



**Verified Carbon
Standard**

VERIFICATION REPORT FOR
GULLUBAG 96 MW HYDROELECTRIC
POWER PLANT PROJECT, TURKEY



Carbon
— C H E C K —

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Project Title	Gullubag 96 MW Hydro Electric Power Plant Project, Turkey
Version	Version 04
Report ID	CCIPL1412
Report Title	Verification Report for Gullubag 96 MW Hydro Electric Power Plant Project, Turkey
Client	Senerji Enerji Elektrik Uretim A.S.

Pages	46 Pages
Date of Issue	02 November 2022
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Summary:

SENERJI Enerji Elektrik Uretim A.S. has appointed the validation/verification body Carbon Check (India) Private Ltd. to perform verification of the registered Project Activity (VCS319) "Gullubag 96 MW Hydro Electric Power Plant Project, Turkey (hereafter "project activity") for the third monitoring period from 01/05/2020- 22/03/2022 of second crediting period 23/03/2012 to 22/03/2022.

The main purpose of this project activity is to generate a clean form of electricity through renewable energy sources (Hydro Electric Power Plant). SENERJI Enerji Uretim A.S. is the project proponent of the project activity. The project activity involves the operation of a 96MW hydroelectric power plant in East of Turkey, in the province of Erzurum on the river Coruh. The electricity generated from the Hydroelectric Powerplant is sold to the national grid of Turkey. The project achieved emission reductions of 179,252 tCO₂e for the monitoring period by generating a net 290,997 MWh amount of electricity from the generation-mix of power plants connected to the national grid.

The purpose of the verification is to review the monitoring results and verify that the monitoring methodology was implemented according to the monitoring plan and monitoring data, used to confirm the reductions in anthropogenic emissions by sources are sufficient, definitive and presented in a concise and transparent manner. In particular, the monitoring plan, monitoring report and the project's compliance with relevant VCS, UNFCCC and host Party criteria are verified in order to confirm that the project has been implemented in accordance with the previously registered design and conservative assumptions, as documented.

The verification scope is defined as an independent and objective review of the monitoring report (MR). The MR is reviewed against the relevant criteria and guidance documents provided by VCS which include the following: VCS Program Guide (v4.2, dated 22/06/2022), VCS Standard (v4.3, dated 22/06/2022), Program Definitions (v4.2, dated 22/06/2022), Registration & Issuance Process (v4.2, dated 22/06/2022) and in line with the VCS Validation and Verification Manual (v3.2, dated

19/10/2016) /B04/ applicable at the time in order to confirm that the emission reductions produced during the monitoring period are in accordance with the project activity as provided in the registered CDM PDD. The CDM-approved methodology ACM0002, Version 10 has been applied for the project activity.

The verification consisted of the following three phases:

- i) a desk review of the Monitoring Report
- ii) Remote Audit
- iii) the resolution of outstanding issues and internal technical review followed by the issuance of the final verification report and opinion.
- iv) In the course of the verification process, 08 CARs and 12 CLs were raised, all have been successfully closed. The list of Clarification and Corrective Actions Requests (CL and CAR) is presented in this report.

CC IPL confirms that the project is implemented in accordance with the validated VCS-PD and the monitoring plan; and then, claimed emissions reductions are calculated without material misstatements. Two project description deviations have been applied to the project activity (as listed in section 3.2.2 of the monitoring report).

CC IPL has performed the verification of the project activity “Gullubag 96 MW Hydro Electric Power Plant Project, Turkey” on the basis of all issues and criteria of VCS Standard version 4.3 and VCS Program Guide version 4.2 for VCS projects and also on the criteria given to provide for consistent project operations, monitoring and reporting. Hence, in CC IPL’s opinion, the project correctly applies the baseline and monitoring methodology ACM0002, version 10 and meets the relevant UNFCCC requirements for the CDM Methodology, Voluntary Carbon Standard requirements and the relevant host country criteria.

Therefore, CC IPL is able to certify that the emissions reductions from the “Gullubag 96 MW Hydro Electric Power Plant Project, Turkey” project during the period from 01/05/2020 to 31/03/2022 amount to 179,252 tCO₂e. The year-wise break up of verified emission reduction is as below:

Year	Baseline Emissions (tCO ₂ e)	Project Emissions (tCO ₂ e)	Leakage Emissions (tCO ₂ e)	Net Emission Reductions or Removals (tCO ₂ e)	GHG or
2020 (17/11/2019-31/12/2019)	87,229	0	0	87,229	
2021 (01/01/2020 - 31/12/2020)	77,097	0	0	77,097	
2022	14,926	0	0	14,926	

(01/01/2021 - 31/12/2021)				
Total	179,252	0	0	179,252

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1 INTRODUCTION

1.1 Objective

SENERJI Enerji Uretim A.S. (Project Proponent) has appointed the VVB, Carbon Check India Pvt Ltd (CC IPL) for the verification service for the VCS registered Project activity - “Gullubag 96 MW Hydro Electric Power Plant Project, Turkey” located in East of Turkey, in the province of Erzurum on the river Coruh (hereafter referred to as “project activity”) against the requirement of VCS Program.

Verification is the periodic independent review and ex post determination of both quantitative and qualitative information by the Validation and Verification Body (VVB) of the monitored reductions in GHG emissions that have occurred as a result of the VCS project activity during a defined monitoring period (monitoring period 3).

The purpose of verification is to review the monitoring results and verify that the monitoring methodology was implemented according to the monitoring plan and monitoring data and used to confirm the reductions in emissions is sufficient, definitive, and presented in a concise and transparent manner. Carbon Check’s objective is to perform a thorough, independent assessment of the registered projects activities. In particular, the monitoring plan, monitoring report and the project’s compliance are verified against the relevant criteria and guidance documents provided by VCS. This allows for the confirmation that the project has been implemented in accordance with the CDM PDD/B01/ and conservative assumptions, as documented. And, also to confirm if the monitoring plan is in compliance with the CDM PDD/B01/ and approved monitoring methodology, ACM0002, version 10/B03/. The objective of this verification was to verify and certify emission reductions reported for the “Gullubag 96 MW Hydro Electric Power Plant Project, Turkey” for the period 01/05/2020 to 22/03/2022.

1.2 Scope and Criteria

The verification of this project is based on the registered Project Description/B01/, the Monitoring Report of this monitoring period /01/, emission reduction calculation spread sheet /02/, supporting documents made available to the verifier and information collected through performing interviews and during the remote audit assessment. Furthermore, publicly available information was considered as far as available and required.

Carbon Check has employed a risk-based approach in the verification, focusing on the identification of significant risks and reliability of project monitoring and generation of emission reductions.

The verification is carried out on the basis of the following requirements (latest available on VCS website at the time of verification), applicable for this project activity:

- VCS Program Guide (v4.2, dated 22/06/2022)
- VCS Standard (v4.3, dated 22/06/2022)
- Program Definitions (v4.3, dated 22/06/2022)
- Registration & Issuance Process (v4.2, dated 22/06/2022)
- VCS Validation and Verification Manual (v3.2, dated 19/10/2016)
- CDM Methodology: ACM0002: Grid-connected electricity generation from renewable sources -- Version 10
- Other relevant rules, including the host country legislation

The scope of this verification, by independent checking of objective evidence, is as follows:

- To verify that the project is implemented as described in the project description
- To assess the project's compliance with other relevant rules including the host country legislation.
- To assess the implementation of the monitoring plan content as mentioned in the VCS-PD/B01/
- To confirm that the monitoring system is implemented and fully functional to generate voluntary emission reductions (VERs/VCUs) without any double counting and
- To establish that the data reported are accurate, complete, consistent, transparent and free of material error or omission by checking the monitoring records and the emissions reduction calculation /02/.
- To evaluate the GHG emission reduction data and express a conclusion with a reasonable level of assurance about whether the reported GHG emission reduction data is free from material misstatement.
- To verify that reported GHG emission data is sufficiently supported by evidence.

The verification shall ensure that the reported emission reductions are complete and accurate in order to be certified.

The method and criteria used for verification consisted of the following phases:

1. Completeness check and desk review:
2. Remote Audit; 27/06/2022

3. Resolution of outstanding issues and issuance of final verification report and applicable VCS Validation and Verification Deeds of Representation.

Carbon Check (India) Private Ltd. conducts all its work under strict rules to safeguard impartiality and ensure the independence of the verification team. The verification does not provide any consulting or recommendations for the client. However, stated requests for clarifications and/or corrective actions may provide input for improvement of the monitoring activities.

1.3 Level of Assurance

Reasonable level of assurance

Limited level of assurance

1.4 Summary Description of the Project

The project activity 'Gullubag 96 MW Hydro Electric Power Plant Project, Turkey' is a project activity consisting of a 96 MW hydroelectric power plant involves generation of grid-connected renewable energy. The power plant is connected to the national electricity grid, EPIAS of Turkey. The project is located in east of Ispir district, in Erzurum province, in the East of Turkey. The start date for the project is 23/03/2012 as per the commissioning certificate /06/ and Monitoring report /01/, the date on which the project activity is connected to the grid and begins generating GHG emission reductions.

The total emission reductions for the reported monitoring period 01/05/2020 to 22/03/2022 are 179,252tCO_{2e}.

2 VERIFICATION PROCESS

2.1 Method and Criteria

The method and criteria used for verification:

The verification consists of the following three phases:

1. Completeness check and desk review of the validation report, monitoring plan, monitoring report, monitoring methodology, CDM PDD, applicable tools in particular attention to the frequency of measurements, quality of metering equipment's including calibration requirements, QA/QC procedures and other relevant documents.
2. Remote audit (including follow-up interviews with project stakeholders, when deemed necessary). The remote audit assignment includes the following:

- An assignment of implementation and operation of project activity with respect to validated CDM PDD.
- Review of information flows for generating, aggregating and reporting the monitoring parameters.
- Interview with relevant personals to determine whether the operational and data collection procedures are implemented and in accordance with monitoring plan of the validated CDM PDD.
- Cross check of information and data provided in the monitoring report with plant logbooks, inventories, purchase records or similar data sources.
- Check of monitoring equipment's, calibration frequency and monitoring practice in-line with methodology and validated CDM PDD.
 - Review of assumptions made in calculating the emission reduction.
 - Implementation of QA/QC procedure in-line with the validated CDM PDD and methodology requirement.

Resolution of outstanding issues and the issuance of the final Verification report and if applicable, the VCS Validation and Verification Deeds of Representation.

2.2 Document Review

The registered CDM PDD/B01/, MR version 03/01/, emission reduction calculation spread sheet/02/, and supporting documents related to the project implementation, project design, monitoring and baseline were reviewed as per VCS version 04.3 standard requirements. The desk review included:

- A review of the data and information presented to verify completeness and consistency in accordance with VCS version 04 requirements/B01/.
- A review of the approved monitoring plan and monitoring methodology, paying particular attention to the frequency of measurements, quality of monitoring equipment (including calibration requirements) and the quality assurance and quality control (QA/QC) procedures.
- An evaluation of data management and the QA/QC system in the context of their influence on the generation and reporting of emission reductions.

Data input values were also checked from the records maintained by the project proponents. Results of calculations reported in the monitoring report were checked against data values as available from the project proponent in VER calculation sheet /02/.

These data values and other information related to project performance are available in the form of data records duly archived and maintained as per the quality assurance/quality control procedure specified as a part of monitoring plan in the registered VCS-PD/B01/.

Furthermore, the verification team used additional documentation by third parties like host-party legislation, technical reports referring to the project design or to the basic conditions and technical data.

2.3 Interviews

A remote audit to the project activity was undertaken on 27/06/2022 to assess the implementation and operation of the project activity and to review evidence, and interview key personnel to confirm evidence associated with the data generation, aggregation, and calculation and reporting of the monitoring parameters. The remote audit addressed:

- An assessment of the project implementation and operation as per the CDM PDD/B01/ (including physical inspection to confirm physical existence and operation of project components);
- Review of information flows for generating, aggregating and reporting the monitoring parameters.
- Interviews with relevant personnel to confirm that the operational and data collection procedures are implemented in accordance with the monitoring plan in the monitoring report /01/.

The key personnel interviewed, and the main topics of the interviews are summarized in the table below:

Date	Name	Organisation	Topic
27/06/2022	Mustafa Sargul	Gullubag HEPP	<ul style="list-style-type: none"> • Project Design • Project Implementation status • Project start date and Project Location • Roles and responsibility, Project Implementation and Operation status, Qualification and Training, Roles and responsibility. • Involved in Emissions Trading Programs and Other Binding Limits or Other Forms of Environmental Credit.
27/06/2022	Elasbetis	Gullubag HEPP	<ul style="list-style-type: none"> • CER calculation and completeness of monitoring report, Electronic Monitoring system

			<ul style="list-style-type: none"> • Project implementation and operation, Project design, monitoring procedure, data and information flow, compliance of monitoring plan with monitoring methodology and approved VCS-PD. • Project Implementation status • Monitoring and operating system • Quantification of emission reductions • Monitoring parameters • Emission factor for the grid • Roles and responsibility
27/06/2022	Umit Alapagut	Gullubag HEPP	<ul style="list-style-type: none"> • Project design • Turbine details • Monitoring plan • Monitoring procedures and monitoring equipment • Maintenance and operation plan • Data and information flow, Data input device, Roles and responsibility, Project implementation and operation, monitoring procedure.
27/06/2022	Muhammet Ali ERUDURAN	Carbon Check	<ul style="list-style-type: none"> • Installed capacity with the EPIAS grid
27/06/2022	Islam Bulut	Satkeholder	Ongoing communication, grievances resolution.

2.4 Site Inspections

Carbon Check has not conducted an on-site inspection due to the recent pandemic COVID19 and due to its related policy measures created restrictions all over the world impacting travel activities on an international level and even for in-country travel. Moreover, the site visit cannot be postponed due to verification timeline agreed between the Project Participant and the DOE as per the verification contract. /11/

A reasonable level of assurance has been maintained through the alternative means used for the purpose of validation as follows:

- An assessment of the implementation and operation of the proposed project through remote interviews with the representatives of project proponent.
- Assessment of the project design, turbines details, monitoring plan, monitoring procedures and monitoring equipment.
- Assessment of the design change impacts on the applicability of the methodology, additionality, or the appropriateness of the baseline scenario.

- Confirmation of the applicability of the methodology, monitoring, controlling instruments and operational arrangements.

A remote audit was carried out to verify that the project is implemented in accordance with the applicable criteria. Remote audit assessment is necessary to check the monitoring data with respect to accuracy to ensure the calculation of emission reductions. The remote audit assessment included an investigation of whether all relevant equipment is installed and works as anticipated:

- The operating staff was interviewed and observed in order to check the risks of inappropriate operation and data collection procedures.
- Information processes for generating, aggregating, and reporting the selected monitored parameters were reviewed.
- The duly calibration/testing of all metering equipment was checked.
- The monitoring processes, routines and documentations were audited to check their proper application.
- The monitoring data were checked completely.

During the site visit all monitoring data with respect to accuracy to ensure the calculation of emission reductions was checked. All the procedures and records were found authenticated and properly maintained as per the requirements of the project.

The verification team has carried out interviews in order to assess the information included in the project documentation and to gain additional information regarding the compliance of the project with the relevant criteria applicable for the VCS.

A remote audit inspection was carried out to check the project implementation and operation for the gap validation and verification for the VCS registered project activity, and to confirm that the project is developed as described in the VCS-PD/B01/. The project remote audit was inspected from 27/06/2022. On 27/06/2022, verification team was introduced to the project design, project implementation and operation and other description related to the project. The meeting was conducted at the project proponent's office in Turkey. The project site located in east of Ispir district, in Erzurum province, in the East of Turkey was also inspected remotely on 27/06/2022.

2.5 Resolution of Findings

Material discrepancies identified in the course of the verification are addressed either as CARs, CLs or FARs. **Corrective action requests (CAR)** are issued, where:

- i. Mistakes have been made with a direct influence on project results requiring adjustments of the VERs/VCUs monitoring report;
- ii. Applicable methodological specific requirements have not been met.

A **Clarification request (CL)** may be used where additional information is needed to fully clarify an issue or where the information is not transparent enough to establish whether a requirement is met.

A **forward action request (FAR)** should be issued, where:

- i. The actual project monitoring and reporting practices requires attention and /or adjustment for the next consecutive verification period, or
- ii. An adjustment of the MP is recommended.

In the context of FARs, risks have been identified, which may endanger the delivER_y of high-quality emissions reductions in the future, i.e., by deviations from standard procedures as defined by the MP. As a consequence, such aspects should receive a special focus during the next consecutive verification. A FAR may originate from lack of data sustaining claimed emission reductions.

A total of 08 CARs and 12 CLs had been raised for the verification of the project activity and all are closed. The findings are provided below:

2.5.1 Forward Action Requests

No FAR has been raised for the project activity during the monitoring period.

2.6 Eligibility for Validation Activities

Validation/Verification body (VVB), Carbon Check (India) Private Ltd. holds accreditation for validation for the relevant sectoral scope 1 and is eligible for validation/verification for the project activity.

VALIDATION FINDINGS

3.1 Participation under Other GHG Programs

Not Applicable.

3.2 Methodology Deviations

Project emissions from fossil fuel consumption due to diesel generator (PEFF,y) was calculated and approved in the first monitoring period. Since it was found insignificant and it is not required to monitor this parameter according to the new version of the methodology, it was not monitored and not included in this monitoring period. With the same reason, the parameter of quantity of fuel type combusted in diesel power (FCi,j,y) was not monitored and not included in this monitoring period.

The monitoring parameters $wC_{i,y}$ and CapPJ would be monitored once for the crediting period according to the registered PD (dated 30/01/2010), Section B.7.1. These parameters have been monitored once for the crediting period in the first verification. Therefore, these parameters have been removed from Section 4.2 of the respective MR.

Water Utilization Rights Protocol was published by State Water Works (DSI). According to this protocol, DSI record the level of water continuously at real time and extracts data remotely. Data checks and the water level is monitored continuously by DSI. For this reason, this parameter (minimum flow) is added to Section 4.2 of the respective MR.

As PMUM system is not active anymore, we have used EPIAS records and meter reading forms for ER calculations. Though there is no significant difference between, lowest figure in records have been used for conservativeness.

According to revised agreement between TEIAS and PP, System Use Agreement was revised on 04/03/2021.

3.3 Project Description Deviations

In registered PDD, the crediting period was expected to start in 01/12/2011. However, since the facility has been commissioned later, the start date of crediting period was updated as 23/03/2012.

Global Tan Energy mentioned in the registered PD and initial monitoring period has changed its name to become GTE KARBON SÜRDÜRÜLEBİLİR ENERJİ EĞİTİM DANIŞMANLIK VE TİCARET A.Ş. The company is the same with a different name.

Verification team confirmed that the deviations are not causing changes to applicability of the methodology, additionality, or the appropriateness of the baseline scenario by reviewing the CDM PDD/101/, MR/01/, ER sheets/02/ and other supporting documents mentioned in Appendix 1.

3.4 Grouped Projects

Not Applicable.

VERIFICATION FINDINGS

4.1 Project Implementation Status

The project activity, “Gullubag 96 MW Hydro Electric Power Plant Project, Turkey” applying the methodology ACM0002, version 10, /B03/. The project has been registered under VCS with VCS ID 391. The Project Proponent for the project activity is GTE KARBON SÜRDÜRÜLEBİLİR ENERJİ EĞİTİM DANIŞMANLIK VE TİC. A.Ş.

The project activity, Gullubag 96 MW Hydro Electric Power Plant Project, Turkey, is located on the Coruh River in the East of Turkey, in the province of Erzurum, with total installed power of 96 MW. License application for the Hydroelectric Power Plant was made to the Energy Market Regulatory Authority and the Generation License was awarded in accordance with the Electricity Market Law (No: 4628) for a period of 49 years by the decision numbered EU/1054-1/770 on 11/01/2007. Verification team confirmed from the registered CDM PDD/B01/ and remote audit that the location of the project activity including the coordinates is same as mentioned in the registered CDM PDD/B01/.

Global Tan Energy mentioned in the registered PD and initial monitoring period has changed its name to become GTE KARBON SÜRDÜRÜLEBİLİR ENERJİ EĞİTİM DANIŞMANLIK VE TİCARET A.Ş. The company is the same with a different name.

The ex-ante fixed grid emission factor of 0.616 tCO₂/MWh has been used for the baseline emission calculation, which is line with the registered CDM PDD/B01/.

The registered VCS-PD/B01/ clearly describes the monitoring and responsibility of monitoring is with PP. During the remote audit, monitoring and reporting procedures were confirmed with the relevant staff and through the document review.

The monitoring plan is in accordance with the UNFCCC approved methodology ACM0002, version 10/B03/. All the data is collected and archived in accordance with the methodology and included in the monitoring plan. The monitoring has been carried out in accordance with the provision of monitoring plan, the verification team reviewed if:

- The monitoring of reductions in GHG emissions resulting from the proposed VCS project activity were implemented in accordance with the monitoring plan contained in the registered VCS-PD/B01/.
- The monitoring plan and the applied methodologies had been properly implemented and followed by the project participants.
- All parameters stated in the monitoring plan, the applied methodologies and relevant VCS requirements had been sufficiently monitored and updated.

- The responsibilities and authorities for monitoring and reporting were in accordance with the responsibilities and authorities stated in the monitoring plan.

The GHG emission reductions generated by the project activity are not included in an emissions trading program or any other mechanism that includes GHG allowance trading, this has been confirmed from the review of the PD/B01/ and also confirmed during the remote audit. The project activity has not received or sought any other form of environmental credit, this has been confirmed from the review of the PD/B01/ and also confirmed during the remote audit.

The sustainable development contribution of the project activity to the host country, Turkey have been provided in the PD/B01/ and the contributions were confirmed with the PP during the remote audit. The main sustainable development contributions have been listed under Energy, Employment opportunities and combating climate change,

Overall, the project has been implemented in accordance with the registered VCS-PD/B01/. Safeguards

4.2 Safeguards

4.2.1 No Net Harm

Since the project is a renewable energy project, it has positive impacts instead of negative impacts. The project uses hydropower to generate electricity rather than burning fossil fuels and causing pollution, hence, the project reduces emissions. The project provides employment opportunities as well/08/. Domestic and hazardous wastes (if any), and wastewater generated at the site will be handled according to the national regulations hence will not cause harm.

4.2.2 Local Stakeholder Consultation

Project is operational since 2013 and there is an ongoing communication with locals. Stakeholder consultation has been organized before project start date, details of which is given in PDD. Project manager is accessible by locals all the time. Project sponsors also support local community through providing support for local organization cultural events. After implementation of the project, no unexpected change has occurred with respect to risks, cost of locals. In terms of regulation, all staff recruited is trained as per the requirements of their assignment and regulations. Trainings include first aid, electrical equipment operation certificates, crane operator and occupational competency trainings.

All the supporting documents, training certificates, were submitted to the DOE, and they have found to be in line with the monitoring period.

No comments were received from local stakeholders during ongoing communication.

4.3 AFOLU-Specific Safeguards

Not Applicable.

4.4 Accuracy of GHG Emission Reduction and Removal Calculations

Total Emission Reduction has been determined as.

$$ER_y = BE_y - PE_y - LE_y$$

Where;

ER_y = Emission reductions in year y (tCO₂)

BE_y = Baseline emissions in year y (tCO₂)

PE_y = Project Emissions in year y (tCO₂)

LE_y = Leakage emissions in year y (tCO₂)

As per the applied methodology,

Installed capacity of plant (Cap_{PJ}) = 96 MW or 96,000,000 W

Area of reservoir (AP_J) = 1,210,000 m²

Power Density (PD) = Installed capacity of Plant (Cap_{PJ})/ Area of reservoir (AP_J)

$$PD = 96,000,000 \text{ W} / 1,210,000 \text{ m}^2$$

$$PD = 79.33 \text{ W} / \text{m}^2$$

The project activity involves the generation of electricity by a hydroelectric power plant which has power density higher than 10W/m² and does not include significant vegetation in the catchment area, therefore emissions from reservoir is ignored as per the applied methodology. Hence Project Emission (PE_y) = 0. Also, the leakage for the project activity is nil as per the registered CDM PDD and the applied methodology. Hence Leakage (LE_y) = 0

$$\text{Thus, } ER_y = BE_y - PE_y$$

$$ER_y = BE_y$$

Baseline Emissions

$$BE_y = E_{GBL,y} \times EFCO_2$$

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

$E_{GBL,y}$: Energy baseline in year (kWh) which is 290,997 MWh as per the meter records

$EFCO_2$: Combined Margin CO₂ emission factor (tCO₂/MWh), which is 0.616 tCO₂/MWh in the validated PD.

So,

$$BE_y = 290,997 \text{ MWh} \times 0.616 \text{ tCO}_2/\text{MWh} = 179,252 \text{ tCO}_2$$

$$ER_y = 179,252 \text{ tCO}_2$$

Thus, the emission reduction (in tonnes CO₂) for the years between May 2020 and March 2022 is calculated as given in table below.

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)
2020 May- Dec	87,229	0	0	87,229
2021 Jan- Dec	77,097	0	0	77,097
2022 Jan-Mar	14,926	0	0	14,926
Total	179,252	0	0	179,252

The verification team has determined whether the registered monitoring plan in the PDD/B01/ has been properly implemented and followed by the PP and whether all parameters fixed ex-ante for emission reduction calculation are as per the registered PDD/B01/. The verification team's assessment of each data and parameter fixed ex-ante is provided below:

Data /Parameter	Description	Value	Unit	Source																																																
EG _{y,T} total	Gross Electricity delivered to the grid by power plants in Turkey in years 2005, 2006, 2007	191,558.1 GWh for year 2007, 176,299.8 for year 2006 and, 161,956.2 for year 2005	MWh	TEIAS web page (http://www.teias.gov.tr/ist2007/13.xls)																																																
EF _{CO₂, l, y, l}	CO ₂ emission factor of fossil fuel type "i" in year "y"	<table border="1"> <thead> <tr> <th>FUEL SOURCE</th> <th>EF (TCO₂/T)</th> </tr> </thead> <tbody> <tr> <td>Coal</td> <td>94.6</td> </tr> <tr> <td>Lignite</td> <td>90.9</td> </tr> <tr> <td>Fuel Oil</td> <td>75.5</td> </tr> <tr> <td>Diesel</td> <td>72.6</td> </tr> <tr> <td>LPG</td> <td>61.6</td> </tr> <tr> <td>Naphtha</td> <td>69.3</td> </tr> <tr> <td>Natural Gas</td> <td>54.3</td> </tr> </tbody> </table>	FUEL SOURCE	EF (TCO ₂ /T)	Coal	94.6	Lignite	90.9	Fuel Oil	75.5	Diesel	72.6	LPG	61.6	Naphtha	69.3	Natural Gas	54.3	tCO ₂ /TJ	For EF of fossil fuels, IPCC values at the lower limit have been used.																																
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Data /Parameter	Description	Value	Unit	Source																																
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$\eta_{m,y}$	Average net energy conversion efficiency of power unit m in year y	1,210,000	%	Environmental map of Turkey (www.cedgm.gov.tr/dosya/cevreatlasi/atlasin_metni.pdf) and EC Integrated Pollution Prevention and Control Reference Document on Best Available Techniques for Large Combustion Plants																																
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The values are consistent with the registered CDM PDD/B01 and defined fixed ex-ante during 2nd crediting period of the project activity. The fixed ex-ante data and parameter have been listed in the monitoring report/01/ and confirmed by the verification team as correct and consistent with that stated in the registered CDM PDD/B01/. The verification team confirms that the MR/01/ and the ER calculation spreadsheet/02/ have considered the parameters fixed ex-ante correctly.

4.5 Quality of Evidence to Determine GHG Emission Reductions and Removals

CC IPL was able to confirm that the calculations are based on authentic data. The spreadsheets/02/ used to calculate the VCU calculations and all figures were tracked, checked, and found to be consistent.

The quality of supporting evidence submitted to the VVB for verification is adequate and found to be verifiable. The transfer of carbon rights and other supporting documents related to quality and maintenance were checked by the verification team during the remote audit to confirm the authenticity of the documents and to check the correctness of the calculation.

When verifying the reported emission reductions, CCIPL ensured that there was a clear audit trail that contained the evidence and records that validate the stated figures. All source documents that form the basis for assumptions and other information underlying the GHG data were checked by the verification team.

When assessing the audit trails, CCIPL also examined:

1. Whether sufficient evidence was available, both in terms of frequency and in covering the full monitoring period
2. The source and nature of the evidence
3. If comparable information was available from sources other than that used in the monitoring report, CCIPL cross-checked the monitoring report against the other sources to confirm that the stated figures were correct.

CC IPL also assessed that the data collection system met the requirements of the monitoring plan as per the applied methodology.

Proper data management inclusive of data acquisition and aggregation, data management system is being followed for the project activity.

The monitoring personnel at site are well trained and follow reproducible routines. Thus, they are competent to carry out the relevant tasks with sufficient accuracy.

Monitored Parameters

Data / Parameter	Net Electricity generated and delivered to the grid by the proposed project in year y (EG _{facility,y})
Measuring frequency/ Recording frequency	Continuous measurement at the site and daily and monthly recording were applied. The plant manager and the staff extracted the records regularly every day. The monthly records recorded by TEIAS, and the plant were used for monitoring emission reductions.
Is measuring and reporting frequency in accordance with the monitoring plan and monitoring methodology? (Yes / No)	Yes
Type of monitoring equipment	Make/model: EMH Type:/LZQJ-XC Precision: 0.5s Serial number of first main meter: 8923726 Serial number of first back up meter: 8923727

	Serial number of second main meter: 8923728 Serial number of second back up meter: 8923739 Serial number of third main meter: 8923730 Serial number of second back up meter: 8923731
Value(s) of monitored parameter	290,997 MWh
Is accuracy of the monitoring equipment as stated in the PDD?	Yes, the accuracy of the monitoring equipment is as stated in the CDM PDD/B01/.
Calibration frequency /interval	10 years
Is the calibration interval in line with the monitoring plan of the PDD?	Yes
Company performing the calibration	TEIAS
Did calibration confirm proper functioning of monitoring equipment? (Yes / No)	Yes
Is(are) calibration(s) valid for the whole reporting period?	Yes
If applicable, has the reported data been crosschecked with other available data?	Yes, the reported data has been cross-checked with the electricity sales invoices/08/ in accordance with the QA/QC procedures provided in the section B.7.1 of the registered CDM PDD/B01/.
How were the values in the monitoring report verified	The values in the monitoring report were verified through the comparison with the values in the ER sheet/02/ and the raw data provided therein, and cross checked with the electricity sales invoices/03/.
Does the data management (from monitoring equipment to emission reduction calculation) ensure correct transfer of data and reporting of emission reductions and are necessary QA/QC processes in place?	Yes, the data management ensures correct transfer of data and reporting of emission reductions and are necessary QA/QC processes in place.

Back-up meter with serial number as 8923729 were replaced the meter with serial number 8923739 in 03/01/2020 due to breakdown. Detailed information of the replaced meter was given in Table below:

	Back-up Meter (Removed on 03/01/2020)	Back-up -Meter
Serial no.	8923729	8923739
Brand (Type)	EMH- LZQJ-XC	EMH- LZQJ-XC
First Index Date (First Calibration Date)	03/12/2019	03/01/2020
Calibration Due	02/12/2029	02/01/2030
Calibration Frequency	10 years	10 years
Test Date	03/12/2019	03/01/2020

Test Frequency	2 years ¹	2 years
Class	0.5S	0.5S
Entity responsible for calibration	TEIAS	TEIAS

Data / Parameter	Area of the reservoir measured in the surface of the water, after the implementation of the project activity, when the reservoir is full (AP_j)
Measuring frequency/ Recording frequency	Yearly
Is measuring and reporting frequency in accordance with the monitoring plan and monitoring methodology? (Yes / No)	Yes
Type of monitoring equipment	Topographical studies
Value(s) of monitored parameter	1,210,000 m ²
Is accuracy of the monitoring equipment as stated in the PDD?	NA
Calibration frequency /interval	NA
Is the calibration interval in line with the monitoring plan of the PDD?	NA
Company performing the calibration	NA
Did calibration confirm proper functioning of monitoring equipment? (Yes / No)	NA
Is(are) calibration(s) valid for the whole reporting period?	NA
If applicable, has the reported data been crosschecked with other available data?	Yes, the reported data has been cross-checked topographical maps provided by the project proponent/08/ in accordance with the QA/QC procedures provided in the section B.7.1 of the registered CDM PDD/B01/.
How were the values in the monitoring report verified	The values in the monitoring report were verified through the topographical maps /12/
Does the data management (from monitoring equipment to emission reduction calculation) ensure correct transfer of data and reporting of emission reductions and are necessary QA/QC processes in place?	Yes, the data management ensures correct transfer of data and reporting of emission reductions and are necessary Calibration and Maintenance of equipment are made regularly by authorized service companies. QA/QC processes in place.

¹ Gullubag HEPP- System Use Agreement, page 13, section 3.3., item d

Data / Parameter	Minimum Flow
Measuring frequency/ Recording frequency	Continuously
Is measuring and reporting frequency in accordance with the monitoring plan and monitoring methodology? (Yes / No)	Yes
Type of monitoring equipment	Gauging stations
Value(s) of monitored parameter	According to the report of Turkey State Hydraulic Works, minimum flow should be 5m ³ /s at least. Minimum flow is provided in the monitoring period.
Is accuracy of the monitoring equipment as stated in the PDD?	NA
Calibration frequency /interval	NA
Is the calibration interval in line with the monitoring plan of the PDD?	NA
Company performing the calibration	NA
Did calibration confirm proper functioning of monitoring equipment? (Yes / No)	NA
Is(are) calibration(s) valid for the whole reporting period?	NA
If applicable, has the reported data been crosschecked with other available data?	Yes, the reported data has been cross-checked topographical maps provided by the project proponent/12/ and minimum flow records /13/ in accordance with the QA/QC procedures provided in the section B.7.1 of the registered CDM PDD/B01/.
How were the values in the monitoring report verified	The values in the monitoring report were verified through the topographical maps /12/ and minimum flow records /13/
Does the data management (from monitoring equipment to emission reduction calculation) ensure correct transfer of data and reporting of emission reductions and are necessary QA/QC processes in place?	Yes, the data management ensures correct transfer of data and reporting of emission reductions and are necessary Calibration and Maintenance of equipment are made regularly by authorized service companies. QA/QC processes in place.

The verification team can confirm that sufficient evidence is available for the whole monitoring period and the same is verifiable and that the data collection system meets the requirements of the monitoring plan and the applied methodology according to the assessment carried out in remote audit and in the document review.

Verification team confirms that the quality of evidence to determine the GHG reductions and removals produced was found satisfactory. The detailed information flow with the roles and responsibilities of the individuals and the monitoring system have been provided in the VCS-MR/01/.

4.6 Non-Permanence Risk Analysis

As the project activity is a non-AFOLU project activity no risk related to non-permanence has been identified for the project activity.

VERIFICATION CONCLUSION

Carbon Check (India) Private Limited has performed the verification of the grouped project activity “Gullubag 96 MW Hydro Electric Power Plant Project” in Turkey, with regards to the relevant requirements for VCS project activities.

The conclusions can be summarised as follows:

- The project is implemented and installed as planned and described in the registered CDM PDD/B01/ and the project activity confirms with the verification criteria for project and their GHG emission reductions or removals set out in the VCS rules.
- The monitoring plan is in accordance with the applied approved methodology, i.e., ACM0002, version 10/B03/ and monitoring plan as sought out in the registered VCS-PD/B01/.
- The monitoring system is in place and functional. The project has generated verifiable GHG emission reductions.

As the result of the verification of project activities, the verifier confirms that the GHG emission reductions are calculated without material misstatements in a conservative and appropriate manner. Carbon Check (India) Private Ltd. herewith confirms that the project has achieved emission reductions in the below mentioned reporting period as follows. The project complies with the verification criteria for projects and their GHG emissions reductions or removals set out in VCS rules.

Verification period: From [01/05/2020] to [31/03/2022]

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)
Year 2020	87,229	0	0	87,229
Year 2021	77,097	0	0	77,097
Year 2022	14,926	0	0	14,926

Total	179,252	0	0	179,252
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APPENDIX 1: REFERENCES

S. No.	Document
/01/	Monitoring report version 05 dated 02/11/2022
/02/	ER spread sheet corresponding to /01/
/03/	Electricity Sales Invoices for the period 01/05/2020 to 22/03/2022
/04/	Electricity meter specifications (EMH/LZQI-XC)
/05/	Power Purchase Agreement
/06/	Commissioning Certificate
/07/	Technical specifications of the wind turbines installed
/08/	Employment Records as per SDG 8
/09/	Plant layout
/10/	Electricity meters testing conformity testing certificates
/11/	Verification contract signed between PP and VVB dated - 23/06/2022
/12/	Topographical maps
/13/	Flow Rate sheet for Data/Parameter "Minimum Flow"
/B01/	CDM PDD (version 05 dated 30/01/2010)
/B02/	VCS MR Template V4.1
/B03/	ACM0002: Large-scale Consolidated Methodology: Grid-connected electricity generation from renewable sources, Version 10
/B04/	VCS Standard, version 04.3 VCS Program Guide version 04.2 VCS Validation and Verification Manual, version 3.2 Registration and Issuance Process v4.1 VCS Program Definitions version 04.2

APPENDIX 2: ABBREVIATION

BAU	Business As Usual
CA	Corrective Action / Clarification Action
CER	Certified Emission Reduction
CAR	Corrective Action Request
CCIPL	Carbon Check (India) Private Ltd.
CDM	Clean Development Mechanism
CER	Certified Emission Reduction
CL	Clarification Request
CO₂	Carbon Dioxide
CO_{2e}	Carbon Dioxide Equivalent
DOE	Designated Operational Entities
DVR	Draft Validation Report
EB	CDM Executive Board
EF	Emission Factor
FA	Final Approval
FAR	Forward Action Request
FVR	Final validation Report
GHG	Greenhouse gas(es)
GWh	Giga Watt Hour
IPCC	Intergovernmental Panel on Climate Change
MW	Megawatts
MWh	Mega Watt Hour
OSV	On Site Visit
QC/QA	Quality control/ Quality assurance
SENELEC	Société nationale d'électricité du Sénégal
TA	Technical Area
TR	Technical Review
UNFCCC	United Nations Framework Convention on Climate Change
VCS	Verified Carbon Standard
VVB	Validation / Verification Body

APPENDIX 3: LIST OF FINDINGS

TABLE 1: CORRECTIVE ACTION REQUESTS (CARs) AND CLARIFICATION REQUESTS (CLs)

Finding	CL 01		
Classification	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	In section 4.2 of MR, the monitored parameter – WC,i,y, the verification team didn't find this parameter in the respective methodology. Thus, PP is requested to clarify the use of this.		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	There is a mistake. This parameter (WC,i,y) is removed.		
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	As per the registered PDD this parameter (WC,i,y) is supposed to be used in the monitoring. PP is requested to clarify, why is not integrated as per the registered PDD and applied methodology.		
Corrective Action or clarification #2 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	WC,i,y was given as the monitored parameter in the registered PDD; this process was confirmed during the initial monitoring period. In the second monitoring period, this parameter was removed, and it was informed that this parameter does not need to be monitored. Thus, in the second monitoring period, this parameter was removed, and the reason is explained in section 3.2. Deviations. VCS has confirmed this. Thus, deviations are added to this report and WC,i,y is removed.		
VVB Assessment #2 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	<p>The justification provided for parameter WC,i,y is appropriate as per the VVB. Although, parameter WC,i,y is not mentioned in section in section 3.2 of the submitted MR.</p> <p>Moreover, as per the VCS MR Template 4.1 section 3.2.1, PP should -</p> <p><i>“Describe and justify any methodology deviations applied during this monitoring period. Include evidence to demonstrate the following:</i></p>		

	<ul style="list-style-type: none"> • <i>The deviation does not negatively impact the conservativeness of the quantification of GHG emission reductions or removals.</i> • <i>The deviations relate only to the criteria and procedures for monitoring or measurement and do not relate to any other part of the methodology.”</i> <p><i>Thus, PP is requested to mention the parameter WC,l,y in section 3.2 and also justify its removal as per the standard’s requirement.</i></p> <p><i>Also, please mention the link for deviation in the footnote.</i></p>
<p>Corrective Action or clarification #3 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i></p>	<p>The justification about the removed parameter WC,i,y is added to Section 3.2. Deviations.</p>
<p>VVB Assessment #3 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i></p>	<p>VVB has found that the corrective actions taken by the PP are appropriate. Thus, this finding is closed.</p>
<p>Conclusion <i>Tick the appropriate checkbox</i></p>	<p> <input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed </p>

Finding	CL 02		
<p>Classification</p>	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
<p>Description of finding (VVB)</p>	<p>It has been observed by the verification team that there are discordances between the energy generation in EPIAS records MR and the ER sheet.</p> <p>Also, discordances in energy generation are found between the EPIAS records and ER in the months of April 2021 & March 2022.</p> <p>Thus, PP is requested to clear this discrepancy.</p>		

Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	ER sheet is redone. The discordances between MR and ER sheet are fixed.
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	VVB has found that the corrective action taken by the PP is appropriate. Thus, this finding is closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed

Finding	CL 03		
Classification	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	Verification team has found discordances between the total emission reductions (tCO ₂) present in the various sections of the MR. Also, this creates a difference with the ER sheet. Thus, PP is requested to clear this perplexity.		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	ER sheet is redone. The discordances between MR and ER sheet are fixed.		
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	VVB has found that the corrective action taken by the PP is appropriate. Thus, this finding is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed		

Finding	CL 04		
Classification	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR

Description of finding (VVB)	<ol style="list-style-type: none"> 1. It has been observed by the verification team that there are contradictions between the net generation values noted by Metering records and EPIAS records in the month of May 2020, June 2020 & November 2020. 2. Same is observed in the net generation values of Metering records and EPIAS records in the month of January 2021, August 2021, September 2021, October 2021 & February 2022. <p>Thus, PP is requested to clarify these discrepancies.</p>
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	ER sheet is redone. The discordances between MR and ER sheet are fixed.
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	VVB has found that the corrective action taken by the PP is appropriate. Thus, this finding is closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed

Finding	CL 05		
Classification	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	As per the VCS Monitoring Report Template version 4.1, PP has numbered sub section of 3.2 are not mentioned in accordance with the 3.2. Thus, PP is requested to revise it according to the template.		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	This part (3.2.) is regulated in accordance with the VCS Monitoring Report Template version 4.1. and the previous report.		
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	VVB has found that the corrective action taken by the PP is appropriate. Thus, this finding is closed.		

Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed
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Finding	CL 06		
Classification	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	1.It has been observed by the verification team that there are contradictions between the gross generation values noted by Metering records and EPIAS records in the month of May 2020, June 2020 & November 2020. 2.Same is observed in the gross generation values of Metering records and EPIAS records in the month of January 2021, August 2021, September 2021, October 2021 & Feb. Thus, PP is requested to clarify these discrepancies.		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	ER sheet is redone. The discordances between MR and ER sheet are fixed.		
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	VVB has found that the corrective action taken by the PP is appropriate. Thus, this finding is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed		

Finding	CL 07		
Classification	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	The verification team has found that in the current MR report ID is missing. Thus, PP has requested to add the report ID in the MR		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	Report ID is defined as "01".		

VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	VVB has found that the corrective action taken by the PP is appropriate. Thus, this finding is closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed

Finding	CL 08		
Classification	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	As per the CDM standard - CDM validation and verification standard for project activities, paragraph 9.2.6, PP is requested to provide a previous calibration certificate/ 1st protocol of meters to check for any delay.		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	The date of first index protocol is provided in the Table 1: Project implementation milestones of Gullubag HEPP. Also, the first index protocol is given in File 06 (Information about meters).		
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	VVB has found that the corrective action taken by the PP is appropriate. Thus, this finding is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed		

Finding	CL 09		
Classification	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	PP is requested to review the data/parameters monitored as per the registered PDD and add all the parameters to be monitored as per the PDD. If any parameter is not going to monitored PP is requested to provide proper clarification for that.		
Corrective Action or clarification #1	Some parameters in registered PDD removed in the second monitoring period and this situation is explained		

<p><i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i></p>	<p>in section 3.2. Deviations. Also, some parameters (i.e., minimum flow) is added. This case is approved from VCS in last monitoring period. Thus, these parameters are taken off or added in third monitoring report.</p>
<p>VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i></p>	<p>PP is requested to add every parameter that has been revised, added or removed from the registered PDD in section 3.2 of the MR as per the MR template 4.1 guidelines.</p> <p><i>Also, please mention the link for deviation in the footnote</i></p>
<p>Corrective Action or clarification #2 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i></p>	<p>All parameters are reviewed and justification about removed and added parameters is added to Section 3.2. Deviations.</p>
<p>VVB Assessment #2 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i></p>	<p>VVB has found that the corrective action taken by the PP is appropriate. Thus, this finding is closed.</p>
<p>Conclusion <i>Tick the appropriate checkbox</i></p>	<p> <input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed </p>

Finding	CL 10		
<p>Classification</p>	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
<p>Description of finding (VVB)</p>	<p>As per the registered PDD, parameter “Minimum Flow” is not mentioned. Thus, PP is requested to clarify on how this is used for monitoring.</p>		
<p>Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i></p>	<p>Water Utilization Rights Protocol was published by State Water Works (DSİ). According to this protocol, DSİ record the level of water continuously at real time and extracts data remotely. Data checks and the water level is monitored continuously by DSİ. For this reason, this parameter (minimum flow) is added as monitoring parameter in the second monitoring period and approved by VCS in last monitoring period.</p>		

VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	The justification provided by the PP has been found appropriate by the VVB. Thus, this finding is closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed

Finding	CL 11		
Classification	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	As per the MR section, the 3.2.2 crediting period was updated to 23/03/2012, thus for the verification, PP is requested to provide a commissioning certificate for the same.		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	Commissioning certificates to the updated crediting period is provided in File 15- Commissioning certificates in attached documents.		
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	VVB has found the commissioning certificate		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed		

Finding	CL 12		
Classification	<input type="checkbox"/> CAR	<input checked="" type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	As per para 3.17.2 of VCS standard_v4.3 PP shall identify potential negative environmental and socio-economic impacts and shall take steps to mitigate them. Thus, PP is requested to revise the section 2.1 as per the respective standard.		

Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	Environmental and socio-economic impacts of the project are defined as per para 3.17.2 of VCS standard_v4.3. Section 2.1 is revised to this evaluation.
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	The corrective action taken by the PP has been found appropriate by the VVB. Thus, this finding is closed.
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed

Finding	CAR 01		
Classification	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	In the supporting documents the registered PDD is missing, thus, the PP is requested to provide the registered PDD for the current monitoring period.		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	Registered PDD is provided with other documents.		
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	PP has provided the registered PDD. Thus, this finding is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed		

Finding	CAR 02		
Classification	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	It has been observed by the verification team that in the current MR section 4.2, under the parameter Cap _{PJ} source of data i.e. equipment purchase agreement is missing. Thus, PP is requested to provide the same.		

<p>Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i></p>	<p>There is a mistake. This parameter (Cap_{PJ}) is removed.</p>
<p>VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i></p>	<p>As per the PDD Cap_{PJ} is supposed to be monitored, so why has this parameter has been removed. PP is requested to provide integrate it as per the registered PDD.</p>
<p>Corrective Action or clarification #2 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i></p>	<p>Cap_{PJ} was given as the monitored parameter in the registered PDD; this process was confirmed during the initial monitoring period. In the second monitoring period, this parameter was removed, and it was informed that this parameter does not need to be monitored. Thus, in the second monitoring period, this parameter was removed, and the reason is explained in section 3.2. Deviations. VCS has confirmed this. Thus, deviations are added to this report and Cap_{PJ} is removed.</p>
<p>VVB Assessment #2 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i></p>	<p>The justification provided by the PP here is corrective although as per the VCS MR template v4.1 section 3.2 requirements, PP should mention all the deviations from the PDD in the respective MR and describe them along with the justification as per the template requirements.</p> <p><i>Also, please mention the link for deviation in the footnote</i></p>
<p>Corrective Action or clarification #3 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i></p>	<p>The justification about the removed parameter Cap_{PJ} is added to Section 3.2. Deviations.</p>
<p>VVB Assessment #3 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i></p>	<p>PP has added the justification for the parameter “Cap_{PJ}” in the section 3.2 of respective MR. Thus, this finding is closed.</p>
<p>Conclusion <i>Tick the appropriate checkbox</i></p>	<p> <input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed </p>

Finding	CAR 03		
Classification	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	As per the VCS Monitoring template v4.1 if the appendix is not in use, it should be deleted. Thus, PP is requested to delete the appendix.		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	Appendix part is deleted.		
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	PP has deleted the appendix; thus this finding is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed		

Finding	CAR 04		
Classification	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	<p>As per the VCS Monitoring template v4.1, calibration details, Specify the measurement methods and procedures, any standards or protocols to be followed, and the person/entity responsible for the measurement. Include any relevant information regarding the accuracy of the measurements (e.g., accuracy associated with meter equipment or laboratory tests), date of change, date of previous calibration date of next calibration, should be mentioned in the MR.</p> <p>Thus, PP is requested to kindly revise the meter details in the MR.</p>		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	<p>There is one meter replacement during monitoring period. Thus, Table 5: Meter Serial Numbers is revised. Also, the details about calibration and measurement are given in section 4.3 Monitoring Plan.</p>		
VVB Assessment #2 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	<p>PP is requested to write details of the meter in the section 4.3 of MR. the details should have the calibration date, calibration frequency, next calibration date, accuracy, person, or entity responsible for calibration.</p> <p>PP is requested to add these details as per the monitoring report template v4.1, section 4.3 filling guidelines. Moreover, PP is also requested to add the reference for these meter details in section 4.2, data and parameter monitored table, section "QA/QC procedures to be applied"</p>		
Corrective Action or clarification #2 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	<p>The detailed information about the replaced meter is provided in section 4.3. Also, system use agreement is referred for test frequency. Soi system use and connection agreements are added in the file 16 in ZIP.</p>		
VVB Assessment #3 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	<p>PP has done all the necessary revisions as per the VCS filling guidelines. Thus, this finding is closed.</p>		

Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed
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Finding	CAR 05		
Classification	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	As per the VCS Monitoring template v4.1, in section 2.2, following revisions are required - <ul style="list-style-type: none"> • The procedures or methods used for documenting the outcomes of the local stakeholder communication should be mentioned. • The mechanism for on-going communication with local stakeholders. • How due account of all and any input received during ongoing communication has been taken. Include details on any updates to the project design or justify why updates are not appropriate. 		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	These details are given in section 2.2 in the last monitoring period and is approved by VCS. Thus, this part has been added same as last monitoring report.		
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	PP is requested to review and revise the section 2.2, while considering and addressing all the three points mentioned previously, to maintain consistency with the VCS Monitoring template v4.1 filling guidelines for section 2.2.		
Corrective Action or clarification #2 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	Registered PDD is prepared regarding Voluntary Carbon Standard 2007. It is stated in Validation Report. In this version, it is not required to documenting procedures. This is also approved by VCS in last monitoring period. These procedures are considered in the next validation period (revalidation).		
VVB Assessment #2 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	VVB has found that the justification provided by PP is appropriate, thus this finding is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed		

Finding	CAR 06		
Classification	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	In figure 2, single line diagram of the MR, the position of meter is not understandable. Thus, PP is requested to revise it accordingly.		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	Single line diagram given in Figure 2 is revised. Also, new single line diagram is added in File 04 in attached documents.		
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	PP is requested to review and revise the single line diagram.		
Corrective Action or clarification #2 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	The single line diagram is revised and added to same file (04).		
VVB Assessment #2 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	The corrective action taken by the PP has been found appropriate by the VVB. Thus, this finding is closed.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed		

Finding	CAR 07		
Classification	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	<p>In MR section 1.11, number for table titled “Sustainable Development Contributions” is mentioned as table 4, which should be table 1, likewise, every other table number should also be revised.</p> <p>Thus, PP is requested to review and revise the same.</p>		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	<p>In section 1.11, number for table titled “Sustainable Development Contributions” is termed as Table 1 rather than Table 4. Other tables are revised.</p>		
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	<p>PP is requested to review and revise the table numbers in MR, as the table number are not synchronised.</p>		
Corrective Action or clarification #2 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	<p>The table numbers are revised and synchronised.</p>		
VVB Assessment #2 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	<p>The corrective action taken by the PP has been found appropriate by the VVB. Thus, this finding is closed.</p>		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed		

Finding	CAR 08		
Classification	<input checked="" type="checkbox"/> CAR	<input type="checkbox"/> CL	<input type="checkbox"/> FAR
Description of finding (VVB)	PP is requested to review and revise following inconsistency in the MR – <ol style="list-style-type: none"> 1. The monitoring period is inconsistent in the MR, in the table 2, the monitoring period is mentioned as 01/05/2020 to 31/03/2022, while in rest of the MR, the monitoring period is written as 01/05/2020 to 22/03/2022. 2. The value of SDG 7 and 13 is written as 175,691 and 285,215 respectively, which is inconsistent with the rest of the MR and ER. 3. The name of meters written in QA/QC for parameter EGfacility,y as ELSTER 1500, while in the supporting documents and other sections of MR, the make of meters is EMH. 		
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>	<ol style="list-style-type: none"> 1. The inconsistency is fixed. 2. The inconsistency is fixed. 3. Mistake about meters is fixed. 		
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>	VVB has found that the corrective action taken by the PP is appropriate, thus this finding is correct.		
Conclusion <i>Tick the appropriate checkbox</i>	<input type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input checked="" type="checkbox"/> The finding is closed		

TABLE 2: FORWARD ACTION REQUESTS

Finding	FAR XX		
Classification	<input type="checkbox"/> CAR	<input type="checkbox"/> CL	<input checked="" type="checkbox"/> FAR
Description of finding (VVB)			
Corrective Action or clarification #1 <i>(PP shall write a detailed and clear corrective action or further information for clarification as per finding)</i>			
VVB Assessment #1 <i>The assessment shall encompass all open issues in the finding. In case of non-closure, additional corrective action and VVB assessments (#2, #3, etc.) shall be added.</i>			
Conclusion <i>Tick the appropriate checkbox</i>	<input checked="" type="checkbox"/> To be checked during the next periodic verification <input type="checkbox"/> Outstanding finding (not closed) <input type="checkbox"/> The finding is closed		