

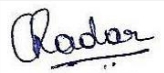


SAINT NIKOLA WIND FARM



Document Prepared By: 4K Earth Science Private Limited

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Project ID	1258
Verification period	01-December-2020 to 31-October-2022 (both days included) (4 th monitoring period)
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Client	AES Geo Energy OOD
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Summary:

4K Earth Science Private Limited (4KES) has been contracted by “AES Geo Energy OOD” to undertake verification and certification for the greenhouse gas (GHG) emission reductions reported from ‘Saint Nikola Wind Farm’ for the monitoring period 01-December-2020 to 31-October-2022 in the initial monitoring report/1/.

The Saint Nikola Wind Farm project is a 156 MW, grid-connected, renewable energy wind farm in the Municipality of Kavarna, Bulgaria initiated and operated by “AES Geo Energy OOD”. The AES Geo Energy OOD is acting as the project proponent for this project activity. The Saint Nikola Wind Farm (SNWF) project is located in the Municipality of Kavarna, Bulgaria.

The Wind Farm consists of 52 wind turbines, type V90-3.0 MW manufactured by Vestas, each with nominal capacity of 3MW totaling the installed capacity to 156 MW.

The main purpose of this project activity is to generate clean form of electricity through renewable wind energy sources. The Project is expected to generate around 300,000 MWh per year, which is dominated by fossil fuels, thereby reducing greenhouse gas emissions. The project will therefore displace an equivalent amount of electricity which would have otherwise been generated by fossil fuel dominant electricity grid and hence there by avoid associated CO₂ emission.

The wind farm was expected to generate over 300,000 MWh/y depending on wind conditions and average wind turbines technical availability. The design life time of the turbines of the V90-3.0 MW turbine is 20 years. The owner of the project AES Geo Energy OOD. Since March 15th 2010 the wind park is in continuous operation.

The scope of verification includes confirming the implementation of the monitoring plan of the registered VCS-PD and the application of the monitoring methodology “ACM0002: Grid-connected electricity generation from renewable sources” Version 14.

The verification is consisted of three phases: i) desk review of the project; ii) interviews with project stakeholders; iii) resolution of outstanding issues and the issuance of the final verification report and opinion. The overall verification, from Contract Review to Verification Report & Opinion, was conducted following 4KES internal quality procedures.

During the verification process 04 CARs, 05 CLs and 00 FARs were raised. All the findings have been closed satisfactorily and the same has been discussed in Appendix IV.

4KES confirms that the monitoring system is in place and the emission reductions are calculated without material misstatements. During the monitoring period from 01-December-2020 to 31-October-2022 (including both days), the project activity has supplied 666,498.122 MWh of electricity to the grid, thereby resulted in an emission reduction of 527,199 tCO₂e.

As per registered PD, the project activity results in replacing anthropogenic emissions of greenhouse gases (GHG's) estimated to be approximately on an average of 256,108 tCO₂ per year and 2,561,076 tCO₂ over the crediting period.

4KES confirms the following;

Reporting period: 01-December-2020 to 31-October-2022

Vintage period	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions or removals (tCO ₂ e)
2020 Vintage (01-December-2020 to 31-December-2020)	32,760	0	0	32,760
2021 Vintage (01-January-2021 to 31-December-2021)	265,811	0	0	265,811
2022 Vintage (01-January-2022 to 31-October-2022)	228,628	0	0	228,628
Total	527,199			527,199

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1 INTRODUCTION

1.1 Objective

4K Earth Science Private Limited (4KES) has been commissioned by 'AES Geo Energy OOD' to perform verification of its registered VCS project 'Saint Nikola Wind Farm' (VCS ID 1258), for the reported GHG emission reductions for the given monitoring period 01-December-2020 to 31-October-2022 (both dates included). The VCS projects must undergo an independent third-party verification and certification of emission reductions as the basis for issuance of Voluntary Carbon Units (VCUs). The objective of this verification is a thorough and independent assessment of registered project activities against the applicable VCS requirement by the VVB. The verification process shall determine whether the proposed project activity complies with the requirements of latest VCS guidelines, applicability conditions of the selected methodology, relevant host country regulations and guidance issued by the VCS Board.

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

- The project activity has been implemented and operated as per the project description (PD) and that all physical features (technology, project equipment, and monitoring and metering equipment) of the project are in place;
- Monitoring report and other supporting documents are complete;
- The data is recorded and stored as per the monitoring methodology and approved monitoring plan.
- To confirm that the monitoring system is implemented and fully functional to generate Verified Carbon Units (VCUs) without any double counting, and
- To establish that the data reported are accurate, complete, consistent, transparent and free of material error or omission by checking the monitoring records and the emissions reduction calculation.

1.2 Scope and Criteria

The scope of verification is to assess the claims and assumptions made in the VCS monitoring report (MR) against the VCS criteria, including but not limited to, VCS standard, applied methodology and other relevant rules and requirements established for VCS project activities.

The Verification is not meant to provide any consulting towards the project participants. However, stated requests for clarification and/or correction actions request may have provided inputs for improvement of the project design.

1.3 Level of Assurance

The verification team verified the complete monitoring data /13/ for the monitoring parameter of the monitoring plan against the Monitoring report/1/ and ER Calculation sheet /2/ and confirms that the reported emission reductions are free from any type of material errors. The site visit was also conducted to verify the implementation and monitoring plan of the project activity. The implementation of the project activity (i.e. major equipment and the metering arrangement) was verified from the Commercial Operation date supportive /7/, document Calibration certificate /15/, and during the site visit and found in accordance with the monitoring report /1/ and the registered VCS PD /4/. Verification team has also verified the technical details of the project equipments and metering arrangement with the supportive documents /6/ and found correct. The verification team verified the complete monitoring data for all the parameters of the monitoring plan and confirms that the reported emission reductions are free from any type of material errors. Therefore, 4KES confirms that the verification is conducted with reasonable level of assurance.

1.4 Summary Description of the Project

The main purpose of this project activity is to generate clean form of electricity through renewable wind energy sources. The project consists of 52 wind turbines, type V90-3.0 MW manufactured by Vestas, each with nominal capacity of 3MW. The project is expected to generate over 300,000 MWh/y depending on wind conditions and average wind turbines technical availability and supply to the electricity grid, which is dominated by fossil fuels, thereby reducing greenhouse gas emissions. The project activity generated renewable electricity without any GHG emissions, which displaced part of the electricity otherwise supplied by grid connected fossil fuel fired power plants. Thus, GHG emission reductions are achieved.

The Saint Nikola Wind Farm (SNWF) project is located in the Municipality of Kavarna, Bulgaria. The project is in operation since 15-March-2010. As per MR, the electricity generated from the project is supplied to grid which is confirmed from approved VCS PD/4/, verification of supporting documents, interview with PP.

Location of the project was verified through Google Map and found consistent with the data provided in the registered PD/4/

The project activity is a new facility (Greenfield) and the project will therefore displace an equivalent amount of electricity which would have otherwise been generated by fossil fuel dominant electricity grid.

As per registered PD, the project activity results in replacing anthropogenic emissions of greenhouse gases (GHG's) estimated to be approximately on an average of 256,108 tCO₂ per year and 2,561,076 tCO₂ over the crediting period.

During the monitoring period from 01-December-2020 to 31-October-2022 (including both days), the project activity has supplied 666,498.122 MWh of electricity, thereby resulted in an emission reduction of 527,199 tCO₂e.

2 VERIFICATION PROCESS

The registered VCS project is undergoing fourth verification under VCS (1st Crediting period), the approach adopted to ensure the quality of emission reductions is described in the following sections.

2.1 Method and Criteria

4KES assessed and determined whether the proposed implementation and operation of the project activity, and the steps taken to report emission reductions comply with the criteria and relevant guidance provided by the VCS Board. The validation/verification process consist of the following three phases;

- A desk review of the VCS PD and VCS MR
- Follow up interviews with project stakeholders
- The resolution of outstanding issues and issuance of final report and opinion.

The prepared verification report and other supporting documents then undergo an internal quality control before being submitted to the VCS executive board for issuance of credits as per VCS standard.

Contract signing	17-October-2024
Desk Review	01-November-2024 to 07-November-2024
On-site Audit	08-November-2024
Draft (Reporting)	26-November-2024
Final (Reporting)	05-May-2025

2.2 Document Review

The verification is performed primarily as a document review of the approved VCS PD, previous MR and Verification report and associated documents as stated in detail in Appendix III of this document. The assessment is performed by a verification team using a protocol. The cross checks between information provided in the Monitoring report, VCS PD and information from sources other than those used, if available, the team's sectoral or local expertise and, if necessary, independent background investigations.

2.3 Interviews

The site visit was conducted for the project activity and the physical inspection of power plant, interviews with the PP representative and stakeholders were conducted and reviewed documents to achieve a reasonable level of assurance in the verification. No sampling procedures were adopted in document verification and all the document were cross checked to ensure conservative estimation of emission reduction. The details on the interviews are provided as follows:

Location	The Saint Nikola Wind Farm (SNWF) project is located in the Municipality of Kavarna, Bulgaria.	
Dates	08-November-2024	
Key points discussed	Name of person, interviewed	Designation, Organization
Project Implementation, Operational data, Calibration, Data collection, QA/QC, procedures, Calculation of ERs, VCS requirements	Kerim Kerimov	Security
	Vladimir Dimitrov	Engineer
	Radomir Draganov	O&M Manager
	Veselin Marinov	O&M Team Lead
	Georgi Novachev	Engineer
	Dobromir Yovkov	Engineer
	Nikolay Nikolov	Engineer
	Georgi Nikolov	Engineer
	Nadezhda Aleksandrova	Performance Analyst
	Dimo Ivanov	Engineer
	Petar Georgiev	Personnel, EHS
	Asya Borisova	Janitor for Pavlikyanov (the cleaning company is called Pavlikyanov)

	Bisera Kalcheva	Commercial and Regulatory Officer
	Gareth Turner	Director, Numerco
	Anushree Mishra	Manager, Numerco

2.4 Site Visits

The site visit was conducted by Technical Expert & Local Expert for the project activity on 08-November-2024 and the physical inspection of power plant, interviews with the PP representative and stakeholders were conducted and reviewed documents to achieve a reasonable level of assurance in the verification. Additionally, the Team Leader was also present remotely during the site visit to confirm all the information at the ground level. No sampling procedures were adopted in document verification and all the document were cross checked to ensure conservative estimation of emission reduction.

The following points were atleast covered during the site visit.

- Review of project design, monitoring procedure, any change in design or monitoring procedure, ER calculation etc.
- Plant photographs & energy meter photographs are checked to confirm the plant project design and energy meter specification
- Technical specification of wind plant is verified to confirm the plant specification and project design.
- PPA is checked to confirm the monitoring procedure followed for billing which is used for emission reduction calculation.
- Energy meter reading of monitoring period are verified to confirm the electricity generated during the monitoring period.
- Calibration Certificate of energy meters are verified to confirm the accuracy of energy meter and validity of calibration of energy meters used for monitoring

From the above assessment, verification team confirm that the project achieves a reasonable level of assurance in the verification. This is in line with the requirements of the VCS Standard, as per which VVBs must achieve a reasonable level of assurance on all validations and verifications.

2.5 Resolution of Findings

The objective of this step is to identify, discuss and conclude on the issues related to the monitoring, implementation and operations of the registered project activity that could impair the capacity of the registered project activity to achieve emission reductions or influence the monitoring and reporting of emission reductions. This is done based on the desk review and onsite assessment. The verification team prepares and/or updates a verification protocol

(internal document) that records the conformities and non-conformities, which may be of following types;

CAR (Corrective Action Request) is raised if one of the following occurs:

- Non-compliance with the monitoring plan, the methodology or the standardized baseline are found in monitoring and reporting and has not been sufficiently documented by the project participants, or if the evidence provided to prove conformity is insufficient;
- Modifications to the implementation, operation and monitoring of the registered project activity has not been sufficiently documented by the project participants;
- Mistakes have been made in applying assumptions, data or calculations of emission reductions that will impact the quantity of emission reductions;
- Issues identified in a FAR during validation to be verified during verification or previous verification(s) have not been resolved by the project participants.

Clarification request (CL) is raised if information is insufficient or not clear enough to determine whether the applicable CDM requirements have been met. All CARs and CLs raised by the 4KES during verification shall be resolved prior to submitting a request for issuance

FAR (Forward Action Request) is raised during verification if the monitoring and reporting require attention and/or adjustment for the next verification period.

During the Verification process, total 04 CARs and 05 CLs were raised and resolved satisfactorily. No FAR has been raised in the verification. The list of CARs/CLs/FARs raised and the response provided, the mean of validation, reasons for their closure and references to correction in the relevant documents are provided in Appendix IV of this report.

2.5.1 Forward Action Requests

No FAR raised during the verification.

2.6 Eligibility for Validation Activities

4KES has a valid accreditation in the sectoral scope (TA 1.2) from VERRA for the project verification. The VVB name (4KES) is already available on the VERRA website, which can be checked from the below link: <https://cdm.unfccc.int/DOE/list/DOE.html?entityCode=E-0069>. It is clear from the above weblink that 4KES holds approval for the TA 1.2 for the VCS projects.

3 VALIDATION FINDINGS

3.1 Methodology Deviations

The verification team confirms that the registered PD complies with the requirements in the applied monitoring methodology ACM0002- Version 14.0 /8/. Therefore, no methodology deviations are applied during the monitoring period. The verification team confirms that no methodology deviations were observed during the current monitoring period.

3.2 Project Description Deviations

There is no deviations in the project description

3.3 New Project Activity Instances in Grouped Projects

The project is not a grouped project. Therefore, this section is not applicable.

3.4 Baseline Reassessment

Did the project undergo baseline reassessment during the monitoring period?

☐ Yes

☒ No

4 VERIFICATION FINDINGS

4.1 Project Details

The Saint Nikola Wind Farm project is a 156 MW, grid-connected, renewable energy wind farm in the Municipality of Kavarna, Bulgaria initiated and operated by "AES Geo Energy". The Project consists of 52 Vestas V90 wind turbine, each with a capacity of 3MW and to allow the export of the full capacity. The construction of the wind farm started in 2008 and the project was implemented in full according to the technical design without any deviations. The owner of the project AES Geo Energy OOD was granted a "Permit of Use" for the wind farm by the Ministry of

Regional Development and Public Works - Directorate for National Construction Supervision in two stages. On December 22nd 2009, a Permit of Use was granted for Saint Nikola sub-site C, and on March 15th 2010 for Saint Nikola sub-site A & B. Together, sub-sites A, B, and C constitute the full operational wind farm and include the 52 wind turbines, the energy collection system, the substation, and the overhead line connecting the wind farm to the grid. Since March 15th 2010 the wind park is in continuous operation. The registration of the project under VCS took place on October 27th 2014 when the registration documents had been uploaded at VCS web-site. Next verifications phases are being conducting:

- First verification phase conducted from RINA covered the period from 01/11/2012 to 31/12/2014
- Second verification period conducted from RINA covered the period 01/01/2015 to 30/04/2016
- Third verification period conducted from RINA covered the period (01/05/2016 to 30/11/2020)
- During the current 4th monitoring period (01/12/2020 to 31/10/2022) the project was found in normal operation and there were no events impacting the current generation of GHG emission reductions. The project has been implemented according the description and technical data presented in the PD. There are no concerns related to conformity of the actual project activity and its operation with the project design document. All project technical data and parameters have been verified during the verification process. As per the applied CDM approved Methodology the only figures that are taken into consideration are the net generating energy and emission factor of the grid, which is publicly available. The used electric meters are periodically calibrated.

During this monitoring period, the project is operated and implemented in accordance with the registered VCS-PD. Neither emergencies nor did events or situations occur during the monitoring period which may impact the applicability of the methodology. Since commissioning the project is running without any major breakdown. There is no major incident taken place during the monitoring period that impact GHG emission reduction or monitoring.

There is no change in project owner or any party involved in the project during the monitoring period. The installation and specification of wind power plant has been checked and confirmed during the site visit. The assessment team confirmed that there is no proposed or actual change to the project design during this monitoring period. The project design as mentioned in the registered VCS PD & monitoring report submitted is implemented and thus the same is acceptable to the assessment team. All required monitoring equipment's and procedures as mentioned in the registered VCS PD & monitoring report are available and implemented in an appropriate manner.

The organizational role and responsibility as mentioned in the registered VCS PD & monitoring report is followed onsite. All the monitoring equipment was calibrated as per the specified

interval in the registered VCS PD & monitoring report. No delay is observed in Calibration for the current monitoring period and hence the calibration is valid for the complete monitoring period. All the emergency preparedness as mentioned in the registered VCS PD & monitoring report is followed onsite and no discrepancies were found regarding the same. However, the project description deviation was applied as per Section 3.2 of the report.

It was also observed during the verification process that project is not seeking registration under any other GHG program around the world. Declaration in that effect is also provided by PP in the MR.

The assessment team found that the project is in line with the registered VCS PD and no deviation on project design or monitoring plan is observed.

Assessment team concludes the following:

- There is no material discrepancies between project implementation and the project description provided in the registered PD/4/.
- There are some mistakes in the registered PD. The same is corrected in MR and described as project description deviation in the MR/1/
- The monitoring plan is implemented completely and monitoring system (i.e., process and schedule for obtaining, recording, compiling and analyzing the monitored data and parameters) is appropriate.
- There is no material discrepancies between the actual monitoring system, and the monitoring plan set out in the project description and the applied methodology/8/.
- The GHG emission reductions or removals generated by the project have not included in an emissions trading program or any other mechanism that includes GHG allowance trading/17/.
- The project has not received or sought any other form of environmental credit, or has become eligible to do so since validation or previous verification.

In view of the information's as verified above the assessment team is able to conclude that the project has been implemented as described in the project description.

- The verification team checked the Environmental Impact Assessment Report of the project. The report analyses the impacts of the project during the various stage of the project. Verification team finds the environmental and social impacts of the project are correctly identified in the report and the summary of the same is reported in the VCS PD.
- The project proponent is 'AES Geo Energy OOD' and other entity is 'Numerco Limited', which was confirmed through the interviews during the audit.

Verification team also reviewed the implementation details of Environmental Management and Monitoring Plan report. The summary of the same is provided in the VCS MR. The verification

team finds that the management plan including the plan are implemented appropriately during at the site during the monitoring period.

Item	Evidence gathering activities, evidence checked, and assessment conclusion:				
Audit history	The audit history table is provided below:				
	Audit type	Period	Program	Validation/verification body name	Number of years
	Validation / verification	01-November-2012 to 31-October-2022	VCS	Carbon Check (Pty) Ltd, RSA	10 years
	Verification	01-November-2012 to 31-December-2014	VCS	Rina Services S.p.A (RINA)	2.167 year
	Verification	01-January-2015 to 30-April-2016	VCS	Rina Services S.p.A (RINA)	1.33 years
	Verification	01-May-2016 to 30-November-2020	VCS	Rina Services S.p.A (RINA)	4.58 years
	Verification	01-December-2020 to 31-October-2022	VCS	4K Earth Science Private Limited (4KES)	1.92. years
	Total	01-December-2012 to 31-October-2022	VCS		Validation: 10 years Verification: 2 years
	The assessment team has checked the information about the audit history as provided in the above table and confirmed that the information provided are accurate.				
Double counting and participation under other GHG programs	The project activity is registered under the VCS only (VCS Project ID 1258) and is not registered under any other emissions trading program or any other mechanism that includes GHG allowance trading. The assessment team has checked the relevant registry websites and confirmed the same.				

	The PP also confirms that net GHG emission reductions or removals generated during this monitoring period shall not be used for compliance under any such programs or mechanisms. This has been confirmed in the MR /1/ submitted by the PP and also declaration has been submitted/17/, hence accepted by the assessment team.						
No double claiming with emissions trading programs or binding emission limits	The PP has confirmed in the Monitoring Report that the net GHG emission reductions generated by the project activity will not be used for compliance with any other emissions trading program or to meet binding limits on GHG emissions for the same monitoring period.						
No double claiming with other forms of environmental credit	The project activity has not sought, received, or is planning to receive credit from another GHG-related environmental credit system. The PP has confirmed in the Monitoring Report that the net GHG emission reductions generated by the project activity will not be used for compliance with any other emissions trading program or to meet binding limits on GHG emissions for the same monitoring period.						
Supply chain (scope 3) emissions double claiming	The project activity is a wind power project and does not involve any supply chain involved in the project such as manufacturers, wholesalers, distributors, and retailers. So, no indirect upstream and downstream GHG emissions are not involved in the project activity. Thus, the Scope 3 emissions are not applicable in this project activity.						
Sustainable development contributions	The project's contribution towards sustainable development has been assessed as under the below table: <table><tr><th>S. No.</th><th>Sustainable Indicator</th><th>VVB Assessment</th></tr><tr><td>1</td><td>Social Well Being</td><td> There are several job opportunities were created to local people during erection, commissioning, and maintenance of the wind power project. This may result to a social balance in the region. The frequency of visiting to villages and nearby areas by skilled, technical and industrialist has increased due to installation /site visit/operation and maintenance work related to wind plant site. This directly and indirectly positively effects the economy of nearby populace. </td></tr></table>	S. No.	Sustainable Indicator	VVB Assessment	1	Social Well Being	There are several job opportunities were created to local people during erection, commissioning, and maintenance of the wind power project. This may result to a social balance in the region. The frequency of visiting to villages and nearby areas by skilled, technical and industrialist has increased due to installation /site visit/operation and maintenance work related to wind plant site. This directly and indirectly positively effects the economy of nearby populace.
S. No.	Sustainable Indicator	VVB Assessment					
1	Social Well Being	There are several job opportunities were created to local people during erection, commissioning, and maintenance of the wind power project. This may result to a social balance in the region. The frequency of visiting to villages and nearby areas by skilled, technical and industrialist has increased due to installation /site visit/operation and maintenance work related to wind plant site. This directly and indirectly positively effects the economy of nearby populace.					

2	Environmental well being	Wind power is one of the cleanest renewable energy powers and does not involve any fossil fuel. There are no GHG emissions. The impact on land, water, air and soil is negligible. Thus, the project activity contributes to environmental well-being without causing any negative impact on the surrounding environment.
3	Economic well being	The project activity has generated permanent and temporary employment opportunity within the vicinity of the project. The electricity supply in the nearby area improves which directly and indirectly improves the economy and lifestyle of the area. During the on-site visit, the assessment team has interviewed the PPs representatives, site personnel and observed that almost all the personnel were unemployed before taking up the job with the project developer. In general, the project activity has delivered the following economic benefits: a. Employment opportunities b. Reduce rate of migration to urban area c. Improvement of a rural economy
4	Technological well being	The project activity is step forward in harnessing the untapped wind power potential and further diffusion of the technology in the region. The project activity leads to the promotion and demonstrates the success of wind projects in the region which further motivate more investors to invest in wind power projects. Hence, the project activity leads to technological well-being.

The project activity claimed contribution to SDG13 as follows.

SDG target	SDG indicator	Contribution during the monitoring period
SDG 13.2	SDG 13.2.2 (Total greenhouse gas emissions per year)	The project activity has prevented the release of 527,199 tonnes of CO ₂ into the atmosphere during the reporting period.
	Greenhouse Gas Emissions prevented	

	SDG 7.2	SDG7.2.1 (Renewable energy share in the total final energy consumption)	The project activity prevented 666,498.122 MWh net electricity generation from fossil fuels during the monitoring period.
	SDG 8.3	8.3.1 (Proportion of Informal employment in non-agriculture employment, by sex)	During construction and operational period, the project has created approx. 4 number of employment opportunities for the local community.
Additional information relevant to the project	No commercially sensitive information has been excluded from the public version of the project description. Findings CL01, CL05, CAR 01, CAR 03, were raised and successfully closed. Opinion: Assessment team concludes the following: There is no material discrepancies between project implementation and the project description provided in the registered PD/04/. The monitoring plan is implemented completely and monitoring system (i.e., process and schedule for obtaining, recording, compiling and analysing the monitored data and parameters) is appropriate. There is no material discrepancies between the actual monitoring system, and the monitoring plan set out in the project description and the applied methodology. The GHG emission reductions or removals generated by the project have not included in an emissions trading program or any other mechanism that includes GHG allowance trading. The project has not received or sought any other form of environmental credit, or has become eligible to do so since validation or previous verification. The project is registered under VCS only. In view of the information's as verified above the assessment team is able to conclude that the project has been implemented as described in the project description.		

4.2 Safeguards and Stakeholder Engagement

4.2.1 Stakeholder Identification

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Stakeholder identification	Local stakeholder consultation was appropriately conducted under VCS to inform the design of the project and maximize participation from stakeholders during the validation During implementation process, the Local Stakeholder Meetings were organized for information and consultation with the representatives of local stakeholder groups and organisations. Both the EIA and the planning process involved a stakeholder dialogue. As a result, the Environmental Management and Monitoring Plan include specific provisions for community liaison and cultural heritage. Following the publication of the EIA, there was a period of two months where any comment or suggestion could have been raised directly to AES Geo Energy or through the municipality. An open public meeting was also held where stakeholders could learn about the project and raise any issues they may have. In May 2008, a Public Disclosure and Consultation Plan was published. The plan provides the framework for consultation during three distinguish stages: pre construction, during construction, and during operation. To support the dialogue with stakeholders during the planning and construction phase, a special website was established that includes information on the project (http://www.geopowerbg.com/en/projects/view/1/St.-Nikola/), which was later transferred to the current website http://www.aesgeoenergy.com/. The process was validated during the registration of project activity in VCS. VCS validation report verified to confirm the same. The PP had invited identified stakeholders well in advance with details of venue and time of meeting. The details on the stakeholder consultations were confirmed during the site visit. There are no changes in the makeup of the stakeholder since the last consultation meeting was conducted, which was confirmed through the interviews during the site visit. Additionally, PP has a mechanism for on-going communication with local stakeholders which has been discussed during the site visit. During the monitoring period (from 01-December-2020 to 31-October-2022), there are no comments

	received from the comment books, via phone calls for the project activity.
Legal or customary tenure/access rights	The project location is not used for any agricultural or stock-raising purposes and it appropriately far from the border of the village. Therefore, the stakeholders did not formulate any negative consideration regarding the planned project. The project is implemented on private owned land and does not interfere with any legal or customary rights to territories and resources held by project stakeholders. During the onsite visit a few stakeholders were interviewed on this, and no issues identified in this regard.
Stakeholder diversity and changes over time	Stakeholder diversity: The staff of the project, the local residents around the project site, and the local government are affected by the project activity directly. Part of employees are mainly from the project area, and they have different levels of education and skills, and income levels may vary. The farmers around the project live in different villages, and they may have different social networks and ways of interacting. Workers in government departments may come from different backgrounds and have different expertise and experience. Government authorities are responsible for regulating and approving the operation of the project, and different government authorities may have different policies and regulations. Over time, the members of each group will adjust, but their groups does not change much in terms of society, economy, culture, etc. The assessment team has verified the same during the on-site visit. interviewed stakeholders/users during the site visit. It is confirmed that all the stakeholders are in Bulgaria, and no changes identified over the time.
Expected changes in well-being	The implementation of the project is expected to have a positive impact on the well-being and other characteristics of stakeholders. Relative to the baseline scenario of electricity generation by the project that would otherwise been generated by the operation of grid-connected power plants and by the addition of new generation sources into the grid, the project bring about the following changes: Local people's well-being: The construction and operation of the project provide employment opportunities for the local people as the

	persons have been employed by the project as long-term employee period. Social welfare: The implementation of the project promoted the local economic development, and provided employment opportunities. Climate change Impact: The Project generates electricity from renewable source to displace equal electricity generated from fossil fuel fired power plants. Collectively, these changes will have a positive impact on villagers' livelihoods and living environment around the project site. During the site visit the assessment team interviewed stakeholders and observed that there was agreement among the stakeholders that the proposed project activity would lead to the overall development of the area, mainly by generating employment opportunities and improving the infrastructure leading to an improved life for the villagers. The socio-economic development took place in past and further expected to improve in future as a result of the project activity.
Location of stakeholders	The Saint Nikola Wind Farm (SNWF) project is located in the Municipality of Kavarna, Bulgaria. The project activity involves installation of wind power project and the location of stakeholders, Indigenous Peoples (IPs), local communities (LCs), customary rights holders, and areas outside the project area are not impacted by the project. The location of stakeholders were confirmed during the site visit and also through the Environmental Management and Monitoring Plan/23/
Location of resources	The Saint Nikola Wind Farm (SNWF) project is located in the Municipality of Kavarna, Bulgaria. The Land belongs to the project and hence there are no uncertainties regarding land tenure, access rights, usage rights or land ownership which stakeholders own or to which they have customary access. The location of stakeholders were confirmed during the site visit and also through the Environmental Management and Monitoring Plan/23/

4.2.2 Stakeholder Consultation and Ongoing Communication

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Ongoing consultation	For on-going stakeholder's communication, the Project Owner maintains a grievance register in plant office for local stakeholders to give feedback/grievances as a part of ongoing communication with stakeholders in line with of VCS Standard. In case of grievances, the nature of probable resolution is discussed with the plant head office and implemented by the site in charge. The contact information of the plant responsible exists at the village head, the project owner and local community are always in touch. The project owner regularly checks with the village head if any complaint or a request exists. Any complaint or need from the local community could directly be received by the project owner and appropriate contributions or improvements are made to the local community. The process of Local Stakeholder Consultation is continuous. No grievance was received from the stakeholders in current monitoring period thus no mitigation measure is required. Local community is delighted that the government has chosen this area for this important project not just for the region but for the whole country as well. The project location is not used for any agricultural or stock-raising purposes and it appropriately far from the border of the village. Therefore, the stakeholders did not formulate any negative consideration regarding the planned project. During the current monitoring period, no negative comments were received from the local stakeholders.
Date(s) of stakeholder consultation	19-December-2006 and Ongoing process
Communication of monitored results	The process of Local Stakeholder Consultation is continuous. No grievance was received from the stakeholders in current monitoring period thus no mitigation measure is required. Local community is delighted that the government has chosen this area for this important project not just for the region but for the whole country as well. The project location is not used for any agricultural or stock-raising purposes and it appropriately far from the border of the village. Therefore, the stakeholders did not formulate any negative consideration regarding the planned project. The same was confirmed during the site visit. The construction of a wind farm on the territories of the villages Bulgarevo, Sveti Nikola, Hadji Dimitar, Rakovski and Porouchik Chounchevo, the municipality of Kavarna do not exert a negative

	effect on the environment and its health and hygienic aspects. Therefore, the stakeholders did not formulate any negative consideration regarding the planned project.
Consultation records	Project Owner maintains a grievance register in plant office for local stakeholders to give feedback/grievances. In case of grievances, the nature of probable resolution is discussed with the plant head office and implemented by the site in charge. The same was confirmed during the site visit.
Stakeholder input	The stakeholders were pleased with the project. Since they have informed regarding the project at the first stakeholder consultation process, they have no negative comments on the project.

Findings CL03 was raised and successfully closed.

4.2.3 Free, Prior, and Informed Consent

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Consent	The project is located at site where there are not any peoples residing. The project is located at barren land. there is no physical or economic relocation of people.
Outcome of FPIC discussion	This is not relevant for project activity. No resettlement/ forced physical or economic displacement was required without consent.

4.2.4 Grievance Redress Procedure

Item	Evidence gathering activities, evidence checked, and assessment conclusion
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Grievance received and steps taken to resolve the grievance including the outcomes of the resolution	The grievance mechanism is in place. Project Owner maintains a grievance register in plant office for local stakeholders to give feedback/grievances. In case of grievances, the nature of probable resolution is discussed with the plant head office and implemented by the site in charge. The assessment team checked the grievance register provided by PP and found that no grievance/feedback was received during the current monitoring period.
Grievance redress procedure	The PP has kept grievance register in plant site office seeking complaints/grievances from local community as a part of ongoing communication with stakeholders in line with the requirements of the VCS Standard.

4.2.5 Public Comments

Comments received	Actions taken by the project proponent	Evidence gathering activities, evidence checked, and assessment conclusion
No comments received as verified through the project view page and grievance register https://registry.verra.org/app/projectDetail/VCS/1258	Not Applicable	Not Applicable

4.2.6 Risks to Local Stakeholders and the Environment

4.2.6.1 Management Experience

The PP's management team has the experience and expertise to effectively implement similar project activities. The team members have many years of working experience in the field of renewable power plant with relevant skills and expertise in project planning, implementation and supervision to effectively manage and drive the implementation of the project.

The project has male and female employees of different genders, and there are female employees in management positions. There is no significant gender difference between female employees and male employees in terms of salary, promotion opportunities and welfare benefits, and employees of different genders have equal opportunities to obtain training and development resources. In regular employee satisfaction surveys, all employees feel that the project is treated equally in terms of gender and pay. The project adopts a compliant recruitment and employment policy to ensure that the recruitment and employment policies comply with relevant ILO

standards and do not involve any form of human trafficking, forced Labour and child Labour. PP conducted comprehensive background checks and comply with local labor laws and regulations to ensure that employees are not exploited and abused.

The project has put in place monitoring mechanisms to ensure that all employees and partners involved in the project are not involved in human trafficking, forced Labour and child Labour. PP conducts regular on-site inspections and audits to ensure that there are no violations of labor rights during the implementation of the project. The PPs work with partners who share the same commitment to labor rights to ensure that the entire supply chain is free from human trafficking, forced labor and child labor.

The project provides training to employees and partners on human trafficking, forced Labour and child Labour to increase their awareness of these issues and how to avoid and report possible violations. The management was interviewed and it was found that management has sufficient experience in the field of renewable energy including wind power generation.

Findings CL04 was raised and successfully closed.

4.2.6.2 Risk Assessment

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Natural and human induced risks to stakeholders' wellbeing	No risk identified as confirmed during the site visit.
Risks to stakeholder participation	Stakeholders are involved in every stage of informing about the project activity. The complaint mechanism is fully functioning. No risk identified as confirmed during the site visit.
Working conditions	All necessary training regarding the health and safety of employees is provided. Child labor as defined in the ILO Minimum Age Convention is not permitted. The Project Developer ensures that there is no forced labor, and that all employment complies with national occupational and occupational health and safety laws, obligations under international law, and the principles and standards and essential conventions of the International Labor Organization (ILO). No risk identified as confirmed during the site visit.

Safety of women and girls	The project does not endanger the safety of girls and women. No risk identified as confirmed during the site visit.
Safety of minority and marginalized groups, including children	The project does not jeopardize the safety of minorities and isolated groups, including children. No risk identified as confirmed during the site visit.
Pollutants (air, noise, discharges to water, generation and release of hazardous materials and chemical pesticides and fertilizers)	The project is a wind energy project. The Environmental Impact Assessment was carried out the summary of the findings of the report are the following. No negative impact was assessed. No risk identified as confirmed during the site visit.

4.2.7 Respect for Human Rights and Equity

4.2.7.1 Labor and Work

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Discrimination	The verification team during the site visit confirmed that the project does not involve and is not complicit in any form of discrimination based on gender, race, religion, sexual orientation or any other basis.
Sexual harassment	The verification team during the site visit confirmed that the project does not involve and is not complicit in any form of discrimination based on gender, race, religion, sexual orientation or any other basis.
Gender equity in labor and work	The verification team during the site visit confirmed that the project does not reduce access to or control of resources for women. The project does not involve in any form discrimination in any kind of form. The project respects the employees' freedom of association and their right to collective bargaining and is not complicit in restrictions of these freedoms and rights.
Forced labor	The verification team during the site visit confirmed that the child labour, as defined by the ILO Minimum Age Convention, is not allowed. The Project Developer ensures that there is no forced labour, and that all employment is in compliance with national labour and occupational health and safety laws, with obligations under international law, and consistency with the principles and standards embodied in the International Labour Organization (ILO) fundamental conventions

Child labor	The verification team during the site visit confirmed that the child labour, as defined by the ILO Minimum Age Convention, is not allowed. The Project Developer ensures that there is no forced labour, and that all employment is in compliance with national labour and occupational health and safety laws, with obligations under international law, and consistency with the principles and standards embodied in the International Labour Organization (ILO) fundamental conventions.
Human trafficking	The verification team during the site visit confirmed that the child labour, as defined by the ILO Minimum Age Convention, is not allowed. The Project Developer ensures that there is no forced labour, and that all employment is in compliance with national labour and occupational health and safety laws, with obligations under international law, and consistency with the principles and standards embodied in the International Labour Organization (ILO) fundamental conventions.

4.2.7.2 Human Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
N/A	The verification team during the site visit confirmed that the project is not complicit in Human Rights abuses and the project owner respects internationally proclaimed human rights including dignity, cultural property and uniqueness of indigenous people.

4.2.7.3 Indigenous Peoples and Cultural Heritage

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
N/A	However, the verification team during the site visit confirmed that there is no resettlement issue associated with the project.

4.2.7.4 Property Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
N/A	The verification team during the site visit confirmed that all permits for the project site were obtained during the construction and initial operation of the project activity.

4.2.7.5 Benefit Sharing

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Summary of the benefit sharing plan	The verification team during the site visit confirmed that there is no benefit sharing in the project activity.
Benefit sharing during the monitoring period	The verification team during the site visit confirmed that there is no benefit sharing in the project activity.

4.2.8 Ecosystem Health

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Impacts on biodiversity and ecosystems	The verification team during the site visit confirmed that the few recorded species are common and only found in small numbers on the site. None of the species found on or near the site is rare or endangered. Nevertheless, care is being taken to keep any impact as low as reasonably possible, both on the site itself and on any surrounding area affected by the project (e.g. site access roads), as a precautionary measure.
Soil degradation and soil erosion	The verification team during the site visit confirmed that project is wind energy project and there is no soil degradation and soil erosion involved due to the project activity.
Water consumption and stress	The verification team during the site visit confirmed that the sanitary wastes and waste from maintenance and food production occur only in small quantities. Site management practices introduced during construction is continued (e.g. storage and disposal of wastes; training and supervision of staff and contractors).

4.2.8.1 Rare, Threatened, and Endangered species

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Species or habitat	The verification team during the site visit confirmed that there are no any endangered species identified as potentially present within the Project boundary (including those that may route through the area). The Project does not potentially impact other areas where endangered species may be present through transboundary affects

Areas needed for habitat connectivity	N/A
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4.2.8.2 Introduction of Species

Species introduced	Evidence gathering activities, evidence checked, and assessment conclusion
No species introduced	Not applicable

Existing invasive species	Evidence gathering activities, evidence checked, and assessment conclusion
No invasive species exists	Not applicable

4.2.8.3 Ecosystem conversion

Item	Evidence gathering activities and evidence checked
Ecosystem conversion	Not applicable

4.3 Accuracy of Reduction and Removal Calculations

The verification team was able to confirm that the monitoring plan contained in registered VCS- PD/4/ and MR/1/ is in accordance with the approved large scale methodology applied for the project activity i.e. “ACM0002 ver. 14 - Grid-connected electricity generation from renewable sources” /8/ and its applicable tools.

The parameter stated in the monitoring plan and the applied methodology /8/ has been fulfilled in the current monitoring period.

Parameters monitored:

Verification team confirms through site visit verification and from the document review, the actual monitoring system complies with the monitoring plan mentioned in the registered

validated VCS-PD/4/. According to the monitoring plan in the registered VCS-PD, there is 1 monitoring parameter required to be monitored “Quantity of net electricity generation supplied by the project plant/unit to the grid in year” ($EG_{\text{facility},y}$), for which the details are provided in Section 4.4 of the report.

The verification team assessed whether the data and calculations of GHG emission reductions achieved resulting from the MR. The verification team has checked whether calculations of baseline GHG emissions, project GHG emissions and leakage GHG emissions have been carried out in accordance with the formulae and methods described in the monitoring plan of the VCS PD and MR.

In detail the following has been verified:

Transparency: It has been checked whether the calculation of baseline emissions is fully traceable and, where used, the Excel calculation provides all calculation formulae.

Parameter consistency: It has been checked whether all internal and external parameters and data used for the calculation are applied consistently in the monitoring report and the calculation spreadsheet.

Correctness: It has been checked whether the applied formulae and methods for calculating baseline emissions are in accordance with the monitoring plan and the approved methodology.

Completeness: It has been checked whether all calculations are complete and without omissions

Baseline emission: The baseline Emissions for a given year is calculated by multiplying the energy baseline (EB) with the grid emission factor as determined at the time of validation.

Formula used:-

$$BE_y = EG_{\text{facility},y} * EF_{\text{grid,CM},y}$$

Where;

BE_y : Baseline emissions in year y (tCO₂e/yr)

$EG_{\text{facility},y}$: Quantity of net electricity generation that is produced and fed into the grid as a result of the implementation of the project activity in year y (MWh/yr)

$EF_{\text{grid,CM},y}$: Combined margin CO₂ emission factor for grid connected power generation in year y calculated using the latest version of the “Tool to calculate the emission factor for an electricity system” (tCO₂/MWh)

$EG_{\text{facility},y}$: The verification team has checked the entire monthly energy meter reading statement applicable for the monitoring period as per the project activity applied for verifications and found all the parameters are monitored and recorded as per the monitoring plan in the approved PD. The verification team has crosschecked the emission reduction sheet and monitoring report data with the energy meter reading statement and found all the values are matching.

$EF_{grid,CM,y}$ As verified from the registered PD the Combined margin CO₂ emission factor for grid is 0.791 tCO₂/MWh which is fixed ex-ante

Project Emission:

According to Methodology ACM0002, Version 14.0, the proposed project activity is wind power plants that does not use fossil fuels. Therefore, project emissions are considered zero.

PE_y= 0.

Leakage: As per methodology and registered VCS PD the leakage is zero.

LE_y= 0.

Emission Reduction:

Emission Reduction is calculated as below:

$$ER_y = BE_y - PE_y - LE_y$$

PP has submitted emission reduction the calculation in the excel sheet/2/. The emission reduction calculation in the excel sheet is checked whether the calculation is in accordance with the formula given in the approved PD/4/ and the selected methodologies/8/.

Finding: CL02, CAR 02, CAR 04 was raised and successfully closed.

The verification team confirms the following:

- The complete data set for the identified and required parameter for the operational days in the current monitoring period was available;
- The reported data has been cross checked with available records, as indicated in the section 4.4 above under each monitored data, wherever appropriate;
- In the opinion of assessment team, emission factor values that were applied in the calculations is consistent with registered PDD /05/ and correctly applied in MR /1/, emission reduction spread sheet /02/ and justified.
- The baseline, project and leakage emissions have been determined in accordance with the requirement of the applied methodologies, as contained in the final monitoring report and corresponding emission reductions spreadsheet;
- The assumptions, emission factors and default values used are justified, as indicated in the section 4.4 above
- The monitoring plan has been implemented as per the registered PD /4/;
- The monitoring complies with the requirement of the applied methodology /8/;
- The information inflow (from data generation, aggregation, to recording, calculation and reporting) is included above under each parameter and confirms to the requirement of the PDD;
- The values included in the monitoring report and corresponding emission reduction sheets are verified and included under each monitoring parameter, wherever appropriate;

4.4 Quality of Evidence to Determine Reductions and Removals

The only monitoring parameter in the project activity is “Quantity of net electricity generation supplied by the project plant/unit to the grid in year” (EGfacility, y). This is obtained from monthly Energy Meter Reading. The bi-directional energy meter will measure both export & import electricity and net electricity supplied to grid is estimated from difference between export & import electricity. Electricity export to the grid and import from the grid is metered by main and backup energy meters of 0.2s accuracy class.

The monthly net export is recorded in the monthly protocol for generated electricity. The appropriateness of electricity generation is assessed as below:

Criteria/Requirements	Assessment/Observation
Measuring /Reading /Recording frequency	The electricity generated is determined through bi-directional meter reading and bulk energy meter installed at sub-station. The electricity exported is measured on continuous basis and reported monthly.
Is measuring and reporting frequency in accordance with the monitoring plan and monitoring methodology? (Yes / No)	Yes. The reporting frequency is in line with the monitoring plan as outlined in the approved PD/04/ and monitoring methodology/8/.
Monitoring equipment	Energy meters (main & check) installed at substation.
Is accuracy of the monitoring equipment as stated in the monitoring plan? If the monitoring plan does not specify the accuracy of the monitoring equipment, does the accuracy of the monitoring equipment comply with local/national standards, or as per the manufacturer's specification?	The energy meters are bi-directional meter of accuracy class 0.2s. Accuracy of the monitoring equipment's is in accordance with the monitoring plan as outlined in the PD.
Is the accuracy valid for the entire measuring range or do different accuracy levels apply to different measuring ranges?	Yes the accuracy valid for the entire measuring range
Calibration frequency /interval:	Annual
Is the calibration interval in line with the monitoring plan and/or methodology? If the monitoring plan does not specify the frequency of calibration, is the selected frequency in accordance with the local/national standards, or as per the manufacturer's specifications?	During the monitoring period calibration is not conducted as per the approved monitoring plan and delay has occurred for different periods for the main and check meters. As per the results mentioned in the latest calibration certificates the error was found within the maximum permissible limits (+/-0.2%) during the calibration of energy meters. As per VVS PA v 03 para 366 (a) requirement: error factor of "-0.2%" should be applicable for

	export & +0.2% to the import i.e. the measured values. Hence being conservative and to account for the error for both export & import, error of maximum "-0.2%" on export and import has been applied for the entire monitoring period. The approach chosen for applying the correction factor is found conservative and appropriate.
Is the calibration of measuring equipment carried out by an accredited person or institution?	Calibration of the measuring equipment's is carried out by an accredited entity.
Is(are) calibration(s) valid for the whole reporting period?	During the monitoring period calibration is not conducted as per the approved monitoring plan and delay has occurred for different periods for the main and check meters. As per the results mentioned in the latest calibration certificates the error was found within the maximum permissible limits (+/-0.2%) during the calibration of energy meters. As per VVS PA v 03 para 366 (a) requirement: error factor of "-0.2%" should be applicable for export & +0.2% to the import i.e. the measured values. Hence being conservative and to account for the error for both export & import, error of maximum "-0.2%" on export and import has been applied for the entire monitoring period. The approach chosen for applying the correction factor is found conservative and appropriate.
Is the calibration carried out for a measuring range comparable with the range for which measurements have been carried out?	Yes, calibration carried out for a measuring range comparable with the range for which measurements have been carried.
How were the values in the monitoring report verified?	Reported values of this parameter have been verified with monthly energy meter reading statement/3/. Value of this parameter for the current monitoring period are verified and the values is 666,498.122 MWh. Furthermore, monthly values of this parameter is reported in the ER calculation sheet/02/ are also verified with the MR/01/ and found to be consistent.
Does the data management ensure correct transfer of data and reporting of emission reductions and are necessary QA/QC processes in place?	Yes, the adequate QA/QC procedures were implemented by all the stakeholders, namely, the Grid Authority, the PP and the O&M team.
In case project participants have temporarily not monitored the parameter, has either i) a deviation been approved by the CDM EB or ii) has the parameter been estimated as stipulated by Appendix 1 to the CDM Project Standard?	No such issues.

Parameters not monitored/ex-ante fixed parameters:

- a. **EF_{grid,CM,y} (tCO₂/MWh):** Combined margin CO₂ Emission factor of national grid applying for wind power plant in year y

	Discussion and verification assessment
Purpose of data	Calculation of baseline emissions
Verified value	0.791 tCO ₂ /MWh
Source of value	Registered VCS-PD /04/ The value applied is based on the summary document: "Baseline Carbon Emission Factor of Bulgarian Electricity and Heat Power System" which was commissioned and published by the Bulgarian Ministry of Environment and Water (MoEW), Climate Change Policy Directorate, International Emission Trading Mechanisms Department. Available for download at the web-site of the Ministry of Environment and Water 2006 IPCC Guidelines on National GHG Inventories default values The build margin is calculated as per the "Tool to calculate the emission factor for an electricity system", version 7.0 Calculate using EG_{grid,OM,y} and EF_{grid,BM,y} published by Department of Climate Change and W_{om}, W_{BM} with value of 0.75 and 0.25 for wind power plant project
Justification	It is fixed for the entire crediting period as per the registered VCS-PD /04/. The value of the combined margin emission factor has been correctly taken as per the registered VCS-PD /04/ and hence accepted by the verification team.

Calibration of meters: During the verification assessment of the project activity, accuracy of all the metering have been checked and found appropriate. The bulk energy meters installed at the substation. Details of meter calibration are provided in below table:

Measuring equipment	Measured Parameter variable	Equipment producer and type	Serial number	Installation date	Date of latest calibration	Measurement error data	Comments
Digital electric meter	EG _{facility,y}	Landis+Gyr	51369628	21July-2020	21July2020	Class 0.2S	Property of the electric transmission company (ESO)
		Landis+Gyr	50464143	27-July-2021	27-July-2021		
		Landis+Gyr	60225248	19-July2022	19-July-2022		
Digital	EG _{facility,y}	Landis+Gyr	5136962	21July-	21-July-2020	Class 0.2S	Property of

electric meter			9	2020			the electric transmission company (ESO)
		Landis+Gyr	50464144	27-July-2021	27-July-2021		
		Landis+Gyr	60225249	19-July-2022	19_July2022		
Digital electric meter	EGfacility,y	Landis+Gyr	97600398	2012	11_August-2020	Class 0.2S	Property of AES. Back-up meter for cross-check
		Landis+Gyr	97600398	2012	22-August-2022		
Digital electric meter	EGfacility,y	Landis+Gyr	97600399	2012	11-August-2020	Class 0.2S	Property of AES. Back up meter for cross check
		Landis+Gyr	97600399	2012	22-August-2022		

The energy meter calibration certificates/15/ are checked and found that the calibration details provided in the MR is correct. It is found that energy meters are calibrated as per the required frequency except for some intervals where the calibration frequency not met, however the correction factor has been applied to the entire monitoring period on conservative basis.

The assessment team has verified the monthly joint meter reading report issued by respective state utility and confirmed that only the data recorded through main meters is used to calculate net electricity supplied to the grid by the projects belongs to particular developer and consequently for ER calculations.

In view of the above discussion the assessment team able to confirm that evidence used to determine the GHG reductions and removals are sufficient and appropriate with respect to quality and quantity.

GHG Calculations

The emission reduction as per the applied methodology equals the baseline emissions (project emissions and leakage emissions for such project activities is considered zero). The formula provided for the calculation of baseline emissions is:

$$BE_y = EG_{PJ,y} * EF_{grid,CM,y}$$

Monitoring period (vintage)	EGfacility,y (MWh)	EFgrid,CM ,y (tCO2e/MWh)	BEy (tCO2e)
2020 (01-December--2020 to 31-December-2020)	41,416.143	0.791	32,760

2021 (01-January-2021 to 31-December-2021)	336,044.293	0.791	265,811
2022 (01-January-2022 to 31-October-2022)	289,037.684	0.791	228,628
Total	527,199		527,199

Since project emission and leakage are zero, baseline emission is equal to emission reduction.

$$ER_y = BE_y$$

Monitoring period (vintage)	Baseline emissions removals* (tCO2e)	or	Project emissions removals (tCO2e)	or	Leakage emissions (tCO2e)	Net emission reductions or removals (tCO2e)	GHG
2020 (01-December-2020 to 31-December-2020)	32,760		0		0	32,760	
2021 (01-January-2021 to 31-December-2021)	265,811		0		0	265,811	
2022 (01-January-2022 to 31-October-2022)	228,628		0		0	228,628	
Total	527,199		0		0	527,199	

The verification team confirms that appropriate methods and formulae for calculating baseline emissions have been followed. The assumptions, emission factors and default values that were applied in the calculations are justified. All the data were made available and have monitored as per required monitoring frequency. The means of verification for the values of parameters, used for baseline emission calculation, is described above.

However, verification team has observed that the actual ER achieved during the current monitoring period is very much lower than the estimated ER as per registered PD for the comparable period. Since the emission reduction is less than the estimated emission reduction,

no further justification is required.

We further confirm that, sufficient evidence covering the entire monitoring period and at the required frequency were available. A list of referred documents for verification is also included in Appendix III of this report.

4.5 Non-Permanence Risk Analysis

Not applicable

5 VERIFICATION OPINION

5.1 Verification Summary

4K Earth Science Private Limited (4KES), contracted by AES Geo Energy OOD, has performed the independent verification of the emission reductions for the VCS project activity ‘Saint Nikola Wind Farm’ (VCS ID 1258), in Bulgaria for the monitoring period 01-December-2020 to 31-October-2022 (both dates included) as reported in the final Monitoring Report. The AES Geo Energy OOD and the project proponent are responsible for the collection of data in accordance with the monitoring plan and the reporting of GHG emissions reductions from the project activity. It is our responsibility to express an independent verification statement on the reported GHG emission reductions from the project activity

4KES commenced the verification on the basis of the baseline and monitoring methodology ACM0002, Version 14, the monitoring plan contained in the registered VCS PD and VCS guidelines, final Monitoring Report as per the process described under Section 2 of this report.

4KES verification approach is based on the understanding of the risks associated with reporting of GHG emission data and the controls in place to mitigate these. 4KES planned and performed the verification by obtaining evidence and other information and explanations that 4KES considered necessary to give reasonable assurance that reported GHG emission reductions are fairly stated.

In our opinion, the GHG emissions reductions reported for the project activity for the period 01-December-2020 to 31-October-2022 (both dates included) are fairly stated in the Monitoring Report. The GHG emission reductions were calculated correctly on the basis of the approved baseline and monitoring methodology ACM0002, Version 14, and the VCS standard.

Verification period: From 01-December-2020 to 31-October-2022

Verified GHG emission reductions and removals in the above verification period:

Year	Baseline emissions or removals (tCO2e)	Project emissions or removals (tCO2e)	Leakage emissions (tCO2e)	Net GHG emission reductions or removals (tCO2e)
2020 (01-December-2020 to 31-December-2020)	32,760	0	0	32,760
2021 (01-January-2021 to 31-December-2021)	265,811	0	0	265,811
2022 (01-January-2022 to 31-October-2022)	228,628	0	0	228,628
Total	527,199	0	0	527,199

5.2 Verification Conclusion

4K Earth Science Private Limited (4KES), contracted by “AES Geo Energy OOD”, has performed the independent verification of the emission reductions for the VCS project activity (VCS ID-1258) “Saint Nikola Wind Farm” in Bulgaria for the monitoring period 01-December-2020 to 31-October-2022 as reported in the final Monitoring Report/1/. PP is responsible for the collection of data in accordance with the monitoring plan and the reporting of GHG emissions reductions from the project activity. It is our responsibility to express an independent verification statement on the reported GHG emission reductions from the project activity.

4KES commenced the verification on the basis of the baseline and monitoring methodology ACM0002- Version 14.0, the monitoring plan contained in the registered VCS PD /04/, VCS guidelines/9/10/ and initial Monitoring Report/1/ as per the process described under Section 2 of this report.

4KES verification approach is based on the understanding of the risks associated with reporting of GHG emission data and the controls in place to mitigate these. 4KES planned and performed the verification by obtaining evidence and other information and explanations that 4KES considered necessary to give reasonable assurance that reported GHG emission reductions are fairly stated.

In our opinion the GHG emissions reductions reported for the project activity for the period 01-

December-2020 to 31-October-2022 are fairly stated in the final Monitoring Report/1/. The GHG emission reductions were calculated correctly on the basis of the approved baseline and monitoring methodology ACM0002- Version 14.0, VCS standard and ISO 14064-3:2019.

Verification period: From [01-December-2020] to [31-October-2022]

Verified GHG emission reductions and carbon dioxide removals in the above verification period:

Vintage period	Baseline emissions (tCO ₂ e)	Project emissions (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Reduction VCU (tCO ₂ e)	Removal VCUs (tCO ₂ e)	Total VCUs (tCO ₂ e)
2020 (01-December-2020 to 31-December-2020)	32,760	0	0	32,760	-	32,760
2021 (01-January-2021 to 31-December-2021)	265,811	0	0	265,811	-	265,811
2022 (01-January-2022 to 31-October-2022)	228,628	0	0	228,628	-	228,628
Total	527,199	0	0	527,199	-	527,199

5.3 Ex-ante vs Ex-post ERR Comparison

Vintage period	Ex-ante estimated reductions/removals	Achieved reductions/removals	Percent difference	Explanation for the difference
2020 (01-December-2020 – 31-December-2020)	21342	32,760	31%	The difference is well within seasonal wind fluctuations.

2021 (01-January-2021 - 31-December-2021)	256108	265,811	32%	The difference is well within seasonal wind fluctuations.
2022 (01-January-2022 - 31-October-2022)	213420	228,628	35%	The difference is well within seasonal wind fluctuations.
Total	490870	527,199	32%	The difference is well within seasonal wind fluctuations.

APPENDIX 1: COMMERCIALLY SENSITIVE INFORMATION

Not Applicable

APPENDIX II: ABBREVIATIONS

BM	Build Margin
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CL	Clarification Request
DPR	Detailed Project Report
EB	Executive Board
EIA	Environmental Impact Assessment
ER	Emission Reductions
FAR	Forward Action Request
GHG	Greenhouse Gases
IPCC	Intergovernmental Panel for Climate Change
JMR	Joint Meter Readings
LCS	Local Controller System
MP	Monitoring Period
MR	Monitoring Report
MW	Mega Watt
MWh	MegaWatt hour
OM	Operating Margin
O&M	Operation & Maintenance
PD	Project Description
PP	Project proponent
PPA	Power Purchase Agreement
QA/QC	Quality Assurance/Quality Control
tCO ₂	Tonnes of Carbon Dioxide
UNFCCC	United Nations Framework Convention on Climate Change
VCS	Verified Carbon Standard
VCU	Verified Carbon Unit

APPENDIX III: LIST OF DOCUMENTS

Reference No.	Title of document	Version	Date
1	Monitoring Report (initial) Monitoring Report (final)	1 4	01/10/2024 30/04/2025
2	Emission Reductions Excelsheet (initial) Emission Reductions Excelsheet (final)	1 4	01/10/2024 30/04/2025
3	VCS Project page: https://registry.terra.org/app/projectDetail/VCS/1258		
4	Registered VCS Project Description	5	18/10/2014
5	VCS Validation Report	4	22/10/2014
6	Technical specifications of the project plant		
7	Commissioning certificates of the wind power plant		22/12/2009
8	CDM Methodology: ACM0002: Grid-connected electricity generation from renewable sources	14	
9	VCS Standard	4.7	16/04/2024
10	VCS Program Guide	4.4	29/08/2023
11	Clean Development Mechanism Validation and Verification Standard	3	09/09/2021
12	Grievances Register	-	-
13	Protocol for the generated electricity for the monitoring period	-	-
14	Permit for the power plant	-	22/12/2009
15	Calibration Certificates for electricity meters	-	-
16	Break down details of the complete monitoring period	-	-
17	Declaration regarding no participation in other GHG program for the concerned monitoring period	-	27/01/2025
18	Louis Boisgibault, Fahad Al Kabbani (2020): Energy Transition in Metropolises, Rural Areas and Deserts. Wiley - ISTE. (Energy series)	-	-
19	Training Records of O&M Staff	-	-
20	Employment Records	-	-
21	Plant photographs	-	-
22	Environment Impact Assessment		October- November 2006
23	Environmental Management and Monitoring Plan		November 2008

APPENDIX IV: VERIFICATION FINDINGS

Table 1. FAR FROM VALIDATION AND/OR PREVIOUS VERIFICATIONS

FAR ID	01	Section no.	-	Date: 26/11/2024
Description of CAR				
After the initial issued Letter of Approval N 26-00-3500 of 13/12/2014 by the Ministry of Environment and Water of Republic of Bulgaria (DNA), there is a subsequently decision for cancelation of AAUs from the national registry for this project activity for the period after 2020, issued by the Ministry of Environment and Water of Republic of Bulgaria (DNA) - N 26-00-3500 of 01/12/2022. Since receipt of the cancellation of AAUs by Bulgaria Ministry of Environment and Water (DNA) might take some time a FAR has been raised to confirm that the project has got assigned amounts units cancelled from the national registry from the first Kyoto Protocol period before sending files to VERRA.				
Project participant response				Date: 30/12/2024
PP has submitted the receipt of cancellation by Ministry of Environment and Water (DNA)				
Documentation provided by project participant				
DOE assessment				Date: 06/01/2025
The Letter for the cancellation from Ministry of Environment and Water (DNA) has been submitted and found appropriate. Hence the FAR is closed.				

Table 2. CL FROM THIS VALIDATION/VERIFICATION

CL ID	01	Section no.	Section 4.1	Date : 26/11/2024
Description of CL				
1. The Reference ID of the applied Tools not provided in the Section 1.9 of MR. Check.				
Project participant response				Date : 30/12/2024
The reference ID has been provided in the revised MR				
Documentation provided by project participant				
DOE assessment				Date : 06/01/2025

The Reference ID of the applied Tools is now provided in the revised MR, which is found appropriate. Hence the CL is closed.

CL ID	02	Section no.	Section 4.4	Date : 26/11/2024
Description of CL				
1. The PD shall clarify how the calibration frequency requirements as per the registered VCS-PD has been met. The relevant details be included in the MR. Further the accuracy class (0,2s) does not look appropriate. Check.				
Project participant response				Date : 30/12/2024
During the monitoring period calibration is not conducted as per the approved monitoring plan and delay has occurred for different periods for the main and check meters. As per the results mentioned in the latest calibration certificates the error was found within the maximum permissible limits (+/- 0.2%) during the calibration of energy meters. As per VVS PA v 03 para 366 (a) requirement: error factor of "-0.2%" should be applicable for export & +0.2% to the import i.e. the measured vales. Hence being conservative the error factor has been applied for the entire monitoring period. The accuracy class has been corrected.				
Documentation provided by project participant				
DOE assessment				Date : 06/01/2025
During the monitoring period, calibration frequency of meters was not met for some of the months of the monitoring period, hence the calibration was not conducted as per the approved monitoring plan of the VCS-PD. As per the results mentioned in the latest calibration certificates the error was found within the maximum permissible limits (+/-0.2%) during the calibration of energy meters. As per VVS PA v 03 para 366 (a) requirement: error factor of "-0.2%" should be applicable for export & +0.2% to the import i.e. the measured vales. Hence being conservative the error factor has been applied for the entire monitoring period. Hence the CL is closed.				

CL ID	03	Section no.	Section 4.2	Date : 26/11/2024
Description of CL				
The relevant details on the stakeholder consultation as per the requirements of the table under Section 2.1 of the MR not provided. Check.				

Project participant response	Date : 30/12/2024
The relevant details on stakeholder consultation has been incorporated in the MR.	
Documentation provided by project participant	
DOE assessment	Date : 06/01/2025
The relevant details on the stakeholder consultation process is now provided in the revised MR. Hence the CL is closed.	

CL ID	04	Section no.	Section 4.2.6	Date : 26/11/2024
Description of CL				
No details on the management experience are provided in the Section 2.2 of the MR. Check.				
Project participant response				Date : 30/12/2024
Details on the management experience has been provided in the section 2.2. of the MR.				
Documentation provided by project participant				
DOE assessment				Date : 06/01/2025
The details on the management experience is now provided in the revised MR. Hence the CL is closed.				

CL ID	05	Section no.	-	Date : 26/11/2024
Description of CL				
Please submit the following documents:				
1. Supporting evidence for the electricity generation.				
2. Calibration Certificates				
3. Organizational chart for the operation of the power plant				
4. Public disclosure and consultation plan				

Project participant response	Date : 30/12/2024
Submitted.	
Documentation provided by project participant	
DOE assessment	Date : 06/01/2025
The required documents have now been provided. Hence the CL is closed.	

Table 3. CAR FROM THIS VALIDATION/VERIFICATION

CAR ID	01	Section no.	Cover page	Date : 26/11/2024
Description of CAR				
1. The version 4.2 of MR template used, which is quite older as compared to the latest version of the MR template available on the VCS website. Check. 2. The VCS ID presented on the cover page does not look correct. Check. 3. The period for verification (number of years) do not look correct in the Section 1.2 of the MR. Check.				
Project participant response				Date : 30/12/2024
1. The version 4.2 of the MR has been revised to the latest version 4.4 2. The VCS ID has been corrected in the MR 3. The period verification has been corrected in the revised MR				
Documentation provided by project participant				
DOE assessment				Date : 06/01/2025
1. The MR has now been submitted in the latest version 4.4 of the MR template, which is found appropriate. 2. The VCS ID is now presented on the cover page of MR, which is found appropriate. 3. The correct period of verification is now provided in the revised MR, which is found appropriate. Hence the CAR is closed.				

CAR ID	02	Section no.	Section 4.1	Date : 26/11/2024
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Description of CAR	
1. The start date of “22-10-2014” presented in Section 1.1 (MR), however the start date is “November 1st 2012” as per the registered VCS-PD. Check. 2. The emission reductions presented in Section 1.1 (MR) do not match with the emission reductions as per the ERs Excelsheet. Check.	
Project participant response	Date : 30/12/2024
1. The start date has been revised in section 1.1 of the MR. 2. The emissions reductions have been revised in section 1.1 of the MR	
Documentation provided by project participant	
DOE assessment	Date : 06/01/2025
1. The start date is now correctly updated in the revised MR, which is found appropriate. 2. The emission reductions now matches with the ERs Excel sheet, which is found appropriate. Hence the CAR is closed.	

CAR ID	03	Section no.	Section 4.1	Date : 26/11/2024
Description of CAR				
1. The date format (DD-Month-YYYY) is the requirements as per the MR filling requirements. Check and appropriate revisions be provided throughout the MR. Check. 2. The details in the column “number of years” in Section 1.2 (MR) do not look correct. Check. 3. The complete sectoral scope applicable to the project is not included in the Section 1.3 of MR. Check. 4. MR (Section 1.12, Table 1): The emission reductions presented in the Table 1 (Section 1.12) do not match with the ERs Excelsheet. Check.				
Project participant response				Date : 30/12/2024

1. The date format (DD-Month-YYYY) as per the MR requirements has been made consistent in the MR. 2. The details in Section 1.2 of the MR have been corrected. 3. The complete sectoral scope applicable to the project is now included in the Section 1.3 of MR. 4. MR (Section 1.12, Table 1): The emission reductions presented in the Table 1 (Section 1.12) has been corrected with the ERs Excel sheet. Check.	
Documentation provided by project participant	
DOE assessment	Date : 06/01/2025
1. The date format (DD/MM/YYYY) is now made consistent throughout the revised MR, which is found appropriate. 2. The details on the “number of years” are now corrected in the revised MR, which is found appropriate. 3. The complete sectoral scope is now indicated in the revised MR, which is found appropriate. 4. The emission reductions in the revised MR is now consistent with the emission reductions excel sheet. Hence the CAR is closed.	

CAR ID	04	Section no.	Section 5.2	Date : 26/11/2024
Description of CAR				
The vintage details of emission reductions in Section 5.4 (MR) do not match with the Emission Reductions Excel sheet. Check.				
Project participant response				Date : 30/12/2024
The vintage details of emission reductions in Section 5.4 (MR) has been corrected with the Emission Reductions Excelsheet.				
Documentation provided by project participant				
DOE assessment				Date : 06/01/2025

The vintage details of emission reductions in the revised MR matches with the emission reductions excel sheet. Hence the CAR is closed.

Table 4. FAR FROM THIS VERIFICATION

FAR ID	FAR	SECTION NO:	<i>Insert reference of protocol</i>	Date: DD/MM/YYYY
Description of FAR				
N/A				
Project participant response				Date: DD/MM/YYYY
N/A				
Documentation provided by project/ activity participant				
N/A				
DOE assessment				Date: DD/MM/YYYY
N/A				

APPENDIX V: COMPETENCY OF TEAM MEMBERS AND TECHNICAL REVIEWERS

<u>Certificate of Competence</u>							
Name	☒ Mr. ☐ Ms.	Rohit Badaya					
Qualification Procedure	Fulfil the requirement as per the appointment of personnel procedure of 4KES for Validation and Verification of CDM/VCS/GS/GCC/GHG Projects.						
Appointed to work as:							
	Validator/ Verifier	Team Leader	Trainee	Technical Expert	Technical Reviewer	Financial Expert	Approver
<i>Appointed</i>	Yes	Yes	No	Yes	Yes	No	No
<i>Appointed Date</i>	29-08-2023						
Authorized to work as Technical Expert for:							
<i>Authorized Technical Area</i>	Sectoral Scope		TA Code	Technical Area within the scope			
	Energy industries (renewable - / non-renewable sources)		1.1	Thermal energy generation			
	Energy industries (renewable - / non-renewable sources)		1.2	Renewables			
	Energy distribution		2.1	Energy distribution			
	Energy demand		3.1	Energy demand			
	Waste handling and disposal		13.1	Solid waste and wastewater			
	Waste handling and disposal		13.2	Manure			

<i>Authorized to work as Local Expert for:</i>	
<i>Country/Countries</i>	India
<u>Compliance check by:</u>	Anand S. R.

<u>Certificate of Competence</u>							
<i>Name</i>	☒ Mr. ☐ Ms.	Yordan Vanev Ivanov					
<i>Qualification Procedure</i>	Fulfil the requirement as per the appointment of personnel procedure of 4KES for Validation and Verification of CDM/VCS/GS/GCC/GHG Projects.						
<i>Appointed to work as:</i>							
	Validator/ Verifier	Team Leader	Trainee	Technical Expert	Technical Reviewer	Financial Expert	Approver
<i>Appointed</i>	No	No	No	Yes	No	No	No
<i>Appointed Date</i>	21-10-2024						
<i>Authorized to work as Technical Expert for:</i>							
<i>Authorized Technical Area</i>	Sectoral Scope		TA Code		Technical Area within the scope		
	Energy industries (renewable - / non-renewable sources)		1.2		Renewables		
<i>Authorized to work as Local Expert for:</i>							
<i>Country/Countries</i>	Bulgaria						
<u>Compliance check by:</u>				Anand S. R.			

<u>Certificate of Competence</u>							
Name	☒ Mr. ☐ Ms.	Ma Paa Puratchikkanal					
Qualification Procedure	Fulfil the requirement as per the appointment of personnel procedure of 4KES for Validation and Verification of CDM/VCS/GS/GCC/GHG Projects.						
Appointed to work as:							
	Validator/ Verifier	Team Leader	Trainee	Technical Expert	Technical Reviewer	Financial Expert	Approver
<i>Appointed</i>	Yes	Yes	No	Yes	Yes	Yes	Yes
<i>Appointed Date</i>	28-08-2023						
Authorized to work as Technical Expert for:							
<i>Authorized Technical Area</i>	Sectoral Scope		TA Code		Technical Area within the scope		
	Energy industries (renewable - / non-renewable sources)		1.1		Thermal energy generation		
	Energy industries (renewable - / non-renewable sources)		1.2		Renewables		
	Energy demand		3.1		Energy demand		
	Construction		6.1		Construction		
	Waste handling and disposal		13.1		Solid waste and wastewater		
	Waste handling and disposal		13.2		Manure		
	Agriculture		15.1		Agriculture		
Authorized to work as Local Expert for:							
<i>Country/Countries</i>	India and Sri Lanka						
<u>Compliance check by:</u>							
							Anand S. R.

