

# PROJECT REVIEW REPORT

This project review report includes findings raised during Verra’s review of the project specified below. The VVB must address the findings before the project request can be considered for approval by Verra. The project review report will be made publicly available on the Verra Registry. Confidential information may be provided in separate attachments.

<b>Project ID</b>	2307
<b>Project Name</b>	Ambatolampy Solar PV
<b>Review Type</b>	Verification Approval
<b>Program(s)</b>	VCS Program
<b>Verification Period</b>	01-January-2022 to 31-December-2023
<b>Project Proponent</b>	New Energy Africa Ambatolampy (NEA Ambatolampy)
<b>Methodology</b>	ACM0002: Grid-connected electricity generation from renewable sources, v21.0
<b>VVB</b>	LGAI Technological Center, S.A. (Applus+ Certification)
<b>Assessment Criteria</b>	VCS Standard version 4.7
<b>Date of First Issue</b>	02 December 2024
<b>Date of Second Issue</b>	24 January 2025
<b>Review Conclusion</b>	Approved
<b>Date of Final Issue</b>	17 February 2025

## FINDINGS

#	Finding Description	VVB Response	Status
1	<b>Inconsistency in MR, VR and JPDMR</b>		
	<p><u>Issue</u></p> <ol style="list-style-type: none"> <li>1. PP to use the latest available methodology while updating the methodology in verification/validation/crediting period renewal.</li> <li>2. Sections 1.10 and 4.4 of JPDMR claimed ERRs for 2018 are different from registered JPDMR.</li> <li>3. Section 2.3 of VR mentioned that a remote audit was performed on 24 November 2024 via videoconferencing using the ICT tool Microsoft Teams. However, this date is after the final report submission.</li> </ol> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. VVB must ensure that PP uses the latest version of the applied methodology and that VVB provides its assessment in VR.</li> <li>2. VVB must ensure that PP uses consistent values of ER's in all documents.</li> <li>3. VVB to justify the date of remote audit in VR.</li> </ol> <p><u>Program Rule(s)</u>  <i>VCS Monitoring Report Template v.4.4</i>  <i>VCS Joint Project Description &amp; Monitoring Report Template v.4.4</i>  <i>VCS Standard, v4.7</i></p>	<p><b>Round 1</b></p> <p><u>VVB Response</u></p> <ol style="list-style-type: none"> <li>1. VVB team confirms that the PP has now used the latest available version of the methodology, i.e. version 22.0 of “ACM0002: Grid-connected electricity generation from renewable sources” in all the project documents (i.e. JPDMR and MR for MPO3). The additional applicability conditions of the latest version are now included in the JPDMR. The relevant assessment is provided by the VVB team in its verification report and references updated to latest version of the methodology.</li> <li>2. VVB Team through onsite visit confirmed that the start date of project activity is 10-July-2018 by checking commissioning documents. During the verification process, it was realized that the actual start date of phase 1 of the project was 10-July-2018, instead of 12-July-2018 as stated in the initial JPDMR. This was assessed by VVB Team and the project documents were corrected accordingly, including the ex-ante ER sheet.                      As a result of this 2 days difference, the expected ERs for year 2018 slightly increased in the updated JPDMR. It is now consistent in all updated documentations.</li> <li>3. VVB team would like to clarify that the initial remote audit was performed on 24-November-2023. The date was erroneously mentioned as 24-November-2024 in section 2.3 of VR. It was a typographical error. VVB team has now corrected the date in section 2.3 of VR.</li> </ol> <p><u>Verra Response</u></p> <ol style="list-style-type: none"> <li>1. PP updated the latest version of the applied methodology</li> </ol>	Closed

		<p>and that VVB provides its assessment in VR.</p> <ol style="list-style-type: none"> <li>2. PP updated the MR to consistent values of ER's in all documents.</li> <li>3. VVB updated the date of the remote audit in VR.</li> </ol> <p>The issue is closed.</p>	
		<b>Round 2</b>	
		<u>VVB Response</u> (Pending)	
		<u>Verra Response</u> (Pending)	
		<b>Round 3</b>	
		<u>VVB Response</u> (Pending)	
		<u>Verra Response</u> (Pending)	

<b>2</b>	<b>Additionality</b>		
	<p><u>Issue</u></p> <ol style="list-style-type: none"> <li>1) The method of proving additionality has changed in this deviation. In registered JPD MR, it was proved through the activity method (positive list). In this deviation, tool 23 is used for additionality (first of its kind). However, the use of tool 23 is nowhere mentioned in ACM0002 v21.0.</li> <li>2) Para 12 of Tool 23 v03.0 states about first-of-its-kind identification;             <ol style="list-style-type: none"> <li>a) The project is the first in the applicable geographical area that applies a technology that is different from technologies that are implemented by any other project, which are able to deliver the same output and have started commercial operation in the applicable geographical area before the project design document (CDM-PDD) is published for global stakeholder consultation or before the start date of the proposed project activity, whichever is earlier;</li> <li>b) The project implements one or more of the measures.</li> </ol> </li> </ol>	<p><b>Round 1</b></p> <p><u>VVB Response</u></p> <ol style="list-style-type: none"> <li>1) VVB team ensures that the Project Proponent has now included detailed justification related to applicability of Tool 23, version 03.0, in section 3.5 of revised JPD-MR and section 3.2.2 of revised MR for this Monitoring Period. VVB Team confirmed it to be correct and appropriate. The related VVB Team's assessment regarding applicability of Tool 23 is included in section 3.2 of the VR.</li> <li>2) VVB team would like to clarify that the FOIK identification is applied to the overall greenfield solar PV plant, not to the capacity addition which is a deviation only. It is to be noted that, FOIK is demonstrated based on the fact that there is no other solar large-size PV plant (&gt;15 MW capacity) in the country (according to the map of plants provided in early 2024 by state-owned electric utility JIRAMA which is being submitted along with the response, second largest solar PV plant has a capacity of 1 MW).</li> </ol>	Closed

<p>c) The project participants selected a crediting period for the project activity that is “a maximum of 10 years with no option of renewal”.</p> <p>It is unclear how it was identified that capacity addition to the previous installed solar plant (or largest capacity of the plant) is first of its kind while other solar plant was also installed within the host country having different capacity.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. The VVB must ensure that PP provides the justification of tool 23's applicability, and the VVB must assess and provide its assessment in VR.</li> <li>2. VVB needs to justify how they assessed the implemented technology as the first of its kind and provide their assessment in VR.</li> </ol> <p><u>Program Rule(s)</u>  <i>VCS Standard, v4.7</i>  <i>CDM tool 23, v3.0</i></p>	<p>Moreover, VVB team has already provided detailed assessment about the FOIK identification in section 3.2 of the VR, in the table under heading “Overall impact of the sought deviations on Applicability of methodology, additionality and Baseline scenario and corresponding assessment”, in accordance with the requirements of Tool 23, v03.0.</p> <p><u>Verra Response</u></p> <ol style="list-style-type: none"> <li>1. PP justified tool 23's applicability, and the VVB also provided its assessment in VR. The issue is closed. However, sub-finding 2 is still open.</li> <li>2. FOIK identification is applied to the overall greenfield solar PV project. However, in section 3.2 of VR, VVB justified that the Ambatolampy Solar PV is the first large-scale solar power plant in Madagascar. It is unclear whether the project activity is the first solar project or the first large-scale solar project.          Further, VVB will confirm if the FOIK assessment has been done as per Annex 7 of CDM-EB-69.</li> </ol> <p><u>Action Required</u></p> <p>VVB needs to justify how they assessed the implemented technology as the first of its kind and provide clarity on whether the implemented project activity is the first of its kind by technology or by the large size of similar available technology within the host country.</p> <p><b>Round 2</b></p> <p><u>VVB Response:</u></p> <ol style="list-style-type: none"> <li>2. VVB Team confirms that the FOIK assessment has been done in accordance with Annex 7 of CDM-EB-69 (whose latest version is Annex 6 of CDM-EB-84, i.e. Tool 23, v03.0). The VVB team has already provided the detailed assessment about the FOIK demonstration in section 3.2 of the VR, in the table under heading “Overall impact of the sought deviations on Applicability of methodology, additionality and Baseline scenario and</li> </ol>	
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		<p>corresponding assessment”, in accordance with the requirements of Annex 7 of CDM-EB-69 (whose latest version is Annex 6 of CDM-EB-84, i.e. Tool 23, v03.0).</p> <p>Moreover, for better clarity a summary table has been included now in MR, JPD-MR and VR in accordance with <i>Definitions as per Annex 7 of CDM-EB-64</i>, in which it is clearly indicated that the project activity is the first large scale solar project in the host country.</p> <p>VVB team reaffirms that the implemented project activity is the first of its kind by the large size of similar technology within the host country. The detailed assessment about identification of project as FOIK by large size is already provided in section 3.2 of VR. Thus, VVB team is of the opinion that the project activity is in compliance with all the requirements of FOIK guidelines (Tool 23 / Annex 6 of CDM-EB-84 / Annex 7 of CDM-EB-69).</p> <p><u>Verra Response</u>  VVB justified the implemented technology as the first of its kind and clarified whether the implemented project activity is the first of its kind by technology or by the large size of similar available technology within the host country.  The issue is closed.</p>	
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3 Stakeholder consultation and Grievance redress procedure			
	<p><u>Issue</u></p> <p>1) Stakeholder consultation was done during the initial plant installation phase between 05 to 08 July 2016. Mission 1 &amp; 2 were conducted during the extension phase to make the local stakeholders aware of the project extension. However, details of the Mission 1&amp; 2 are missing</p> <ul style="list-style-type: none"> <li>i) Stakeholder identification process.</li> <li>ii) Place of meeting conducted during missions 1 &amp; 2.</li> <li>iii) Means of invitation sent to stakeholders.</li> <li>iv) Details of feedback received during consultation</li> </ul>	<p><u>Round 1</u></p> <p><u>VVB Response</u></p> <p>1) VVB Team confirms that the PP has now included the information on mission 1 &amp; 2 in section 2.1 of the MR and section 2.2 of the JPD MR, on:</p> <ul style="list-style-type: none"> <li>i) Stakeholder Identification process</li> <li>ii) Place of meetings</li> <li>iii) Means of invitation</li> <li>iv) Feedback received and resolution</li> </ul> <p>VVB Team cross-checked the included information, which was</p>	<p>Closed</p>

<p>and their resolutions.</p> <p>2) The Process and details of ongoing communication, as well as the grievance redress procedure, are not mentioned. Also, the means of communication regarding grievances are missing in MR.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> <li>1. VVB ensures that PP provides the details of Stakeholder consultation during the project extension phase, and accordingly, VVB assesses and provides their justification in VR.</li> <li>2. VVB must ensure that PP provides the details of how stakeholders can register the grievances and mentioned the means of communication (e.g. email ID, contact number, and via logbook)</li> </ol> <p><u>Program Rule(s)</u>  <i>VCS Monitoring Report Template v.4.4, Section 2.1.1, 2.1.2, 2.1.4</i>  <i>VCS Validation Report Template v.4.4, Section 4.2.2</i></p>	<p>confirmed to be correct and accordingly incorporated the relevant assessment about the Missions 1 &amp; 2 during the project extension phase, in section 4.2 of VR.</p> <p>2) VVB Team confirms that the additional information about the Process and details of ongoing communication, as well as the grievance redress procedure are now included in section 2.1 of MR and section 2.2 of the JPDMR. Details about grievance logbooks, contact information of the responsible authorities, etc. were included. VVB team confirmed those details to be correct based on its onsite audit observations and documentary review.</p> <p>VVB has included relevant assessment about the Process and details of ongoing communication, as well as the grievance redress procedure in sections 4.2.2 and 4.2.4 of VR.</p> <p><u>Verra Response</u></p> <ol style="list-style-type: none"> <li>1. PP provided the details of Stakeholder consultation during the project extension phase and updated the MR; accordingly, VVB provided their assessment in VR.</li> <li>2. PP provided the details of how stakeholders can register their grievances and mentioned the means of communication in the updated MR.</li> </ol> <p>The issue is closed.</p> <p><b>Round 2</b></p> <p><u>VVB Response</u> (Pending)</p> <p><u>Verra Response</u> (Pending)</p> <p><b>Round 3</b></p> <p><u>VVB Response</u> (Pending)</p> <p><u>Verra Response</u> (Pending)</p>
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