

TEMPLATE

DEVIATION REQUEST FORM

PUBLICATION DATE **11.04.2021**

Version **5.0**

A. To be completed by Gold Standard

1 | Decision

1.1 | Date – dd/mm/yyyy

24/07/2024

1.2 | Decision

The Deviation Request is Not Approved.

In line with Scenario 1.b of RC-2023: The design certification renewal request shall be submitted within 6 months from the date of transition review completion or before the end date of year 7 under CDM crediting cycle, whichever is earlier. Transition review was approved on 17/02/2022, which is earlier to the end date of year 7 under CDM crediting cycle. Since the design renewal request has not been submitted, the delay as per p.5.1.46 shall be applicable and no credits can be claimed until the submission of VVB opinion on design renewal.

1.3 | Is this decision applicable to other project activities under similar circumstances?

No

B. To be completed by the Project Developer/Coordinating and Managing Entity and/or VVB requesting deviation (Submit deviation request form in Microsoft Word format)

2| Background information

Deviation Reference Number	DEV_739	
Date of decision	24/07/2024	
Precedent (YES/NO)	No	
Precedent details	NA	
Date of submission	14/06/2024	
Project/PoA/VPA	Project	ID – GS5830
	☐ PoA	ID – GSXXXX
	☐ VPA	ID – GSXXXX
Project/PoA/VPA title	GS5830 Renewable Power Project by Emami Power Ltd	
Date of listing	16/09/2017	
GS Standard version applicable	GS4GG	
Date of transition to GS4GG (if applicable)	17/02/2022 (GSCER to GSVER)	
Date of transition to Gold Standard from another standard (e.g. CDM) (if applicable)	N.A.	
Date of design certification/inclusion (if applicable)	08/11/2017	
Location of project/PoA/VPA	India	
Scale of the project/PoA/VPA	☐ Microscale ☐ Small scale ☒ Large scale	
Gold Standard Impact Registry link of the project/PoA/VPA	https://registry.goldstandard.org/projects/details/1376	
Status of the project/PoA/VPA	☐ New ☐ Listed ☐ Certified design ☒ Certified project	
Title/subject of deviation	Deviation Requested to claim GS Impact Certifications for the entire 2 nd Crediting Period in GSVER stream without any losses of claimable crediting period.	
Specify applicable rule/requirements/methodology, with exact paragraph reference and version number	Scenario 1b Stated at the Page 4 of the RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG dated 02/06/2023 (https://globalgoals.goldstandard.org/standards/RC-2023-Design-certification-renewal-requirements-CDM-projects-transitioning-to-GS4GG.pdf)	

Specify the monitoring period for which the request is valid (if applicable)	Start date: _____ End date: _____
Submitted by	Contact person name: Bhaskar Dutta
	Email ID: bhaskar.dutta@enkingint.org
	Organisation: EKI Energy Services Limited
	Project participant: Yes ☒ No ☐
Validation and Verification body (VVB opinion shall be included, where required by the applicable rules/requirements or request is submitted by the VVB).	Yes ☐ No ☒ If yes; VVB name: VVB Staff name(s):
Any previous deviations approved for the same project activity/PoA/VPA(s)?	Yes ☐ No ☒

3 | Deviation detail

3.1 | Description of the deviation:

3.1.1 | Deviation detail (to be completed by Project developer):

According to the Scenario 1b Stated at the Page 4 of the RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG (<https://globalgoals.goldstandard.org/standards/RC-2023-Design-certification-renewal-requirements-CDM-projects-transitioning-to-GS4GG.pdf>) dated 02/06/2023, if a project is/was is in the last 2 years of CDM crediting period at the time of first submission to GS4GG then The design certification renewal request shall be submitted within 6 months from the date of transition review completion or before the end date of year 7 under CDM crediting cycle, whichever is earlier.

The Project Activity GS 5830 completed its transition from GS-CER to GS-VER on 17/02/2022. Since the crediting period under CDM mechanism of the Project with reference ID – 10393 (<https://cdm.unfccc.int/Projects/DB/Applus1501710196.92>) is from 03/08/2017 to 02/08/2024 so the project activity currently falls under the scenario 1.b as per the RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG. The crediting period under the GS-VER scheme approved after transition is from 03/08/2017 to 02/08/2022. Also, as per the transition date of 17/02/2022, the project had to do the Design certification renewal till 6 months from the transition approval date and the project developer has proactively taken steps for the design certification renewal of the project activity. Also, it is to be informed that the performance review of the project activity for the monitoring period 01/04/2021 to 31/12/2022 was recently approved on 17/05/2024 and hence the project developer was always serious about claiming GS-Impact certifications under the GS-VER Scheme.

Since the end date of CDM crediting period is 02/08/2024, Thus as per scenario 1.b-clause - The clause for delay in submission of renewal request beyond the end of year 7 of crediting period as mandated by the Principles and Requirements shall apply to any

delay. Thus, if GS RCP is submitted before end date of CDM crediting period, no loss of claimable period is applicable. Also, the Project Developer assures that the submission of the final set of documents to sustain-cert will be done within the end date of the CDM crediting period that is 02/08/2024 as the VVB engagement has already been done and the design certification renewal for the 2nd crediting period from 03/08/2022 to 02/08/2027 is currently under process.

Kind request to approve this deviation of exemption of loss of claimable period and conduct the GS verifications of retroactive period without loss of claimable period provided the GS submission for RCP is done before 02/08/2024.

3.1.2 | VVB opinion (to be completed by VVB, if applicable):

3.2 | Assessment of the deviation:

3.2.1 | Deviation assessment (to be completed by Project developer):

Since the Project activity is currently under the last 2 years of the 1st crediting period from 03/08/2017 to 02/08/2024 for the corresponding CDM project with ID - 10393 (<https://cdm.unfccc.int/Projects/DB/Applus1501710196.92>). So, According to the Scenario 1b Stated at the Page 4 of the RULE CLARIFICATION DESIGN CERTIFICATION RENEWAL REQUIREMENTS: CDM PROJECTS TRANSITIONING TO GS4GG (<https://globalgoals.goldstandard.org/standards/RC-2023-Design-certification-renewal-requirements-CDM-projects-transitioning-to-GS4GG.pdf>) dated 02/06/2023, if a project is/was is in the last 2 years of CDM crediting period at the time of first submission to GS4GG then The design certification renewal request shall be submitted within 6 months from the date of transition review completion or before the end date of year 7 under CDM crediting cycle, whichever is earlier.

It to be noted that the project activity recently got the closure of performance review on 17/05/2024 for the monitoring period 01/04/2021 to 31/12/2022. Also, the Project developer regularly did Annual Reporting for the Project activity on regular basis, the last Annual Report was uploaded on sustain-cert on 13/12/2023. Hence the project developer was always serious about GS-Impact Certifications.

Since the revenue from the GS Impact certifications are very essential for the survival of the project activity and rejection of the deviation will lead to a huge financial loss to the project developer for the monitoring period from 03/08/2022 to 02/08/2024 which will tentatively lead to a loss of 63,436 GS-VERs. This is a very huge loss and it may lead to very serious implications in the current business scenario and sustaining the project activity.

The Project activity has already completed its transition from GS-CER to GS-VER on 17/02/2022. So, the project activity completed its transition process well before the end of year 7 of the CDM crediting period. Since the project developer has proactively done the transition from GS-CER to GS-VER, the project developer is serious about revenue from GS Impact Certifications and thus no loss of credits shall be applied while executing for the subsequent verification of the project activity as the Project Developer assures that the submission of the final set of documents to sustain-cert will be done within the end date of the CDM crediting period that is 02/08/2024 as the VVB engagement has already been done and the design certification renewal for the 2nd crediting period from 03/08/2022 to 02/08/2027 is currently under process.

Thus, GS is requested to to approve this deviation for exemption of loss of claimable period and conduct the GS verifications of retroactive period without loss of claimable period under the GS-VER scheme as per option 1(b) of the subject guidelines, provided the GS submission for Renewal of Crediting period is done before 02/08/2024.

3.2.2 | VVB opinion (to be completed by VVB, if applicable):

3.3 | Impact of the deviation:

3.3.1 | Impact assessment (to be completed by Project developer):

The above deviation will not cause any impact upon the data quality or attract any potential risk on GS related to any issuance or any other material impact affecting the quality of the project and thus no any potential risk is attributed to GS Project activity in particular.

The deviation requested adheres to the Principles and Requirements set forth by GS4GG and complies with:

- Environmental Integrity- The GSVER's generated from the project activity are not Over-estimated as a result of deviation and conservativeness are ensured.
- Contribution to Sustainable Development Goals- SDG contributions that the project is designed to achieve are in line with GS4GG requirements and the above deviation does not have any potential impact upon the certified SDG's claimed during the current monitoring period.

Safeguarding Principles and requirements- The deviation does not create any impact upon the safeguarding principles and requirements set forth by GS4GG

- Compliance with Host Country Regulations- The project does not create any conflict with Host Country regulations and all the host country regulations are followed.

Thus, Kind request to allow PP to claim the credits for complete monitoring period without loss of any credits.

3.3.2 | VVB opinion (to be completed by VVB, if applicable):

Not Applicable.

3.4 | Documents:

Not Applicable, if required, the project developer can submit any kind of supporting sought by the GS.

Version number	Release date	Description
5	11.04.2022	Additional information added: - date of listing, design certification, transition - standard version - specific reference to a requirement deviated from - any previous deviations/design changes approved Guidance on VVB opinion
4	14.01.2021	
3	16.07.2020	
2	03.05.2018	
1	01.07.2017	Initial adoption