

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.

Project ID	0138
Project Name	Greater New Bedford LFG Utilization Project
Review Type	Verification Approval
Program(s)	VCS Program
Verification Period	01/01/2023 - 30/09/2023
Project Proponent	CommonWealth Resource Management Corporation
Methodology	ACM0001: Large-scale Consolidated Methodology – Flaring or use of landfill gas, v16.0
VVB	GHD Services Inc
Assessment Criteria	VCS Standard, 4.5
Date of First Issue	01/03/2024
Review Conclusion	Approved
Date of Final Issue	21/03/2024

FINDINGS

#	Finding Description	VVB Response	Status
1	<p>Incomplete audit history table</p> <p><u>Issue</u> The audit history table does not include the current monitoring period dates.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> VVB must ensure that the details of the current monitoring period are included in the audit table. VVB shall ensure that the audit table comprises all the activities, including the current monitoring period. <p><u>Program Rule(s)</u> VCS Monitoring Report Template, v 4.2; Section 1.1.</p>	<p>Round 1</p> <p>GHD has confirmed that the Project Proponent has updated the table within Section 1.1 of the Monitoring Report to include the current verification of the January 1, 2023 to September 30, 2023 monitoring Period. GHD confirmed that the details within the audit table are now comprehensive of the project's audit activities</p> <p>No updates were made to the Verification Report in response to this finding.</p>	[Closed]
		<p><u>Verra Response</u></p> <p>The PP has revised the MR and included a complete audit history, including the current monitoring period. The issue is closed.</p>	
		<p>Round 2</p> <p><u>VVB Response</u> (Pending)</p>	
		<p><u>Verra Response</u> (Pending)</p>	
		<p>Round 3</p> <p><u>VVB Response</u> (Pending)</p>	
		<p><u>Verra Response</u> (Pending)</p>	
2	<p>Inconsistent monitoring period dates</p> <p><u>Issue</u></p> <ol style="list-style-type: none"> In the Emergency Generator Analysis tab, the diesel consumption is for the period from January 1 - September 30, 2023; in MR, page 33 (Exhibit 4), the monitoring period indicated is July 1 - December 31, 2022. Final ERRs should be rounded down. In exhibit 4, CellI22, the data used for estimating 	<p>Round 1</p> <p><u>VVB Response</u></p> <ol style="list-style-type: none"> GHD confirmed that the reference to a previous monitoring period has been appropriately updated to reflect the Monitoring Period captured within the Monitoring Report (January 1, 2023 to September 30, 2023). No update was determined to be required to the Verification Report as a result of this finding. 	[Closed]

<p>baseline emissions is sourced from June 2023 instead of using the total for the entire monitoring period.</p> <p>4. The emission reductions for the period stated in the summary section (pg 3) of the verification report is 98,272 tCO₂, while in the MR and ERR sheet, the emission reductions for the period are 98,261 tCO₂.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. VVB must ensure that the monitoring period indicated is consistent across the MR and ERR sheets. 2. VVB must ensure that the final emission reductions are rounded down. The baseline emissions are supposed to be rounded down, while project emissions shall be rounded up to ensure conservativeness. 3. VVB shall re-check the ERR sheet and verify that the data sources used to estimate baseline emissions cover the entire monitored period. 4. VVB shall ensure consistent reporting of emission reductions achieved by the project in all sections of the verification report. <p><u>Program Rule(s)</u> VCS Standard, v4.5; Section 2.2.1 and 3.5.6,</p>	<ol style="list-style-type: none"> 2. Final ERRs were revised to be rounded appropriately. References to previous values were revised accordingly throughout Monitoring Report and Verification Report. 3. Project Propoenent calculations and Verification Body recalculations revised accordingly. Relevant values updated throughout Monitoring Report and Verification Report. Confirmed that the periods included within relevant calculations matched the monitoring period. 4. Reviewed and confirmed consistent and accurate reporting of emissions reductions through Monitoring Report and Verification Report. <p><u>Verra Response</u></p> <ol style="list-style-type: none"> 1. The MR has been revised, and correct referencing for exhibit 4 is not indicated. The issue is closed. 2. The ERRs are now rounded down appropriately. The issue is closed. 3. The ERR has not been recalculated, and the correct cell formulas have been applied. The issue is closed. 4. The total ERRs for the period are consistent across the MR, VR, and ERR sheet. The issue is closed. <p>Round 2</p> <p><u>VVB Response</u> (Pending)</p> <p><u>Verra Response</u> (Pending)</p> <p>Round 3</p> <p><u>VVB Response</u> (Pending)</p> <p><u>Verra Response</u> (Pending)</p>	
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3	Missing version numbers of the document reviewed and inconsistency in on-site visit		
	<p><u>Issue</u></p> <ol style="list-style-type: none"> 1. The version number of document reviews is not shown in section 2.1. 2. It is stated under section 2.4 that an in-person site 	<p>Round 1</p> <p><u>VVB Response</u></p> <ol style="list-style-type: none"> 1. Section 2.1 of the Verification Report has been updated to include reference to the applicable document version 	[Closed]

<p>inspection was not carried out. However, section 2.7.1 of the verification report states, "Mr. Gerber reviewed and signed the verification opinion and verification report. Mr. Gerber conducted an in-person site visit of the Project site".</p> <p>3. VVB has not provided all information on how each aspect was verified and how a reasonable level of assurance was obtained while conducting a remote audit without a site visit.</p> <p><u>Action Required</u></p> <ol style="list-style-type: none"> 1. VVB shall indicate the version number of the documents reviewed. 2. VVB shall ensure consistency in the verification report regarding the type of audit carried out. 3. VVB shall provide all the information in the verification report on how a reasonable level of assurance was ensured while carrying out the remote audit. <p><u>Program Rule(s)</u> VCS Standard, v4.5; Section 4.1.10 and 4.1.12</p>	<p>numbers where applicable. Please note that document version numbers were/are also provided in the preceeding section 1.2 and each of the document versions were defined in Section 1.2 for simplicity throughout the rest of the document.</p> <ol style="list-style-type: none"> 2. Section 2.7.1 of the Verification Report has been updated for accuracy as a site visit was not required to achieve a reasonable level of assurance. 3. Section 2.4 of the Verification Report was updated to discuss how a reasonable level of assurance was achieved without conducting an in person Site visit. Section 4.1.12 of the VCS Standard was referenced as well as GHD's strategic risk assessment that was conducted ahead of the verification. The risk assessment did not identify any risk of material misstatement associated with the decision to not conduct an in-person visit. <p><u>Verra Response</u></p> <ol style="list-style-type: none"> 1. The version number of documents reviewed have been revised and are now consistent. The issue is closed. 2. The verification report has been updated, and it is confirmed that no site visit was carried out. There is consistency in the verification report. The issue is closed. 3. The VVB has clarified how a reasonable level of assurance was achieved due to the fact that there has been no change in project activities since the last verification conducted by the same VVB. The issue is closed. <p>Round 2</p> <p><u>VVB Response</u> (Pending)</p> <p><u>Verra Response</u> (Pending)</p> <p>Round 3</p> <p><u>VVB Response</u> (Pending)</p> <p><u>Verra Response</u> (Pending)</p>	
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<p>4</p>	<p>Inappropriate justification for clarification request 5</p>	<p>Round 1</p>	
	<p><u>Issue</u> The justification provided for CL5 is not appropriate. The clarification request identifies a significant downtime for engines, and PP clarified that there was insufficient LFG to run all the engines. However, reviewing exhibit 2, column J, the methane quantities generated in those months do not have a significant variation to support the PP claim that there was insufficient LFG to run all the engines.</p> <p><u>Action Required</u> 1. VVB shall revisit the justification provided by the PP and provide their opinion on whether the volume of methane generated during those months when some engines were not running was flared or utilized by other engines.</p> <p><u>Program Rule(s)</u> VCS Standard, v4.5; Section 2.2.1</p>	<p><u>VVB Response</u></p> <ol style="list-style-type: none"> 1. GHD had a call with the project proponent and discussed the finding. The resolution of CL5 has been updated accordingly to clarify. The reason that the fourth engine was not operational for the complete period was that three engines were capable of destroying the volume of gas consumed during these months. Reviewing operating time in January, it was determined that all four engines were operated at an average of 73% capacity for the duration of the month (with each engine operating at an average of between 71-76% capacity). From February onwards, the site chose to operate only three engines at a higher capacity each (each operating ~96% capacity) with the fourth engine not operating. The total operating capacity in the February example is similar to January (71% total capacity achieved). While there was sufficient gas available to run all four engines, the site chose to operate three engines at near full capacity rather than 4 engines at ~73% capacity (as happened in January). Additional details have been added to the Verification Report. 	<p>[Closed]</p>
		<p><u>Verra Response</u> The VVB has clarified and explained why the 4th engine was not running. The explanation offered is acceptable. The issue is closed.</p>	
		<p>Round 2</p>	
		<p><u>VVB Response</u> (Pending)</p>	
		<p><u>Verra Response</u> (Pending)</p>	
		<p>Round 3</p>	
	<p><u>VVB Response</u> (Pending)</p>		

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