VALIDATION REPORT

TEPEKISLA DAM & HYDROELECTRIC POWER PLANT

Report ID	VCS.25.VAL.016
Project title	Tepekisla Dam & Hydropower Plant Project
Project ID	2097
Crediting period	13-August-2025 to 12-August-2035
Original date of issue	05- July-2025
Most recent date of issue	02-November-2025
Version	1.3
VCS Standard Version	4.7
Client	SANKO Enerji Sanayi ve Ticaret A.Ş.
Prepared by	KBS Certification Services Ltd.
Approved by	Mr. Praveen N Urs – Director of Climate Change & Sustainability

Work carried out by	Team Leader, Technical Expert (TA 1.2) & Local Expert (Türkiye): Tuğçe Kıratlı Technical Reviewer: Ashwin Kumar K V Manager T & C: Rishabh Madan

Summary:

The “KBS Certification Services Ltd.” has been commissioned by SANKO Enerji Sanayi ve Ticaret A.Ş. to carry out the Renewal of the Crediting period of the project “Tepekisla Dam & Hydropower Plant Project” with regard to the requirements of VCS Version 4.7.

The project involves the emission reduction through renewable hydro energy in the host country Türkiye. Thus, GHG removals are achieved.

The project applies the CDM consolidated methodology ACM0002 “Consolidated baseline methodology for grid-connected electricity generation from renewable sources, Version 22.0.0.

In the course of the VCS Validation, 3 Clarification Requests (CL) were raised and successfully closed. No Correction Action Requests (CAR) nor Forward Action Requests (FAR) have been raised.

The VCS Validation was based on the draft project description, emission reduction calculation spreadsheets and supporting documents made available to KBS Certification Services Ltd by the project participant.

In addition, the validator confirms that the GHG emission reductions are calculated without material misstatements in a conservative and appropriate manner.

The review of the project design documentation and the subsequent follow-up interviews have provided KBS with sufficient evidence to determine the project’s fulfilment of all the stated criteria. In our opinion, the project meets all applicable VCS requirements.

CONTENTS

1 INTRODUCTION

1.1 Objective

SANKO Enerji Sanayi ve Ticaret A.Ş. has commissioned the KBS Certification Services Ltd. to carry out the renewal of the crediting period of the project: "Tepekisla Dam & Hydropower Plant Project" with regard to the relevant requirements of the VCS Project Standard Version 4.7 /9/.

The objectives of this validation are, by review of objective evidence, to establish that:

- Assess whether the project description has been correctly updated;

- Assess the validity of the original baseline scenario, including and evaluation of the impact of new relevant national and/or sectorial policies and circumstances on the validity of the baseline scenario.

- Assess the application of the latest applied methodology;

- Assess the estimated emission reductions;

- Assess the monitoring plan

1.2 Scope and Criteria

The scope of the validation is the independent and objective review of the Project Description Document (PD) which is revised for the 2nd CP. The PD is reviewed against the relevant criteria including the approved baseline and monitoring methodology. The validation was based on the guidance given in the VCS Project Standard V4.7 /9/.

The validation team has employed a risk-based approach to assess the completeness and accuracy of the claims and conservativeness of the assumptions in the PD. The main focus of the validation team is to determine if the identified baseline is still applicable to the project activity, if the estimated emission reductions for the 2nd crediting period are still conservative and if the monitoring plan is still feasible for the project activity.

The only purpose of the validation is its usage during the renewal of crediting period process as part of the VCS project cycle. Therefore, KBS Certification Services. Ltd. can't be held liable by any party for decisions made or not made based on the validation opinion, which will go beyond that purpose.

1.3 Reasonableness of Assumptions

The validation has been planned and organized to achieve a reasonable level of assurance.

The validation is based on the requirements of the VCS Project Standard v4.7 /9/, the VCS Program Guide, v4.4 /8/, the Validation and Validation Manual, v3.2 /25/, the updated applied

methodology ACM0002 “Consolidated baseline methodology for grid-connected electricity generation from renewable sources, Version 22.0.0 /7/, the tool to calculate the emission factor for an electricity system, v07.0 /11/, Methodological Tool assessment of the validity of the original/current baseline and update of the baseline ay the renewal of the crediting period, v03.0.1 /13/, the tool for the demonstration and assessment of additionality, version 07.0 /12/, the registered VCS PD and additional documents related to baseline and monitoring methodology, the subsequent background investigation, monitoring plan, follow-up interviews and supporting documents made available to the validation team by project proponent. KBS has employed a rule-based approach in the validation, focusing on the fulfilment of the rules determined by the VCS Standard /9/.

The Validation team has checked all the above-mentioned details and confirms that all the information provided is accurate.

KBS applies the rule-based approach aimed at focusing on the fulfilment of the rules determined by the VCS Standard, in order to assure not omitting any part of the mandatory processes. A few discrepancies were found during the validation and the findings were submitted to the project proponent, indicated under the titles clarification requests (CL). CLs require to be addressed by the PP.

Through on-site interviews, host country rules and regulations related to project activity, the project description, validity of the baseline scenario, monitoring plan and estimated emission reduction has been checked and found appropriate.

Hence the above steps were followed for achieving the level of assurance in validation report. Based on the process and procedures conducted, KBS confirms that the information in the PD:

- is materially correct and is a fair representation of the actual project details, and

- is prepared in accordance with VCS requirements and the applied CDM methodology for information pertaining to GHG qualification, monitoring and reporting.

The validation work is carried out as per the requirements of the applied program (e.g. VERRA) and the validation opinion is given in section 4 below.

1.4 Summary Description of the Project

SANKO Enerji Sanayi ve Ticaret A.Ş. has commissioned KBS to carry out the re-validation of the registered “Tepekisla Dam & Hydropower Plant Project” project in Türkiye, VCS Registration Reference N° 2097, for the crediting period of 13-August-2025 to 12-August-2035.

The project is hydroelectric power plant located in Kelkit River (the longest tributary of the Yesilirmak river basin) in Black Sea Region, Tokat Province of Türkiye.

The Tepekisla HEPP aims to produce clean energy by utilizing water flow from a thalweg elevation of 216 meters and a crest elevation of 255.50 meters. Water is conveyed through two penstocks, each 130 meters long and 5.00 meters in diameter, down to a tailwater elevation of 214.00

meters. After passing through the turbines, the water is returned to the Kelkit River. This setup takes advantage of the 37-meter elevation difference between 252.50 meters and 215.0 meters at the Kelkit River, thereby preserving the productive lands of the Niksar plain. The energy transmission line extends approximately 15 km. Water drives three turbines (two horizontal axis SAM turbines and one horizontal axis Francis turbine) with a combined installed capacity of 69.627 MWe, connected to three-phase synchronous generators. ALSTOM is the manufacturer of the turbines and generators used in the project as confirmed through the Previous VCS PD /3/. The generated electricity is supplied to the National Electricity Transmission Grid of Turkey.

The technical description of the project activity is as follow:

Power Plant Building		
Length	M	58.3
Width	M	38.5
Turbines		
Brand/Model		Alstom-Kaplan and Francis
Type		Horizontal axis SAM and Francis
Number of Units		2+1
Unit Rated Power	MWe	2 * 32.993 + 1*3.641
Total Installed Capacity	MWe	69.627
Project rated discharge	m^3/s	213.00
Transformer		
Type		Outdoor Type, oily, three phased
Number of Units		3
Power of a Unit	kVA	85,000
Voltage	kV	11/154 kV (+/- 2 x 2.5 %)
Efficiency	%	99
Type		Internal Type, dry or silicone oil, three phased
Number of Units		3
Power of a Unit	kVA	400
Voltage	kV	11 (+/-2 x 2.5 %) / 0.4 kV
Penstock		
Number of Units		2
Inner Diameter	m	5

Steel Thickness	mm	14,09
Length	m	130
Generator		
Type		Horizontal axis, three phased synchronal
Number of Units		3
Power Factor		0,90
Efficiency	%	98.5

The project activity is categorized under scope 1 – Energy industries (renewable/non-renewable). The projectproponent is SANKO Enerji Sanayi ve Ticaret A.Ş. and the Project consultant is Rüzgar Karbon ve Enerji Danışmanlık Sanayi Ticaret Ltd.Şti.

The GHG benefit of the project activity was only accounted under VCS. There are not any other RECs were being issued for the project activity. Furthermore, as a host country in Turkey such any programme like a government-regulated system or programme for the constraint and monetisation of GHG emissions (such as emissions trading scheme, cap and trade or carbon tax mechanisms) has not been implemented.

The milestones of the project activity as VCS project are as follow:

Milestone	Date
Final Project Description Report for EIA Process	April 2011
EIA approval (by the Ministry of Environment and Forestry)	08 June 2011
Water Usage Agreement	01 October 2012
Generation License	15 November 2012
Revised Feasibility Report	January 2013
Construction Contract	08 May 2013
Permission letter for the use of forestry lands	12 June 2013
Electromechanical Equipment Contract	28 June 2013- 17 July 2013
The letter related to credit condition from the financier	12 March 2013
The date for start of construction (Site delivery record)	04 June 2013
Partial Provisional Acceptance Date (3.755MWm/3.641MWe)	13 August 2015
Partial Provisional Acceptance Date (33.431MWm/32.993MWe)	04 September 2015
Partial Provisional Acceptance Date (33.431MWm/32.993MWe)	05 November 2015

1st Monitoring Period	13-August-2015 to 31-August-2020
2nd Monitoring Period	01-September-2020 to 30-November-2023
2nd Crediting Period	13-August-2025 to 12-August-2035

During the on-site audit inspection, location (as mentioned in section 1.7 of previous MR) and all the technical aspects of the project activity mentioned in the previous approved VCS PD have been verified. The same was also crosschecked during the desk review of supporting documents.

2 VALIDATION PROCESS

2.1 Method and Criteria

Based on the desk review and on site visit the audit team follows the validation protocol to identify and record the findings in the context of the project activity. The findings are communicated to the client in the findings document (Appendix IV). The project documentation, including responses to the findings is reviewed by the team leader in consultation with team members, wherever appropriate. The team leader prepares the draft validation report subject to closure or non-closure of the findings.

The validation process was carried out in line with the requirements of VCS Standard, Version 4.7. In addition, the validation team followed standard auditing techniques and KBS's VCS Procedures were also applied during the validation. A rule-based approach was followed to carry out validation and access all the factors and concerns that relate to the renewal of the crediting period of the project activity.

KBS follows a rule-based validation approach, wherein a desk review of the project documentation is undertaken, which is followed by a on-site inspection by the members of validation team. The validation protocol is filled by the validation team that is based on standard auditing practices and VCS requirements. The validation protocol provides transparent means to record the observations by the validation team members and the non-conformities, if any. The validation protocol is an internal document, and available on request.

Duration of validation:

Validation contract	02-April-2025
On site audit	16-May-2025
Draft Validation Report	04-July-2025
Final Validation Report	23-July-2025

2.2 Document Review

A detailed review of all project documentation was done to ensure the accomplishment VCS program requirements, the methodology applied, and the registered VCS PD. A desk review is undertaken, involving but not limited to:

- Review of the project description;

- Review the validity of the original baseline scenario;

- Review the estimated emission reductions;

- Review of the monitoring plan and monitoring methodology, paying particular attention to the frequency of measurements, the quality of metering equipment including calibration requirements, and the quality assurance and quality control procedures;

- Evaluation of data management and the quality assurance and quality control system in the context of their influence on the generation and reporting of emission reductions.

The list of documents reviewed is included in the section 'References' in Appendix III.

2.3 Interviews

Interviews were undertaken by members of validation team, involving Interviews with relevant personnel to confirm the actual operational and data collection procedures are still valid and in accordance with the approved monitoring plan. Furthermore, an assessment of the implementation and operation of the updated VCS PD against the registered VCS PD. The interviews for this validation assessment were undertaken by the audit team. The details are mentioned below:

No.	Name	Function	Organization
1	Çağla Balcı Eriş	Consultant	Rüzgar Danışmanlık
2	Yusuf Çavdar	Administrative Affairs	Sanko Enerji
3	İsmet Kaya	Business Manager	Sanko Enerji
4	Mert Yelis	Operation Engineer	Sanko Enerji
5	Zafer Özer	Maintenance Supervisor	Sanko Enerji
6	Duran Şahin	Mukhtar	Tepekışla Village
7	Ömer Yalçın	Stakeholder	Tepekışla Village
8	Mehmet Şahin	Stakeholder	Tepekışla Village
9	Zeynel Yılmaz	Assistant Mukhtar	Tepekışla Village

2.4 Site Visits

The validation team performed an on-site assessment on 16-May-2025. The audit team has conducted several activities during on site assessment:

- A complete desk review of the PD, as well as all applicable country legal requirement and supportive evidence have been checked by the validation team.

- To check implementation, project boundary, current situation, monitoring and metering equipment, monitoring procedures, etc.

- Cross-check evaluation, for information received from interviews, under the scope of all information and references provided in PD and supporting documents.

- An assessment of the implementation and operation of the VCS project activity as per the registered VCS PD;

- A review of information flows for generating, aggregating and reporting the monitoring parameters;

- A check of the monitoring equipment including performance and observations of monitoring practices against the requirements of the registered VCS PD and the selected methodology.

- A review of calculations and assumptions made in determining the GHG data and emission reductions;

- An identification of quality control and quality assurance procedures in place to prevent or identify and correct any errors or omissions in the reported monitoring parameters.

2.5 Resolution of Findings

KBS applies the rule-based approach aimed at focusing on focusing on the fulfilment of the rules determined by the VCS Standard. A few discrepancies were found during the validation and the validation report was submitted to the project proponent, indicated under the titles Clarification Requests (CLs). CLs are handled by PP.

Criteria for judging items as CAR, CL or FAR are as follows:

Corrective action request (CAR):

The project participants have made mistakes that will influence the ability of the project activity to achieve real, measurable additional emission reductions;

- The Voluntary Carbon Standard's requirements have not been met, or

- There is a risk that emission reductions cannot be monitored or calculated.

Clarification request (CL):

Information is insufficient or not sufficiently clear to determine whether the applicable VCS requirements have been met.

Forward Action Request (FAR):

FARs is to be raised to highlight issues related to project implementation that require review during the first validation of the project activity. FARs does not relate to VCS requirements for registration. VCS Validation Report Template, v4.4

CARs and CLs are to be resolved or closed out if the PP modifies the project description, rectifies the MR or provides adequate additional explanations or evidence that satisfies the concerns. If this is not completed, the project activity cannot be recommended for issuance under VCS registry.

The PD was revised addressing the CLs by KBS. After reviewing the revised and resubmitted PD; resolving the CLs raised and outstanding concerns, KBS issues this final validation report and opinion.

The list of CARs/CLs raised, and the response provided, the means of validation, reasons for their closure and references to correction in the PD are provided in appendix IV of this report. The revised PD with changes incorporated as per the issues raised were rechecked with the documentary evidence and found to be inline.

A summary of all raised findings is provided below:

Areas of validation findings	No. of CL	No. of CAR	No. of FAR
Compliance of PD with the PD form			
Update of project details	1		
Application of the methodology			
Validity of the original baseline scenario			
Validity of the Monitoring Plan	2		
Calculation of emission reductions			
Total	3		

2.5.1 Forward Action Requests

No FAR has been raised during validation stage and during the current validation.

3 VALIDATION FINDINGS

3.1 Project Details

<table>
<tr><th>Item</th><th>Evidence gathering activities, evidence checked, and assessment conclusion</th></tr>
<tr><td>Audit history</td><td>
<table>
<tr><th>Date</th><th>Milestone</th></tr>
<tr><td>13-August-2015 - 12-August-2025</td><td>Validation - Re-Consult Rüzgar Enerjisi Danışmanlık İç ve Dış Tic. Ltd. Şti. (10 years)</td></tr>
<tr><td>13-August-2015 - 31-August-2020</td><td>1st verification - Re Carbon Gözetim Denetim ve Belgelendirme Ltd. Şti. (5 years)</td></tr>
<tr><td>01-Sep-2020 - 30-Nov-2023</td><td>2nd verification - RINA Services S.p.A. (3 years and 2 months)</td></tr>
</table>
</td></tr>
<tr><td>Sectoral scope</td><td>1 - Energy industries (renewable - / non-renewable sources)</td></tr>
<tr><td>AFOLU project category, if applicable</td><td>Not Applicable</td></tr>
<tr><td>Project activity type</td><td>Renewable energy project (hydroelectric project)</td></tr>
<tr><td>General eligibility of the project to participate in the VCS Program</td><td>As this is the renewal of the crediting period, the project is already registered under VCS program.</td></tr>
<tr><td>AFOLU project eligibility, if applicable</td><td>Not Applicable</td></tr>
<tr><td>Transfer project eligibility, if applicable</td><td>As this is the renewal of the crediting period, the project is already registered under VCS program.</td></tr>
<tr><td>Project design</td><td>The project activity has single location. The project activity consists of the installation of hydroelectric power plant located in Kelkit river, Tepekisla village of Tokat Province, Türkiye.</td></tr>
<tr><td>Project ownership</td><td>The legal ownership of the VCS carbon credits generated from the project activity is SANKO Enerji Sanayi ve Ticaret A.Ş. which was confirmed by Generation License /21/.</td></tr>
<tr><td>Project start date</td><td>13-August-2015 - Project commissioning date</td></tr>
<tr><td>Project crediting period</td><td>13-August-2015 to 12-August-2025 (1st CP)
13-August-2025 to 12-August-2035 (2nd CP)</td></tr>
</table>

Project scale	< 300,000 tCO_2e/year (project)
Likelihood of achieving estimated GHG emission reduction or removals	This is the renewal of the crediting period. Hence, it is likely that the project will continue reducing GHG emissions.
Technologies and measures implemented by the project activity or activities	The facility consists of Tepekışla Dam, upstream and downstream cofferdams, penstock, forebay, weir and powerhouse, and the powerhouse has two horizontal axis SAM turbines, each with a power of 32.993 MWe, and one horizontal axis Francis turbine with a power of 3.641 MWe.
Implementation schedule of the project activity or activities	As this is the renewal of the crediting period, the project is already registered under VCS program.
Project location	The project site is situated along the Kelkit River, the longest tributary of the Yeşilırmak River Basin, located in Turkey's Middle Black Sea Region. It lies approximately 3.5 km south of the Doğanyurt Nahiye center and 5.5 km upstream from the village of Tepekişla in Tokat Province. The coordinates of the project area are 40° 39' 34'' N and 36° 42' 13'' E.
Conditions prior to project initiation	The project is a greenfield project. Hence, prior to project implementation, no hydropower plant was installed at the site.
Project compliance with applicable laws, statutes and other regulatory frameworks	The project complies with any applicable laws, statutes and other regulatory requirements /11-15/.
Double counting and participation under other GHG programs	The positive environmental impact of the project was considered only within the framework of the International Carbon Registry. No other Renewable Energy Certificates (RECs) were generated for the project. Additionally, in Turkey, as the host country, there is no established government-regulated system or program for controlling and monetizing greenhouse gas emissions, such as emissions trading schemes, cap and trade, or carbon tax mechanisms. It can be confirmed after reviewing all websites /16-19/, that no double issuance of emission reductions had happened.
No double claiming with emissions trading programs or binding emission limits	See above.

No double claiming with other forms of environmental credit	See above.
Supply chain (Scope 3) emissions double claiming	Not applicable.
Sustainable development contributions	Not applicable.
Additional information relevant to the project	As this is the renewal of the crediting period, the project is already registered under VCS program.

3.2 Safeguards and Stakeholder Engagement

3.2.1 Stakeholder Engagement and Consultation

3.2.1.1 Stakeholder Identification

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Stakeholder identification	In accordance with the regulation issued by the Ministry of Environment and Forestry, published in the Official Gazette dated 17 July 2008 (No. 26939), projects that are exempt from the requirement to conduct an Environmental Impact Assessment (EIA) are not obligated to hold stakeholder meetings. Therefore, no stakeholder meeting was scheduled during the project registration phase. Nonetheless, local village mukhtars have been consulted and kept regularly informed throughout the development of the HEPP project to gather feedback and understand the general community sentiment. To date, both the mukhtars and local residents have demonstrated a high level of cooperation in exchanging information and opinions. Furthermore, the contact details of the plant representative are available with the mukhtar, ensuring ongoing communication between the project owner and the local community. The project owner regularly follows up with the mukhtar to address any complaints or requests. Any concerns raised by the local population are communicated directly to the project owner, who then takes appropriate steps to support or improve conditions for the community.

	The project was granted a "Positive Environmental Impact Assessment" decision by the Ministry of Environment and Forestry, confirming that the Tepekışla HEPP will not result in any environmental harm. This approval is documented in the official letters dated 08/06/2011 and 04/12/2014 and remains valid.
Legal or customary tenure/access rights	The project owner maintains a positive and ongoing relationship with local stakeholders, ensuring continuous communication. All stakeholders are provided with multiple channels to share feedback regarding the project, including telephone, email, postal mail, or in-person visits to the project site. Additionally, since all project employees are recruited locally from nearby villages, community members are able to easily approach them with any requests or concerns.
Stakeholder diversity and changes over time	There is no stakeholder diversity and changes.
Expected changes in well-being	NA
Location of stakeholders	The project site is situated on the Kelkit River, the longest tributary of the Yeşilırmak River Basin in Turkey's Middle Black Sea Region, approximately 5.5 kilometers upstream from Tepekişla village in Tokat, Turkey.
Location of resources	Tepekisla village of Tokat, Turkey

3.2.1.2 Stakeholder Consultation and Ongoing Communication

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Stakeholder engagement process	The Stakeholder engagement process has been verified through interview with the headman of village and the logbook dated 26/03/2025 /26/ has been checked.
Consultation outcome	The stakeholders indicated that if they need, they can communicate directly and easily with the responsible of the project activity.

Ongoing communication	The stakeholders stated that they have the opportunity to reach the project owner whenever they want, through the opinion book, by phone or by sending news to the working locals.
Stakeholder input	Local stakeholders expressed their desire for a dam to be constructed alongside the Kelkit Stream, where the Tepekişla HEPP is located. However, since such works fall under the jurisdiction of the State Hydraulic Works (DSI), the project owner supported the villagers by contacting DSI on 11/04/2025 and 14/04/2025 to facilitate the request.

3.2.1.3 Free, Prior, and Informed Consent

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Obtaining consent	Not applicable
Outcome of FPIC discussion	Not applicable

3.2.1.4 Grievance Redress Procedure

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Development process	A positive relationship has been observed between the project owner and local stakeholders, with ongoing communication maintained. Stakeholders can share their feedback on the project through various channels, including phone, email, mail, or by visiting the project site and using the feedback book available. Additionally, local stakeholders often communicate directly with project employees—most of whom are residents of the surrounding villages—whenever they have requests or concerns.
Grievance redress procedure	The PP has established a grievance redress procedure to address and resolve any concerns raised by stakeholders. Grievances may be submitted through accessible channels such as phone, email, meetings, or the official website. All submissions are promptly acknowledged, reviewed by the appointed committee, and—where feasible—resolved within 30 working days. All steps taken and final outcomes are duly documented. Grievance redress is also monitored through logbooks provided to the mukhtars. Stakeholders may access

	these logbooks at any time. It has been observed that the feedback received by the stakeholders is reported to the upper management and action is taken on the issue. This issue was confirmed throughout the stakeholders. In the opinion book, stakeholders have expressed their problems by writing two comments. However, these requests are not directly related to the project and are not the responsibility of the project owner. However, the comments were still evaluated and the relevant units - State Hydraulic Works - were informed by the project owner.

3.2.1.5 Public Comments

Comments received	Actions taken by the project proponent	Evidence gathering activities, evidence checked, and assessment conclusion
Not applicable	Not applicable	Not applicable

3.2.2 Risks to Local Stakeholders and the Environment

3.2.2.1 Management Experience

The project is operated by SANKO Enerji Sanayi ve Ticaret A.Ş., which is responsible for overall site management in compliance with Turkish legislation and in alignment with the technical specifications provided by the technology suppliers.

Monitoring activities are conducted internally by the project proponent, as outlined below:

- ✓ Electrical Engineers are responsible for implementing the monitoring plan, including measuring electricity generation, the electricity delivered to the national grid, any imported electricity, and fuel consumption (if applicable). Additionally, a group representative provides annual training sessions covering monitoring and validation procedures.
- ✓ Mechanical Engineers ensure that all monitoring instruments and devices remain operational and calibrated as required.
- ✓ The Accounting Manager is tasked with submitting electricity sales invoices to the Operations Manager.
- ✓ The Operations Manager serves as the VER Coordinator and holds responsibility for:
  - Verifying the availability and proper functioning of monitoring equipment;
  - Overseeing and coordinating monitoring activities across all departments;

- Developing, implementing, reviewing, and improving the VER Monitoring and Reporting Procedures, including cross-checking and consolidating data from the electrical and accounting teams;
- Calculating and reporting emission reductions; and
- Organizing internal seminars to educate and train staff on monitoring protocols.

3.2.2.2 Risk Assessment

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Natural and human-induced risks to stakeholders' wellbeing	Not applicable
Risks to stakeholder participation	Not applicable
Working conditions	Not applicable
Safety of women and girls	Not applicable
Safety of minority and marginalized groups, including children	Not applicable
Pollutants (air, noise, discharges to water, generation of waste, release of hazardous materials, and chemical pesticides and fertilizers)	Dust emissions were primarily a concern during the construction phase. Currently, the project does not generate any process-related or fuel combustion emissions, apart from the auxiliary diesel generator, which was only operated for testing during the monitoring period. Wastewater is collected in septic tanks, which are regularly emptied and managed in compliance with the host country's Water Pollution Control regulations. Solid waste is systematically collected, with recyclable materials separated and sent to designated recycling centers. Non-recyclable waste is transported to the nearest landfill in coordination with Tokat Municipality.

3.2.3 Respect for Human Rights and Equity

3.2.3.1 Labor and Work

Item	Evidence gathering activities, evidence checked, and assessment conclusion

Discrimination	No instances of discrimination have been reported. Moreover, Turkey has ratified ILO convention 100 and 111 and discrimination based on gender is illegal in Turkey.
Sexual harassment	No cases of sexual harassment have taken place.
Equal pay for equal work	Equal opportunity has been ensured for all individuals. According to the Woman Empowerment Strategy Paper and Action Plan prepared by the Ministry of Family and Social Policies, there are 21 targets classified under 5 main fields in order to enhance participation of women to the society. In this action plan, economy and employment-oriented strategies are represented for women since the labor force activity of women is not at desired level compared to the EU countries.
Gender equity in labor and work	Gender equity and fair compensation for labor and employment have been maintained. Turkey has ratified ILO convention 100, 111, 122 and 142, which provides gender equality and promotes women's employment
Forced labor	The project does not engage in any form of forced labor. Turkey has ratified ILO 87 and 98 conventions. All employees are recruited according to the national legislation. Turkey has ratified ILO convention 155 and about work safety and precautions.
Child labor	No child labor is employed in the project. Turkey has ratified ILO 87 and 98 conventions. All employees are recruited according to the national legislation. Turkey has ratified ILO convention 155 and about work safety and precautions.
Human trafficking	The project does not involve individuals who are victims of human trafficking.

3.2.3.2 Human Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
NA	There are no identified risks concerning the recognition, respect, and promotion of the rights of Indigenous Peoples, local communities, and customary rights holders, in accordance with applicable international human rights law, the United Nations Declaration on the Rights of Indigenous Peoples, and ILO Convention 169 on Indigenous and Tribal Peoples.

3.2.3.3 Indigenous Peoples and Cultural Heritage

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
NA	There are no identified risks concerning the recognition, respect, and promotion of the rights of Indigenous Peoples, local communities, and customary rights holders, in accordance with applicable international human rights law, the United Nations Declaration on the Rights of Indigenous Peoples, and ILO Convention 169 on Indigenous and Tribal Peoples.

3.2.3.4 Property Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
NA	There are no identified risks concerning the recognition, respect, and promotion of the rights of Indigenous Peoples, local communities, and customary rights holders, in accordance with applicable international human rights law, the United Nations Declaration on the Rights of Indigenous Peoples, and ILO Convention 169 on Indigenous and Tribal Peoples.

3.2.3.5 Benefit Sharing

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Process used to design the benefit sharing plan	Not applicable.
Summary of the benefit sharing plan	Not applicable.
Approval and dissemination of benefit sharing plan	Not applicable.

3.2.4 Ecosystem Health

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Impacts on biodiversity and ecosystems	There are no identified risks to biodiversity or ecosystems. Appropriate measures are taken to protect any species under international conservation agreements, should they be present at the site.
Soil degradation and soil erosion	Not applicable
Water consumption and stress	Domestic water is brought to the facility by tankers, and wastewater is collected from regularly emptied septic tanks by sewage tanks.

3.2.4.1 Rare, Threatened, and Endangered species

Risk identified	Evidence gathering activities, evidence checked, and assessment conclusion
Species and habitat	According to regulations in Türkiye, if there are species identified in the field that are protected by international agreements, necessary precautions are taken. However, there is no such species within the scope of the project.
Areas needed for habitat connectivity	According to regulations in Türkiye, if there are species identified in the field that are protected by international agreements, necessary precautions are taken. However, there is no such species within the scope of the project.

3.2.4.2 Introduction of Species

Species introduced	Evidence gathering activities, evidence checked, and assessment conclusion
NA	No negative impacts occurred, as the species were already naturally present in the area.

Existing invasive species	Evidence gathering activities, evidence checked, and assessment conclusion
NA	There are no invasive species.

	Evidence gathering activities, evidence checked, and assessment conclusion

Invasive species	There are no invasive species.

3.2.4.3 Ecosystem conversion

Risks Identified	Evidence gathering activities and evidence checked
Ecosystem conversion	No risks have been identified. The project site has not been cleared or drained of any existing natural ecosystems. If any species protected under international conventions are found on-site, appropriate measures are taken to ensure their protection.

3.3 Application of Methodology

3.3.1 Title and Reference

The project activity has correctly applied the latest version of the applied methodology ACM0002– "Consolidated baseline methodology for grid-connected electricity generation from renewable sources", Version 22.0.0. No discrepancies were identified. Furthermore, the tool to calculate the emission factor for an electricity system, v07.0 and the Methodological Tool Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period, v03.0.1 have been correctly applied. No discrepancies were identified.

3.3.2 Applicability

This section is not updated as part of the Renewal of the Crediting Period.

3.3.3 Project Boundary

This section is not updated as part of the Renewal of the Crediting Period.

3.3.4 Baseline Scenario

According to VCS Standard v4.7:

a) The validity of the baseline scenario shall be assessed. Such assessment shall include an evaluation of the impact of new relevant national and/or sectoral policies and circumstances on the validity of the baselines scenario.

b) Where it is determined that the original baseline scenario is still valid, the GHG emissions associated with the original baseline scenario shall be reassessed using the latest version of the CDM Tool to assess the validity of the original/current baseline and to update the baseline at the renewal of the crediting period.

c) Where it is determined that the original baseline scenario is no longer valid, the current baseline scenario shall be established in accordance with the VCS Program rules.

The validation team reviewed the updated PDD and evaluated whether project participants have assessed and incorporated the impact of national and/or sectoral policies and circumstances existing at the time of requesting renewal of the crediting period on the current baseline GHG emissions, without reassessing the baseline scenario. Where data and parameters used for determining the original baseline that was determined ex ante (and not monitored during the crediting period) are no longer valid, the assessment team identified whether PP updated such data and parameters in accordance with the Methodological Tool "Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period" Version 03.0.1.

The steps from the Methodological Tool "Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period" Version 03.0.1 as per CDM VVS for project activities version 03.0 were applied to assess the continued validity of the baseline and/or the update of the baseline at the renewal of the crediting period:

Step 1: Assess the validity of the current baseline for the next crediting period

The Methodological Tool "Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period" Version 03.0.1 CDM requires assessing the impact of new relevant national and/or sectoral policies and circumstances on the baseline. The validity of the current baseline is assessed in the following sub-steps:

Step 1.1: Assess compliance of the current baseline with relevant mandatory national and/or sectoral policies

Validation team confirms that there have been no changes in the relevant national and/or sectoral regulations /14-18/ for hydro projects for generating electricity since the previous crediting period.

On the other hand, the baseline scenario for hydro projects to generated electricity was still valid according to latest applied methodology ACM0002, version 22.0.

As demonstrated in the registered PDD, the project activity is the installation of a new grid-connected renewable power plant; therefore, the baseline scenario is the electricity delivered to the grid by the project activity that otherwise would have been generated by the operation of grid-connected power plants and by the addition of new generation sources.

As per latest applied methodology ACM0002, version 22.0, "The baseline scenario is that the electricity delivered to the grid by the project activity would have otherwise been generated by the operation of grid-connected power plants and by the addition of new generation sources into the grid.".

Hence, the baseline for the second crediting period of the project remains the same as that in the registered PDD. In the absence of project activity, the same amount of electricity would otherwise have been generated by the operation of some grid connected fossil fuel-based power plants or newly added generation sources into grid. The information presented in the PDD has

been validated by an initial document review of all data. Further confirmation has been made based on the on-site assessment and review of information.

There are no new relevant national and/or sectoral policies and circumstances ever since the project was registered that have an impact on the baseline.

Thus, the baseline identified during the validation is still compliance with the relevant mandatory national and/or sectoral policies. Hence, no need to update the current baseline for the next crediting period.

Step 1.2: Assess the impact of circumstances

The recent changes in national circumstances have influenced the grid emission factor (EF), thereby affecting the project's current baseline emissions. Consequently, the EF has been revised for the second crediting period in accordance with the most recent version of the "Tool to calculate the emission factor for an electricity system." During the first crediting period, no significant deviations or changes in market characteristics were observed.

Step 1.3: Assess whether the continuation of the use of current baseline equipment(s) or an investment is the most likely scenario for the crediting period for which renewal is requested

According to the step 1.3 of the Methodological Tool "Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period" Version 03.0.1 /13/:

"This sub-step should only be applied if the baseline scenario identified at the validation of the project activity was the continuation of use of the current equipment(s) without any investment and, the projects proponents or third party (or parties) would undertake an investment later due, for example, to the end of the technical lifetime of the equipment(s) before the end of the crediting period or the availability of a new technology".

As the project activity was a greenfield project, this step is not applicable.

Step 1.4: Assessment of the validity of the data and parameters

During the 1st crediting period, project was registered applying large scale methodology ACM0002 (version 15.0). During the 2nd crediting period, the project has applied the latest version i.e. 22.0 of the same methodology ACM0002 The assessment of the validity of the parameters are provided below:

Ex-ante Parameter	Value for the 1st crediting period	Validity during 2nd crediting period
EFgrid,OM,y	0.659	0,7108*
EFgrid,BM,y	0.290	0,3721*
EFgrid,CM,y	0.474	0.4568*

*Published by the Turkish Ministry of Energy and Natural Resources /30/.

No other ex-ante parameters are updated.

Step 2: Update the current baseline and the data and parameters

As determined in the step 1.4 above, the following fixed parameters needs to be updated:

1. EFgrid,OM,y

2. EFgrid,BM,y

3. EFgrid,CM,y

The weight applied for the Operating Margin is 0.25 and for the Build Margin is 0.75, which is according to paragraph 86 of the applied EF tool, and it is suitable for the second crediting period.

Step 2.1: Update the current baseline

The baseline remains unchanged as discussed above. Only the baseline emissions have been updated for the 2nd crediting period, without re-assessing the baseline scenario, based on the latest approved version (Version 22.0) of the applied methodology ACM0002

The revised PDD provides, the updated baseline emissions for the 2nd crediting period, without reassessing the baseline scenario, based on the latest approved version of the methodology applicable to the project activity i.e., ACM0002, version 22.0. The revised baseline emissions are calculated in accordance with the relevant sectoral policies and circumstances that are applicable at the time of request for renewal of the crediting period.

Step 2.2: Update the data and parameters

The approach used to calculate the baseline emission factor is updated as per applied methodology and the most updated tool to calculate the emission factor available at the time of PDD submission for renewal of crediting period.

As a result, to calculate the project activity emission factor, the following fixed parameters have resulted:

1. EFgrid,OM,y

2. EFgrid,BM,y

3. EFgrid,CM,y

The Validation team has checked the reference and found acceptable. The grid emission factor has been revised in accordance with the publication issued by the Ministry of Energy and Natural Resources, which provides emission factor values calculated for the year 2022.

Validity of the baseline has been correctly assessed and the parameters are updated as per the Methodological Tool “Assessment of the validity of the original/current baseline and update of

the baseline at the renewal of the crediting period" /13/ Version 03.0.1 in the PDD submitted for the renewal of crediting period.

3.3.5 Additionality

This section is not updated as part of the Renewal of the Crediting Period. As stated in VCS Standard, V4.7, paragraph 3.9.8, a full assessment of additionality is not required when renewing the project crediting period unless otherwise specified in the methodology. However, regulatory surplus shall be demonstrated in accordance with the requirements set out in the VCS Program rules and the project description shall be updated accordingly."

The applied methodology does not require the reassessment of additionality as well. Furthermore, as demonstrated in previous section (3.2.4), there were no regulatory changes that would have affected the additionality of the project. Hence, the project remains additional.

3.3.6 Quantification of GHG Emission Reductions and Carbon Dioxide Removals

Baseline Emission:

The project activity is the installation of a new plant; Baseline emissions include only CO2 emissions from electricity generation in power plants that are displaced due to the project activity. The baseline emission of the project activity is estimated in accordance with applied methodology ACM0002 (Version 22.0.0) as follows:

$BE_y = EG_{PJ,y} \times EF_{grid,y}$

Where: BE_y = Baseline emissions in year y (t CO2e)

$EG_{PJ,y}$ = Quantity of net electricity generation that is produced and fed into the grid as a result of the implementation of the CDM project activity in year y

$EF_{grid,y}$ = CO2 emission factor of the grid in year y

The emission factor is calculated as per the tool to calculate the emission factor for an electricity system (v.07).

Validation team has checked the source of data and found it correct. Based on the above formulae, the baseline emission is estimated as 110,126 tCO_2e/year.

Project emission:

The project emissions shall be accounted using the following equation:

$PE_y = PE_{EF,y} + PE_{GP,y} + PE_{HP,y}$

Where:
PE_y : Project emissions in year y (tCO_2e/yr)
$PE_{FF,y}$: Project emissions from fossil fuel consumption in year y (tCO_2e/yr)

$PE_{GP,y}$: Project emissions from the operation of geothermal power plants due to the release of non-condensable gases in year y (tCO_2e/yr)
$PE_{HP,y}$: Project emissions from water reservoirs of hydro power plants in year y (tCO_2e/yr)

Project emission from Fossil fuel consumption ($PE_{FF,y}$)

The project's internal electricity consumption is approximately 500 kVA, which is considered minimal. During operation, this demand will be met by the electricity generated on-site, while during non-operational periods, it will be supplied from the grid. In rare cases where neither the plant is operational nor grid electricity is available, a diesel generator will be used to meet this demand. Should diesel generators be utilized, the resulting emissions will be calculated using the "Tool to calculate project or leakage CO_2 emissions from fossil fuel combustion" and accounted for as project emissions.

Therefore:

$PE_{FF,y} = 0$

Emissions of non-condensable gases from the operation of geothermal power plants ($PE_{GP,y}$) Since the project activity does not involve the operation of a geothermal power plant,

$PE_{GP,y} = 0$

Emission from water reservoirs:

Emission from hydro power plants has to be considered following the procedure described in most recent version of ACM0002 Version 22.0.0 /7/. For hydro power project activities that result in new single or multiple reservoirs and hydro power project activities that result in the increase of single or multiple existing reservoirs, project proponents shall account for CH_4 and CO_2 emissions from the reservoirs, estimated as follows:

If the power density of the single or multiple reservoirs (PD) is greater than 4 W/m^2 and less than or equal to 10 W/m^2:

Where:

$PE_{HP,y}$ = Emission from reservoir expressed as tCO_2e/year

EF_{Res} = Default emission factor for emissions from reservoirs of hydro power plants in year y (tCO_2e /MWh) = 0.09

TEG_y = Total electricity produced by the project activity, including the electricity supplied to the grid and the electricity supplied to internal loads, in year y (MWh).

However, again according to ACM0002 version 22.0.0 if the power density (PD) of the hydro power plant is above 10 W/m^2, PEy is 0.

The power density of the project activity is calculated as follows:

Where:

PD = Power density of the project activity, in W/m^2
Cap_{PJ} = Installed capacity of the hydro power plant after the implementation of the project activity (W)

Cap_{BL} = Installed capacity of the hydro power plant before the implementation of the project activity (W). For new hydro power plants, this value is zero
AP_J = Area of the reservoir measured in the surface of the water, after the implementation of the project activity, when the reservoir is full (m^2)
AB_L = Area of the reservoir measured in the surface of the water, before the implementation of the project activity, when the reservoir is full (m^2). For new reservoirs, this value is zero.

Emissions from water reservoirs of hydro power plants ($PE_{HP,y}$) The project has a reservoir area of 2,319,000 m^2.

The power density (PD) for this regulation pond is calculated as follows:
Cap_{PJ} = 69,627,000 W
Cap_{BL} = 0 (Justification: The project is a new hydro power plant)
AP_J = 2,319,000 m^2
AB_L = 0 (Justification: The project is a new hydro power plant))
PD = 69,627,000W / 2,319,000 m^2
PD = 30.02 W/m^2

PD > 10 W/m^2

Therefore, $PE_{HP,y}$=0

Hence, PE_y= 0

Leakage:

Because the technology used in this project is neither transferred to nor transferred from another activity leakage is considered to be zero (LE_y = 0) which is found correct.

Emission reduction:

As per the methodology, emission reduction (ER_y) is calculated as below:

$ER_y = BE_y - PE_y - L_y$ = 110,126 - 0 - 0 = 110,126 tCO_2e/year

The PP has submitted the ex-ante emission reduction estimation in a excel sheet. The excel sheet is clear, viewable, non-protected and the calculated values in the sheet are reproducible. Hence the ex-ante emission reduction calculated for this project is correct.

The assessment team confirms that

- All assumptions and data used by the project participants are listed in the PDD, including their references and sources;

- All documentation used by project participants as the basis for assumptions and source of data is correctly quoted and interpreted in the PDD;

- All values used in the PDD are considered reasonable in the context of the proposed project activity;

- The baseline methodology, ACM0002, version 22.0 has been applied correctly to calculate project emissions, baseline emissions, leakage and emission reductions;

- All estimates of the baseline emissions can be replicated using the data and parameter values provided in the PDD.

3.3.7 Methodology Deviations

The validation team confirms that the registered VCS PD complies with the requirements in the applied monitoring methodology ACM0002 – "Consolidated baseline methodology for grid-connected electricity generation from renewable sources" (version 22.0.0). As a result of the documental review, it is concluded that there are no methodology deviations.

3.3.8 Monitoring Plan

The project monitoring plan is in compliance with the monitoring methodology ACM0002, version 22.0. The project has applied the methodology - "ACM0002 Version 15.0 - Consolidated baseline methodology for grid-connected electricity generation from renewable sources" during the 1st crediting period. For the 2nd crediting period, latest version i.e. version 22.0 of the methodology ACM0002 "Consolidated baseline methodology for grid-connected electricity generation from renewable sources" has been applied and the monitoring plan of the same has been adopted. As per the methodology, the following parameter will be monitored:

Parameters	Monitoring procedure
$EG_{facility,y}$ (MWh/yr) Quantity of net electricity generation supplied by the project to the grid in year y	**Source of data:** Measurement by project participant (electricity meters). Main data will be monthly meter readings records - EPİAŞ data. **Measurement method:** The electricity generated and consumed by the power plant is continuously monitored through dedicated electricity meters. These measurements are recorded on a monthly basis. Both EPİAŞ and the project personnel have access to read and verify the meter data. At the end of each month, a protocol is signed by both parties, documenting the total electricity generated as well as the amount drawn from the grid. This protocol serves as the basis for determining the net electricity delivered to the grid. **Monitoring frequency:** Measured continuously and monthly recorded.

	Monitoring equipment: The parameter is monitored continuously as "MWh" by four electricity meters that are located at the project area. For TM-1; the main meter is EMH LZQJ-XC with serial number 12744468 and the backup meter is EMH LZQJ-XC with serial number 12744469. For TM-2; the main meter is EMH LZQJ-XC with serial number 12744470 and the backup meter is EMH LZQJ-XC with serial number 12744471. The meters have an accuracy of 0.2s as confirmed through on-site visit. The accuracy class of the meters complies with the "Communiqué for Measurement Devices used in the Electricity Market" /28/. The electricity meters are sealed by TEIAS as confirmed during the site visit. **QA/QC procedures:** TEAIS is responsible for calibration and maintenance of the devices as per the registered revised PD /1/. The project owner has no control on the meters since the meters are sealed by the TEIAS. If any major discrepancy occurs between the two meters, TEIAS performs necessary calibration. The calibration of the electricity meters was made on 12/10/2023 /29/ and will be valid till 11/10/2033. Recalibration of these meters will be done in line with the equipment requirements and through the period defined by national metrology institutes country by country and for Turkey this period is defined as 10 years. The calibration of meters is deemed appropriate and in compliance with the national regulation /27/. The validation team can conclude that the monitoring plan is complying with the applied methodology i.e. ACM0002 version 22.0 and project participant is able to implement the monitoring plan.

The monitoring plan will give opportunity for real measurements of achieved emission reductions.

The monitoring plan provided in the PDD is in line with applied methodology ACM0002, version 22.0. From the validation of the monitoring procedure provided in the PDD, validation team could conclude that the project participant is able to implement the monitoring plan.

3.4 Non-Permanence Risk Analysis

Not applicable for the project activity.

4 VALIDATION OPINION

4.1 Validation Summary

KBS Certification Services Ltd. has been contracted by "SANKO Enerji Sanayi ve Ticaret A.Ş." to perform a renewal of the crediting period of the VCS registered project "Tepekisla Dam & Hydropower Plant Project". VCS Validation Report Template, v4.4

The project involves the emission reduction through renewable hydro energy in the host country Türkiye.

The project conforms with the validation criteria for projects set out in the VCS Standard V4.7, the VCS Program Guide, v4.4, the latest version of Validation and Validation Manual v3.2, the latest version of the applied CDM methodology and methodological tools and related Standards/Guidance and host country criteria, as well as criteria given to provide for consistent project arrangements.

The validation GHG statement was conducted in accordance with ISO 14064-3:2019. The GHG statement is the responsibility of the project proponent.

The VCS Validation was based on the draft PD, emission reduction and emission factor calculation spread sheets, the monitoring plan as set out in the updated PD and supporting documents made available to the KBS Certification Services Ltd. by the project participant.

4.2 Validation Conclusion

The validation has been planned and organized to achieve a reasonable level of assurance limited level of assurance. The data and information supporting the GHG statement assertion were historical in nature.

KBS applies the rule-based approach aimed at focusing on the fulfilment of the rules determined by the VCS Standard, in order to assure not omitting any part of the mandatory processes. As a result of this validation, the validator confirms that:

- The latest version of the PD template has been used;

- The project description has been correctly updated;

- Assess the pasication of the latest applied methodology;

- The original baseline scenario is still valid;

- The monitoring has been updated in accordance with the applied rules and requirements, and

- The calculation of the emission reductions and corresponding emission factor has been done without mistakes.

The VCS project activity will result in reductions of greenhouse gas (GHG) emissions that are real, measurable and give long-term benefits to the mitigation of climate change. In our opinion, the project meets all relevant VCS criteria and all relevant host country criteria.

The total emission reductions from the project are estimated to be 1,110,126 tCO_2e for the 2nd crediting period during 13-August-2025 to 12-August-2035 (first and last days included), averaging 110,126 tCO_2e annually.

The emission reduction forecast has been checked, and it is deemed likely that the stated amount is achievable given the underlying assumptions do not change.

Crediting period: From [13-August-2025 to 12-August-2035]

Validated estimated GHG emission reductions and carbon dioxide removals for the project crediting period:

Vintage period	Estimated baseline emissions (tCO_2e)	Estimated project emissions (tCO_2e)	Estimated leakage emissions (tCO_2e)	Estimated reduction VCUs (tCO_2e)	Estimated removal VCUs (tCO_2e)	Estimated total VCUs (tCO_2e)
13-August-2025 to 31-December-2025	42,542	0	0	42,542	0	42,542
01-January-2026 to 31-December-2026	110,127	0	0	110,127	0	110,127
01-January-2027 to 31-December-2027	110,127	0	0	110,127	0	110,127
01-January-2028 to 31-December-2028	110,127	0	0	110,127	0	110,127
01-January-2029 to 31-December-2029	110,127	0	0	110,127	0	110,127
01-January-2030 to	110,127	0	0	110,127	0	110,127

31-December-2030						
01-January-2031 to 31-December-2031	110,127	0	0	110,127	0	110,127
01-January-2032 to 31-December-2032	110,127	0	0	110,127	0	110,127
01-January-2033 to 31-December-2033	110,127	0	0	110,127	0	110,127
01-January-2034 to 31-December-2034	110,127	0	0	110,127	0	110,127
01-January-2035 to 12-August-2035	67,584	0	0	67,584	0	67,584
Total	1,101,269	0	0	1,1,101,269	0	1,1,101,269

Location: Faridabad, Haryana, India
Date: 01-December-2025
Authorized Signatory:

Mr. Praveen N URS
Director – Climate Change & Sustainability
KBS Certification Services Limited

The non-permanence risk rating (%)	NA
If applicable, the Long-term Average (LTA), whether it has been properly updated, and if it has been reached.	NA

APPENDIX 1: COMMERCIALLY SENSITIVE INFORMATION

There is no commercial sensitivity information included in the project description which need to be excluded in the public version.

APPENDIX II: ABBREVIATIONS

CL	Clarification request
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CO2	Carbon dioxide
CO2e	Carbon dioxide equivalent
CP	Crediting Period
DNA	Designated National Authority
EB	CDM Executive Board
EIA	Environmental Impact Assessment
ER	Emission Reduction
FAR	Forward Action Request
GHG	Greenhouse gas(es)
GWP	Global Warming Potential
IPCC	Intergovernmental Panel on Climate Change
MP	Monitoring Plan
MR	Monitoring Report
PD	Project Description
PP	Project Proponent
UNFCCC	United Nations Framework Convention on Climate Change
VCS	Verified Carbon Standard
VCU	Verified Carbon Unit
VVB	Validation/Validation Body

APPENDIX III: REFERENCES

No	Reference Document	Version & Date
/1/	VCS PD for "Tepekisla Dam & Hydropower Plant Project" in Türkiye	Version 0.1 of 15/04/2025 Version 0.2 of 16/05/2025 Version 0.3 of 21/07/2025 Version 0.4 of 01/08/2025 Version 0.5 of 17/10/2025
/2/	ER Calculations_Tepekisla HEPP_v0.1	version 0.1 of 15/04/2025
/3/	Previous Approved VCS PD for "Tepekisla Dam & Hydropower Plant Project" in Türkiye	version 03 of 13/01/2014
/4/	Previous Approved Validation Report for "Tepekisla Dam & Hydropower Plant Project" in Türkiye	version 02 *of* 25/02/2015
/5/	Previous Approved Monitoring Report for "Tepekisla Dam & Hydropower Plant Project" in Türkiye	version 04 *of* 18/06/2021
/6/	Previous Approved Validation Report for "Tepekisla Dam & Hydropower Plant Project" in Türkiye	version 02 *of* 24/06/2021
/7/	CDM Executive Board: Baseline and monitoring methodology "ACM0002", "Consolidated methodology for grid connected electricity generation"	version 13.0 of 11/05/2012
/8/	VCS Verified Carbon Standard: VCS Program Guide	Version 4.4 of 29/08/2023
/9/	VCS Verified Carbon Standard: VCS Standard	Version 4.7 of 16/04/2024
/10/	VCS Verified Carbon Standard: VCS Project Description Template	Version 4.4 of 16/04/2024
/11	Methodological Tool "Tool to calculate the emission factor for an electricity system"	version 07.0 of 31/08/2018
/12/	Methodological Tool "Tool for the demonstration and assessment of additionality"	version 07.0 of 23/11/2012
/13/	Methodological Tool "Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period"	version 03.0.1 of 02/03/2012

/14/	Website: https://www.mevzuat.gov.tr/MevzuatMetin/1.5.4628.pdf Argument: Electricity Market Law Language: Turkish	Retrieved on: 04/07/2025
/15/	Website: https://www.mevzuat.gov.tr/MevzuatMetin/1.5.5346.pdf Argument: Law on Utilization of Renewable Energy Resources for the Purpose of Generating Electricity Energy Language: Turkish	Retrieved on: 04/07/2025
/16/	Website: https://www.resmigazete.gov.tr/eskiler/2007/05/20070502-2.htm Argument: Energy Efficiency Law Language: Turkish	Retrieved on: 04/07/2025
/17/	Website: https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=6831&MevzuatTur=1&MevzuatTertip=3 Argument: Unlicensed Electricity Production Regulation in Electricity Market Language: Turkish	Retrieved on: 04/07/2025
/18/	Website: https://www.mevzuat.gov.tr/MevzuatMetin/1.5.2872.pdf Argument: Environment Law Language: Turkish	Retrieved on: 04/07/2025
/19/	Website: https://registry.goldstandard.org/projects?q=&page=1 Argument: GS Database Language: English	Retrieved on: 04/07/2025
/20/	Website: https://projects.globalcarboncouncil.com/pages/submitted_projects Argument: GCC Database Language: English	Retrieved on: 04/07/2025
/21/	Website: https://www.ecoregistry.io/projects-list/cercarbono-co2 Argument: CerCarbono Database Language: English	Retrieved on: 04/07/2025
/22/	Website: https://www.carbonregistry.com/projects Argument: ICR Database Language: English	Retrieved on: 04/07/2025
/23/	Website: https://registry.verra.org/app/projectDetail/VCS/2097 Argument: Project in Verra Database Language: English;	Retrieved on: 05/07/2025
/24/	Sanko Enerji: Generation License EÜ8940-5/04372	Date of 21/11/2019
/25/	Validation and Validation Manual	Version 3.2 date of 19/10/2016
/26/	Logbook of Tepekışla Village	Date of 26/03/2025
/27/	The Turkish Ministry of Trade and Industry: Regulation of Metering and Testing of Metering Systems	Date of 24/07/1994
/28/	Turkish Energy Market Regulatory Authority: Communiqué for Measurement Devices used in the Electricity Market	Date of 22/03/2003

/29/	Calibration report of the Electricity meters	Date of 12/10/2023
/30/	Turkish Ministry of Energy and Natural Resources: Emission Factors for Türkiye	Published on 26/11/2024

APPENDIX IV: FINDINGS

Table 1.FAR FROM VALIDATION AND/OR PREVIOUS VERIFICATIONS

FAR ID	XX	SECTION NO.	Insert reference of protocol/report	Date: DD/MM/YYYY
Description of FAR				
Project/ Activity participant response		Date: : DD/MM/YYYY		
Documentation provided by project/ Activity participant				
DOE assessment		Date: : DD/MM/YYYY		

Table 2.CL FROM THIS VALIDATION/VERIFICATION

CL ID	CL 01	SECTION NO	Section 1	Date: 16/05/2025
Description of CL				
Please clarify/revise the listed issues: • Please revise VCS Standard Version given on the first page. Most recent data is available. • Please check "Justification" given in Section 1.9. the crediting period dates given are not correct. • In section 1.10, the project crediting period is not in line with the previously approved VCS-PD.				
Project/ Activity participant response		Date: **16/05/2025**		
VCS Standard Version has been revised on the first page of the VCS-PD. The crediting period dates have been corrected accordingly. The project crediting period has been revised accordingly, and it is in line with the previously approved VCS-PD in section 1.10.				

Documentation provided by project/ activity participant	
Revised PD	
DOE assessment	Date: **20/06/2025**
• VCS Standard Version given on the first page is now revised. • The crediting period dates given in Section 1.9 are now corrected. • In section 1.10, the project crediting period is now in line with the previously approved VCS-PD. **Hence, CL 1 is closed.**	

CL ID	CL 02	SECTION NO	Section 2	Date: 16/05/2025
Description of CL				
Please clarify/revise the listed issues: - During the site visit, it is realized that there is a letter dated 04/12/2014 about Environmental Impact Assessment. Please take it into consideration. - During the site visit, it was learned that since the reservoir area is in the Ayan village region, it was in contact with the village during the construction period, but as it can be seen from the previous MRs, Ayan village has not remained in the status of a village affected by the project since it was put into operation. For this reason, the only affected village is Tepekışla. Since Ayan village is still mentioned in the report, this situation should be clarified. - Please add "date of stakeholder consultation", "consultation outcome" and "stakeholder input" to VCS-PD.				
Project/ Activity participant response			Date: **16/05/2025**	
It has been corrected. It has been corrected and only used and mentioned Tepekışla village in the VCS-PD. The "date of stakeholder consultation", "consultation outcome" and "stakeholder input" have been aded to VCS-PD.				
Documentation provided by project/ activity participant				
Revised PD				
DOE assessment			Date: **20/06/2025**	

- The letter dated 04/12/2014 about Environmental Impact Assessment was taken into consideration. - The clarification is now revised. - "Date of stakeholder consultation", "consultation outcome" and "stakeholder input" were added to VCS-PD. **Hence, CL 2 is closed.**

CL ID	CL 03	SECTION NO	Section 4-5	Date: 16/05/2025
Description of CL				
Please clarify/revise the listed issues: - In Section 4.1, please check the information given. Some of SDG explanations are not related to Baseline Emissions given in the title of this section. - In Section 4.2, please check the information given. SDG explanations are not related to Project Emissions given in the title of this section. - Please add the accuracy class of the electricity meters.				
Project/ Activity participant response			Date: 16/05/2025	
- It has been revised accordingly in Section 4.1 of the VCS-PD - It has been revised accordingly in Section 4.2 of the VCS-PD. - The accuracy class of the electricity meters gave been added in the VCS-PD.				
Documentation provided by project/ activity participant				
Revised PD.				
DOE assessment			Date: 20/06/2025	
- In Section 4.1, the information is now revised. - In Section 4.2, the information is now revised. - The accuracy class of the electricity meters are now added. **Hence, CL 3 is closed.**				

Table 3.CAR FROM THIS VALIDATION/VERIFICATION

CAR ID	*1)* CAR 01	SECTION NO.	Insert reference of protocol	Date: DD/MM/YYYY
Description of CAR				
NA				

Project/ Activity participant response	Date: DD/MM/YYYY
NA	
Documentation provided by project/ activity participant	
NA	

Table 4.FAR FROM THIS VALIDATION

FAR ID	FAR 01	SECTION NO.	Insert reference of protocol	Date: DD/MM/YYYY
Description of FAR				
NA				
Project participant response				Date: DD/MM/YYYY
NA.				
Documentation provided by project/ activity participant				
NA.				
DOE assessment				Date: DD/MM/YYYY
NA.				

APPENDIX V: COMPETENCE OF TEAM MEMBERS

Personnel Name	Tuğçe Kıratlı					
Schemes	☐ CDM	☐ GCC	☒ GS	☒ VCS	☒ Other GHG Schemes (ICR, Cercarbono, ISO 14064)	
Qualified to work as						
Team Leader	☒	Technical Expert	☒			
Validator/Verifier	☒	Financial Expert	☐			
Technical Reviewer	☒	Local Expert (Turkey)	☒			
Area(s) of Technical Expertise						
Sectoral Scope	**Technical Area**					
SS 1: Energy industries (renewable/non-renewable sources)	TA 1.2. Renewable					
SS 13: Waste handling and disposal	TA 13.1. Solid waste and wastewater					
	TA 13.2. Manure					
Approved by (Manager Competence)	Dr. Rajesh Monga					
Approval date	05-10-2023					

Personnel Name	Mr. Ashwin Kumar K V					
Schemes	☐ CDM	☒ GCC	☒ GS	☒ VCS	☒A6.4	☒Other GHG Schemes (Cercarbono, SDvista, ISO 14064)
Qualified to work as						
Team Leader	☒	Technical Expert	☒			
Validator/Verifier	☒	Financial Expert	☐			

Technical Reviewer	☒	Local Expert	☒
Area(s) of Technical Expertise			
Sectoral Scope		**Technical Area**	
SS 1: Energy industries (Renewable / Non-Renewable Sources)		TA 1.2. Renewables	
SS 3: Energy Demand		TA 3.1: Energy Demand	
SS 9: Metal production		TA 9.1. Aluminum and magnesium production	
Approved by (Manager Competence & Training)		Mr. Dushyant Parashar	
Approval date		02-06-2025	