

PROJECT REVIEW REPORT

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

Review Type	Credit Period Renewal
Project ID	810
Project Name	CEYHAN 61.7 MW Hydropower Project
Program(s)	VCS
Verification Period	NA
Project Proponent	Enova Enerji Üretim A.Ş
Methodology	ACM0002: Grid-connected electricity generation from renewable sources, Version 20.0
VVB	Re Carbon Gözetim Denetim ve Belgelendirme Ltd. Şti.
Assessment Criteria	VCS Version 4
Date of First Issue	20 July 2022
Review Conclusion	Approved
Date of Final Issue	12 December 2022

FINDINGS

#	Description	Response	Status
1	<p><u>Missing or incomplete information in PD Issue</u></p> <p>Project Description (PD) includes sections with missing or incomplete information which conflicts with the VCS rules and requirements.</p> <p>Action item</p> <p>Based on the requests below, the VVB must ensure that the following sections are updated by the project proponent:</p> <ul style="list-style-type: none"> A. 1.6: Provide a contact phone number for the Other Entity B. 1.7: Provide evidence of project ownership, in accordance with the VCS Program requirements. Currently, the section simply states the PP name. C. 1.9: Clarify what type of crediting period (CP) was selected. Previous monitoring reports indicate a 10 year, twice renewable CP was chosen but this is not clear on the new PD. D. 1.14: Describe and demonstrate how the project complies with all and any relevant local, regional and national laws, statutes and regulatory frameworks. The current text only identifies relevant laws. <p>The VVB is required to ensure that all project description sections are completed per the PD template requirements. The VVB shall assess each of the updates and update the Validation Report as necessary.</p> <p>Program rule(s) or methodology section</p> <p>VCS Standard, v4.2, Section 3.4.1 and 4.1.14, 3.8.9</p>	<p>Round1:</p> <p>VVB Response: All sections have been revised accordingly.</p> <p>Verra Review: This finding is closed, and no further action is required.</p>	<p>Closed</p>

<p>2 <u>Incomplete Applicability Conditions Demonstration</u></p> <p>Issue</p> <p>The PD fails to demonstrate and justify how the project activity meets <i>each</i> of the applicability conditions of the methodology and tools applied by the project.</p> <p>Action item</p> <p>A. The VVB must ensure that Section 3.2 of the PD is updated to include a justification that the project meets all the methodology applicability conditions. Steps 5 – 9 in ACM0002 are not presented.</p> <p>B. The VVB must also ensure that Section 3.2 of the PD is updated to demonstrate and justify that the project meets all the applicability conditions for the three tools applied. This is absent.</p> <p>C. The VVB must also update Section 3.3.2 of the Validation Report so that it includes a description of the steps taken to assess project compliance with each applicability condition for the selected methodology and tools.</p> <p>Program rule(s) or methodology section</p> <p>VCS Standard, v4.2, Section 3.4.1 and 4.1.14.</p>	<p>Round1:</p> <p>VVB Response: Section 3.2 has been revised accordingly. Report revised.</p> <p>Verra Review: This finding is closed, and no further action is required.</p>	<p>Closed</p>
<p>3 <u>Project Boundary is not described per template requirements and lacks VVB assessment</u></p> <p>Issue</p> <p>The required PD map is absent and VVB assessment does not follow template requirements</p> <p>Action Item</p> <p>A. The VVB shall ensure that Section 3.3 of the PD be updated to include a diagram or map of the project boundary, showing clearly the physical locations of the various installations or management activities taking place as part of the project activity based on the description provided in Section 1.8.</p> <p>B. The VVB must assess and confirm this update. The VVB must also update Section 3.3.3 so that it identifies the project boundary and describes in greater detail the documentation assessed. For each GHG source, sink and reservoir, the VVB shall describe the steps taken to assess</p>	<p>Round1:</p> <p>VVB Response: Section 3.3 has been revised accordingly. Report revised</p> <p>Verra Review: This finding is closed, and no further action is required.</p>	<p>Closed</p>

that it has been selected correctly in accordance with the applied methodology. Currently only vague language is used to indicate compliance with methodology and accuracy of boundary.

Program rule(s) or methodology section

VCS Standard, v4.2, Section 3.4.1 and 4.1.14.

4 Regulatory surplus conclusion lacks clarity

Issue

Despite stating that the project scenario is considered financially unattractive, it is not clear if the project has achieved regulatory surplus.

Action item

A. The VVB must ensure that Section 3.5 of the PD is updated to include an explicit statement and justification as to if regulatory surplus has been achieved.

B. The VVB shall assess and confirm the updates. The VVB must also update Section 3.3.5 of the Validation Report to describe how they assessed if the project has achieved regulatory surplus and state the overall conclusion.

Program rule(s) or methodology section

VCS Standard, v4.2, Section 3.4.1 and 4.1.14, 3.8, 3.8.9(1)

Round1:

VVB Response: Section 3.5 has been revised accordingly. report revised

Verra Review:

Issue

The PD and Validation Report do not clearly establish that the project activity has achieved regulatory surplus.

Action Item

A. The VVB must ensure that Section 3.5 of the PD is updated to include an explicit statement and justification as to if regulatory surplus has been achieved. This discussion should include a list and assessment of applicable laws.

B. The VVB shall assess and confirm the updates. The VVB must also update Section 3.3.5 of the Validation Report to describe how they assessed if the project has achieved regulatory surplus and state an overall conclusion on if the project as achieved regulatory surplus.

Round 2:

VVB Response:

Both sections 3.4 and 3.5 have been revised accordingly. VR 3.1 is revised too.

Verra Review: This finding is closed, and no further action is required.

Closed

<p>5 <u>ERR Quantification Process lacks details required to reproduce calculations and follow methodological choices</u></p> <p>Issue Methodological steps, choices and calculations are not adequately described to allow a reader to reproduce the calculations.</p> <p>Action item The VVB must update the Validation Report, Section 3.3.6 to:</p> <ul style="list-style-type: none"> • Describe the steps taken to validate the GHG ERR quantification methods applied by the project, as well as the items listed in the template. Currently this section lists what information is present in the PD but does not describe how the information was assessed or by what means the VVB arrived at the conclusions it presents. • Provide a link to the Ministry of Energy and Natural Resources where the emissions factor was published. <p>Program rule(s) or methodology section VCS Standard, v4.2, Section 3.4.1 and 4.1.14, 3.14</p>	<p>Round1: VVB Response: report revised Verra Review: This finding is closed, and no further action is required.</p>	<p>Closed</p>
<p>5 <u>Project Details section does not address all requirements</u></p> <p>Issue Section 3.1 does not meet the validation report requirements, as it is missing a discussion of three items.</p> <p>Action item The VVB must update Section 3.1 of the validation report to include their conclusion and a description of how they assessed:</p> <ul style="list-style-type: none"> • Conditions prior to project start • Project ownership <p>Program rule(s) or methodology section VCS Standard, v4.2, Section 4.1.14</p>	<p>Round1: VVB Response: report revised Verra Review: This finding is closed, and no further action is required.</p>	<p>Closed</p>