



VERIFICATION REPORT FOR PERALTA I WIND POWER PROJECT



Document Prepared by AENOR Confía S.A.U

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Summary:

Palmatir S.A has commissioned the verification body AENOR Confía S.A.U (hereinafter AENOR) to perform the third verification of VCS Project “Peralta I Wind Power Project” (VCS ID: 1349) (hereinafter the Project) in Uruguay for the period from 01-September-2020 to 28-February-2023 with respect to the relevant requirements of VCS programme guidelines and standard.

The project activity encompasses the development (construction and O&M) of an onshore wind farm which consists of 25 wind turbines with 2 MW each, resulting in total installed capacity of 50 MW. The purpose of the project activity is to generate renewable electricity to the national grid of Uruguay. Generated electricity is dispatched to a first power substation located in the wind farm and then dispatched to a power substation called “Cuchilla Peralta” (owned by UTE and where generated electricity is measured /18/). The wind farm is located at 280 km North from Montevideo, near the village of Peralta, Department of Tacuarembó (Uruguay).

The verification scope is to verify that actual monitoring systems and procedures are in compliance with the monitoring systems and procedures described in the monitoring plan; evaluate the GHG emission reduction data and express a conclusion with a reasonable level of assurance about whether the reported GHG emission reduction data is free from material misstatement and reported GHG emission data is sufficiently supported by evidence.

AENOR has performed the verification of “Peralta I Wind Power Project” on the basis of all issues and criteria of VCS Standard version 4.5 /2/ and VCS Program Guide version 4.4 /1/ for VCS projects and also on the criteria given to provide for consistent project operations, monitoring and reporting. In addition, the verification includes conformance of the project activity to the monitoring plan in accordance with the registered VCS PD /9/. Hence, in AENOR’s opinion the project correctly applies the baseline and monitoring methodology ACM0002 “Consolidated baseline methodology for grid-connected electricity generation from renewable sources”; Version 13.0.0 /6/ and meets the relevant

requirements for the CDM Methodology, Voluntary Carbon Standard requirements and the relevant host country criteria /15, 28/.

During the current monitoring period (01-September-2020 to 28-February-2023), the plant has successfully delivered 354,927 MWh of clean energy to the grid, and the emission reduction are calculated as 184,207tCO₂e. The emission reductions are thus claimed as Voluntary Carbon Units (VCU) and verified on the basis of the Verified Carbon Standard (VCS) version 4.5 for GHG emission reduction and removal projects.

In order to confirm that the monitoring report as documented meets the stated requirements and identified criteria, the verification consisted of the following three phases: i) a desk review of the project monitoring report and monitoring plan implementation; ii) follow-up interviews with PP; iii) the resolution of outstanding issues and internal technical review followed by the issuance of the final verification report and opinion.

AENOR has carried out this Verification Report and deems with reasonable level of assurance that the project implementation complies with all verification requirements of the VCS Standard. The assessment team has no restrictions or uncertainties with respect to the compliance of the project with the verification criteria; hence, the audit team concludes that the net GHG emissions reductions of 184,207 tCO₂e over the monitoring period has been quantified in accordance with VCS rules.

After reviewing all the documentation sent by the PP, AENOR has raised 4 NC/CARs and 4 CLs during the verification. The PP has prepared and corrected all the documentation in order to solve all of its errors based on a corrective action's procedures. Finally, AENOR has closed every NC/CAR and CL after reviewing all the PP responses and corrective actions for every of each NC/CAR and CL. The list of findings (CARs and CL) is presented in Appendix 4. There are no uncertainties associated with the verification of the project activity and reasonable level of assurance has been obtained.

AENOR confirms that the project is implemented in accordance and is operating as per validated VCS-PD and the monitoring plan; and then, claimed emissions reductions are calculated without material misstatements. Therefore, AENOR is able to certify that the emissions reductions from the "Peralta I Wind Power Project" project during the period from 01-September-2020 to 28-February-2023 the amount of 184,207 tCO₂e are correct.

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1 INTRODUCTION

1.1 Objective

Palmatir S.A has commissioned the verification body AENOR to perform the third verification of VCS Project “Peralta I Wind Power Project” (VCS ID: 1349) in Uruguay for the period from 01-September-2020 to 28-February-2023 with respect to the relevant requirements of VCS programme guide v4.4 and standard v4.5.

The objective of the verification audit was to conduct an independent assessment of the Project to determine:

- The extent to which methods and procedures, including monitoring procedures, have been implemented in accordance with the validated project description, including the monitoring plan.
- Ex-post independent assessment of the project and its GHG statement of emission reductions and carbon dioxide removals that have occurred as a result of the project during the monitoring period. The extent to which GHG emission reductions and removals reported in the monitoring report are materially accurate, conforms with specified requirements, and is conducted in accordance with the VCS Program rules.
- Verify a statement of historical data and information of a project to a reasonable level of assurance and ensure that the project meets the relevant materiality requirements.
- Evaluate the project proponent's response to comments received during the 30-day public comment period.
- Conform the verification in accordance with the requirements set forth in ISO 14064-3 /10/ and ISO 14065 /11/; in addition to other requirements set forth in VCS Program Rules, Standard, applied Methodology, and other relevant regulatory documents or National Laws.
- Evaluation of the project's stakeholder engagement, individual stakeholders and/or stakeholder groups to be interviewed, in order to demonstrate that the stakeholder interviews are free from bias or influence from the project proponent.
- Generate a verification report describing the verification process, any findings raised during verification and their resolutions, and the opinion reached by AENOR. In addition, keep all documents and records in a secure and retrievable manner.

1.2 Scope and Criteria

The scope of the verification audit is to verify the emissions reductions and/or removals of the project, against the Verified Carbon Standard, the identified methodology, the validated PD, and other abovementioned document throughout the monitoring period from 01-September-2020 to 28-February-2023.

The objective of this audit included a verification of the projects calculated removals with the Verified Carbon Standard requirements. In addition, the audit assessed the project with respect to the validated baseline scenarios presented in the PD and the fulfilment of applied methodology.

The scope was defined as follows:

- Objective review and ex-post determination of the monitored reductions in GHG emissions by the project.
- Assess the accuracy, conservativeness, relevance, completeness, consistency, and transparency, as well as reliability and credibility of the information provided in the monitoring report. Be adhere to the principles of independence, ethical conduct, fair presentation, and due professional care in assessment process.
- The physical infrastructure, activities, technologies and processes of the project.
- The GHG sources, sinks and/or reservoirs those are applicable to the project, and the types of GHGs that are applicable to the project.
- The project monitoring period and Monitoring Plan /12/.
- Project boundaries and its implementation status /12, 13, 18, 19, 20, 24, 25, 26, 27, 29, 30, 31, 32/.
- Environmental integrity, SDG Contributions, and Safeguards /12, 13, 21, 22, 23, 24, 29, 32/.
- Avoiding of Double Claiming.

1.3 Level of Assurance

☒ Reasonable level of assurance

☐ Limited level of assurance

The assessment was conducted to provide a reasonable level of assurance of conformance against the defined audit criteria and materiality thresholds within the audit scope. Based on the audit findings, a positive evaluation statement reasonably assures that the project GHG assertion is materially correct and is a fair representation of the GHG data and information. The level of assurance of the verification is reasonable, with respect to material errors, omissions, and misrepresentations.

The threshold for materiality with respect to the aggregate of errors, omissions, and misrepresentations relative to the total reported GHG emission reductions and/or removals is five percent.

All the revisions of the Verification Report before being submitted to the client were subjected to an independent Internal Technical Review to confirm that all Verification activities had been completed according to the pertinent AENOR instructions required. The Technical Review was performed by a technical reviewer qualified in accordance with AENOR's qualification scheme for CDM/VCS Validation and Verification.

In addition, more evidences used to achieve a reasonable level of assurance are specified in sections 2.3 and 2.4 of this report.

Therefore, AENOR confirms that the estimated GHG emissions reductions were calculated correctly on the basis of the approved baseline and monitoring methodology as per ACM0002 version 13.0.0 and the requirements as per VCS standard, version 4.5.

1.4 Summary Description of the Project

The project activity encompasses the development (construction and O&M) of an onshore wind farm located at 280 km North from Montevideo, going along the national road n°. 5, near the village of Peralta, Department of Tacuarembó (Uruguay). The nearest population centre is the “Caserío Cuchilla de Peralta” located approximately 12 km Northeast of the area of the entrepreneurship. This wind farm consists of 25 wind turbines with 2 MW each, resulting in total installed capacity of 50 MW.

The Peralta I wind farm is located in the patterns No. 8,508, 11,088, 11,089, 12,501, 12,502 and 12,503, corresponding to the 10th Judicial Division of the Department of Tacuarembó. The locations of the turbines as mentioned in the MR has been confirmed through Google Earth and is found to be valid.

The purpose of the project activity is to generate renewable electricity to the national grid of Uruguay. Generated electricity is dispatched to a first power substation located in the wind farm and then dispatched to a power substation called “Cuchilla Peralta” (owned by UTE and where generated electricity is measured /18/) located at 50 m from the first substation. From there generated electricity is transmitted through a 30 km transmission line with 150kV voltage to the “Rincón de Bonete B” power station and then to the “Rincón the Bonete” power station where generated electricity is finally dispatched to the grid. Therefore, the Sectoral scope for the Project is N°. 1 VCS Sectoral Scope: Energy industries (Renewable/non-renewable sources).

The main SDG Contributions of the Project will be based on SDGs Targets 7.2 (Renewable energy supplied to the power grid), 8.3 (Provide job opportunities by implementation of the project), and 13.0 (Tonnes of greenhouse gas emissions avoided or removed). All of the are implemented activities will increase. The project activity envisaged an estimated net electricity generation of 354,927 MWh by the efficient utilization of the available wind energy and thereby leading to a total emission reduction of 184,207 tonnes of CO2e for this monitoring period.

The Project Proponent is Palmatir S.A., and Atlantica Sustainable Infrastructure Plc in the Consultant Enterprise for the Project. The Project start date is 13-May-2014, which is the commercial operation date. The crediting period of the project will be 10 years. It will run from 13-May-2014 to 12-May-2024, extendable for another two 10 year periods.

The Project was verified against VCS rules. The project is registered under VCS with ID 1349..

The project underwent multiple validation and verification audits over the years. The initial validation was conducted under the CDM program for the crediting period from 01-November-2013 to 31-October-2020. Subsequently, a validation under the VCS program was carried out by AENOR for the crediting period from 13-May-2014 to 12-May-2024. The first verification under the VCS program was performed by AENOR for the monitoring period from 13-May-2014 to 31-October-2015. This was followed by another verification for the monitoring period from 01-November-2015 to 31-August-2020. The actual, and third verification, is being conducted by AENOR for the monitoring period from 01-September-2020 to 28-February-2023. For the current monitoring period, four sub-periods have been the object of study: Year 2020 (01-September-2020 to 31-December-2020); Year 2021 (01-January-2021 to 31-December-

2021); Year 2022 (01-January-2022 to 31-December-2022); and Year 2023 (01-January-2023 to 28-February-2023). The verification team based on the assessment of the UTE records /18/, Meter test Protocol/14/, remote visit photographs /31/, remote assessment with the PP and the plant personnel was able to confirm that the project activity is fully functional and is implemented in accordance with the description in the registered VCS PD.

2 VERIFICATION PROCESS

2.1 Method and Criteria

Palmatir S.A has commissioned the verification body AENOR to perform the third verification of VCS Project “Peralta I Wind Power Project” (VCS ID: 1349) in Uruguay for the period from 01-September-2020 to 28-February-2023 with respect to the relevant requirements of VCS programme guide v4.4 and standard v4.5.

The verification was performed through a combination of document review, interviews and communications with relevant personnel and remote assessment. The project was assessed for conformance to the criteria described in Section 1.2 of this report. As discussed in this report, findings were issued to ensure that the project was in full conformance to all requirements.

AENOR carried out this verification report and deems with reasonable level of assurance that the project complies with all of the verification criteria.

The verification has been performed through a deep desk review, remote assessment (conducted by Microsoft Teams on 22-November-2023) to the project and interviews with relevant personnel responsibly for monitoring. The verification activities in which risks were assessed were the evaluations of the monitoring system (data flow, data control procedures, etc.) but mainly the quality of raw data as well as sources and the spreadsheet calculations /13/. In addition,

No sampling plan has been adopted by the verification team as all the data related to the wind power plant was appropriately presented in the MR /12/ and ER sheet and was verified by the assessment team.

AENOR reproduced and verified 100% of sheets in the spreadsheet of emission reduction calculations and the data/calculations carried out in those sheets for the monitoring period from 01-September-2020 to 28-February-2023. Monthly records meters /18/ were also 100% verified and crosschecked with validated values and raw data /19, 23, 26, 27, 32/.

AENOR decided to carry out a deep and meticulous review of the sheets due to the following reasons:

- To verify the correct application of the methodology (formulae, equations...) and checked that data required to calculate the GHG removals are appropriately provided, and all the other requirements set in Section 1.2 of the present document.

Based on the assessment carried out, AENOR confirms with a reasonable level of assurance that the claimed emission reductions are free from material errors, omissions or misstatements.

In addition, AENOR confirms that sufficient evidence was presented for the reported net anthropogenic GHG emission reductions and that there is a clear audit trail that contains the evidence and records that validate the stated figure in this verification report since:

- Sufficient evidence available: The project participant has provided the 100% of data used in the calculations to achieve the final amount of GHG emission reductions reported.
- Nature of evidence: The raw data were collected from reliable sources. They are detailed in the project documents and have been provided to the verification team and the most relevant are appropriately detailed in the Appendix 2.
- Cross-checked evidence: AENOR cross-checked the collected information through an remote assessment to the project area and reproducing calculations.

The activities to be carried out during the and verification are the following:

Tasks	Period
Desk review of documents	2 weeks after the KoM*
Preliminary findings	11-August-2023
Follow-up actions (on-site inspection or remote; interviews; cross checks of information)	22-September-2023
Findings, including CARs and CLs	29-September-2023
Verification reports (after PP provides definitive documentation and the CARs and CLs are closed)	1 week after closing all findings
Technical review	1 week after draft verification report

*: On July 19th of 2023, the Kick of Meeting for the verification of the “Peralta I Wind Project” project was carried on through Microsoft Teams platform.

The attendants of the meeting were:

- Luis Javier Arribas – AENOR team leader.
- Marcos Recio Blitz – AENOR auditor in trainee.
- João Pedro Barata – AENOR auditor in trainee.
- Sergio Rodrigo Santano – AENOR auditor in trainee.
- Javier Llopis – Atlantica Sustainable Infrastructure Plc.

- Fernando Dastis – Atlantica Sustainable Infrastructure Plc.

Hence, AENOR confirms that the stated figures in the monitoring report are correct and confirms that is able to certify net anthropogenic GHG removals based on verifiable and reliable evidence.

2.2 Document Review

The verification is performed primarily as a document review of the associated documents as stated in detail in Appendix 2 of this document. Concretely, Registered VCS PD /9/, Validation Report, previous Verification Reports; first version and final version of monitoring report /12/; spreadsheet of emission reduction calculation /13/, monthly energy records and energy meters raw data /18/ were carefully reviewed for conformance to the verification criteria and consistency with the Project Description and among others. A large part of these documents (e.g., Validation report or previous Verification Reports) can be found on the official VERRA website in the form of public information.

The audit team examined the baseline data gathered from the baseline spreadsheets used to enter and compile information required by the methodology and reproduced the GHG emissions reductions calculations presented in the spreadsheet models to obtain same results than those appearing in the Monitoring report. In addition, an 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.

2.3 Interviews

A remote assessment to the project activity was undertaken on 22-November-2023 /33/ to assess the implementation and operation of the project activity; review evidence and interview key personnel to confirm evidence associated with the data generation, emission reduction calculation and reporting of the monitoring parameters. Furthermore, more interviews has been done with the PP and consultants to try to solve doubts, clarifications or misstatements.

The validated and registered PDD includes comprehensive stakeholder consultations, ensuring that all relevant concerns were addressed. The audit team asserts that the stakeholder makeup has not changed since validation; therefore, no additional local stakeholders need to be interviewed during the current verification process.

Additionally, the Project Design Document indicates that there are no local communities in close proximity to the project, which has been verified using Google Earth and Google Maps. It has been reviewed that the project has not received any complaints, grievances, or comments either through Verra or through the communication channels established by the project. According to Section D of the PDD and the Environmental Impact Assessment (EIA), the project had no negative impacts or mitigation measures to monitor, except for the maintenance of the turbines, which was verified at the documentary level.

The audit team verified the net impact of the project on job creation to the affected local stakeholders through the review of changes in the project staff and interviews hold primarily with the plant operators on 22-November-2023.

It was found that the impact has been positive, as it has resulted in the creation of jobs in accordance with what was established in Section 1.12 of the MR,

The key personnel interviewed and the main topics of the interviews are summarized in the table below:

Interviewed organization Person/Position	Interview topics
Federico Arrue, Asset Manager/ Cadonal S.A.	Flows for generating, aggregating and reporting the monitoring parameters. Testing of monitoring equipment and observation of monitoring practices. Calibration of monitoring equipment. Clarifications related to monitoring procedures. Sufficiency of monitoring plan. Reliability of internal and external data. Internal data quality control. Remote <i>assessment</i> of wind farm Project's impact on local stakeholders during the current MP

Carlos Navarro/Consultant	Crosscheck between information provided in the monitoring report and data from the monitoring system, logbooks, purchase records, handwritten records. Monitoring report and emission reduction calculations.
Javier Llopis/Consultant	Crosscheck between information provided in the monitoring report and data from the monitoring system, logbooks, purchase records, handwritten records. Monitoring report and emission reduction calculations.
Sebastián Guach Curbelo/ Atlantica Sustainable Infrastructure Plc	Flows for generating, aggregating and reporting the monitoring parameters. Testing of monitoring equipment and observation of monitoring practices. Calibration of monitoring equipment. Clarifications related to monitoring procedures. Reliability of internal and external data. Internal data quality control. Remote <i>assessment</i> of wind farm. Project's impact on local stakeholders during the current MP

2.4 Site Visits

On site visit was not conducted as mean of verification. According to the paragraph 4.1.12 of VCS standard v4.5. This verification correspond to the third monitoring and do not include a baseline reassessment nor project deviation. In addition, it is important to notice that AENOR conducted the validation and first verification of the project, which included a site visit to the project facilities (it was conducted by Richard Daniel Gonzáles Toledo).

Even site visits were not conducted a remote assessment /33/ were performed; mainly, to cross check the description provided in the monitoring report related to the VCS requirements implemented by the proponent, including:

- An assessment of the implementation and operation of the project activity as per the registered VCS-PD /18, 19, 20, 23, 25, 26, 27, 31, 32/.

- A review of information flows for generating, aggregating and reporting the monitoring parameters /27/.
- A cross-check between information provided in the Monitoring Report and data from other sources such as database or similar data sources /23, 27, 32/.
- A check of the monitoring procedure and observations (video conference) of monitoring practices against the requirements of the 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 /25/.
- Interview the key personnel involved in the mentoring and observe monitoring practices and the project's impact on local stakeholders during the current MP /33/.

It is noteworthy that no sampling plan has been carried out, based on the assessment of the abovementioned items; mainly, because AENOR has verified the sufficient and appropriate evidence. Therefore, verification team was able to confirm that the project activity has been operating as per stated in the validated project design document.

2.5 Resolution of Findings

All documentation provided by the Project Proponent was assessed against the most recent version of the relevant VCS guidance document. Some clarification requests (CL) and corrective action requests (CAR) were raised and submitted to the Project Proponent, which addressed them either by providing to the audit team the requested information or by making the appropriate corrections.

- CAR (Corrective Action Request) is raised if one of the following occurs:
 - Non-compliance with the monitoring plan, the methodology or the standardized baseline is 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 have 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 number of emission reductions.
- A clarification request (CL) is raised if the information is insufficient or not clear enough to determine whether the applicable VCS requirements have been met.
- FAR (Forward Action Request) is raised during verification if the monitoring and reporting require attention and/or adjustment for the next verification period.

Updated versions of the documentation were submitted by the Project Proponent and the audit team reassessed them against the guidance documentation. This process was repeated iteratively until all CLs and CARs were fully resolved. Specifically, 4 CARs, 4 CLs and 0 FARs were reported.

All findings issued by the AENOR audit team during the verification process have been closed. All findings issued during the verification process, and the inputs for their closure, are described in Appendix 4 of this report.

2.5.1 Forward Action Requests

No FARs were raised to the PP during the verification process. Additionally, it is important to note that there are no FARs pending from the previous verification process /8/.

2.6 Eligibility for Validation Activities

Not applicable since the verification body has not undertaken validation activities as part of the verification.

3 VALIDATION FINDINGS

3.1 Methodology Deviations

No methodology deviation is identified during the current monitoring period. Therefore, this section is not applicable.

3.2 Project Description Deviations

Firstly, the audit team can confirm that no deviations have been requested or made during the verification process for the current period. During the monitoring period (01-09-2020 to 28-02-2023), the project has operated continuously and with no major issues /12/.

The following project description deviations have been detected in previous monitoring periods:

- Start date has been changed from the PDD to adapt to the real start date of the project on the 13-May-2014. This is the date when full commercial operation started in the farm.

These changes have no impact in the applicability of the methodology, additionality or the appropriateness of the baseline scenario, and the project remains in compliance with the applied methodology.

Therefore, the audit team can confirm that the information presented in the MR is truthful and correct, in line with what has been made clear after the relevant documentary review /9/.

3.3 New Project Activity Instances in Grouped Projects

Not applicable since the project activity is not a grouped project.

3.4 Baseline Reassessment

Did the project undergo baseline reassessment during the monitoring period?

☐ Yes

☒ No

4 VERIFICATION FINDINGS

4.1 Project Details

Item	Evidence gathering activities, evidence checked, and assessment conclusion:
Audit history	AENOR verified that the project is fully implemented according to the description included in the validated VCS-PD. The verification team confirmed through visual inspection (remote assessment) and document review that all physical features of the VCS project activity, including data collection systems and storage systems have been implemented in accordance with the validated VCS-PD. The technical diagrams of the project activity were reviewed and an installed capacity of 50 MW was confirmed. The audit team has confirmed that the project is completely operational which was confirmed by means remote assessment. In addition, commercial operation was achieved on 13-May-2014 which is the commercial operation date. During the monitoring period (01-September-2020 to 28-February-2023), the project has operated continuously and satisfactorily, with few no significant interruptions as per DTE reports from national electricity regulator and Operation and Maintenance reports /17, 18, 19, 23, 32/. The verification team confirmed that the monitoring plan of the validated project activity is in accordance with the applied methodology ACM0002 “Consolidated methodology for grid-connected electricity generation from renewable sources” version 13.0.0 on the following reasons:

- During the desk review monitoring parameters included in the applied methodology were compared with the ones included in the monitoring plan of the validated VCS-PD and they were found consistent.
- During the verification process no need was identified for a revision of the monitoring plan.
- No other relevant aspects for monitoring not included in the methodology were identified.
- No deviations from the monitoring methodology were identified during the verification process.

In addition, monitoring of reductions in GHG emissions has been implemented in accordance with the monitoring plan. The monitoring mechanism is effective and reliable. In accordance with the monitoring plan,

Furthermore, the meter readings provided by the project participant have been verified against the original reading records downloaded from the Administration of the Electricity Market (ADME) website /35/, and they were found consistent. No contradictions were found. In order to be conservative, the PP crosschecked the monthly readings with the monthly records for sold of electricity,

PP has provided the certificates from UTE /14, 15, 16, 17, 27, 31/ that are consistent with the calibration information included in the latest monitoring report. As per resolution 14/002 /36/ the SMEC should be calibrated once every two year. After reviewing calibration certificates, verification team confirmed that the calibration is as per local regulation /14, 17, 27, 28, 31/.

Finally, during desk review and remote assessment, it was confirmed that the project has not received or sought any other form of environmental credit for the project. Also, it was verified that the project has not been rejected from other GHG program after validation.

Overall the project activity was implemented as described in the validated VCS-PD. Verification team confirmed that the component project implementation is in accordance with the project description contained in the validated VCS-PD. No material discrepancies were identified between project implementation and the project description. The details of the audit history as described under section 1.2 of the MR have been confirmed from the publicly available information and previous verification reports on the project webpage and is found consistent /34/.

Audit Type	Period	Program	VVB Name	Number of years
Validation	01-November-2013 – 31-October-2020	CDM	TÜV	7
Validation	13-May-2014 – 12-May-2024	VCS	AENOR	10
Verification	13-May-2014 – 31-October-2015	VCS	AENOR	1,47
Verification	01-November-2015 – 31-August-2020	VCS	APPLUS CERTIFICATION	4,84
Verification	01-September-2020 – 28-February-2023	VCS	AENOR	2,49

Double counting and participation under other GHG programs	Through reviewing the registered PD, and previous Validation and Verification Reports, the assessment team has checked that the project is also registered under the UNFCCC CDM with ID 9336 and can be found in /34/. The project does not participate in other emissions trading programmes, and this has been crosschecked by the review of publicly available information on internet and confirmed during the interviews with the Project Developer. The Project was initially registered in another program (i.e., CDM 28-December-2012; crediting period (01-November-2013 to 31-October-2020) /9/). In addition, it has been confirmed that the Project made the transfer to VCS (6-April-2020). In this way, it has been verified by the audit team that during the current period (01-September-2020 to 28-February-2023) no double accounting has been given, since the emissions corresponding to its activity in CDM were already verified (no CERs have been claimed under the CDM scheme for this project since its registration in UNFCCC /34/); nevertheless, the project has not yet been removed from CDM. Verification team reviewed different GHG online registry platforms and confirm this issue. Therefore, the project is not receiving or seeking credit for reductions and removals from a project activity under another GHG program. A research has been carried out by the assessment team in the registries such as CDM or GS and project is not registered in any other GHG program.
No double claiming with emissions trading programs or binding emission limits	Through reviewing the registered PD, and previous Validation and Verification Reports, the assessment team has checked that the project is also registered under the UNFCCC CDM with ID 9336 and can be found in /34/. The project does not participate in other emissions trading programmes, and this has been crosschecked by the review of publicly available information on internet and confirmed during the interviews with the Project Developer. The Project was initially registered in another program (i.e., CDM 28-December-2012; crediting period (01-November-2013 to 31-October-2020) /9/). In addition, it has been confirmed that the Project made the transfer to VCS (6-April-2020). In this way, it has been verified by the audit team that during the current period (01-September-2020 to 28-February-2023) no double accounting has been given, since the emissions corresponding to its activity in CDM were already verified (no CERs have been claimed under the CDM scheme for this project since its

	registration in UNFCCC /34/); nevertheless, the project has not yet been removed from CDM. Furthermore, the project is neither registered on other GHG emission trading program or binding emission limits. Verification team reviewed other than VCS GHG platform, such as CDM, GS, etc. in order to confirm that the project is not claiming GHG emission reduction or carbon dioxide removal by more than one entity towards separate mitigation targets or emissions inventories /34/. Verification team confirms that the project activity is not part of another emissions Trading Program.
No double claiming with other forms of environmental credit	Verification team confirmed by reviewing GHG trading platforms that no other forms of environmental credits are requested by project activity.
Supply chain (scope 3) emissions double claiming	PP states that they are not preventing other companies within the supply chain from reporting their Scope 3 emission statements
Sustainable development contributions	Verification team confirmed the sustainable contribution by confirming the achievement of reported indicator detailed in the MR /12/, section 1.12. It includes: - SDG 7.2: Renewable energy supplied to the power grid:. 354,927 MWh was supplied to the grid during the current period /13/. - SDG 8.3: Provide job opportunities by implementation of the project. Even during this monitoring period, no new employment was created; during project life it will create 21 jobs (6 directly, 15 indirectly) in total. - SDG 13: Tonnes of greenhouse gas emissions avoided or removed GHG emissions reduction thanks to project. During this monitoring the emission reduction amounts: 184,207 tCO₂e /13/.
Additional information relevant to the project	No commercially sensitive information has been excluded from the public versions of project documents.

4.2 Safeguards and Stakeholder Engagement

4.2.1 Stakeholder Identification

This part is not applicable to the project activity because the stakeholder makeup has not changed since validation /9, 34/.

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Stakeholder identification	N/A
Legal or customary tenure/access rights	N/A
Stakeholder diversity and changes over time	N/A
Expected changes in well-being	N/A
Location of stakeholders	N/A
Location of resources	N/A

4.2.2 Stakeholder Consultation and Ongoing Communication

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Ongoing consultation	Consultation process has been conducted before project implementation. The project has signs indicating an email address (wind@atlantica.com) and a contact telephone number 24/7 for complaints and suggestions with the local communities. For the last AAO renewal it was signed by owners who had no claim. There is a complaints procedure, but to date it has not been used, as there have been no complaints made to the project.
Date(s) of stakeholder consultation	According to the summary of the stakeholder consultation and validated PD /9/ two public hearings took place on 10th and 12th

	December 2013, the first in Montevideo and the second one in Trinidad, Flores. There have been no complaints/suggestions.
Communication of monitored results	No consultations were presented before or during operation, as per monitoring plan it is not mandatory to disseminate the monitoring results
Consultation records	The project has signs indicating an email address (wind@atlantica.com) and a contact telephone number for complaints and suggestions with the local communities. Neither the EIA nor the VCS-PD included the requirement to conduct additional consultations to stakeholders.
Stakeholder input	There was no consultation and therefore the project was not modified or updated.

4.2.3 Free, Prior, and Informed Consent

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Consent	There are no conflicts. The contract with owners is respected. The consent of the communities is not direct, but the regulatory body, depending on compliance with regulations, gives or withholds prior AAP authorisation, such as for construction and operation. In other words, consent is given indirectly through the state body, as per EIA and its approval that oversees the affected communities.
Outcome of FPIC discussion	There are no indigenous peoples in the affected area. There were no such impacts on the project.

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	No grievance were received during this monitoring period. Verification team reviewed news and public information from the Ministry of the Environment of Uruguay, to confirm if there is any social or environmental conflict in the project area, none was identified.
Grievance redress procedure	As per stated in the MR section 2.1.2 the project has signs indicating an email address (wind@atlantica.com) and a contact telephone number for complaints and suggestions with the local communities.

4.2.5 Public Comments

Comments received	Actions taken by the project proponent	Evidence gathering activities, evidence checked, and assessment conclusion
No comment were received	N/A	Verification team reviewed VCS Verra Registry platform and confirm that no comment were received for this monitoring.

4.2.6 Risks to Local Stakeholders and the Environment

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Risks to stakeholder participation	No risk identified. Even that, there is a mail to leave any suggestions and complaints; All impact and measures are documented in the approved EIA /24/.
Working conditions	Risk identified; Health and Safety measures are taken according to Atlantica HSEQ policy /23, 24, 25, 26, 30/. Verification team reviewed public information provided by Uruguayan Ministry of Labour and Social Security to confirm that no work incidents have been reported.
Safety of women and girls	No risk identified; There are no women working in the project.
Safety of minority and marginalized groups, including children	No risk identified; Local communities are far from the project.

Pollutants (air, noise, discharges to water, generation of waste, release of hazardous materials)	Risks identified for Pollutants (air, noise, discharges to water, generation of waste, release of hazardous materials); There is a triannual plan issued to DINACEA where all these points are considered. The audit team can confirm with sufficient certainty that all these risks have been contemplated and are taken into consideration for the development of the project. The PP has adequately identified all of them and has a plan to identify all these types of events.
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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 and sexual harassment	The PP has provided its 'Atlantica Integrated Annual Report' /23, 24, 25, 26, 32/. Hence, the PP states 'We are committed to conducting our business in a manner that respects the rights and dignity of our employees and those linked to our activities, including our supply chain. We respect internationally recognised human rights, as set out in the International Bill of Human Rights, the International Labour Organisation's (ILO) Declaration Core Conventions and the OECD Due Diligence Guidance for Multinational Enterprises' and 'Labour practices at Atlantica, including our employees and directors, are governed by our Human Rights Policy. This Policy aims to ensure respect for human rights in all our day-to-day activities...' and 'We also have a Code of Conduct /39/, Supplier Code of Conduct, Corporate Governance Guidelines and an Anti-Bribery and Anti-Corruption Policy to identify and mitigate any type of violations of human rights...'. Furthermore, the PP states 'In addition, we have a Diversity and Inclusion Policy to formalise our zero tolerance to discrimination against anyone based on any personal characteristic, such as ethnic background, culture...'; in addition, the PP states 'we acknowledge the rights of workers to collectively bargain the terms and conditions of work as defined by international reference standards, directives and conventions.' Referring to its management experience, the PP show all of its expertise in Atlantica Integrated Annual Report. Atlantica's management has implemented different measures to identify, assess and mitigate potential human rights-related risks. These include: - An Internal Compliance team that reviews human rights-related matters as part of their annual due diligence activities.

- A Code of Conduct that sets forth on working with third parties
- A Supplier Code of Conduct to which our suppliers must adhere to and which includes human rights and labour standard principles.
- Internal and external due diligence processes for new suppliers.
- Regular internal and external audits to review compliance with data protection rules and regulations.
- A Corporate Operations team that audits health and safety procedures at the asset level.
- An Investment Committee that reviews, , that the asset and/or the potential investment partner have not had any human rights incidents or sanctions.
- A Head of Risk Management who reviews risk management processes, procedures and tools implemented by the Company.
- Rights of local communities.
- Tolerating no salary discrimination for any reason, including gender.
- Reporting our “Communication-On-Progress” on our commitment to the Sustainable Development Goal (SDG) N°8 (Decent Work and Economic Progress) through this Integrated Annual Report and directly through the United Nations webpage.
- Proposing changes to the Compliance and ESG-related policies to the Board.
- Providing communication channels to report any misconduct or instances of non-compliance with human rights.

Therefore, after reviewing all the documentation, AENOR can confirm that the PP has clearly stated its respect for labour and work as part of its policy; furthermore, declaring its competence with respect to human rights and equity.

As abovementioned, the PP states on its : *‘we have a Diversity and Inclusion Policy to formalise our zero tolerance to discrimination against anyone based on any personal characteristic, such as ethnic background, culture, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation, health, disability, pregnancy, or any other characteristic protected by law...’*. In addition, the states *‘We provide a work environment free of discrimination, intimidation and sexual and nonsexual harassment, where everyone can participate in the success of the business and where all employees are valued for the distinctive skills and experiences they bring to the Company’*.

Therefore, after reviewing all the documentation, AENOR can confirm that the PP has clearly stated its respect for sexual harassment zero tolerance

	as part of its policy; furthermore, declaring its competence with respect to human rights and equity.
Management experience	The affected population was identified prior to any environmental authorisation. This report /24/ is published so that any interested party can have access to view it in accordance with decree 349-005 Art.15 /37/. Therefore, the audit team can confirm with sufficient certainty that the PP has sufficient capacity and experience for the overall management of the Project, as well as for the different stakeholders and the possible damages and risks to the environment. This has been verified as the Project has been operating normally since its first verification /34/, and AENOR has carried out several verifications to ensure that the PP has sufficient capacity to manage and perform the Project. In addition, the CP has provided sufficient documentary evidence /25, 26, 29, 39/ to prove that the project team has sufficient experience for the management and performance of the project.
Gender equity in labor and work	No women has been found to be working in the power plant. However, women participants are encouraged and equal opportunity has been provided as confirmed during the remote assessment. Therefore, after reviewing all the documentation, AENOR can confirms that the PP has clearly stated its respect for labour and work as part of its policy; furthermore, declaring its competence with respect to human rights and equity.
Human trafficking, forced labor, and child labor	The PP has declared with all the requested evidence that at no time will it carry out or force human trafficking throughout the project. This is reflected in all the documentation mentioned above. Therefore, AENOR can confirm that the PP has made its policies clear, and declares that no situation involving human trafficking or actions of a similar nature will or has occurred. The PP has declared, with all the evidence requested that at no time will it carry out or oblige the workers of the Project to carry out rubbing/forced work. This is reflected in all the documentation mentioned above. In May 2022 their Board of Directors amended and approved their “U.K. Anti-Modern Slavery and Human Trafficking Statement” under the Modern Slavery Act, 2015. The statement, available on www.atlantica.com. Atlantica has zero tolerance for modern slavery, and they confirm that no incidents of modern slavery were reported or identified during 2022, 2021 or 2020.

	Therefore, AENOR can confirm that the PP has made its policies clear, and declares that no situation involving forced labour will or has occurred. The PP has declared with all the evidence requested that at no time will it carry out or force minors to do rubbing work on the Project. This is reflected in all the documentation mentioned above. Therefore, AENOR can confirm that the PP has made its policies clear, and declares that no situation involving forced labour of minors will or has occurred.
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4.2.7.2 Human Rights

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Human rights	The PP respects internationally recognised human rights, as set out in the International Bill of Human Rights, the International Labour Organisation's (ILO) Declaration Core Conventions and the OECD Due Diligence Guidance for Multinational Enterprises /39/. Labour practices at Atlantica, including our employees and directors, are governed by our Human Rights Policy. This Policy aims to ensure respect for human rights in all our day-to-day activities They also have a Code of Conduct, Supplier Code of Conduct, Corporate Governance Guidelines and an Anti-Bribery and Anti-Corruption Policy to identify and mitigate any type of violations of human rights that are linked to our operations, products or services and by our business relationships. In addition, they also have a Diversity and Inclusion Policy to formalise our zero tolerance to discrimination against anyone based on any personal characteristic, such as ethnic background, culture, religion, age, etc. Any behaviour which is not acceptable must be reported through the Ethical Mailbox that Atlantica has established to report any kind of abuse. Furthermore, they acknowledge the rights of workers to collectively bargain the terms and conditions of work as defined by international reference standards, directives and conventions. Therefore, AENOR can confirm that, after the relevant documentary review, the PP makes clear in its policies all the mechanisms of action regarding human rights. As well as all the ways of acting in the face of possible problems

of this nature. In addition, the PP has demonstrated that no situation has arisen that violates human rights.

4.2.7.3 Indigenous Peoples and Cultural Heritage

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Preservation and protection of cultural heritage	The local communities are far from the project. There are no indigenous people in the region.

4.2.7.4 Property Rights

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Disputes over rights to territories and resources	Specialists in Socio-environmental Impacts carried out reports prior to the start of construction (IAR and EIA /21, 23, 24, 25, 26/) to present to the authorities to obtain the necessary authorizations for the construction of the project. The regulations for environmental impact assessment and environmental authorisations are laid down in Decree 349-005 /37/. In addition, they seek out the nearest local communities, that are away from the project. Furthermore, the legal property rights has not changed since previous validations and verifications /34/.
Respect for property rights	The legal property rights has not changed since previous validations and verifications /34/.

4.2.7.5 Benefit Sharing

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Summary of the benefit sharing plan	According to the PDD, there is no benefit sharing plan associated with the project

Benefit sharing during the monitoring period	There is no benefit sharing plan.
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4.2.8 Ecosystem Health

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Impacts on biodiversity and ecosystems	Risk identified; The risks identified are the occurrence of the impacts of mortality due to collision, habitat loss and displacement, on the fauna present. There is a triannual plan issued to DINACEA /22, 23, 24, 25/ where all these points are considered. The PP constantly monitor and report on the impact of spinning blades on local species of birds. After the relevant desk review, the audit team can confirm that the impacts have been taken into account and that a three-year action plan is in place to avoid such impacts as far as possible. Therefore, the evidence provided is correct and supports the information provided by the PP.
Soil degradation and soil erosion	Risk identified; The impacts would be the generation of roads, soil erosion, and damage to vegetation cover, which occur during the construction phase. There is a triannual plan issued to DINACEA where all these points are considered. After the relevant desk review, the audit team can confirm that the impacts have been taken into account and that a three-year action plan is in place to avoid such impacts as far as possible. Therefore, the evidence provided is correct and supports the information provided by the PP.
Water consumption and stress	Risk identified; Surface and groundwater can be affected during construction or in the event of possible spills of harmful substances. There is a triannual plan issued to DINACEA where all these points are considered. After the relevant desk review, the audit team can confirm that the impacts have been taken into account and that a three-year action plan is in place to avoid such impacts as far as possible. Therefore, the evidence provided is correct and supports the information provided by the PP.
Usage of fertilizers	No Risk identified; Surface and groundwater can be affected during construction or in the event of possible spills of harmful substances, but not due to the use of fertilizers.

4.2.8.1 Rare, Threatened, and Endangered species

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Species or habitat	The PP will constantly monitor and report on the impact of spinning blades on local species of birds /21, 22, 23,24, 25/. The scientific monitoring studies are performed by independent biodiversity consultants contracted by their projects. Studies cover a census of birds to analyse bird mortality and monitor the protected birds in case of Peralta, the loica pampeana has been monitored. Therefore, AENOR can confirm that, after the relevant documentary review, the PP makes clear in its policies all the mechanisms of action regarding the protection of rare, threatened or endangered species. In addition, the PP has demonstrated that it has a clear policy on the protection of rare, threatened and endangered species.
Areas needed for habitat connectivity	Thanks to the environmental impact assessment, the PP can demonstrate that the project has not adversely affected areas of high ecological impact or areas of high ecological connectivity during the current monitoring period.

4.2.8.2 Introduction of Species

Species introduced	Evidence gathering activities, evidence checked, and assessment conclusion
N/A	N/A

Existing invasive species	Evidence gathering activities, evidence checked, and assessment conclusion
N/A	N/A

4.2.8.3 Ecosystem conversion

Item	Evidence gathering activities and evidence checked
Ecosystem conversion	N/A

4.3 Accuracy of Reduction and Removal Calculations

The monitoring has been carried out in accordance with the provision of monitoring plan; the verification team reviewed if:

- The monitoring of reductions in GHG emissions resulting from the proposed VCS project activity were implemented in accordance with the monitoring plan contained in the validated VCS-PD.

- The monitoring plan and the applied methodologies had been properly implemented and followed by the project participants.
- All parameters stated in the monitoring plan, the applied methodologies and relevant VCS requirements had been sufficiently monitored and updated.
- The responsibilities and authorities for monitoring and reporting were in accordance with the responsibilities and authorities stated in the monitoring plan.

The monitoring system and all applied procedures are in compliance with the monitoring plan contained in the validated VCS-PD /9/ and the applied methodology ACM0002 “Consolidated baseline methodology for grid-connected electricity generation from renewable sources”; Version 13.0.0 /6/, based on the information included in the final monitoring report, there are several procedures for data collecting depending on the methodology applicable for each step of the project

Based on the information in the validated VCS-PD, the baseline emission factor ($EF_{grid,CM,y}$) was ex-ante determined according to version 13.0.0 of the approved methodology ACM0002 and is fixed for the crediting period. The value of baseline emission factor used in the Monitoring Report /12/ is 0.519 tCO₂e/MWh, which is the same as the one in the validated VCS-PD.

Data / Parameter	$EF_{grid,CM,y}$
Data unit	tCO ₂ /MWh
Description	Combined margin CO ₂ emission factor of the grid connected power generation in year y calculated using the “Tool to calculate the emission factor for an electricity system” version 02.2.1 /7/.
Source of data	Calculation of $EF_{grid,CM,y}$ was made ex-ante for the project at validation time. Value obtained was 0.519 with data obtained from National Freight Forwarding (Despacho Nacional de Cargas) (UTE) / UTE's Annual Report, 2008, 2009 & 2010 and ADME /9/.
Value applied	0.519
Justification of choice of data or description of measurement methods and procedures applied	The Combined Margin emission factor is calculated ex ante, as described in section B.6.1. / B.6.2/ B.6.3 of the PDD /9/.
Purpose of data	Calculation of baseline emissions
Comments	N/A

According to the formulae and procedure defined in the monitoring plan the Baseline Emissions (BE_y) is calculated as follows:

$$BE_y = EGP_{J,y} \times EF_{grid,CM,y}$$

Where:

BE_y: Baseline Emission in year y (tCO₂).

- EGP_{J,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 (MWh).
- EF_{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).

The calculation of EGP_{J,y} is different for (a) Greenfield plants, (b) retrofits and replacements, and (c) capacity additions. Due to the fact that the project involves the installation of a new grid-connected renewable power plant/unit at a site where no renewable power plant was operated prior to the implementation of the project activity (Case (a) Greenfield plant), then:

$$EGP_{J,y} = EG_{facility,y}$$

Where:

- EGP_{J,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 (MWh).
- EG_{facility,y}: Quantity of net electricity generation supplied by the project plant/unit to the grid in year y (MWh).

The net electricity generation as a result of the project activity to the grid is calculated based on monthly records from meter measurements /18/ and is the output from the difference between the exported energy (or the gross energy generation) and the imported energy /19/ (or the energy consumed by the project). The results are presented in the following table (the hourly generation from the SMEC meter has been submitted for crosscheck to the VVB):

Period	Net electricity supplied (MWh)
01-September-2020 to 31-December-2020	54,906
01-January-2021 to 31-December-2021	144,622
01-January-2022 to 31-December-2022	133,904
01-January-2023 to 28-February-2023	21,495
Total	354,927

Data / Parameter	EGfacility,y
Data unit	MWh
Description	The following parameters shall be measured: (i) The quantity of electricity supplied by the project plant/unit to the grid; and (ii) The quantity of electricity delivered to the project plant/unit from the grid
Source of data	The electricity is measured through a bidirectional main meter and a bidirectional backup meter owned by UTE /14, 27, 31/. They are located at the connection position UTE within walking distance to the substation project. The measurements have been cross checked with records of sold electricity. Additionally, there is a record of the energy generated by a SCADA.
Description of measurement methods and procedures to be applied	The quantity of electricity supplied by the project plant/unit to the grid and from the grid is directly measured during the crediting period by SCADA system and records of sold of UTE /18, 19, 26, 32/. This data is archived electronically as per internal procedures, for 2 years after the end of the last crediting period or the last issuance of credits, whichever occurs later.
Frequency of monitoring/recording	Continuous measurement and at least monthly recording.
Value monitored	EGfacility,2020: 54,906 MWh EGfacility,2021: 144,622 MWh EGfacility,2022: 133,904 MWh EGfacility,2023: 21,495 MWh
Monitoring equipment	Bidirectional main meter and a bidirectional backup meter owned by UTE. The meters are both SL7000 type (manufacturer: ACTARIS), with serial numbers 46033991 (accuracy of 0.2S) and 65005113 (accuracy of 0.5S) respectively. Its calibration history has been 07-February-2014, 02-March-2016, 07-March-2018, 24-September-2020 and 26-May-2022. In 27-October-2022, after 10 years of use, they were changed by two other meters, ITRON, models SL7000, serial

	number 23409 and ACE6000, serial number 24549, calibrated on laboratory 26-August-2022.
QA/QC procedures to be applied	Data measured by UTE-meters have been cross-checked with the records from the electronic supervisory system of the wind farm and records for sold of electricity.
Purpose of the data	Calculation of baseline emissions
Calculation method	Continuous reading (Monthly reported)
Comments	Net generation = Energy exported - Energy imported

The quality of data generated by this project is maintained through the development of an overarching monitoring system including procedures used to double check data, for staff training, meter calibration, accreditation of the facility completing calibration and the adherence to the relevant standards. All metering equipment to be used for the monitoring is appropriately maintained, calibrated, and checked at regular intervals in line with the requirements of IEC 62053-22:2003 (Electricity metering equipment (a.c.); Particular requirements, Part 11: Electromechanical meters for active energy (classes 0,5, 1 and 2)) /40/. The sponsor is responsible for calibrating the SMEC meters every 2 years as defined by national decree of law /36/.

Windnet control system (SCADA) is interconnected to all those involved in real time (UTE, Gamesa control service and the project owner's control) and enables the identification of potential emergencies real time and can act accordingly. If any error is detected, the party owning the meter, shall repair recalibrate or replace the meter giving the other party sufficient notice to allow a representative to attend during any corrective activity. As per validated VCS-PD, Project Emissions (PE_y) equal to 0. Therefore, Emission reduction, as per stated in the applied methodology, is calculated as follow:

$$ER_y = BE_y - PE_y$$

Where:

- ER_y: Emission reduction in year y (tCO₂)
- BE_y: Baseline Emission in year y (tCO₂)
- PE_y: Project emission in year y (tCO₂)

Following the methodology, as the project is a new wind power plant without fossil fuel consumption, it does not lead to any GHG emissions and therefore project emissions are considered equal to zero.

- PE_y= 0 tCO₂.

Following the applied methodology, no leakage emissions are considered. The main emissions potentially giving rise to leakage in the context of electric sector projects are emissions arising due to activities such as power plant construction and upstream emissions from fossil fuel use (e.g., extraction, processing, and transportation). These emissions sources are neglected.

- LEy= 0 tCO₂e.

Results are summarized following:

Vintage period	Baseline emissions (tCO ₂ e)	Project emissions (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Reduction VCU (tCO ₂ e)	Removal VCU (tCO ₂ e)	Total VCUs (tCO ₂ e)
Year 2020 (01-September-2020 -- 31-December-2020)	28,496	0	0	28,496	0	28,496
Year 2021 (01-January-2021 -- 31-December-2021)	75,059	0	0	75,059	0	75,059
Year 2022 (01-January-2022 -- 31-December-2022)	69,496	0	0	69,496	0	69,496
Year 2023 (01-January-2023 -- 28-February-2023)	11,156	0	0	11,156	0	11,156
Total	184,207	0	0	184,207	0	184,207

Therefore, the total emissions reductions calculated for the monitoring period are 184,207 tCO₂e. The following table shows the estimated ex-ante GHG emission reductions and the achieved emission reductions for this monitoring period, and the percentage difference, as well as the justification of the difference:

During the first monitoring period, the project has operated continuously and satisfactorily, with few no significant interruptions as per Operation and Maintenance reports /23, 25, 26/.

The verification team confirmed that the monitoring plan of the validated project activity is in accordance with the applied methodology ACM0002 “Consolidated methodology for grid-connected electricity generation from renewable sources” version 13.0.0 on the following reasons:

- During the desk review monitoring parameters included in the applied methodology were compared with the ones included in the monitoring plan of the validated VCS-PD and they were found consistent.
- During the verification process no need was identified for a revision of the monitoring plan.
- No other relevant aspects for monitoring not included in the methodology were identified.
- No deviations from the monitoring methodology were identified during the verification process.

In addition, monitoring of reductions in GHG emissions has been implemented in accordance with the monitoring plan. The monitoring mechanism is effective and reliable. In accordance with the monitoring plan, only one parameter is monitored: Quantity of net electricity generation supplied by the project plant to the grid in year y ($EG_{\text{facility},y}$); it is measured continuously and at least recording monthly. Data measured by meters are cross-checked with the records from the electronic supervisory system of the wind farm and records for sold of electricity /19/.

PP has provided the certificates from UTE /14, 15, 16, 17, 20/ that are consistent with the calibration information included in the latest monitoring report. Moreover, as per resolution 14/002 /36/ the SMEC should be calibrated once every two year. After reviewing calibration certificates, verification team confirmed that the calibration is as per local regulation and is detailed following:

Meter	Serial number	Accuracy class	Calibration dates	Certificate number
Main	46033991	0.2S	24-September-2020 and 26-May-2022	201994 222689
Back up	65005113	0.2S		201995 222690

After 10 years of use, they were changed by two other meters, ITRON, models SL7000, serial number 23409 and ACE6000, serial number 24549, calibrated on laboratory 26/08/2022 /14, 20/.

Meter	Serial number	Accuracy class	Calibration dates	Certificate number
Main	23409	0.2S	26-October-2022	223171
Back up	24549	0.5S		223176

According to Section B.7.3 of the PDD, "All measurements have been conducted with calibrated measurement equipment according to relevant industry standards Commercial Measurements System

by URSEA (URSEA Decision N° 14002 of 27 November 2002)" whose article 40 requires that meters will be verified, at least once each two years.

- Net Generation and Calibration Adjustment of EG_{facility,September 2020}:

Due to COVID-19 restrictions, ADME sent a communication to all SMEC's users (*Communication ADME-Recalibration of Measurement Points 18.03.2020 /20/*) explaining that no commercial recalibrations were conducted in the estimated dates. Therefore, the calibration estimated for 06/03/2020 was not carried out until 24/09/2020, with the conformity of ADME.

Net generation is calculated as the difference between energy exported and energy imported. In the case of the EG_{facility,2020} although there exists an official ADME document exempting the application of a correction factor, a conservative approach has been adopted. Specifically, a 3.33% correction has been applied to the data for the entire month of September 2020, which falls within the current monitoring period (01/09/2020 – 28/02/2023), and more precisely within the sub-period from 01/09/2020 to 31/12/2020.

This adjustment was made due to the postponement of the meter calibration date. The calibration certificates establish a reference energy of 30 MWh, with an uncertainty of 1 MWh, implying an accuracy of 3.33% ($1/30 \times 100$). This amount is greater and therefore, more conservative than the 2% nominal uncertainty indicated in the certificate, and used in the last verification for identical reasons.

Despite that the calibration took place on 24/09/2020, and in line with the methodology applied in previous monitoring reports and the registered PD, the 3.33% correction has been conservatively applied to the entire month of September. The formulas used in the monitoring spreadsheet are as follows:

$$EG_{\text{facility,September 2020}} = A - B$$

Where A and B represent the total generation (Net Electricity Supplied) and consumption (Wind Farm Energy Consumption) for the month of September, respectively in MWh; therefore, the adjusted generation and consumption are:

- a. Adjusted Generation for A = $C \times (100\% - 3.33\%)$
- b. Adjusted Consumption for B = $D \times (100\% + 3.33\%)$

Where C is the Sale Receipts (MWh) (Energy generated) for the month of September and D represents the Energy consumption (MWh) for the month of September.

As evidence of the correct application of this adjustment, two calibration certificates dated 24/09/2020 are provided for the relevant meters (as referenced in the monitoring equipment section). The calibration of the meters was carried out by UTE, as evidenced by the calibration records /41 - 43/. These are certificates no. 202785 and 202786, both of which explicitly state the measurement uncertainty to further support the application of the correction factor. It also aligns with the principle of conservativeness, the applicable regulatory framework. and has been accepted by the VVB in prior verifications.

Therefore, once all the pertinent documentary review, remote assessment, and all the different meetings that have been held throughout the verification process have been carried out, it is concluded that the calculations of emission reduction and removal are correct, accurate and are in accordance with the methodologies and requirements of the standard and the other related documentation. In addition, it is confirmed that the procedures applied for the measurement and monitoring of the different parameters are also considered correct, accurate and faithful to the requirements of the standard and other associated documents.

4.4 Quality of Evidence to Determine Reductions and Removals

AENOR was able to confirm that the calculations are based on authentic data from energy regulators, on the monthly systematic monitoring of the electricity supplied by the project and records of sold electricity. The spreadsheets used to calculate the VCU calculations and all figures were tracked, checked and found to be consistent. The monitoring information is stored as per the monitoring plan.

The different data sources mentioned above permit the comparison of the data and the detection of any deviation between them.

The PP provided the spreadsheets used for calculating the GHG emission reductions /13/, Energy meters monthly records and Energy meters raw data /18/. AENOR has reproduced all these calculations to obtain the same results, hence, they are deemed quantified correctly in accordance with the project description and applied methodology; consistent with the evidence provided and cross-checked by AENOR. Furthermore, appropriate methods and formulae for calculating baseline emissions, project emissions and leakage have been followed, and assumptions and emission factor correctly applied and justified. Then, the GHG emission reductions have been quantified correctly in accordance with the monitoring plan and applied methodology.

The quality of supporting evidence submitted to the VVB for verification is adequate and found to be verifiable. The ER calculation spreadsheet and other supporting documents related to quality and maintenance were checked by the verification team during the remote assessment to confirm the authenticity of the documents and to check the correctness of the calculation.

Verification team confirms that the quality of evidence to determine the GHG reductions and removals produced was found satisfactory. The detailed information flow with the roles and responsibilities of the individuals and the monitoring system have been provided in section 4.3 of the VCS-MR.

The verification team is able to confirm that sufficient evidence is available for the whole monitoring period and the same is verifiable and that the data collection system meets the requirements of the monitoring plan and the applied methodology according to the remote assessment and in the document review.

4.5 Non-Permanence Risk Analysis

This section is not applicable for the project activity.

5 VERIFICATION OPINION

5.1 Verification Summary

AENOR Confía S.A.U contracted by Palmatir S.A. has performed the independent verification of the emission reduction for the VCS project activity (VCS ID 1349) “Peralta I wind power project”, for the monitoring period 01-September-2020 to 28-February-2023 (including both days) as reported in the Monitoring Report Version 4.3 dated 20-June-2025. Palmatir S.A. is responsible for the collection of data in accordance with the monitoring plan and the reporting of GHG emissions reductions from the project activity.

After reviewing the monitoring report and all supporting evidence (all reviewed documents are detailed in Appendix 2), verification team is able to state that the project activity was implemented as described in the validated VCS-PD; the components of the project implementation is in accordance with the project description contained in the validated VCS-PD. No material discrepancies were identified between project implementation and the project description. AENOR commenced the verification on the basis of the baseline and monitoring methodology ACM0002 Version 13.0.0, the monitoring plan contained in the registered VCS PD and MR. Neither project deviation nor methodology deviation are requested for this monitoring period.

Therefore, in AENOR’s opinion the GHG emissions reductions reported for the project activity for the period 01-September-2020 to 28-February-2023 are fairly stated in the Monitoring Report Version 4.3, dated June 2025 . AENOR states that the GHG statement is responsibility of the project proponent, the project conforms with the verification criteria and their GHG emission reductions or carbon dioxide removals set out in VCS Version 4.5, including any qualifications or modifications. AENOR also confirms that the project has been implemented in accordance with the project description and subsequently validated variations. In addition, AENOR decelerate that the verification of the GHG statement was conducted in accordance with ISO 14064-3:2019 and every other relevant document set in Appendix 2. The GHG emission reductions were calculated correctly based on the approved baseline and monitoring methodology ACM0002 Version 13.0.0 and VCS standard version 4.5.

5.2 Verification Conclusion

AENOR has performed the verification of the emission reductions that have been reported for the “Peralta I Wind Power Project” (VCS ID 1349) for the period 01-September-2020 to 28-February-2023.

Verification is performed in accordance with the relevant requirements for VCS rules. The verification ex-post emission reductions has been conducted by AENOR in accordance with ISO 14064-3:2019 with a reasonable level of assurance.

AENOR conducted the verification on the basis of the approved consolidated baseline methodology ACM0002 version 13.0.0, the monitoring plan contained in the validated VCS-PD and the final monitoring report. The verification included i) checking whether the provisions of the monitoring methodology and

the monitoring plan were consistently and appropriately applied and ii) the collection of evidence supporting the reported data.

AENOR planned and performed the verification, obtaining information and requesting explanation necessary to provide sufficient evidence to give reasonable assurance of the reported amount of GHG emission reductions; then, It is AENOR's responsibility to express an independent GHG verification opinion on the GHG emissions and on the calculation of GHG emission reductions from the project for the period 01-September-2020 to 28-February-2023 based on the reported emissions reductions in the Monitoring Report for the same period.

In AENOR's opinion the GHG emissions reductions of the "Peralta I Wind Power Project" for the period 01-September-2020 to 28-February-2023 are fairly stated in the final monitoring report; the GHG emission reductions were calculated correctly on the basis of the approved consolidated baseline methodology ACM0002 version 13.0.0 and the monitoring plan contained in the validated VCS-PD.

AENOR is able to certify that the emission reductions from the "Peralta I Wind Power Project" during the period 01-September-2020 to 28-February-2023 amount to 184,207 tCO₂e, detailed as below.

Verification period: From [01-September-2020] to [28-February-2023].

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's (tCO ₂ e)	Removal VCU's (tCO ₂ e)	Total VCU's (tCO ₂ e)
Year 2020 (01-Sep-2020 -- 31-Dec-2020)	28,496	0	0	28,496	0	28,496
Year 2021 (01-Jan-2021 -- 31-Dec-2021)	75,059	0	0	75,059	0	75,059
Year 2022 (01-Jan-2022 -- 31-Dec-2022)	69,496	0	0	69,496	0	69,496
Year 2023 (01-Sep-2020 -- 28-Feb-2023)	11,156	0	0	11,156	0	11,156
Total	184,207	0	0	184,207	0	184,207

The non-permanence risk rating (%)	N/A
If applicable, the Long-term Average (LTA), whether it has been properly updated, and if it has been reached.	N/A
Whether a loss has been appropriately accounted for, in accordance with the VCS Program rules, if applicable.	N/A

Vintage period	Baseline emissions (tCO ₂ e)	Project emissions (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Buffer pool allocation (tCO ₂ e)	Reductions VCU's (tCO ₂ e)	Removals VCU's (tCO ₂ e)	Total VCU issuance (tCO ₂ e)
Year 2022 (01-January-2022 -- 31-December-2022)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Year 2023 (01-January-2023 -- 28-February-2023)	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A	N/A	N/A	N/A	N/A	N/A

 Luis Javier Arribas Alonso – Lead Auditor

Madrid, 20 June 2025

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
01-September-2020 to 28-	228,345	184,207	19.33%	Deviations in the actual generated electricity generation with respect to

February-2023				the estimated EX ANTE. This happened because, for ex-ante estimates, wrong wind models were used, which did not represent the reality in a proper way; therefore, the estimates were less conservative than expected and its value was higher than expected at the time of monitoring. /32/. Thus, in this monitoring period, actual measurements of energy generation have been used to estimate the reductions correctly, conservatively and accurate. The audit team has been able to verify the veracity of the above mentioned thanks to the documentary review /9, 12, 13, 15, 18, 19, 23/ of the evidence provided by the PP, the remote assessment, and all the different meetings that have been held with the PP throughout the verification process. Therefore, it is confirmed that the percentage difference is correct.
Total	228,345	184,207	19.33%	Deviations in the actual generated electricity generation with respect to the estimated EX ANTE The difference is explained by the lack of wind in the period.

APPENDIX 1: COMMERCIALLY SENSITIVE INFORMATION

This section is not applicable since the project does not have commercially sensitive information.

APPENDIX 2: DOCUMENT REFERENCES

Unless otherwise indicated, the assessment was performed against the most recent version of the relevant VCS documents. The verification assessment was performed in accordance with the requirements detailed in section 4 of the VCS Standard, including the following documents:

Serial No	Title of Document	Version	Date
1	VCS Program Guide	4.4	29-August-2023
2	VCS Standard	4.5	11-December-2023
3	VCS Program definitions	4.4	29-August-2023
4	Validation and Verification Manual	3.2	19-October 2016
5	Monitoring Report Template	4.3	29-August-2023
6	ACM0002 "Consolidated baseline methodology for grid-connected electricity generation from renewable sources"	13.0.0	02-November-22
7	Tool to calculate the emission factor for an electricity system	02.2.1	29-September-2011
8	210212_VCS FVR Peralta (Previous MR)	01.1	12-February-2021
9	CLEAN DEVELOPMENT MECHANISM PROJECT DESIGN DOCUMENT (CDM-PDD)	12.0	9-December-2021
10	ISO 14064-3:2019: Greenhouse gases - Part 3: Specification with guidance for the verification and validation of greenhouse gas statements	UNE-EN ISO 14064-3:2019	October 2019
11	ISO 14065:2021: General principles and requirements for bodies validating and verifying environmental information	UNE-EN ISO 14065:2021	November 2021
12	VCS MR.v4.3 1349 01092020-28022023	4.3	20-June-2025
13	ER Calculations - Peralta	4.3	20-June-2025
14	Certificates Calibration Energy Meters UTE Laboratory	223171 223176 221738 (old) 221739 (old)	26-August-2022 26-August-2022 (old)

15	SMEC GENERATOR ENABLEMENT REPORT UTE Laboratory	1.0	02-June-2022
16	Load measurements in voltage and current transformers UTE Laboratory	221740	01-June-2022
17	UTE Laboratory Voltage and Current Transformer Calibration Certificates	221742 221743 221744 221745 221746 221747	26-May-2022
18	Energy Production Reports; Energy Exports DTE	2020: Monts 9, 10, 11, 12. 2021: Monts [1- 12]. 2022: Monts [1- 12]. 2023: Months 1, 2 and 3.	2020 to 2023
19	Palmatir Energy Invoices and Excel Registries	From 2020 to 2023; More than 80 registries	2020 to 2023
20	AMDE Communication-Recalibration of Measuring Stations	1.0	18-03-2020
21	Palmatir Noise Report 2020	1.0	16- September- 2020
22	Palmatir Noise Report 2021	1.0	22-July-2021
23	Annual and monthly report Peralta Campaign	From 2020 to 2023; More than 16 registries	2020 to 20232020 to 2023
24	Palmatir Environmental Performance Report	Year 2022	June 2023
25	Annual monitoring and maintenance plan	From 2020 to 2023; 8 registries	2020 to 2023
26	Monthly report on the operation and operation of the wind farm	[Q1-Q4] from 2020 to 2023. 10 Registries	2020 to 2023
27	Technical data control and acquisition software	PNG Files. 7 registries from main energy meters	2024
28	Measurement System Regulations Commercial	1.0	29-November- 2002 N° 26.147
29	Organisational Chart	1.0	10-January- 2024
30	FO-O&M-UY-040 Annual Training and Drills Plan	1.0	10-January- 2024
31	Main electricity SMEC Meters pictures	24 Registries	10-January- 2024

32	230573-BRPA-R-05-B Annual Operation Review	230573-BRPA-R-05-B	09-October-2015
33	Comentarios_Aclaraciones_Meeting_231122	1.0	22-November-2024
34	<u>Verra Search Page</u> for Project 1349	N/A	05-June-2024
35	<u>ADME</u> website	N/A	05-June-2024
36	Resolución URSEA N.º 14/002 de 27/11/2002 'TOR2_Energía_Electrica_2017_01'	January 2019	January-2019
37	Decreto 349-005 - Reglamento de Evaluación de Impacto Ambiental y Autorizaciones Ambientales	1.0	21-September-2005
38	GUIA EVALUACIÓN DE IMPACTO AMBIENTAL PARQUES EÓLICOS	1.0	December-2015
39	OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct	1.0	2018
40	UNE-EN 62053-22:2003 - Equipos de medida de la energía eléctrica (a.c.). Requisitos particulares. Parte 22: Contadores estáticos de energía activa (clases 0,2 y 0,5).	1.0	2003
41	2018-03 Calibracion SMEC Palmatir	1.0	14/03/2018
42	SCAN2250	1.0	24/09/2020
43	SCAN2251	1.0	24/09/2020

APPENDIX 3: ABBREVIATIONS

Abbreviation	Description
CMEF	Combined Margin Emission Factor
CAR	Corrective Action Request
CL	Clarification Request
CO ₂	Carbon dioxide
CO ₂ e	Equivalent Carbon dioxide
EIA	Environmental Impact Assessment
FAR	Forward Action Request
GHG	Green House Gas
ISO	International Standards Organization
kW	Kilowatt
kWh	Kilowatt hour
MR	Monitoring Report
MW	Megawatt
MWh	Megawatt-hour
O&M	Operation and Maintenance
PD	Project Description
PP	Project Proponent

QA/QC

Quality Assurance and Quality Control

APPENDIX 4: FINDINGS OVERVIEW

Non Conformities (NCs)/Corrective Action Request (CARs)

NC/CAR id.	01	Date: 22/08/2023
NC/CAR description		
1. The MR has the following information incomplete or/and incorrect: Section 1.1. does not identified the end date of the monitoring period correct. 2. The value of the "Contributions over project lifetime" indicated in table 1 for the first and third SDG targets does not correspond to the period from the start date of the project on 13/05/2014 to 30/10/2034. 3. The information included in section 5.4 to justify the difference between the estimated and the achieved emissions reductions is not enough.		
Project proponent's response		Date: 09/01/2024
1. <i>Section 1.1 has been corrected</i> 2. <i>The template states in its instructions for this table "Brief description of the cumulative quantifiable impact of the project's activities related to the SDG indicator, over the project lifetime." Currently, the quantifiable cumulative impact of the project lifetime reaches 28/02/2023.</i> 3. <i>Information corrected.</i>		
Documentation provided by the project proponent		
New version of Monitoring Report (2.0)		
VVB's evaluation		Date: 30/01/2024

The Audit team has reviewed the documentation given by the PP, and concludes the following:

1. Section 1.1 has been properly corrected.
2. According to the definition of project lifetime included in “program definitions” version 4.4, “Project Lifetime” is “the time period over which project activities are implemented”, and according to section C.1.2 of the CDM PDD, the “project activity is expected to have a lifetime of 20 years from its commissioning date”.
3. Correct and in accordance with the request.
4. The following additional information has been found incomplete and/or incorrect in the new version of the MR:
 - a. The title of the project.
 - b. Appendixes references on the table of contents.
 - c. Total Project emissions reductions achieved during the MP in section 1.2 are not consistent with the updated spreadsheet.
 - d. Project’s activity type in section 1.3.
 - e. Instructions from the MR Template has not been removed (i.e., Pts 2.3.4, 2.3.5, 2.4, 2.4.2).

Therefore, CAR 01 remains open.

Project proponent’s response

Date: 19/03/2024

2. According to the definition of project lifetime included in “program definitions” version 4.4, “Project Lifetime” is “the time period over which project activities are implemented”, and according to section C.1.2 of the CDM PDD, the “project activity is expected to have a lifetime of 20 years from its commissioning date”. The information has been updated.
4. The following additional information has been found incomplete and/or incorrect in the new version of the MR:
 - a. The title of the project. CORRECTED
 - b. Appendixes references on the table of contents. CORRECTED
 - c. Total Project emissions reductions achieved during the MP in section 1.2 are not consistent with the updated spreadsheet. CORRECTED
 - d. Project’s activity type in section 1.3. Project’s activity type has been described as indicated in the PDD.
 - e. Instructions from the MR Template has not been removed (i.e., Pts 2.3.4, 2.3.5, 2.4, 2.4.2). CORRECTED

Documentation provided by the project proponent

New version of Monitoring Report (3.0)

VVB’s evaluation

Date: 04/04/2024

After reviewing all corrected documentation, the audit team can conclude with the following:

2. Project's lifetime is properly corrected; but please, clarify how the PP has reached the Contributions over project's lifetime values in Table 1.

4. c. The total amount of ERs shown in the MR does not match with the ERS shown in the Calculation Spreadsheet.

4.d. Properly corrected.

4.e. Properly corrected.

Therefore, the Audit team concludes that the **NC/CAR id. 01 remains open.**

Project proponent's response

Date: 23/04/2024

2. About table 1: points 1 and 3; The electricity generation and emissions reduction data projected for 20 years are corrected, based on the annual generation indicated in the PDD. Table 1 point 2: about the 6 direct jobs, 2 are from Atlantica and 4 from Siemens Gamesa (the operator). Indirect jobs include, among others, prevention or environmental subcontractors.

4. c. The total amount of ERs shown in the MR (1.2) has been corrected

Documentation provided by the project proponent

New version of Monitoring Report (3.1)

230573-BRPA-R-05-B Annual Operation Review (DNV)

VVB's evaluation

Date: 22/05/2024

The audit team can confirm that all errors have been resolved, so NC/CAR 01 is closed.

NC/CAR id.

02

Date: 22/08/2023

NC/CAR description

The following information of the MR is not in accordance with the requirements to fulfil the template:

1. The contact information in the first page does not include a telephone number.
2. Section 1.6 does not describe that the total number of years of the project is not 3 renewable periods of specific circumstance of the 10 years, according to the requirement 3.9.7. of the VCS standard version 4.4.
3. Section 1.10 does not include information on the supply chain (scope 3) emissions.
4. Section 1.11 must not include activities implemented during previous monitoring periods.
5. Section 1.11 include information that does not correspond to the SDGs identified in table 1.
6. The column of table 1 "Net impact on SDG indicator" does not indicate the correct information.

7. SDG indicator of the SDG target 8.8 does not correspond to the official SDG targets and indicators in table 1. 8. The information of the “current project contributions” for the SDG target 8.8 is not correct in table 1. 9. The format dates shall be dd/mm/yyyy or dd/month/yyyy. 10. Section 5.1 does not include the monthly values of the parameter $EG_{PJ,y}$ or refers to the spreadsheet that included them.	
Project proponent’s response	Date: 09/01/2024
1. <i>In version 4.3 of the Monitoring Report template, this information no longer exists, so it has been corrected. This information is now provided in section 1.4, telephone included.</i> 2. <i>This project was validated with version 3.5 of the standard; therefore, its credit period is correct (according to section 3.8.1). Although in this verification we apply the current standard (v4.5), the monitoring report is carried out in accordance with the validated PD, including methodologies and tools still valid for the project.</i> 3. <i>This section has been replaced in the new version of the Monitoring Report template by 1.11.3 (Supply Chain (Scope 3) Emissions), in which it has been answered using a form.</i> 4. <i>Section 1.11 has been replaced in the new version of the MR by 1.12, with similar content. In this case, it has been indicated, as established in the template, that “no (additional) activities were implemented during the monitoring period”.</i> 5. <i>Corrected, as far as Table 1 refers to achievements during the monitoring period, as well as the lifetime of the project so far, but not related to any additional activities related to the SDG developed during this MP.</i> 6. <i>Corrected.</i> 7. <i>Target 8.8 in table 1 has been replaced by 8.5 as described on the official UN website, since this was the one that was referred to.</i> 8. <i>Corrected by “No jobs were created during this monitoring period”</i> 9. <i>The Monitoring Report template indicates that the dates should be filled in according to dd-mm-yyyy or dd-month-yyyy formats, instead of dd/mm/yyyy or dd/month/yyyy as proposed by the auditor. This can be checked at different points in the template such as the initial table, or sections 1.2, 1.6, 1.7 or 2.1.2.</i> 10. <i>Reference included.</i>	
Documentation provided by the project proponent	
New version of Monitoring Report (2.0)	
VVB’s evaluation	Date: 30/01/2024
The Audit team has reviewed the documentation given by the PP, and concludes the following: 1. Checked and in accordance with the request. 2. Checked and in accordance with the request. 3. Checked and in accordance with the request. 4. Data of current project contributions included in table 1 of section 1.12 is not consistent with the values of the updated spreadsheet. 5. Checked and in accordance with the request. 6. Checked and in accordance with the request. 7. Target 8.8. in table 1 has not replaced by 8.5 in the updated MR.	

8. Checked and in accordance with the request. 9. Several dates continue with incorrect format, such as some calibration dates in section 4.2. 10. Checked and in accordance with the request. Therefore, CAR 02 remains open.	
Project proponent's response	Date: 19/03/2024
4. <i>Corrected</i> 7. <i>Corrected</i> 9. <i>Corrected</i>	
<i>Documentation provided by the project proponent</i>	
New version of Monitoring Report (3.0)	
VVB's evaluation	Date: 04/04/2024
After reviewing all corrected documentation, the audit team can conclude with the following: 4 . Properly corrected. 7 . Properly corrected. 9 . The format of the dates are not properly corrected. Please, refer to VCS-Monitoring-Report-Template-v4.3 to properly include the format (i.e., dates such as ones from section 4.2 still not corrected). Therefore, the Audit team concludes that the NC/CAR id. 02 remains open.	
Project proponent's response	Date: 23/04/2024
Date from section 4.2 has been corrected	
<i>Documentation provided by the project proponent</i>	
New version of Monitoring Report (3.1)	
VVB's evaluation	Date: 22/05/2024
The audit team can confirm that all errors have been resolved, so NC/CAR 02 is closed.	

NC/CAR id.	03	Date: 23/08/2023
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NC/CAR description	
According to the MR of the previous MP, the calibration date in 2020 was moved from March (06/03/2020) to September (24/09/2020) due to Covid-19, however the maximum error factor of UTE measurers has not been applied from 01/09/2020 to 24/09/2020 (increasing imports of electricity and decreasing exports). This situation is not described in section 3.2.2 as a Project Description Deviations.	
Project proponent's response	Date: 09/01/2024
ADME issued a statement as a result of COVID-19 in which the delays caused by recalibration dates will not be taken into account.	
Documentation provided by the project proponent	
Documentation provided	
VVB's evaluation	Date: 30/01/2024
The correction factor due to the delay in the calibration shall be applied from 01/09/2020 to 24/09/2020, as it was applied during the previous MR up to 31/08/2020. Therefore, CAR 03 remains open.	
Project proponent's response	Date: 19/03/2024
<i>Despite there being an ADME document that exempts the application of this factor, a 2% correction has been applied on the 24th day of September 2020, as occurred in the MR of the previous period</i>	
Documentation provided by the project proponent	
ER Calculations - Peralta v3	
VVB's evaluation	Date: 04/04/2024
After reviewing the documentation, the Audit team concludes that the information has not been properly corrected because the correction factor has been applied only to '(A) Net electricity supplied (MWh)', but not for '(B) Wind Farm Energy Consumption (MWh)'. Therefore, the Audit team concludes that the NC/CAR id. 03 remains open.	
Project proponent's response	Date: 23/04/2024
Correction factor has been now applied to (B) Wind Farm Energy Consumption (MWh) too.	

<i>Documentation provided by the project proponent</i>	
<i>ER Calculations - Peralta v3.1</i>	
VVB's evaluation	Date: 22/05/2024
The audit team can confirm that all errors have been resolved, so NC/CAR 03 is closed.	

NC/CAR id.	04	Date: 22/08/2023
NC/CAR description		
Although the values of sale receipts and net electricity supplied in October 2022 are different, the conservative values between both readings have not been considered for emission reduction calculation as is required in the MR. Additionally, clarify the reason of the difference between both values.		
Project proponent's response		Date: 09/01/2024
<i>Corrected. Documentation provided. In July UTE paid more than expected and in October this excess was not paid by them as a compensation.</i>		
Documentation provided by the project proponent		
"ER Calculations - Peralta v2" and new version of Monitoring Report (2.0) with EG and ER data changed.		
VVB's evaluation		Date: 30/01/2024
The Audit team has reviewed the updated ERs Data Sheet and it is considered correct. Therefore, CAR 04 is closed.		

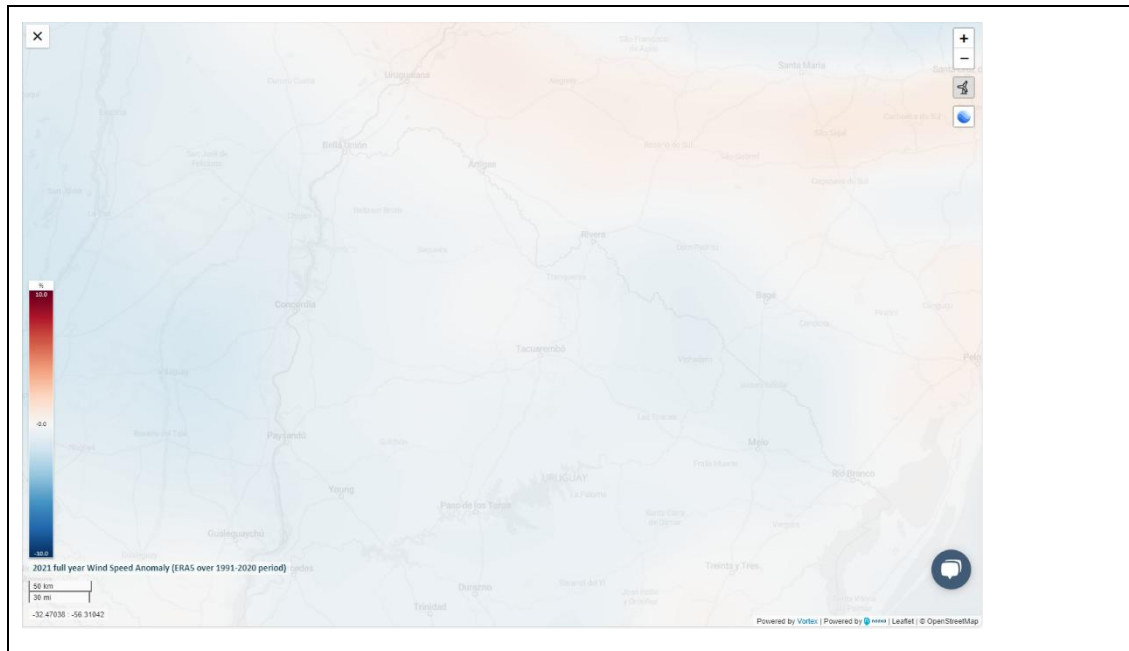
Clarifications (CLs)

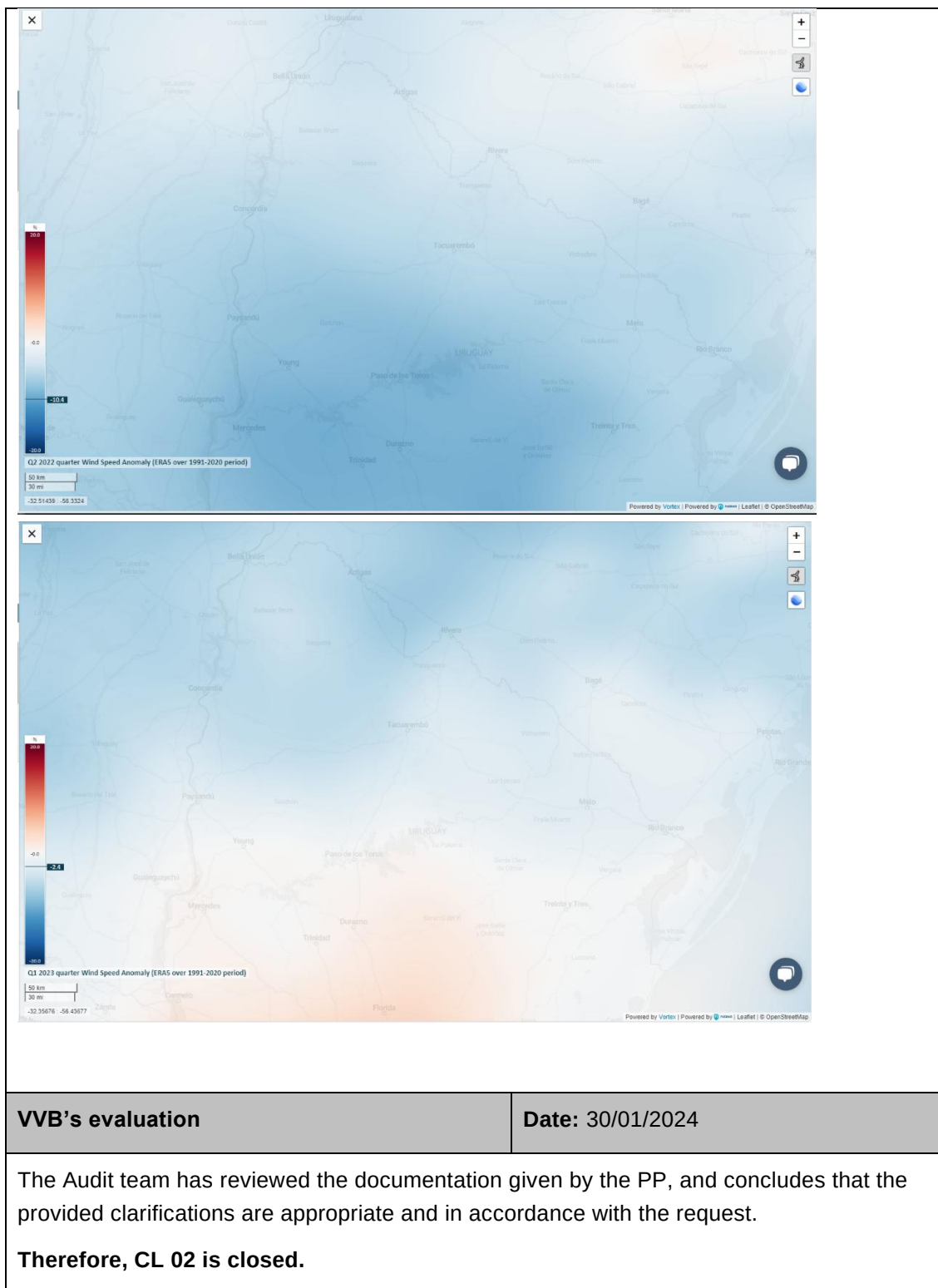
CL ID	01	Date: 22/08/2023
CL description		
The PP shall provide the following evidence: - Noise limits are within the values approved by DINAMA authority. - Monitoring plan for birds and mammals killed or damaged by the turbines established - Pictures of the special areas for the storage of all kinds of residues and their management by authorized agents. - Maintenance reports and maintenance plans. - Logbooks with daily incidents - Daily energy registers generated by SCADA, the electronic supervisory system. - Total energy curtailments during the monitoring period represent 0.37% of all the electricity generated by the wind farm during the monitoring period. - Provide the calibration certificates conducted in 2018 and 2020 to the electrical meters. - The cross-checking of data measured by UTE-meters against the records from the electronic supervisory system of the wind farm and the records for sold of electricity. - URSEA Decision No. 14002 of 27-November-2002. - Organizational chart and clarify if there was some change in the staff during the monitoring period - Training carried out during the monitoring period. - Monitoring reports developed by the monitoring officer and reviewed by the Country Manager. - Pictures of the new electricity meters and other main equipment of the project where serial number, class, model and other technical features could be checked. - Link where information of the project is published in the official web site of the operation coordinator of the National Interconnected System. - The hourly generation from the SMEC meter. - The calculation of the ex-ante emissions reductions indicated in section 5.4. - Invoices of import electricity.		
Project proponent's response		Date: 09/01/2024
<i>2020 and 2021 reports are attached. 2022 we did not carry out noise monitoring, DINAMA renewal established that the noise monitoring review was not necessary</i> <i>Documentation provided</i> <i>In this document there are the photos that are shared with DINACEA (Environmental authority). Photos of the deposits and the remittances left to us by the company that carries out the transfers (Page 17-20)</i> <i>Documentation provided</i> <i>Documentation provided</i> <i>Documentation provided</i> <i>DTE Cuchilla de Peralta I. Curtailment information is provided in this documents provided by ADME.</i> <i>Documentation provided</i> <i>Q2 2022 sampling</i> <i>Documentation provided</i>		

11. Documentation provided 12. Documentation provided 13. Country Manager review all the documents presented here. 14. Photos provided 15. There is no specific link to the project. System operator web where all data can be seen: <u>ADME</u> 16. DTE Documentation provided (Sampling) 17. Explanation of the calculation provided in section 5.4 18. Documentation provided (Sampling)	
Documentation provided by the project proponent	
Several documentation provided, as well as a new version of Monitoring Report (2.0)	
VVB's evaluation	Date: 30/01/2024
The Audit team has reviewed the documentation given by the PP, and concludes the following: The PP shall provide the document of DINAMA renewal where it is established that the noise monitoring review was not necessary already. - Checked and in accordance with the request. - Checked and in accordance with the request. - Checked and in accordance with the request. - Checked and in accordance with the request. The PP has provided pictures of the SCADA system but not the daily energy data base registered in SCADA. The PP has provided the monthly DTE records but no evidence of the value of 0.37%. - Checked and in accordance with the request. - Checked and in accordance with the request. - Checked and in accordance with the request. The PP has not clarified if there was some change in the staff during the monitoring period. - Checked and in accordance with the request. - Checked and in accordance with the request. - Checked and in accordance with the request. - Checked and in accordance with the request. - Checked and in accordance with the request. - Checked and in accordance with the request. - Checked and in accordance with the request. Therefore, CL 01 remains open until points 1 and 11 are clarified.	
Project proponent's response	Date: 19/03/2024
- Documentation provided. Mentioned in section 2.b. - There has not been any change in the organizational chart shared since 2020. We simply made a greater opening in positions and responsibilities because we were asked to do so by the ISO 14001 and 45001 auditors.	

<i>Documentation provided by the project proponent</i>	
<i>CL1.1_response.pdf</i>	
VVB's evaluation	Date: 04/04/2024
After reviewing all corrected documentation, the audit team can conclude with the following: 1 . Properly addressed and in accordance with the request. 6 . Not addressed. Please, provide the daily energy data base registered in SCADA for a closed period, e.g., 2020 September. 11 . Properly clarified. Therefore, the Audit team concludes that the CL ID 01 remains open.	
Project proponent's response	Date: 23/04/2024
Daily energy data base registered in SCADA for a closed period provided (2020 September)	
<i>Documentation provided by the project proponent</i>	
<i>Sheet "Datos Energía Palmatir Sept 20-21"</i>	
VVB's evaluation	Date: 22/05/2024
The audit team can confirm that all evidences have been addressed, so CL 01 is closed.	

CL ID	02	Date: 22/08/2023
CL description		
The PP shall clarify the reason because in February-March 2021, February-June 2022 and February 2023 specially, it is observed a reduction in the monthly generation.		
Project proponent’s response		Date: 09/01/2024
Low wind resource in summer. There is a big difference in the wind profile between the summer months and the others. Anomaly attached.		
Documentation provided by the project proponent		





CL ID	03	Date: 22/08/2023
CL description		
The PP shall clarify if the records of sold of UTE are the DTE spreadsheets and provide the emails with the original DTE spreadsheets or clarify how these files are received from UTE.		
Project proponent's response		Date: 09/01/2024
<i>DTE files are received through ADME's SII system. There is an account to access to this system. DTEs sheet were previously shared.</i>		
Documentation provided by the project proponent		
<i>DTEs sheets were previously shared</i>		
VVB's evaluation		Date: 30/01/2024
The Audit team has reviewed the documentation given by the PP, and concludes that the provided clarifications are appropriate and in accordance with the request. Nevertheless, DME's SII system is pending to be reviewed in a remote interview. Therefore, CL 03 is closed.		

CL ID	04	Date: 22/08/2023
CL description		
The PP shall clarify if the new meters were calibrated in the same moment of the installation on 02/06/2022, and in this case, evidence shall be provided, or they were not calibrated up to 26/08/2022, and this case, the period from June to August would not be cover for any calibration and a conservative corrected factor shall be applied to the measurements carried out from the installation date to the calibration date.		
Project proponent's response		Date: 09/01/2024
<i>In 2022 the meters were calibrated in May and then in August they were changed for new ones that were also calibrated.</i>		
Documentation provided by the project proponent		
Documentation provided		
VVB's evaluation		Date: 30/01/2024

The answer provided by the PP is not consistent with the information set on the MR. Hence, provide a proper evidence of the installation date of the new meters. In addition, please provide clarifications on the intention of the reports sent (CERTIFICADO_ 221741 and CERTIFICADO_221740). Therefore, CL 04 remains open.	
Project proponent's response	Date: 19/03/2024
<i>Information corrected in MR. The laboratory calibration on 26/08 and the correct installation date was 27/10.</i> <i>Both certificates mentioned above are calibration procedures established.</i>	
Documentation provided by the project proponent	
<i>Documentation provided. Adme response by mail attached.</i>	
VVB's evaluation	Date: 04/04/2024
After reviewing all corrected documentation, the audit team can conclude that the calibrations were made before the installation. Therefore, the Audit team concludes that the CL ID 04 is closed.	