

# PROJECT REVIEW REPORT

<b>Project ID</b>	1742
<b>Project Name</b>	Hydroelectric Project in Kinnaur District in Himachal Pradesh
<b>Program(s)</b>	VCS
<b>Verification Period</b>	01 January 2014 – 31 August 2015
<b>Project Proponent</b>	JSW Hydro Energy Limited
<b>Methodology</b>	ACM0002, Consolidated baseline methodology for grid-connected electricity generation from renewable sources, v12.1.0
<b>Sectoral Scope(s)</b>	1. Energy Industries
<b>Validation/Verification Body (VVB)</b>	TÜV SÜD South Asia Pvt Ltd
<b>Assessment Criteria</b>	VCS Standard, v4.0
<b>Date of First Issue</b>	22 October 2021
<b>Date of Final Issue</b>	30 June 2022

## Summary:

An accuracy review of the Hydroelectric Project in Kinnaur District in Himachal Pradesh verification approval request has been conducted by Verra in accordance with Section 4.3 of the *Registration and Issuance Process*.

The accuracy review has raised five assessment findings and one minor finding, detailed below. The VVB, in coordination with the project proponent, is hereby required to provide a response to the assessment findings presented in Section 1. The five assessment findings must be addressed to the satisfaction of Verra. The VVB need not address the minor findings during this review. Please note, however, that where Verra finds consistent minor findings by the VVB in future reviews, minor findings shall be escalated to assessment findings.

This project review report will be made publicly available. Confidential information may be provided as separate attachments.

## 1. ASSESSMENT FINDINGS

### Finding 1

Section 3.19.1 of the VCS Standard, v4.1 states that project proponents shall not seek credit for the same GHG emission reduction or removal under the VCS Program and another GHG program.

The project is registered as Project 4993 under the CDM. The project has submitted monitoring reports for the current verification period to the CDM and has the status “awaiting issuance request.”

Section 1.9 of the monitoring report and Section 3.1 of the verification report state that “the project proponent has provided undertaking that it will not claim any GHG credits under UNFCC CDM during the current monitoring period.”

The VVB is requested to provide the undertaking submitted by the project proponent and to clarify how they assessed if double counting would occur or not?

#### VVB Response:

Undertaking letter was assessed by DOE during verification to confirm project activity will not claim any of GHG credits from registered CDM project for the Monitoring period and same letter has now been submitted to VERRA for review.

#### Verra Response:

The undertaking letter has been submitted to confirm that the project will not claim any credits from CDM for the same monitoring period. This finding is closed, and no further action is required.

### Finding 2

Section 1.3 of the monitoring report states that the name of the project proponent has changed from Himachal Baspa Power Company Ltd to JSW Hydro Energy Limited.

The project proponent is requested to submit a new registration representation, signed by the new project proponent.

#### VVB Response:

Registration representation has now submitted to VERRA as per request.

#### Verra Response:

A new registration representation has been submitted. This finding is now closed, and no further action is required.

### Finding 3

Section 4.1.14 of the VCS Standard, v4.0 states that the validation/verification body shall use the VCS Verification Report Template... and adhere to all instructional text within the template.

Section 3.2 of the VCS Verification Report Template, v4.0 instructs the VVB to identify any methodology deviations applied to the project and to describe the steps taken to validate each deviation.

Section 3.2 on methodology deviations is not included within the verification report.

The VVB is requested to update the verification report to include Section 3.2 on methodology deviations and adhere to all instructional text of the template.

**VVB Response:**

No methodology deviation taken in the monitoring period. Section 3.2 of the verification report is related to project description deviations and the same has been updated in accordance with the MR in section 3.2 of MR. instruction.

**Verra Response:**

The verification report does not include Section 3.2 on methodology deviations. The VVB is requested to update the verification report to include Section 3.2 on methodology deviations and adhere to all instructional text of the template.

**VVB Response:**

**Due to typographic error, there is some change in the template. The section 3.2 is now included in the verification report as per the template.**

**Verra Response:**

Section 3.2 on methodology deviations is now included in the verification report. This finding is closed, and no further action is required.

#### Finding 4

Section 4.1.14 of the VCS Standard, v4.0 states that the validation/verification body shall use the *VCS Verification Report Template...* and adhere to all instructional text within the template.

Section 4.1 of the *VCS Verification Report Template, v4.0* instructs the VVB to assess whether the project has participated or been rejected under any other GHG programs since validation or previous verification, whether the project has received or sought any other form of environmental credit, or has become eligible to do so since validation or previous verification, whether the GHG emission reductions or removals generated by the project have become included in an emissions trading program or any other mechanism that includes GHG allowance trading, and the project's sustainable development contributions.

Section 4.1 of the verification report does not include an assessment of the project's participation under any other GHG program, whether the project has sought any other form of environmental credit, included GHG emission reductions in an emissions trading project, or the project's sustainable development contributions.

The VVB is requested to update Section 4.1 of the verification report to assess whether the project has participated or been rejected under any other GHG programs since validation or previous verification, whether the project has received or sought any other form of environmental credit, or has become eligible to do so since validation or previous verification, whether the GHG emission reductions or removals generated by the project have become included in an emissions trading program or any other mechanism that includes GHG allowance trading, and the project's sustainable development contributions.

**VVB Response:**

Section 4.1. of the verification report has been updated in line with comments.

**Verra Response:**

Section 4.1 of the verification report has been updated to include the information listed above. This finding is now closed, and no further action is required.

**Finding 5**

The summary of the verification report states that this is the third verification for the project. When accounting for verifications under the CDM, this is the project's fourth verification. The VVB is requested to update the summary of the verification report to clarify how many verifications have been performed for the project.

**VVB Response:**

This is 4<sup>th</sup> verification and necessary correction has been made throughout the updated verification report (version 02)

**Verra Response:**

The verification report has been updated. This finding is now closed, and no further action is required.

**Finding 6**

The summary of the project on the Verra registry states that Himachal Baspa Power company Ltd (now known as JSW Hydro Energy Limited) has ownership of the project from 01 September 2015 onwards. The current monitoring period under review is from 01 January 2014 to 31 August 2015. The VVB is requested to clarify how they assessed ownership of the project and to clarify how the project proponent has ownership of the ERRs for the current monitoring period.

**VVB Response:**

The company name changed to JSW Hydro Energy Limited from 11-September-2018. The relevant document for change in company name and corresponding change in communication agreement to VCS has been provided. VVB has checked the ownership documents to confirm that they have the ownership of ERs for the monitoring period.

**Verra Response:**

Section 3.6 of the *VCS Standard, v4.1* states that project and jurisdictional proponents shall demonstrate that they have the legal right to control and operate project or program activities.

The VVB has not addressed how JSW Hydro Energy Limited (formerly Himachal Baspa Power Company Ltd) has demonstrated ownership of the ERRs for the 01 January 2014 to 31 August 2015 monitoring period.

The VVB is requested to clarify how the project proponent can demonstrate ownership of the credits for the 01 January 2014 to 31 August 2015 monitoring period and to submit the ownership documents.

**VVB Response:**

Securities Purchase Agreement dated November 2014 signed between previous and current owners, confirms the ownership of JSW Energy Limited, which includes the ownership of Verified Emission Reductions prior to transfer of ownership of the project also. This agreement has been verified by the VVB and confirms the ownership of the project. The same has been mentioned in sec 4.1 of the Verification report.

**Verra Response:**

This finding is now closed.

## 2. MINOR FINDINGS

### Finding 1

Section 3.4.3 of the *VCS Standard, v4.0* states that “the project proponent shall use the *VCS Monitoring Report Template...* and adhere to all instructional text within the template.”

Section 5.4 of the monitoring report uses white font in the table of GHG emission reductions that does not match the *VCS Monitoring Report Template, v4.0*.

## 3. ASSESSMENT CONCLUSION

On 22 October 2021, Verra sent TÜV SÜD South Asia Pvt Ltd the project review report with five assessment findings and no minor findings.

On 23 December 2021, Verra sent TÜV SÜD South Asia Pvt Ltd the project review report with finding 3 still open and the addition of finding 6 on ownership.

On 19 February 2022, Verra sent TÜV SÜD South Asia Pvt Ltd the project review report with finding 6 on ownership still open for round two of the finding.

On 30 June 2022, Verra closed all findings and approved the VCS verification approval request.