



Voluntary Carbon Standard 2007.1

VERIFICATION REPORT

M/s Kamal Engineering Corporation

**Bundled Grid connected 2.9 MW
Wind Power Project in India by
Kamal Engineering Corporation [Unit
of KEC Industries Ltd]**

**VERIFICATION PERIOD:
28th March 2006 to 01st September 2009**

Project No/ Rev. No.: V-2-I-04-S-0006/01.1-Ve

Verification Report

Name of Verification company:	Date of issue:
Perry Johnson Registrars CDM Inc.	2010-01-22
Report Title:	Approved by:
Verification report – “Bundled Grid connected 2.9 MW Wind Power Project in India by Kamal Engineering Corporation [Unit of KEC Industries Ltd].”	S. V. Jamble
Client:	Project Title:
Kamal Engineering Corporation Contact Person: Mr. S.K. Gupta Manager	Monitoring report of “Bundled Grid connected 2.9 MW Wind Power Project in India by Kamal Engineering Corporation [Unit of KEC Industries Ltd]” Date : 2010-01-12
Summary:	
Kamal Engineering Corporation has commissioned Perry Johnson Registrars Clean Development Mechanism Inc. (PJRCMD) for verification of the project – “Bundled Grid connected 2.9 MW Wind Power Project in India by Kamal Engineering Corporation [Unit of KEC Industries Ltd]. The verification involves independent review of the implementation of project as per VCS project document (PD) and its monitoring plan. The project activity involves installation two Wind Turbine Generators (WTGs) of 1.65 MW and 1.25 MW capacity totalling to an installed capacity of 2.9 MW. The project activity is located across two states of India namely, Maharashtra, and Tamilnadu. A site visit and review of evidences were made to verify the data in the monitoring report version dated 12 January 2010. A number of Clarification Requests (CLs) and Corrective Action Requests (CARs) were issued which were subsequently resolved by the project proponent. In our opinion, the GHG emission reductions reported in the monitoring report version dated 12 January 2010 are fairly stated. Based on the assessment, PJRCMD is able to certify that the implementation of the project has resulted in GHG emission reduction of 16,200 tCO₂ equivalent during the period 28th March 2006 to 01 September 2009. PJRCMD’s opinion regarding the reported emission reductions for the period from 28th March 2006 to 01 September 2009 is based on the information sought and also reviews of publicly available information where applicable. ISO-14064 guidelines have been applied in principle to assess the key issues like accuracy, completeness and conservativeness of the information. PJRCMD’s verification/certification of GHG emissions is limited to this information evaluation. Issuance and utilization of certified GHG-emission reductions is beyond the scope of PJRCMD.	
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Work carried out by:	Work Reviewed by:
Anjana Sharma	Mathsy Kutty

Abbreviations

CAR	Corrective Action Request
CDM	Clean Development Mechanism
CL	Clarification Request
GHG	Greenhouse gas
IPCC	Intergovernmental Panel on Climate Change
KW	Kilo Watt
PD	Project Document
PJRCDM	Perry Johnson Registrars Clean Development Mechanism Inc.
PP	Project Proponent
UNFCCC	United Nations Framework Convention on Climate Change
VCS	Voluntary Carbon Standard

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1 INTRODUCTION

Kamal Engineering Corporation “hereinafter referred to as the client, project proponent or project developer” contracted Perry Johnson Registrars Clean Development Mechanism Inc. (PJRCMD) to perform verification of the project activity “Bundled Grid connected 2.9 MW Wind Power Project in India by Kamal Engineering Corporation [Unit of KEC Industries Ltd]” under the Voluntary Carbon Standard (VCS) 2007.1 for the period 28 March 2006 to 01 September 2009. The report describes the verification work undertaken.

1.1 Objective

Verification under VCS is the independent ex-post quantification and certification of the greenhouse gas (GHG) emission reductions achieved by a project activity which has completed validation under VCS or registered under a VCS approved GHG program.

The above work is carried out through an independent assessment and a written assurance is provided on the GHG emission reductions achieved for the period specified.

1.2 Scope and Criteria

The scope of the verification covers independent objective review and ex-post determination of the monitored GHG emission reductions by the project activity “Bundled Grid connected 2.9 MW Wind Power Project in India by Kamal Engineering Corporation [Unit of KEC Industries Ltd]”.

The specific scope of the verification work involves:

- To verify that the project activity is implemented as per the project details of the registered project design document (PDD)
- To assess whether the emissions reductions determined are in conformance with the monitoring plan of the VCS PD and the approved methodology.
- To express a conclusion whether reported data are accurate, complete, consistent, and transparent with a reasonable level of assurance and free of omission or material error, based on the review of the reported data and emission reduction calculations.

The project is assessed against the verification requirements of VCS2007.1 standard including the criteria that the emission reductions are real, measurable, transparent and conservative. The approach adopted by PJRCMD verification team is risk-based, drawing on an understanding of the risks associated with reporting of GHG emissions data and the controls in place to mitigate these.

The work carried out by PJRCMD is free from any conflict of interest.

Request for issuance of Voluntary Carbon Units (VCUs), verified and certified by PJRCMD, shall be made by the project proponent to the VCS registry in accordance with the most recent version of the “*VCS Guidance Document: VCS Project Registration and VCU Issuance process*”. In view of the above, PJRCMD’s responsibility is limited only to verification and certification of the GHG emission reductions achieved during the specified period.

1.3 VCS project Description

The project activity involves installation of two wind turbine generators (WTGs) of 1.65 MW and 1.25 MW capacity totalling to an installed capacity of 2.9 MW. The project activity is located across two states of India namely, Maharashtra, and Tamilnadu. The project details are as follows:

Project owner	: Kamal Engineering Corporation
Location	: Tirunneveli district in Tamil Nadu and Dhule district in Maharashtra.
Title of the PDD	: Bundled Grid connected 2.9 MW Wind Power Project in India by Kamal Engineering Corporation [Unit of KEC Industries Ltd]
Methodology used	: AMS I D, Version 13
VCS Crediting period	: 28 th March 2006 to 27 th March 2016
Monitoring period under VCS	: 28 th March 2006 to 01 September 2009

1.4 Level of assurance

In line with VCS 2007.1 requirements and as per ISO 14064-3:2006 para A.2.3.2, a reasonable level of assurance is defined for the verification of the project.

This implies that, based on the process and procedures conducted, PJRCMD should state whether the GHG assertion in the monitoring report

- is materially correct and is a fair representation of the GHG data and information, and
- is prepared in accordance with VCS requirements, the registered CDM PDD and the approved methodology for information pertaining to GHG quantification, monitoring and reporting.

The verification work is carried out as per this requirement and details are presented in the Verification statement in section 4 below.

2 METHODOLOGY

2.1 General Approach

The project activity applies approved baseline and monitoring methodology AMS I D (version 13) categorised under sectoral scope 1 'Energy industries (renewable - /non-renewable sources)'. For verification, PJRCMD's approach involves broadly three steps:

- 1) Completeness check and desktop review of the monitoring report
- 2) Onsite inspection and issuance of findings from the audit

3) Resolution of the findings and preparation of the verification report

The following team members from PJRCMD were involved in these steps :

Name	Role	Areas covered
Anjana Sharma	Verifier	Completeness check of monitoring report, desk top review, site visit, Issuance and closure of findings, report preparation
Mathsy Kutty	Technical Reviewer	Independent review of the verification assignment.

2.2 Means of Verification

2.2.1 Review of Project Documentation

On receipt of the monitoring report from the client, the completeness of information made available as per VCS2007.1 standard requirements is reviewed. A desktop review is further carried out to assess the following:

- the validated VCS PD with the monitoring plan
- the emission reduction calculation method used in the applied methodology and the VCS PD
- the monitoring report, including frequency of monitoring and the calculation of emission reductions for the period
- the documented operation and maintenance manual furnished by the project participant (where applicable)
- other external documents like grid emission factor, IPCC emission factor, etc. applied

A complete list of all documents reviewed is attached in Appendix I of this report.

2.2.2 Onsite Inspections

An onsite visit (for WTGs at both the locations) was undertaken during the month of September 2009. During the site visit, the actual operation of the project as described in the PD was verified and the issues identified during the desktop review of the documents provided by the project proponent were also discussed.

List of personnel interviewed and issues discussed during the site visit is as provided below:

Name, Designation	Affiliation	Interviewed on
Mr. R.K.S Pillai, Assistant manager, CDM, Suzlon Energy Ltd.	Suzlon Energy Ltd.	• Project technical details, • Monitoring system, • Calibration practice, • Joint meter readings
Mr. Ananthanarayanan	Suzlon Energy Ltd.	
Sr. project Engineer		

Mr. Bharat Naik, Customer Relations Manager Suzlon Energy Ltd	Suzlon Energy Ltd.	
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During the site visit, PJRCMD verified the actual operation of the project as described in the VCS PD. The electricity generation at the WTG end, net export/import to/from the grid and calibration certificates of the main and check meters were verified during the site visit. All the documentation was found to be in order.

2.2.3 Review of Monitoring Results and Correct Application of Monitoring Methodology

Based on the site inspection and review of records including the monitoring plan, a list of non conformities, also called as Corrective Action Request (CAR) is raised. The non conformities could be related to lack of adherence to the VCS requirement, the monitoring plan of the registered PDD or where evidence provided is found insufficient to prove conformity. They could also be mistakes in applying data/assumptions and in calculation of emission reductions.

If information made available is insufficient to transparently arrive at the stated conclusion, a Clarification request (CL) is raised and communicated to the project proponent.

Observations may also be raised which are for the benefit of future verification period. These, however, have no impact upon the completion of the current verification activity.

On receipt of response from the project developer, the adequacy with compliance with VCS requirements is checked along with a revised monitoring report. Closure of comments raised occurs only if the response provided and correction made fully complies with the stated requirements of the methodology applied.

The list of CARs/ CLs raised and the response provided and reasons for closure are provided Appendix-1.

2.2.4 Determinations of the reductions in GHG Emissions

The emission reductions ER_y by the project activity during the crediting period is the difference between baseline emissions (BE_y), project emissions (PE_y) and emissions due to leakage (L_y), as follows:

1) Baseline emissions: Baseline emissions (BE_y in tCO_2) are the product of the baseline emissions factor (EF_y in tCO_2/MWh) times the electricity supplied by the project activity to the grid (EG_y in MWh). The proposed project activity consists of two WTGs located in two different states of India i.e. Tamil Nadu and Maharashtra. Both these states of India are connected to two different regional power grids; Tamil Nadu forms part of Southern Regional grid while the state of Maharashtra forms part of North East West North East (NEWNE) regional grid of India. Hence, the emission factor of both these grids has been taken into consideration to arrive at the final emission reductions. As per the validated VCS PD, grid emission factor for both the grids has been fixed *ex-ante* and the same will be used for *ex-post* VER calculations. For the current verification period, PJRCMD was able to verify the VER calculations based on the following *ex-ante* fixed grid emission factors:

- Southern Regional grid: $0.931 \text{ t } CO_2/MWh$

- North East West North East Regional grid: 0.906 t CO₂/MWh.

Net electricity supplied to the grid by both the WTGs located in two different states has been verified from the Joint meter readings (JMR) issued by the respective state electricity boards. The same is in line with the validated VCS PD. It has been confirmed that these JMR sheets are based on the readings from the calibrated meters located at the respective sub-stations. Calibration records of the main meter and check for both the WTGs in the states of Maharashtra and Tamil Nadu have been verified by PJRCMD.

2) Project emissions: The project emissions have been considered as zero.

3) Leakage: No leakage has to be considered for the proposed project activity.

4) Emission reductions: $ER_y = BE_y - PE_y - L_y = BE_y$.

During the period from 28th March 2006 to 01 September 2009, the total electricity exported to the grid by the WTG located in the state of Maharashtra is 8794.234 MWh and WTG located in Tamil Nadu exported 8842.806 MWh. The same has been verified from the Joint Meter Readings issued by the state electricity boards of respective states which was further cross verified from the invoices raised by the project developer. Based on this net electricity generation and the ex- ante fixed grid emission factors, the emission reductions resulting from the proposed project during the period from 28th March 2006 to 01th September 2009 have been calculated as 16,200 tCO₂e.

The GHG calculations are complete and transparent, and their accuracy has been verified by PJRCMD.

2.2.5 Review of Additional Data from other Sources if appropriate

The VCS PD dated 12 November 2009 and VCS validation report dated 12 November 2009 issued by PJRCMD was also reviewed for any issues to be taken into account during verification.

2.3 Internal Quality Control

On completion of the assessment by the GHG assessment team, the complete verification package including the verification report, monitoring report and supporting documents is sent to the Technical Reviewer. In this stage, the Technical Reviewer independently assesses the project with the VCS requirements before accepting/ rejecting the recommendation from the GHG assessment team.

3 VERIFICATION FINDINGS

3.1 Remaining issues, including any material discrepancy, from previous validation

No further issues are identified from the discussion, findings and conclusion from the VCS validation report, dated 12 November 2009.

3.2 Project Implementation

The project activity involves installation of two wind turbine generators (WTGs) of 1.65 MW and 1.25 MW capacity totalling to an installed capacity of 2.9 MW. The project activity is located across two states of India namely, Maharashtra, and Tamilnadu. At the time of verification of the project, both the WTGs were operating. PJRCMD was also able to verify that there is no change in the project design compared to the design discussed in the VCS PD dated 12 November 2009.

3.3 Completeness of Monitoring

As per the monitoring plan in the validated VCS PD, the only parameter that needs to be monitored is the net electricity supply from the WTGs to the respective grid. Grid emission factor of the respective grids have been fixed ex-ante as per the VCS PD, dated 12 November 2009. PJRCMD was able to verify that in both the states, the net electricity supply from the WTGs to the grid is measured using the calibrated energy meters located at the sub-station. It was also confirmed that there were two sets of meters at the sub-station, one main meter which directly measures the export and import of electricity to/from the grid. The other meters known as check meter is for emergency situations (in case main meter is not in operation). During the site visit at both locations, PJRCMD was able to verify the following:

Calibration certificates of both the meters i.e. main and check meters for the entire verification period (28th March 2006 to 01 September 2009). Accuracy of the meters (0.5 class in both the states) and the frequency of calibration (once in three years) was found to be in line with the monitoring plan in the VCS PD.

Complete data of electricity supply to the grid was available for the entire verification period (28th March 2006 to 01 September 2009) which was verified by PJRCMD.

3.4 Accuracy of Emission Reduction Calculations

PJRCMD assessed the different areas (as mentioned below) which can affect the accuracy of the final emission reduction calculations:

Value of grid emission factor: PJRCMD was able to confirm that this parameter has very less effect on the final emission factor calculations. On review, it was observed that this parameter has been fixed ex ante during the validation of the project (VCS PD dated 12 November 2009) and the same is to be used for ER calculations during the VCS crediting period of 10 years. Even during the validation stage, the said parameter was derived from the officially published latest data from Central Electricity Authority of India (CEA - <http://www.cea.nic.in/>) which is authentic source of information. Hence, the chances of error in the data are very less.

Net Electricity supply to the grid: This parameter is the difference between the total export to the grid (after taking T&D losses into account) and import from the grid (in case of emergencies/to meet the internal requirements). Since “n” number of WTGs in a particular wind farm are connected to the same feeder (interconnection point between the WTGs and grid), PP used the apportioning principle to arrive at the net electricity supply to the grid from the WTG belonging to him. The procedure for arriving at the final net electricity supply from the project WTG to the grid has already been validated by PJRCMD during the validation stage which was found to be reasonable. During the verification site visit, to ensure the accuracy of the final emission reductions, PJRCMD checked the calibration certificates of the meters (measuring the total electricity supply from “n” number of WTGs in the wind farm) and the net electricity supply from the WTGs belonging to the project was verified from the Joint Meter Reading (JMR) issued by the state electricity board of respective states. The same was further cross verified using the invoices raised by the PP. For the current verification period (28th March 2006 to 01 September 2009) all records were found to be in order.

3.5 Quality of Evidence to Determine Emission Reductions

PJRCMD was able to verify that the calculations are based on the authentic data from the joint meter reading sheets issued by the state electricity boards of respective states. The excel sheet used to calculate the monthly emission reduction figure were all tracked, checked and found to be consistent. Some errors were found in data transfer which were communicated to the project developer and the excel sheet was corrected accordingly.

3.6 Management and Operational System

Kamal Engineering Corporation has established management procedures and implemented the systems to ensure that it is consistent as stated in the VCS PD. The procedures cover management responsibilities, data monitoring procedures, training procedures, periodical internal audits, management reviews and corrective actions in case of any deviations effectively. Calibration process is followed as per defined procedures and carried out once in three years and the calibration certificates of the instruments used for data monitoring and recording were also verified during the site visit.

All the daily and monthly records are archived in electronic copy (MIS) and paper format.

4 VERIFICATION CONCLUSION AND CERTIFICATION STATEMENT

Perry Johnson Registrars CDM Inc. has performed verification under VCS of the project “Bundled Grid connected 2.9 MW Wind Power Project in INDIA by Kamal Engineering Corporation [Unit of KEC Industries Ltd.]”. The verification under VCS is sought for the period from 28th March 2006 to 01 September 2009. The project has applied the AMS I D small scale CDM methodology (version 13) and the emission reductions are as reported in the revised monitoring report dated 12 January 2010 .

The project developer, Kamal Engineering Corporation, is responsible for preparation/collection of the GHG emission reductions data as presented in the Monitoring Report Version 12 January 2010. PJRCMD is responsible for the independent GHG assessment and providing its opinion on the performance of emission reductions for the period 28th March 2006 to 01 September 2009. The verification approach was based on the requirements of VCS 2007.1 standard and the AMS I D methodology (version 13).

PJRCMD’s approach is risk-based, drawing on an understanding of the risks associated with reporting GHG emissions data and the controls in place to mitigate them. The assessment was based on the review of supporting evidences and information provided, including other explanations where necessary to enable PJRCMD to provide reasonable assurance that the reported amount of GHG emission reductions for the specified period is materially correct and fairly stated.

Certification statement:

PJRCMD confirms that the project activity has been implemented as per the VCS PD and that the emission reductions presented in the monitoring report 12 January 2010 are correctly determined as per the VCS2007.1 standard and AMS I D methodology, version 13. Based on the above information, PJRCMD confirms the following:

Name of the project	“Bundled Grid connected 2.9 MW Wind Power Project in INDIA by Kamal Engineering Corporation [Unit of KEC Industries Ltd.]”
VCS PD details	VCS PD dated 12 November 2009. Methodology AMS I D Version 13.

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Reporting period (dd/mm/yyyy) : 28/03/2006 to 01/09/2009

Verified emission in the above reporting period:

Project emissions	: 0	tCO ₂ equivalents
Baseline emissions	: 16,200	tCO ₂ equivalents
Emission reductions	: 16,200	tCO ₂ equivalents

Project Manager

PJRCDM

Site Program Manager

PJRCDM

APPENDIX I: DOCUMENTS REVIEWED

- /1/ Monitoring Report: “*Bundled Grid connected 2.9 MW Wind Power Project in India by Kamal Engineering Corporation [Unit of KEC Industries Ltd]*” dated 12 January 2010 and the previous versions.
- /2/ Project Design Document: “*Bundled Grid connected 2.9 MW Wind Power Project in India by Kamal Engineering Corporation [Unit of KEC Industries Ltd]*” dated 12th November 2009.
- /3/ VCS Validation Report – “*Bundled Grid connected 2.9 MW Wind Power Project in India by Kamal Engineering Corporation [Unit of KEC Industries Ltd]*” dated 12 November 2009
- /4/ Approved Small-scale Methodology – Indicative baseline and monitoring methodology AMS ID, version 13: “*Grid connected renewable electricity generation*”
- /5/ CDM Executive Board: Validation and Verification Manual, version 01.1
- /6/ Emission reduction excel worksheet, ‘*Verification Excel Sheet.xls*’
- /7/ Calibration certificates of Serial No. 04691356 the periodical test dated 11th February 2008.
- /8/ Calibration certificates of Serial No. 04760195 & 04760207 the annual testing letter dated 15th July 2008
- /8/ Log book for electricity generation data for the period - dd month year to dd month year.
- /9/ Invoices for the WTG K 118 for the period May 2006 to 17th August 2009.
- /10/ Invoices for the WTG L 12 for the period April 2006 to 1st September 2009.

APPENDIX II : RESOLUTION OF CARs AND CLs

Draft report clarification requests and corrective action requests by verification team	Ref. To the section of the monitoring report	Summary of project owner response	Verification team conclusion
CAR 1: As per the monitoring plan in the VCS PD, the calibration frequency is stated to be once in three years. Annual meter test certificate provided by MSETCL is for main and check meters connected to MICON and KP Power wind mill feeders located at 132 Sakri sub-station. Please clarify whether this certificate cover the main and check meter connected to WTG (L-12) belonging to Kamal Engineering Corporation also. Further, the certificate provided by MSETCL is just the annual meter testing certificate. PP is required to provide the meter calibration certificate for main and check meter connected to WTG L-12 belonging to Kamal Engineering Corporation (WTG commissioned on		- Further we undertake and declare that WTG L-12 connected to the feeder of KP POWER AT Sakari sub-station and having main and check meter nos 04760195 and 04760207 respectively under joint meter reading system are meant for raising invoices and credit notes . Reference of main meter out of these two meters is given for each and every credit notes issued by the MSEDCL after joint meter reading and thereafter invoice is raised. - Regarding the issue raised through CAR 1 for the calibration frequency and its nomenclature we wish to inform you that it varies from state to state in India, words used as annual meter testing certificate in Maharastra is meant for Calibration certificate as per our information collected by us on telephone.	- It has been confirmed from the joint meter reading (JMR) issued by MSEDCL which mentions the meter no 04760195 (main meter) and 04760207 (check meter) as the source of electricity export data for WTG L-12. Hence, this issue is closed. - PP is stating that terminology is different in the state of Maharashtra. Hence, annual meter test certificate itself is the calibration certificate in the state of Maharashtra. PJRCMD has accepted this argument keeping in view that the frequency as defined

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Draft report clarification requests and corrective action requests by verification team	Ref. To the section of the monitoring report	Summary of project owner response	Verification team conclusion
08/02/2006).			in the VCS PD is once in three years. And the annual meter test has been carried out in line with the frequency defined in the VCS PD. The results of meter test also reveals that the error is within the permissible limits. Keeping all this in mind, this issue has been closed by PJRCMD. CAR 1 is closed.
CAR 2: Errors have been found in data transfer from invoices to excel sheet e.g. for WTG K-118, for the month of October 2008, import, export and net generation figure is not matching with the document (invoices) provided for the same. Please check and correct the same. PJRCMD requests PP to check the excel sheet thoroughly and correct (if any) all such errors.		We have revised enclosed excel sheet for the entire places pin pointed by you. Now CAR 2 IS CLARIFIED ACCORDINGLY. Photo copies of not clear invoices are being sent by courier for your kind perusal.	- Emission reduction excel sheet has been revised and the same has been reviewed by PJRCMD. The final emission reductions have come down from 17,395 tCO₂ e in the initial version of monitoring report dated 15 December 2009 to 16,200 tCO₂ e in the final version of

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Draft report clarification requests and corrective action requests by verification team	Ref. To the section of the monitoring report	Summary of project owner response	Verification team conclusion
			the monitoring report dated 12 January 2010 CAR 2 is closed.

APPENDIX III: LIST OF PARAMETERS

List of parameters covered during the verification period under consideration (28th March 2006 to 01 September 2009) and details regarding the monitoring and reporting practices.

S.No.	Monitoring and reporting practice/Parameter	Parameter 1
1.	Monitoring and reporting frequency as verified during the site visit.	<i>Electricity supplied by the WTGs in the project activity to the respective regional grids EGy</i>
2.	Monitoring equipment verified during the site visit.	<i>Energy meter Accuracy of main and check meter in the state of Tamil Nadu: 0.5 class Maharashtra: 0.5 class</i>
3	Calibration frequency and other details verified during the site visit.	<i>Once in three years. <u>For WTG installed in the state of Tamil Nadu:</u> Date of commissioning of WTG: 29 March 2005 Date of calibration of the meter (meter no- 04691356): 11 February 2008. <u>For WTG located in the state of Maharashtra:</u> Date of commissioning of WTG: 08 February 2006 Date of annual testing of main meter (meter no: 04760195) and check meter (meter no: 04760207): 15 July 2008,</i>
4.	The above parameters are in line with the MP agreed in the registered PDD.	<i>Yes</i>
5	The above parameters are in line with the monitoring methodology applied for the proposed project.	<i>Yes</i>
6	Calibration entity and if the same is in	<i>Meter calibration/annual testing has been carried out by the respective state electricity Boards i.e.</i>

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	line with the monitoring plan as agreed in the registered PDD.	<i>Tamil Nadu Electricity Board and Maharashtra State Electricity Transmission Corporation Ltd, Testing Division , Dhule. The calibration entity is in line with the monitoring plan as mentioned in the VCS PD.</i>
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