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20 December 2021

Mustafa Kemal Gongör
Elen Enerji Üretimi Sanayi Ticaret A.Ş.
İlkbahar Mahallesi Turan Güneş Bulvarı
Galip Erdem Cad. No3 Çankaya/ANKARA

Dear Mr. Gongör,

This letter is in reference to your exemption request submitted to Verra on 10 November 2021. It is our understanding that Elen Enerji Üretimi Sanayi Ticaret A.Ş. (the project proponent), is requesting an exemption from section 4.1.20(2) of the *VCS Standard, v4.1* for Sirma Run-of-River Hydro Power Project (project 603). The exemption requested by the Project Proponent is to allow a single validation/verification body (VVB) to verify approximately 8 years and 6 months of the project's GHG emission reductions or removals.

Based on the information provided to Verra, it is understood that the project proponent was aware that having the same VVB conduct the second verification, the crediting period renewal, and the third verification would be in violation of the VVB Rotation requirements set out in Section 4.1.20(2) of the *VCS Standard, v4.1*. In addition, the availability of VVBs in Turkey during the Covid-19 pandemic is limited.

Verra acknowledges the impacts of the COVID-19 pandemic on the ability of VVBs to carry out their work in Turkey. Therefore, considering the particular circumstances leading to this request, and the background information presented, Verra is able to grant this one-off exemption from Section 4.1.20 of the *VCS Standard, v4.1* for project 603 for the verification of the monitoring period from 01 July 2013 - 05 June 2019.

Please note that exemptions are granted by Verra on a case-by-case basis and do not form the basis of, or set a precedent for, future exemption request approvals or denials. Verra would like to emphasize that it is our expectation that project proponents keep abreast of updates to the *VCS Standard*, and ensure projects are in conformance with such rules throughout the project lifetime. The intent of this expectation is set out in the "Version Control" section (page 3) of the *VCS Standard, 2007.1*, which states "The current version is the version available at the time of use on the www.v-c-s.org."

Therefore, Verra expects that the project proponent and the VVB will continue to use the current rules and requirements of the VCS Program. Since the project proponent and the VVB have been made aware of the current rules and requirements, they are expected to be compliant of such rules in the future. Thus, Verra may not be able to grant any future exemptions to the project proponent regarding this rule.

This letter will be uploaded to the Verra Registry as a public document.

Sincerely,



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Tanushree Bagh Mukherjee

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Senior Program Manager, Verra Programs