to PP at all. Now the PP received the direct value of net export to the grid. These parameters are being monitored in order to calculate the net export by apportioning which is not under the control of PP & neither these values come to the PP. Hence, the values of these parameters are not being reported & only direct value of net export alone is being reported. The VVB assessment team has review the entire changed procedure and found the monitoring of parameters viz., $EG_{clustermeter,Export}$, $EG_{clustermeter,Import}$, $EG_{GETCO,Export}$ & $EG_{GETCO,Import}$ not in control of the PP, hence the same has been not reported in MR. The PP has requested to permanent deviation in registered monitoring plan and mentioned in 3.1.2 of the MR. The same is found to be appropriate and confirmed during on-site visit by the VVB assessment team , hence accepted.

Deviation 02:

There is a change in the Project Proponent (from “AES Saurashtra Windfarms Private Limited” to “Tata Power Renewable Energy Limited”) due to the acquisition of the former by the current PP. The same has been verified by assessment team from the project view page at VERRA website and also cross-check with the PP during on-site interview, hence accepted.

Deviation 03:

There is change in the project crediting period (from 07-June-2011 – 29-February-2012 to 07-June-2011 – 06-June-2021), the same has been corrected in the project view page at VERRA website and found to be correct, hence accepted by verification assessment team.

3.4 Grouped Project

This is not a grouped project.

4 VERIFICATION FINDINGS

4.1 Project Implementation Status

During the onsite audit with PP representative, it was concluded that the project is implemented as per the requirement of the registered VCS PD and approved monitoring plan. During the current monitoring period, it was observed through breakdown log sheet records onsite that no unforeseen incident/event evolved which can impact the operation of the project activity. The project underwent continuous operation and only scheduled maintenance as per the manufacturer's specification which is acceptable to the assessment team. Moreover, there is no unforeseen incident which can affect the applicability of the methodology and thus the same is acceptable to the assessment team.

Project location is confirmed by the assessment team through Google software. Moreover, assessment team confirm that the latitudes and longitudes as mentioned in the registered PDD is incorrect. The WTG wise latitudes and longitudes are confirmed below:

Geographical Location:

S.No.	Loc. No.	Latitude(N)	Longitude(E)
1	CH-01	21°53'59.2"	69°22'37.8"
2	CH-02	21°54'6.3"	69°22'35.7"
3	CH-03	21°54'13.6"	69°22'23.1"
4	CH-04	21°54'19.0"	69°22'18.6"
5	CH-05	21°54'28.5"	69°22'16.0"
6	CH-06	21°54'33.4"	69°22'12.0"
7	CH-07	21°54'40.8"	69°22'11.0"
8	CH-09	21°54'48.4"	69°21'55.7"
9	CH-15	21°54'56.0"	69°21'43.3"
10	JO-44	21°59'52.2"	69°17'22.6"
11	JO-45	21°59'43.6"	69°17'27.2"
12	JO-54N	21°58'59.3"	69°17'44.7"
13	JO-58	21°59'28.3"	69°17'24.0"

14	JO-74	22°0'22.1"	69°16'45.3"
15	JO-75	22°0'33.8"	69°16'59.8"
16	GO-01	22°8'19.6"	69°3'19.4"
17	GO-02	22°8'26.3"	69°3'17.6"
18	GO-03	22°8'34.8"	69°3'19.1"
19	GO-04	22°8'39.1"	69°3'11.0"
20	GO-05	22°9'0.6"	69°3'17.6"
21	GO-06	22°8'53.2"	69°3'17.7"
22	GO-07	22°8'47.1"	69°3'23.2"
23	GO-08	22°8'41.4"	69°3'28.4"
24	GO-09	22°8'35.8"	69°3'33.5"
25	GO-10	22°8'29.8"	69°3'39.0"
26	GO-12	22°8'50.2"	69°3'43.2"
27	GO-11	22°8'56.5"	69°3'38.9"
28	GO-16	22°9'46.5"	69°2'4.4"
29	VA-17	22°9'52.7"	69°1'59.0"
30	VG414	21°52'52.2"	69°21'40.3"
31	VG415	21°53'0.7"	69°21'26.6"
32	VG416	21°52'55.8"	69°21'5.4"
33	VG422	21°53'36.7"	69°20'46.3"
34	VG423	21°53'48.6"	69°20'51.0"
35	VG424	21°53'59.7"	69°20'50.6"
36	VG426	21°54'9.5"	69°20'50.5"
37	LA 448	21°54'53.3"	69°17'58.1"
38	LA 456	21°55'22.7"	69°18'46.3"
39	HA 551	22°1'2.7"	69°18'27.6"
40	HA 552	22°0'48.3"	69°18'27.2"
41	HA 553	22°0'40.4"	69°18'28.0"
42	HA554	22°0'38.8"	69°18'42.4"
43	JO750	21°58'14.9"	69°17'26.4"
44	KU 742	22°3'38.1"	69°9'19.1"

45	KU 743	22°03'43.3"	69°09'12.4"
46	OK 744	22°05'3.0"	69°07'8.7"
47	OK 745	22°05'20.2"	69°06'42.6"
48	OK 746	22°05'25.3"	69°06'35.2"
49	OK 747	22°05'30.0"	69°06'32.0"

Assessment team checked the commissioning certificate and confirmed that the dates of Commission for the wind farm are correct. Assessment team also conform during the on-site visit that there is no change in project design except deviation requested and the project is implemented as per the description provided in the registered PDD.

The technical parameters have been verified with the name plates as well as with the technical specifications of wind farm and also cross checked from the technical manual of the Manufactures. Assessment team confirms that the technical parameters are consistent with the registered VCS PD. The major technical specifications of the WTG are as follows:

E 53 Specifications:

Turbine model	Enercon E-53
Rated power	800 KW
Rotor diameter	53 m
Hub height	75 m
Turbine Type	Direct driven, horizontal axis wind turbine With variable rotor speed
Power regulation	Independent pitch system for each blade
Cut in wind speed	3m/s
Rated wind speed	12.6m/s
Cut out Wind speed	28m/s
Extreme Wind Speed	59.5m/s
Rated rotational speed	29 rpm
Operating range rot. speed	11-29.5rpm
Orientation	Upwind
No of Blades	3
Blade Material	Fiber Glass Epoxy reinforced
Gear box type	Gearless
Generator type	Synchronous generator
Braking	Aerodynamic
Yaw System	Active yawing with 4 electric yaw drives With brake motor

Tower	74 mconcrete
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The assessment team confirmed through on-site visit with PP representative that there is no proposed or actual change to the project design during this monitoring period. It was observed that the monitoring plan was implemented as per the registered VCS PD and applied methodology ACM0002, Version 12.3.0.0. The organisational role and responsibility as mentioned in the registered VCS PD is followed onsite. Meters are calibrated as per calibration frequency in registered VCS PD. All the emergency preparedness as mentioned in the registered VCS PD is followed onsite and no discrepancies were found regarding the same.

Assessment team concludes the following:

- a) There is no material discrepancies between project implementation and the project description provided in the registered PD/04/.
- b) The monitoring plan is implemented completely and monitoring system (i.e., process and schedule for obtaining, recording, compiling and analysing the monitored data and parameters) is appropriate.
- c) There is no material discrepancies between the actual monitoring system, and the monitoring plan set out in the project description and the applied methodology/08/.
- d) The GHG emission reductions or removals generated by the project have not included in an emissions trading program or any other mechanism that includes GHG allowance trading/16/.
- e) The project has not received or sought any other form of environmental credit, or has become eligible to do so since validation or previous verification.
- f) The project is registered under VCS only.
- g) The project activity is comply with indicators for sustainable development in the interim approval guidelines for Clean Development Mechanism (CDM) projects from India as discussed under section 1.11 of MR.

In view of the information's as verified above the assessment team is able to conclude that the project has been implemented as described in the project description.

4.2 Safeguards

4.2.1 No Net Harm

Being bundled renewable wind farm power generation project there is no negative environmental and socio-economic impacts in fact project activity contributes positively by providing environment friendly power generation leading to sustainable development of the region. Also, the generation of employment supports upliftment of socio-economic status of region. As per the EIA notification dated 14th September 2006, the wind farm power projects

are exempted from environmental clearance. Hence, Environmental impact assessment is not required for this project activity.

The report on “Developmental Impacts and Sustainable Governance Aspects of Renewable Energy Projects” prepared by MNRE dated September 2013 also confirms that wind farm power project activity operations do not result in direct air pollution, noise pollution. Hence verification team confirms that there are no any significant impacts due to implementation of project activity on air, water, soil quality and ambience are envisaged due to the project activity.

4.2.2 Local Stakeholder Consultation

The Project is already registered with VCS and registered VCS Project Description; sections 6 describe the Local Stakeholder Consultation Process as in-line with VCS requirement.

As a part of continuous feedback from stakeholders, there were no other major comments or protest raised by the stakeholders and they were totally in support for setting up of these kinds of projects in the region.

For ongoing communication, the PP has also placed a grievance register onsite where in the stakeholder can put down his/her complain and the same if found genuine will be addressed immediately. However, being renewable wind farm power generation project there is no feedback/grievance has been reported within this monitoring period verified from the photos provided by the Project participant.

4.3 AFOLU-Specific Safeguards

Not applicable for this project activity.

4.4 Accuracy of GHG Emission Reduction and Removal Calculations

The project monitoring has been carried in accordance with the registered VCS PD/01/ and the monitoring report/04/. The monitoring plan laid in the registered PD is being followed at the site/18/. The assessment team has verified the information flow (from data generation, aggregation, to recording, calculation and reporting for these parameters including the values) in the MR/04/. The emission reductions are purely based on the net electricity generated and exported from the machines. PP has provided all the sufficient data for current monitoring period. The values of the parameter net electricity generation supplied to the grid by each phase used in deriving the GHG emission reduction could be very well correlated between the data sets and ER spreadsheet/05/ provided by PP. The verification of each monitoring parameter has been discussed later in section 4.5.

The calculation method and formulae used in calculating baseline emission is in compliance to the methodology used i.e. ACM0002 Version 12.3.0 /09/. Since project activity is a wind farm power project, leakage emission and project emission has been considered as zero.

4.5 Quality of Evidence to Determine GHG Emission Reductions and Removals

The below tables describe how the parameter, that is to be measured according to the monitoring plan, has been verified to confirm that the actual monitoring complies with the monitoring plan, monitoring data has been thoroughly assessed and that the calibration requirements are met.

Parameter	Net Quantity of Electricity exported to the grid in MWh, $EG_{P,J,y}/EG_{facility,y}$	
Means of verification	Criteria/Requirements	Assessment/Observation
	Measuring /Reading /Recording frequency	The parameter is calculated and recorded on monthly basis. Quantity of net electricity generation supplied by the project plant/unit to the grid in year y, is calculated as: $EG_{P,J,y} = (\sum EG_{JMR, project, export,y} - \sum EG_{JMR, project, import,y})$

		<p>Where,</p> <p>EG_{JMR, project, export, y}=Quantity of Electricity exported by the Project wind farm connected to the feeder i to the grid during the year y.</p> <p>EG_{JMR, project, import, y}= Quantity of Electricity imported by the Project wind farm connected to the feeder i from the grid during the year y.</p>
	Is measuring and reporting frequency in accordance with the monitoring plan and monitoring methodology? (Yes / No)	Yes. The reporting frequency is in line with the monitoring plan as outlined in the registered PD/01/ and monitoring methodology/09/.
	Monitoring equipment	No monitoring equipment is used as this parameter is calculated. However the parameter EG_{JMR, project, export, y} and EG_{JMR, project, import, y} are calculated using measured values, are continuously monitored, hourly measured and monthly recorded ¹ .
	Is accuracy of the monitoring equipment as stated in the monitoring plan? If the monitoring plan does not specify the accuracy of the monitoring equipment, does the accuracy of the monitoring equipment comply with local/national standards, or as per the manufacturer's specification?	The accuracy of the monitoring equipment used to measure the input values used to calculate EG_{JMR, project, export, y} and EG_{JMR, project, import, y} is 0.2s, which is as per the registered PD/01/ which is as per the norm defined in the PPA/12/.

	Is the accuracy valid for the entire measuring range or do different accuracy levels apply to different measuring ranges?	Yes. The accuracy of monitoring equipment's is valid for the entire range.
	Calibration frequency /interval:	Calibration frequency of the meters is once in 3 years.
	Is the calibration interval in line with the monitoring plan and/or methodology? If the monitoring plan does not specify the frequency of calibration, is the selected frequency in accordance with the local/national standards, or as per the manufacturer's specifications?	Yes. The calibration frequency is once in 3 years as outlined in the registered PD/01/ is in accordance with the national standards/15/.
	Is the calibration of measuring equipment carried out by an accredited person or institution?	Calibration of the measuring equipment's is carried out by an accredited entity.
	Is(are) calibration(s) valid for the whole reporting period?	Calibration of meters is not valid for the current monitoring period. There was calibration delay and the PP has applied error factor for delay period.
	Is the calibration carried out for a measuring range comparable with the range for which measurements have been carried out?	Yes. The calibration is carried out appropriately. However there was calibration delay and the PP has applied error factor for delay period.
	How were the values in the monitoring report verified?	Cumulative value of $EG_{\text{facility},y}$ for entire monitoring period is reported in the monitoring report/04/, and monthly values in the ER calculation sheet/05/. The monthly values were verified from the credit notes issued by state utility and found to be consistent.

		Value of this parameter for the current monitoring period was verified as 445,709.13 MWh.
	If applicable, has the reported data been cross-checked with other available data?	The monthly reported values of EG_{facility,y} were further cross checked with the monthly invoices raised by the PP /07/ to state utility and found to be consistent.
	Does the data management ensure correct transfer of data and reporting of emission reductions and are necessary QA/QC processes in place?	On-site assessment of the project activity confirms that the necessary QA/QC procedures are in place and the data management system is effective and reliable.
	In case project participants have temporarily not monitored the parameter, has either i) a deviation been approved by the CDM EB or ii) has the parameter been estimated as stipulated by Appendix 1 to the CDM Project Standard?	No such issues.
Findings	CAR#4 was raised and resolved	
Conclusion	<p>The parameter has been monitored appropriately, in accordance with the registered monitoring plan (as per measurement methods and procedures to be applied) and applied methodology. The monitoring results were recorded consistently as per the approved frequency in the monitoring plan.</p> <p>The emission reduction calculation for the project activity is estimated based on the electricity supplied by the wind farm . Since 100% data was verified, the team can ascertain that the values taken for emission reduction calculation are free from material errors.</p>	

Parameter	Electricity export recorded at the 0.2s accuracy class cluster meter at the Vacuum Circuit Breaker (VCB) yard, EG_{clustermeter,Export}
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Means of verification	This parameter was included in the registered monitoring Plan at the time of project registration stage. The PP has requested for a permanent deviation from the registered monitoring plan through Section 3.2 & this parameter will not be monitored further. The PP has explained that the Government Agency & discom GEDA/GETCO changed their procedure and now they are directly issuing the share certificate & this parameter is not coming to PP at all. Now the PP received the direct value of net export to the grid. This parameter is being monitored in order to calculate the net export by apportioning which is not under the control of PP & neither this value comes to the PP. Hence, the value of this parameter is not being reported & only direct value of net export alone is being reported. Hence accepted by the VVB team.
Findings	CAR#4 was raised and resolved
Conclusion	This parameter was included in the registered monitoring Plan at the time of project registration stage. The PP has requested for a permanent deviation from the registered monitoring plan through Section 3.2 & this parameter will not be monitored further. Further details please refer deviation 01 in section 3.3 of the Verification Report.

Parameter	Electricity export recorded at the 0.2s accuracy class cluster meter at the Vacuum Circuit Breaker (VCB) yard, $EG_{clustermeter,Import}$
Means of verification	This parameter was included in the registered monitoring Plan at the time of project registration stage. The PP has requested for a permanent deviation from the registered monitoring plan through Section 3.2 & this parameter will not be monitored further. The PP has explained that the Government Agency & discom GEDA/GETCO changed their procedure and now they are directly issuing the share certificate & this parameter is not coming to PP at all. Now the PP received the direct value of net export to the grid. This parameter is being monitored in order to calculate the net export by apportioning which is not under the control of PP & neither this value comes to the PP. Hence, the value of this parameter is not being reported & only direct value of net export alone is being reported. Hence accepted by the VVB team.
Findings	CAR#4 was raised and resolved
Conclusion	This parameter was included in the registered monitoring Plan at the time of project registration stage. The PP has requested for a permanent deviation from the registered monitoring plan through Section 3.2 & this parameter will not be monitored further. Further details please refer deviation 01 in section 3.3 of the Verification Report.

Parameter	Net Electricity export recorded at GETCO meters at the EIL Bhogat Substation, $EG_{GETCO,Export}$
Means of verification	This parameter was included in the registered monitoring Plan at the time of project registration stage. The PP has requested for a permanent deviation from the registered monitoring plan through Section 3.2 & this parameter will not be monitored further. The PP has explained that the Government Agency & discom GEDA/GETCO changed their procedure and now they are directly issuing the share certificate & this parameter is not coming to PP at all. Now the PP received the direct value of net export to the grid. This parameter is being monitored in order to calculate the net export by apportioning which is not under the control of PP & neither this value comes to the PP. Hence, the value of this parameter is not being reported & only direct value of net export alone is being reported. Hence accepted by the VVB team.
Findings	CAR#4 was raised and resolved
Conclusion	This parameter was included in the registered monitoring Plan at the time of project registration stage. The PP has requested for a permanent deviation from the registered monitoring plan through Section 3.2 & this parameter will not be monitored further. Further details please refer deviation 01 in section 3.3 of the Verification Report.

Parameter	Net Electricity import recorded at GETCO meters at the EIL Bhogat Substation, $EG_{GETCO,Import}$
Means of verification	This parameter was included in the registered monitoring Plan at the time of project registration stage. The PP has requested for a permanent deviation from the registered monitoring plan through Section 3.2 & this parameter will not be monitored further. The PP has explained that the Government Agency & discom GEDA/GETCO changed their procedure and now they are directly issuing the share certificate & this parameter is not coming to PP at all. Now the PP received the direct value of net export to the grid. This parameter is being monitored in order to calculate the net export by apportioning which is not under the control of PP & neither this value comes to the PP. Hence, the value of this parameter is not being reported & only

	direct value of net export alone is being reported. Hence accepted by the VVB team.
Findings	CAR#4 was raised and resolved
Conclusion	This parameter was included in the registered monitoring Plan at the time of project registration stage. The PP has requested for a permanent deviation from the registered monitoring plan through Section 3.2 & this parameter will not be monitored further. Further details please refer deviation 01 in section 3.3 of the Verification Report.

Parameters fixed ex ante:

$EF_{grid,OM,y}$; tCO_{2e}/MWh : it is the operating margin emission factor of NEWNE grid fixed at the time of project registration the mentioned value of $1.0049tCO_{2e}/MWh$ is consistent with the registered PD/01/.

$EF_{grid,BM,y}$; tCO_{2e}/MWh : it is build margin emission factor of NEWNE grid fixed at the time of project registration the mentioned value of $0.6752tCO_{2e}/MWh$ is consistent with the registered PD/01/.

$EF_{grid,CM,y}$; tCO_{2e}/MWh : it is the combined margin emission factor of NEWNE grid fixed at the time of project registration the mentioned value of $0.9225tCO_{2e}/MWh$ is consistent with the registered PD/01/.

Calibration of meters:

During the verification assessment of the project activity, accuracy of all the metering have been checked and found appropriate. The installation and working conditions of the meters were checked during the on-site inspection and were found to be satisfactory. Details of meters are provided in below table:

The current meter details for Tata Power Renewable Energy Limited is as follows:

VCB Yard (Cluster Meter Details):

Meter Serial number	GJU07452	GJU60938	18016929
Make	Secure	Secure	Secure
Accuracy Class	0.2s	0.2s	0.2s
Calibration frequency	Once in 3 years	Once in 3 years	Once in 3 years
Date of calibration	14-July-2014	14-July-2014	14-July-2014

Date of calibration	17-June-2018	17-June-2018	17-June-2018
Date of last calibration	14-June-2021	14-June-2021	14-June-2021

Substation / GETCO meter details:

Meter Serial number	GJ-2413A	GJ-2438A	GJ-2439A
Make	Secure	Secure	Secure
Accuracy Class	0.2s	0.2s	0.2s
Calibration frequency	Once in 3 years	Once in 3 years	Once in 3 years
Date of calibration	14-July-2014	14-July-2014	14-July-2014
Date of calibration	17-June-2018	17-June-2018	17-June-2018
Date of last calibration	13-June-2021	13-June-2021	13-June-2021

The assessment team has verified the monthly credit notes issued by the state utility and confirmed that only the data recorded through main meters is used to calculate net electricity supplied to the grid consequently for ER calculations.

Assessment on delay in calibration:

There is delay found in meter calibration as the meter calibration frequency is “Once in three years” and as the meter calibration during the current monitoring period has been found as below:

1. Delay in calibration from 7-June-2014 to 14-July-2014 – The PP has applied maximum permissible error factor in calculation of ER for the entire month of June-2014 & July-2014. Same has been verified by the assessment team and found to be correct and hence accepted.
2. Delay in calibration from 14-July-2017 to 16-June-2018 – The PP has applied maximum permissible error factor in calculation of ER for the entire months from July-2017 to June-2018. Same has been verified by the assessment team and found to be correct and hence accepted.

Based on the above two delay period, overall the PP applied maximum permissible error factor in calculation of ER for the total of 14 months of this Monitoring Period.

The latest calibration report dated 2021 has been provided by the PP and results of calibration shows meters are working permissible error limit. Hence, the due date for meter calibration is in 2024, which is outside the monitoring period.

The verification team has on-site checked all the meters and confirmed that the meters were working satisfactorily. Also the calibration of meters is completely under preview of state utility

and PP has no control over the same as confirmed through interviews of site personnel and PPA signed by the PP with state utility/12/.

Hence it can be concluded that the approach followed by the PP is conservative and in line with the guidelines provided under paragraph 366(a) of VCS version 03.

The registered VCS PD/01/ & MR /04/ and on-site audit observations confirm that the metering equipment are sealed and maintained by the state utility.

In view of the above discussion the assessment team is able to confirm that evidence used to determine the GHG reductions and removals are sufficient and appropriate with respect to quality and quantity.

GHG Calculations

The emission reduction as per the applied methodology equals the baseline emissions (project emissions and leakage emissions for such project activities is considered zero). The formula provided for the calculation of baseline emissions is:

$$BE_y = EG_{PJ, y} * EF_{grid, CM, y}$$

Where:

BE_y : Baseline emissions in year y (tCO₂/yr)

$EG_{PJ, y}$: Quantity of net electricity generation that is produced and fed into the grid as a result of the implementation of the project activity in year y (MWh/yr)

$EF_{grid, CM, y}$: Combined Margin (CM) Emission Factor of NEWNE (tCO₂/MWh)

Since the project activity is the installation of a new grid-connected renewable power plant/unit at a site where no renewable power plant was operated prior to the implementation of the project activity, hence:

$$EG_{PJ, y} = EG_{facility, y}$$

Where,

$EG_{facility, y}$ = Quantity of net electricity generation supplied by the project plant/unit to the grid in year y (MWh/yr)

Thus, $BE_y = EG_{facility, y} * EF_{grid, CM, y}$

For current monitoring period (01-September-2012 to 31-August-2018)

Thus, $BE_y = 445,709.13 * 0.9225 \text{ tCO}_2/\text{MWh}$

= **411,162**tCO₂e (rounded down value)

Furthermore, the PP has provided the vintage wise break-up of electricity generation and emission reduction calculation as above equation and same has been verified as below:

Vintage	Net Electricity Generated	Emission Factor	Vintage wise Baseline Emissions
	$EG_{PJ,y} / EG_{facility,y}$	$EF_{grid,CM,y}$	BE_y
01-September-2012 to 31-December-2012	18,376.04	0.9225	16,951
01-January-2013 to 31-December-2013	73,432.81	0.9225	67,741
01-January-2014 to 31-December-2014	74,095.75	0.9225	68,353
01-January-2015 to 31-December-2015	81,778.81	0.9225	75,440
01-January-2016 to 31-December-2016	75,094.26	0.9225	69,274
01-January-2017 to 31-December-2017	74,240.56	0.9225	68,486
01-January-2018 to 31-August-2018	48,690.90	0.9225	44,917
Total	445,709.13		411,162

Above calculation was checked and found to be correct and hence accepted by verification team.

The verification team confirms that appropriate methods and formulae for calculating baseline emissions have been followed. The assumptions, emission factors and default values that were applied in the calculations are justified. The verification team confirms that appropriate methods and formulae for calculating baseline emissions have been followed. The assumptions, emission factors and default values that were applied in the calculations are justified. The actual emission reduction achieved during the current monitoring period are 14.79% lower than the estimated amount of emission reductions at the time of validation, which is due to the high PLF achieved by the project activity during the monitoring period. The generation of electricity depends upon many other climatic conditions, which are not within the control of the project participant. Hence the assessment team has concluded the increase in emission reduction of the project activity is justified and acceptable.

All the data were made available and have monitored as per required monitoring frequency. The means of verification for the values of parameters, used for baseline emission calculation, is described above. The emission reduction calculation for the project activity is estimated based on the electricity supplied by the TG sets installed at site. Monthly values of electricity generated inserted in the ER sheet was verified with the Joint Meter Reading Report and Invoices provided by the project proponent. Since 100% data was verified, the team can ascertain that the values taken for emission reduction calculation are free from material errors. Therefore, the assessment team confirms that the emission reductions are free from any omissions, misstatement and material errors.

4.6 Non-Permanence Risk Analysis

Not applicable for the project activity. This section is not applicable for non-AFOLU projects.

5 VERIFICATION CONCLUSION

Applus+ certification, contracted by Tata Power Renewable Energy Limited, has performed the independent verification of the emission reductions for the VCS project activity (VCS ID- 1039) “AES SaurashtraWindfarms” in India for the monitoring period 01-September-2012 to 31-August-2018as reported in the Monitoring Report Version 03.3dated 08/11/2022. The Tata Power Renewable Energy Limited is responsible for the collection of data in accordance with the monitoring plan and the reporting of GHG emissions reductions from the project activity.

It is our responsibility to express an independent verification statement on the reported GHG emission reductions from the project activity

Applus+ certification commenced the verification on the basis of the baseline and monitoring methodology ACM0002 Version 12.3.0, the monitoring plan contained in the registered VCS PD Version 06, dated 16/02/2013and VCS guidelines version 4.2, Monitoring Report Version 3.3 dated 08/11/2022 as per the process described under Section 2 of this report.

Applus+ certification verification approach is based on the understanding of the risks associated with reporting of GHG emission data and the controls in place to mitigate these. Applus+ certification planned and performed the verification by obtaining evidence and other information and explanations that Applus+ certification considered necessary to give reasonable assurance that reported GHG emission reductions are fairly stated.

In our opinion the GHG emissions reductions reported for the project activity for the period 01-September-2012 to 31-August-2018are fairly stated in the Monitoring Report Version 3.3 dated 08/11/2022. The GHG emission reductions were calculated correctly on the basis of the approved baseline and monitoring methodology ACM0002, Version 12.3.0, and the VCS standard 4.3.

Verification period: From 01-September-2012 to 31-August-2018(including both days)

Verified GHG Emission reductions and removals in the above verification period:

Year	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions or removals (tCO ₂ e)
2012	16,951	0	0	16,951
2013	67,741	0	0	67,741
2014	68,353	0	0	68,353
2015	75,440	0	0	75,440
2016	69,274	0	0	69,274
2017	68,486	0	0	68,486
2018	44,917	0	0	44,917
Total	411,162	0	0	411,162

The PP has explained that as per the estimated emission reduction to be achieved from the project activity for the current monitoring period is 482,530 tCO₂e, whereas actual emission reductions achieved are 411,162tCO₂e, which is approximately 14.78% lower than the estimated emission reductions. The generation of electricity depends upon many other climatic conditions, which are not within the control of the PP. Same was verified and found to appropriate and accepted by the VVB assessment team.

APPENDIX 1: <REFERENCES>

S.No	Title of Document	Version	Date
1.	Registered VCS PD	02	06/02/2013
2.	VCS Validation Report	02.1	22/03/2013

S.No	Title of Document	Version	Date
3.	VCS Monitoring Report	01	01/06/2022
4.	VCS Monitoring Report (Final)	03.3	08/11/2022
5.	ER spread sheet (corresponding to the final monitoring report)	02 .1	17/10/2022
6	Certificates of Calibration for all the meters belongs to project activity	-	01/09/2012 to 31/08/2018
7.	Invoice issued by PP to state DISCOM	-	01/09/2012 to 31/08/2018
8.	Monthly JMR and Credit notes issued by GIDCO for the current verification period.	-	01/09/2012 to 31/08/2018
9.	"Grid-connected electricity generation from renewable sources", ACM0002	12.3.0	-
10.	CEA Database	Version 06	
11.	Commissioning certificate for all the Wind farm of the project activity issued by state electricity authority	-	
12.	Power Purchase Agreements signed between respective Project developer and state electricity authority	-	-
13.	VCS webpage for the project, VCS ID 1039; https://www.vcsprojectdatabase.org/#/project_details/1039	-	Last accessed on 02/08/2022
14.	Letter of declaration dated from PP regarding not having created or sought any other form of environmental credit for the same period	-	01/07/2022
15.	Central Electricity Authority (Installation and Operation of Meters) Regulations Notified on 17/03/2006 <u>No. 502/70/CEA/DP&D</u> Amendments Notified on 26/06/2010 <u>No. 502/6/2009/DP&D/D-I</u>	-	Dated 17/03/2006
16.	VCS Standard	Version 4.3	Issued:19-09-2019

S.No	Title of Document	Version	Date
			Updated: 22-04-2021
17.	VCS Program Guide	Version 4.2	19/09/2019 Updated: 22-04-2021
18.	On-site assessment –interviews of staff personnel, physical inspection of monitoring system	-	08/07/2022
19.	Monthly generation reports issued by O&M contractor	-	01/09/2012 to 31/08/2018
20.	Clean Development Mechanism Validation and Verification Standard for Project Activity (CDM-VVS for PA), as per EB 101, Annex 2	3.0	
21.	VCS Monitoring Report	03.1	17/06/2022
22.	ER spread sheet	02	17/06/2022

APPENDIX 2: <COMPETENCY STATEMENT>

According to the sectoral scope / technical area and experience in the sectoral or national business environment, Applus+ Certification has composed a project assessment team in accordance with the appointment rules in the internal Quality Management System of Applus+ Certification.

The composition of audit team shall be approved by the Applus+ Certification ensuring that the required skills are covered by the team.

The four qualification levels for team members that are assigned by formal appointment rules are as presented below:

- Lead Auditor (LA).
- Auditor (A) / Auditor in Training (AiT).
- Technical Expert (TE).
- Technical Reviewer (TR).

The sectoral scope / technical area knowledge linked to the applied methodology/ies shall be covered by the assessment team.

Name	Qualification	Coverage of scope	Coverage of technical Area	Financial aspect	Host country Experience	Attendance to the On-site-Site Assessment
Vivek Kumar Ahirwar	Lead Auditor (LA) & Technical Expert (TE)	Yes (1)	Yes (1.2)	N/A	Yes	Yes
Simon Shen	Technical Reviewer (TR)	Yes (1)	Yes (1.2)	N/A	N/A	N/A

The curriculum vitae of the VVB's team members are provided below:

Vivek Kumar Ahirwar is a BEE-Certified Energy Auditor by Govt of India with over eight years of relevant experience in energy efficiency, energy audit, thermal and electrical energy generation technology from renewable source and energy conservation in energy intensive industries, designated consumers and commercial buildings, implementation of energy conservation building codes, research, process and green building projects. He is a certified lead auditor for ISO 14001 EMS and 14064. He has experience under various categories of projects stating from renewable to waste to supercritical projects and WCD. He has successfully audited more than 100 GHG (CDM/VCS/GS) projects in different states across the India. He has done Mater in Technology (Energy Management) from a premier institute, School of Energy& Environmental Studies, DAVV, Indore (M.P.), India and Bachelor of Engineering (Mechanical Engineering) from Govt. Engineering college, Rewa, RGPV, India.

Simon Shen (Master Degree in Thermal Energy Engineering, Bachelor Degree in Environmental Engineering) is a Lead Auditor appointed by Applus+ LGAI for the GHG project assessment. He is based in Shanghai. He has several years of work experience in environmental protection field. Before he

joined Applus+ LGAI, he had been worked for TÜV SÜD as a GHG Validator/Verifier and ISO 9001/14001 Lead Auditor for 3.5 Years.

APPENDIX 3: <ABBREVIATIONS>

ABT	Availability Based Tariff
BEF	Baseline Emission Factor
BM	Build Margin
CAR	Corrective Action Request
CEA	Central Electricity Authority
CERC	Central Electricity Regulatory Commission
CL	Clarification Request
CMS	Central Monitoring System
CMP	Conference of Parties Serving as Meeting of Parties
CO2	Carbon dioxide
DISCOM	Distribution Company
EB	Executive Board
EPC	Engineering, Procurement and Construction
FAR	Forward Action Request
GHG	Green House Gas
ISO	International Standards Organization
JMR	Joint Meter Reading
kW	Kilowatt
kWh	Kilowatt hour
GEDA	Gujarat Energy Development Agency
MFR	Multi-Function Relay
MR	Monitoring Report
GSEDCL	Gujarat State Electricity Distribution Company Limited

MW	Megawatt
MWh	Megawatt-hour
NEWNE	Northern Eastern Western Northern-Eastern
O&M	Operation and Maintenance
PD	Project Description
PLF	Plant Load Factor
PP	Project Proponent
PPA	Power Purchase Agreement
QA/QC	Quality Assurance and Quality Control
Wind farm	Wind farm
TOD	Time of the Day
UNFCCC	United Nations Framework Convention on Climate Change
VCS	Voluntary Carbon Standard
VCSA	Voluntary Carbon Standard Association
VCS PD	VCS Project Description
VCUs	Voluntary Carbon Units

APPENDIX 4: <FINDINGS OVERVIEW>

Table 1. Remaining FAR from validation and/or previous verification

FAR ID		Section no.	NA	Date :DD/MM/YYYY
Description of FAR				
N/A				
Project participant response				Date :DD/MM/YYYY
NA				
Documentation provided by project participant				
NA				
VVB assessment				Date: DD/MM/YYYY
NA				

Table 2. CL from this verification

CL ID	01	Section no.	1.9 & 1.10	Date : 20/07/2022
Description of CL				
PP has not submitted the undertaking letter to support the requirement of section 1.9 and 1.10 of the MR.				
Project participant response				Date : 25/07/2022
PP attached the undertaking letter in support of Section 1.9 and 1.10				
Documentation provided by project participant				
Declaration Letter				
DOE assessment				Date: 02/08/2022
PP has provided the undertaking letter dated 01/07/2022 and same has been acceptable to the verification team. Hence CL#01 is closed.				

Table 3. CAR from this verification

CAR ID	01	Section no.	1.5, B.1	Date 20/07/2022
Description of CAR				

Project participant mentioned the details regarding the technologies used in the project activity but to verify the same, no such document has been provided by the PP (i.e., technical equipment's details & O&M agreement etc.) is provided to DOE team. Corrective action is sought for the same. PP is requested to provide the above documents to assessment team.	
Project participant response	Date : 25/07/2022
PP attached the Technical Equipment Details along with the O & M Agreement	
Documentation provided by project participant	
Technical Equipment Details	
O & M Agreement	
DOE assessment	Date: 02/08/2022
PP has provided the supporting evidence for technical details of equipment and O & M agreement. Hence CAR#01 is closed.	

CAR ID	02	Section no.	E.3	Date :20/07/2022
Description of CAR				
The breakdown details of the power plant are provided in the MR. Further, supporting document regarding the breakdown details are not provided to the assessment team. PP is requested to provide the above documents to assessment team.				
Project participant response				Date : 25/07/2022
PP attached the breakdown details of the power plant				
Documentation provided by project participant				
Breakdown Details				
DOE assessment				Date: 02/08/2022
PP has provided the breakdown detail in appendix -II of the updated monitoring report. Hence CAR#2 is closed.				

CAR ID	03	Section no.	1.5	Date :20/07/2022
Description of CAR				

PP shall clarify the Crediting Period about the project as VCS page says Expired, 01/03/2012 - 28/02/2022. And in section 1.5 has mentation that 07-June-2011.	
Project participant response	Date : 25/07/2022
<p>For this project activity -</p> <p>VCS Crediting Period – 07-June-2011 to 06-June-2021 (Based on Start date of project activity)</p> <p>CDM Crediting Period – 01-March-2012 to 28-February-2022 (Fixed)</p> <p>Project issued carbon credits as follows</p> <ol style="list-style-type: none"> 1. 07-June-2011 to 29-February-2012 – VCS 2. 01-March-2012 to 31-August-2012 – CDM 3. 01-September-2012 to 31-August-2018 – VCS (Current Verification) 	
Documentation provided by project participant	
Updated MR	
DOE assessment	Date: 02/08/2022
PP has provided the justification and supporting document for start date of the project. Hence, CAR #03 is closed.	

CAR ID	04	Section no.	2.2	Date :20/07/2022
Description of CAR				
PP shall submit the current practice for A local stakeholder or current practice at site details along with the evidence.				
Project participant response				Date : 25/07/2022
Kindly refer to section 2.2 of the revised MR for the mechanisms established by the PP for ongoing communication with local stakeholders to allow stakeholders to raise concerns about the impacts during project implementation				
Documentation provided by project participant				
revised MR				
DOE assessment				Date: 02/08/2022
PP has updated the section 2.2 of the monitoring report and same has been found inline. Hence, CAR#04 is closed.				

Table 4. FAR from this verification

FAR ID	XX	Section No.	XX	Date :
Description of FAR				
NA				
Project participant response				Date : DD/MM/YYYY
NA				
Documentation provided by project participant				
NA				
WB assessment				Date: DD/MM/YYYY
NA				