



**Verified Carbon
Standard**

GREATER NEW BEDFORD LFG UTILIZATION PROJECT VERIFICATION REPORT



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Summary:

TÜV SÜD America Inc. was contracted by CommonWealth New Bedford Energy LLC (CNBE) to verify the Greater New Bedford LFG Utilization Project (Project) for the monitoring period from 1 January 2024 to 31 December 2024. The Project, located at the Crapo Hill Landfill located in Dartmouth, Massachusetts, United States, and owned by the Greater New Bedford Regional Refuse Management District (the District), involves the expansion and improvement of the landfill gas collection system and destruction of methane using four Caterpillar engines (3.3 MW net capacity) and a backup flare. The Project reduces GHG emissions by capturing and destroying methane that would otherwise be released to the atmosphere.

The purpose of the verification was to provide an independent, third-party assessment of the Project's reported GHG emission reductions to determine whether they are accurate, complete, consistent, and compliant with the VCS Standard, the approved methodology, and the validated Project Description. The scope included review of monitoring data, calculations, and procedures for the stated monitoring period.

Verification activities included a site visit to the Project to observe equipment and operations, interviews with key personnel, and a detailed review of project data and documentation. The verification was conducted in accordance with ISO 14064-3 principles and VCS Program requirements, using a risk-based approach.

During the process, the verification team raised two corrective action requests, five additional documentation requests, and four clarification requests, all of which were satisfactorily resolved. In addition, the team identified one non-material finding that was not addressed, resulting in an under-reporting difference of less than 0.01% of the total CO₂e emission reductions reported.

The verification team concludes, to a reasonable level of assurance, that the Project's GHG statement of 110,197 metric tonnes of CO₂e emission reductions for the monitoring period is free from material misstatement and presented in accordance with VCS Program requirements.

CONTENTS

1	INTRODUCTION	4
1.1	Objective	4
1.2	Scope and Criteria	4
1.3	Level of Assurance.....	4
1.4	Summary Description of the Project	5
2	VERIFICATION PROCESS	5
2.1	Method and Criteria.....	5
2.2	Document Review	6
2.3	Interviews	7
2.4	Site Visits	7
2.5	Resolution of Findings	7
2.6	Eligibility for Validation Activities	8
3	VALIDATION FINDINGS	8
3.1	Methodology Deviations.....	8
3.2	Project Description Deviations.....	10
3.3	New Project Activity Instances in Grouped Projects.....	11
3.4	Baseline Reassessment	11
4	VERIFICATION FINDINGS.....	12
4.1	Project Details	12
4.2	Safeguards and Stakeholder Engagement	13
4.3	Accuracy of Reduction and Removal Calculations.....	22
4.4	Quality of Evidence to Determine Reductions and Removals.....	27
4.5	Non-Permanence Risk Analysis.....	28
5	VERIFICATION OPINION.....	28
5.1	Verification Summary	28
5.2	Verification Conclusion	29
5.3	Ex-ante vs Ex-post ERR Comparison	29
	APPENDIX 1: DOCUMENTS REVIEWED.....	31
	APPENDIX 2: LIST OF FINDINGS.....	32

1 INTRODUCTION

1.1 Objective

The objective of the verification is to provide an independent, third-party assessment of the Greater New Bedford LFG Utilization Project's (Project's) reported GHG emission reductions to determine whether they are accurate, complete, consistent, and compliant with the VCS Standard, the project's approved methodology, and the validated Project Description (PD). The verification assesses whether the monitoring data, calculations, and procedures are reliable, and whether the reported emission reductions or removals are a true and fair representation of the Project's performance for the monitoring period.

1.2 Scope and Criteria

This verification assessed the Project's activities during the thirteenth monitoring period—01 January 2024 to 31 December 2024—within its second crediting period—29 March 2016 to 28 March 2026—focusing on greenhouse gas (GHG) emission reductions from landfill gas (LFG) collection and destruction, associated equipment emissions, and the monitoring and reporting of LFG quantities and methane content.

The verification team assessed the Project against the following criteria:

- VCS Standard, v4.7, Issued 19 September 2019, Updated 16 April 2024 (VCS Standard);
- VCS Program Guide v4.4, Issued: 19 September 2019, Updated 29 August 2023;
- CDM Methodology ACM0001 Large-scale Consolidated Methodology – Flaring or use of landfill gas, v16, dated 16 October 2015 (Methodology)
- VCS Validation and Verification Manual, v3.2, Issued 4 October 2012, Updated 19 October 2016;
- Validated Project Description, Greater New Bedford LFG Utilization Project Dartmouth, Massachusetts, v6, dated 12 May 2016; and
- ISO 14064-3:2019 Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas statements.

1.3 Level of Assurance

The verification was conducted to a reasonable level of assurance.

1.4 Summary Description of the Project

The Greater New Bedford LFG Utilization Project is located at the Crapo Hill Landfill located in Dartmouth, Massachusetts, United States owned by the Greater New Bedford Regional Refuse Management District. Developed by Commonwealth New Bedford Energy LLC (CNBE), a wholly-owned subsidiary of Commonwealth Resource Management Corporation (CRMC), the Project reduces greenhouse gas (GHG) emissions by collecting and destroying methane from landfill gas that would otherwise be released to the atmosphere in the absence of the Project.

The Project involves the expansion and improvement of the landfill gas collection system and the destruction of methane using four Caterpillar 3516 engines with a combined net capacity of approximately 3.3 MW for electricity generation. A backup open flare is also installed to ensure continuous destruction of methane when engines are offline. For this monitoring period, no emission reductions were claimed for methane destruction by the flare, as it did not operate for a significant duration. Electricity generated is exported to the grid; however, emission reductions are claimed solely for methane destruction, not for displaced grid emissions.

Prior to the Project, the District had voluntarily installed a limited LFG collection system and flare. Emission reductions attributable to this baseline system are excluded from the Project's baseline emissions calculations.

2 VERIFICATION PROCESS

2.1 Method and Criteria

TÜV SÜD applied a risk-based approach to verify the Project against VCS Program rules and criteria defined in Section 1.2. This approach was chosen to focus on areas with the highest potential for material misstatement.

The verification process included the following independent and objective activities:

- A verification team was selected according to TÜV SÜD's GHG Verification Policies & Procedures to ensure team members were qualified. The verification team consisted of the following individuals:
 - Lead Verifier: Nina Pinette
 - Independent Reviewer: Garrett Heidrick
- The team completed a conflict of interest review, which revealed no conflicts with the project proponent.
- The team held a verification kick-off meeting with CNBE on 21 May 2025 to introduce the project proponent and verification teams; to review verification objectives, process, and VCS requirements; to confirm the schedule; and to request data and documents.

- The team performed a strategic analysis and risk assessment of the received data and support documents to understand the scope and identify areas of potential risk in reported GHG emission reductions.
- The team developed a risk-based evidence-gathering plan based on the strategic analysis and risk assessment. The plan was revised as needed based on additional risk assessments.
- The lead verifier conducted a site visit to the Project on 29 September 2025 to observe equipment and operations and interview key personnel involved in the Project.
- The team conducted a detailed desktop review of submitted data and documents including source data, QA/QC evidence, and emission reduction calculations.
- The team submitted corrective action requests, non-material findings, additional documentation requests, and clarification requests, as necessary, throughout the verification as documented in the List of Findings (Appendix 2).
- The team prepared the final Verification Report and Opinion, summarizing the verification findings and conclusions.
- The independent reviewer completed a review of the process, findings, and report and opinion.
- The verification team held an exit meeting with CNBE to communicate final results and address remaining questions.

2.2 Document Review

The verification included reviews of the Monitoring Report, emission reduction calculations, and all supporting documentation. These were cross-checked and compared against the applicable requirements of the VCS Program, the approved methodology, and the validated PD. The verification team assessed the completeness, accuracy, and consistency of reported data by:

- Reviewing source data and records, including landfill gas flow and methane concentration measurements, evidence supporting project emissions, QA/QC logs, and documentation for safeguards and stakeholder engagement requirements.
- Cross-checking emission reduction calculations against the methods and equations identified in the validated PD and verifying the application of all project parameters.
- Evaluating compliance with VCS rules and the validated PD including project-specific monitoring procedures.

A list of data and documents reviewed is provided in Appendix 1.

2.3 Interviews

Throughout the verification process, the verification team engaged in discussions with Tom Yeransian of Commonwealth Resource Management Corporation, who responded to requests documented in the List of Findings and provided project data and supporting documents.

During the verification site visit on 29 September 2025, the lead verifier interviewed key project personnel including:

- Tom Yeransian, Principal of Commonwealth Resource Management Corporation
- Eric Nowicki, Power Plant Operator/Engineer at Commonwealth New Bedford Energy LLC

These interviews were conducted to verify information in the Monitoring Report and explain project operations, data monitoring procedures, data collection and aggregation processes, and QA/QC practices. As noted in Section 2.4, the personnel also provided an overview of project facilities and monitoring equipment.

2.4 Site Visits

The lead verifier conducted a site visit to the Project on 29 September 2025 to observe project operations and monitoring instruments, verify physical implementation, and gather evidence supporting the Monitoring Report and emission reduction calculations.

During the visit, the verifier toured the project facility, including the engines, LFG flow meter and analyzer, SCADA system, and data collection and aggregation processes. The visit also included observation of project emission sources and assessment of organizational aspects such as roles and responsibilities of operational staff.

As described in Section 2.3, interviews were conducted with CNBE representatives during the site visit to confirm monitoring practices and QA/QC procedures.

2.5 Resolution of Findings

The verification team used the List of Findings to communicate corrective action requests, non-material findings, additional documentation requests, and clarification requests to CNBE. During the verification process, the team raised two corrective action requests, one non-material finding, five additional documentation requests, and four clarification requests. All findings were satisfactorily resolved.

Detailed descriptions of each finding, the responses provided, and the final conclusions are included in the List of Findings (Appendix 2).

2.5.1 Forward Action Requests

There were no Forward Action Requests (FARs) issued during the verification.

A FAR was issued during validation, as described in the Validation Report:

“[VB] notes that at the time of Re-Validation the capacity of the Crapo Hill Landfill (landfill site) is below the threshold of approximately 2.5 million cubic meters of design disposal capacity and 50 Mg of NMOC emissions that are set out as per New Source Performance Standards (NSPS) and Existing Facility Guidelines (EGs) for Landfills (40 CFR 51, 52 and 60 March 12, 1996). However, as per the PDD the landfill site is due to be expanded in the future to a capacity greater than 2.5 million cubic meters and there may also be amendments or updates to the regulations as per the proposals issued by the U.S. Environmental Protection Agency (EPA) on August 14, 2015. As a result, [VB] has raised this forward action request for future verifications during the crediting period to address any changes in the capacity of the landfill site and the applicable regulations.

The verification team assessed whether the capacity of the landfill remains below the threshold—now 34 Mg as set out per NSPS for landfills in 40 CFR Part 60, Subpart XXX which updated and replaced 40 CFR Part 60 Subpart WWW—for this monitoring period. CNBE provided a third-party report which shows the calculated NMOC emissions for 2024 to be 7.9 Mg/year. This satisfies the FAR raised during the validation to address any changes in the capacity of the landfill site and the applicable regulations during future verifications.

2.6 Eligibility for Validation Activities

TÜV SÜD holds accreditation for validation under the relevant sectoral scope.

As part of this verification, six methodology deviations previously validated remain applicable to the Project, as described in Section 3.1. In addition, two project description deviations were reviewed and approved by the verification team during this verification.

3 VALIDATION FINDINGS

3.1 Methodology Deviations

There were six methodology deviations identified in the validated PD and reviewed and approved at validation. They continue to apply for the Project:

1. The SCADA system was programmed to calculate the methane gas flow in units of million British thermal units (MMBtu) using standardized gas flow (at 68°F and one atmosphere of pressure), methane concentration, the gross heat content (higher heating value) of methane, and the actual temperature and pressure. CNBE determines the volume of methane destroyed by converting the MMBtu values to total methane gas flow in standard cubic feet. This deviation from the monitoring methodology was previously approved by independent verifiers and had a conservative impact on the quantification of GHG emissions reductions.

2. The Project reference conditions are 20 degrees Centigrade and 1 atmosphere rather than ACM0001 reference conditions of 0 degrees Centigrade and 1 atmosphere.
3. A separate LFG meter is not present on each of the four combustion engines. A single meter is used immediately before the piping splits to each engine. This meter is continuously recording data. Operating data is tracked for each engine so it is possible to calculate the flow destroyed by each engine and to ensure that LFG is destroyed. Flow controls are in place to ensure no LFG is sent to an engine that is not operating. This does not affect the conservativeness of the emissions reductions claimed.
4. Ex-ante emissions reductions calculations use historic Project specific data as the basis for projecting future emissions rather than the required CDM estimation tools. Using real data allows the estimations to be more accurate and reflect actual Project operating conditions. This does not affect the conservativeness of the emissions reductions claimed but increases the accuracy of the ex-ante projections ensuring the project is forecasting obtainable, appropriate emissions reductions.
5. There is no flow meter installed on the collection pipe from the District Initial System to separately monitor the contribution of the original baseline system. Given the collection system design and meter requirements, installing a meter at this location would not produce reliable, meaningful results. Instead, well-head flow measurements are collected manually two times each month. These results are used to calculate the relative contribution of the District Initial System to the overall flow of LFG destroyed by the engines. This portion of the total flow represents FCH₄, BL_y and will be calculated on a monthly basis and subtracted from the total flow to account for the amount of methane destroyed in the baseline scenario. This approach represents an accurate measurement of the flow because (a) the portion of the landfill that includes the District Initial System (Phase 1) is capped so no landfill gas can be passively emitted to the atmosphere, and (b) the remaining active wells from the District Initial System are located in such a way as to enable capture of all LFG generated within the sphere of influence of the District Initial System. This deviation decreases the conservativeness of the emissions reductions claimed but significantly increases the accuracy of the calculations as is allowable under VCS Standard v3.5, Section 3.5.1.
6. The Project uses the eGrid electricity emissions factor rather than the default emissions factor provided in the CDM tool as explained in the project emissions section. This deviation decreases the conservativeness of the emissions reductions claimed but significantly increases the accuracy of the calculations as is allowable under VCS Standard v3.5, Section 3.5.1.

There were no additional methodology deviations applied to the Project during the monitoring period.

3.2 Project Description Deviations

There were two project description deviations that apply to this monitoring period. Both are identified in the Monitoring Report:

1. Frequency of measurement and recording of methane content of LFG while the analyzer was out for service: The California Analytical Instrument was sent out for factory repair, service and calibration on May 14, 2024 and returned to service on July 26, 2024. During the period that the CA Analytical was out for service, the handheld instrument was used once per day to measure methane content in the landfill gas. The handheld instrument was calibrated once per week using a 50% methane span gas. The daily methane content was manually placed into the SCADA and was used in the daily MMBTU calculation. Specifically, the kSCF of LFG was multiplied by the methane content reading to obtain quantity of methane in the day and then converted to MMBTUs by further calculation.

Under 5.3.1 Data Collection, the PD contemplates the use of handheld meters. Specifically, the PD states that "Each week or more frequently as necessary, CNBE calibrates methane concentration measured on an automated basis by a California Instruments NDIR Analyzer installed at the Project, and any hand-held instrument that may be used in addition to the NDIR Analyzer is calibrated prior to its use. CNBE has found that weekly calibrations are sufficient to provide accurate measurements because of the reliable performance of the instrument, and the stringent dependence of engine operations on the accuracy of the methane measurements."

Therefore, a handheld instrument was contemplated to be used in addition to the CA Analytical when service or repair of the instrument is required. However, this does represent a deviation from typical normal operation. Given that methane content does not vary significantly during each day, the daily methane reading does not materially affect the accuracy of the results. Use of the daily methane reading ensures methodological compliance without affecting additionality or the appropriateness of the baseline scenario.

The verification team validated this deviation to the PD as it does not affect the applicability of the applied methodology, the Project continues to meet additionality criteria, and the deviation does not alter the baseline scenario or its appropriateness as previously validated. The deviation is appropriately described and justified. Using a handheld instrument to measure daily methane content for ten weeks while the continuous analyzer was serviced is reasonable. The average methane content during this period was within one percentage point of the average recorded by the continuous analyzer, indicating consistency and reliability.

The verification team concluded that the deviation is valid and the Project remains in conformance with VCS program requirements.

2. Calculation of LFG collected by the District Initial System. The initial wells that remain functioning are short vertical wells on side slopes of the Phase 1 area of the landfill that contain waste from at least 25 to 30 years ago. The wellheads are designed to have measurable operating ranges of 5 to 125 scfm of landfill gas. Each contains a pitot tube to measure flow. The pitot tube and manometer measure flow by differential pressure across the velocity and static pressures. At low flow rates, the velocity pressure becomes very small. The differential pressure that corresponds to 1 to 5 scfm flow rate is 0.001 to 0.005 inches of water gauge, which is so small that the resolution, noise and fluctuations in the system make the accuracy of the measurement unreliable. Near and below the low-end (e.g., <5 SCFM for 2" models), readings typically default to "no flow" or show instability.

The District's landfill technician provided data showing that all the initial wells are near or at 0 flow rate and have poor gas quality (e.g. <40% methane content). Because of these factors, a conservative approach was adopted, setting the historical results to 5 scfm (e.g. the lower limit for accurate flow) of landfill gas containing 50% methane content for each well in the District Initial System, which overestimates the quantity of methane from the initial system. As a result, this deviation leads to an overstatement of methane quantities, which ultimately provides a conservative approach, reduces the emissions reduction claims, and ensures compliance with methodology without impacting additionality or the suitability of the baseline scenario.

The verification team validated this deviation to the PD as it does not affect the applicability of the applied methodology, the Project continues to meet additionality criteria, and the deviation does not alter the baseline scenario or its appropriateness as previously validated. The deviation is appropriately described and justified. This project description deviation is related to Methodology Deviation #5: instead of collecting wellhead flow measurements manually two times each month to calculate $F_{CH_4,BL,y}$, a conservative estimate of wellhead flow is used.

The verification team concluded that the deviation is valid and the Project remains in conformance with VCS program requirements.

3.3 New Project Activity Instances in Grouped Projects

Not applicable as the Project is not a grouped project.

3.4 Baseline Reassessment

Did the project undergo baseline reassessment during the monitoring period?

☐ Yes ☒ No

4 VERIFICATION FINDINGS

The verification team reviewed the Monitoring Report for this monitoring period to confirm that it is accurate, complete, and clearly reflects the implementation of the Project. The team also verified that the reported details are supported by appropriate evidence and data. A summary of the review is provided in the sections below.

4.1 Project Details

Item	Evidence gathering activities, evidence checked, and assessment conclusion:
Audit history	The verification team reviewed the audit history table as shown in the Project Monitoring Report and concluded that the information provided is accurate.
Double counting and participation under other GHG programs	The verification team confirmed that the Project is neither receiving nor seeking credit for emission reductions from the project activity under any other GHG program. This was verified through interviews with the project proponent and an independent review of publicly available offset registries. The Project was previously listed with ACR, and the last year credits were registered under that program was 2008. Additionally, the project proponent provided an attestation stating that all emission reductions for this monitoring period will be registered exclusively with VCS. Based on the evidence reviewed, the verification team concludes that the Project is not claiming GHG reductions under another program and it has not been rejected by another program.
No double claiming with emissions trading programs or binding emission limits	The verification team confirmed that GHG emission reductions generated by the Project have not been included in an emissions trading program or any other mechanism that includes GHG allowance trading.
No double claiming with other forms of environmental credit	The verification team confirmed that the Project is not double claiming GHG-related environmental credits against VCS Standard requirements. The Project generates Renewable Energy Certificates (RECs) for renewable energy generation; however, this does not constitute double claiming because the Project does not claim GHG emission reductions associated with the displacement of grid electricity through renewable generation.

Supply chain (scope 3) emissions double claiming	The project proponent is not a buyer or seller of products whose emissions are affected by the Project, and there is no overlap with Scope 3 emissions reported by other entities; therefore, no public statement is required.
Sustainable development contributions	The verification team reviewed the Project's implementation of activities contributing to the sustainable development contributions (SDGs) described in the Monitoring Report. Based on the evidence reviewed, the following contributions were confirmed to be consistent with the project's design and monitoring data: • SDG 7 - Ensure access to affordable, reliable, sustainable and modern energy for all: The project generates reliable, low-cost renewable energy supplied to local utilities. • SDG 9 - Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation: The Project increases LFG collection through system expansion and installation of an automated collection system. • SDG 13 - Take urgent action to combat climate change and its impacts: The Project collects and destroys methane in LFG, thereby reducing methane emissions to the atmosphere.
Additional information relevant to the project	Financial information not relevant to Project verification has been redacted from Exhibit 9 of the Monitoring Report (RECs Agreements).

4.2 Safeguards and Stakeholder Engagement

4.2.1 Stakeholder Identification

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Stakeholder identification	There were no changes identified in stakeholder makeup since validation.
Legal or customary tenure/access rights	There were no changes identified in stakeholder makeup since validation.

Stakeholder diversity and changes over time	There were no changes identified in stakeholder makeup since validation.
Expected changes in well-being	There were no changes identified in stakeholder makeup since validation.
Location of stakeholders	There were no changes identified in stakeholder makeup since validation.
Location of resources	There were no changes identified in stakeholder makeup since validation.

4.2.2 Stakeholder Consultation and Ongoing Communication

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Ongoing consultation	Project stakeholders are identified as CNBE and the District. According to the Monitoring Report, CNBE communicated with the District on a daily basis during the work week and held monthly meetings with the District following CNBE operations meetings. The verification team confirmed ongoing stakeholder communication throughout the monitoring period through interviews with CNBE and a review of supporting evidence, including samples of email correspondence between CNBE and the District and log of emails between CNBE and the District. Based on the evidence reviewed, the verification team concludes that the project meets the ongoing stakeholder consultation requirements.
Date(s) of stakeholder consultation	Ongoing consultation. Monthly meetings occurred during the monitoring period. Emails occurred on a nearly daily basis.
Communication of monitored results	The verification team confirmed that stakeholder communications were conducted via daily emails, telephone communications, and in-person meetings.
Consultation records	The verification team reviewed records including email correspondence between CNBE and the District and logs of emails between CNBE and the District. CNBE also prepares and submits to the District the Project's performance in the "Statement for Purchase of Landfill Gas from the District" for each month.

Stakeholder input	The verification team confirmed with CNBE that no stakeholder comments or feedback during this monitoring period led to any changes in project implementation or project design.
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4.2.3 Free, Prior, and Informed Consent

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Consent	The FPIC requirement is not applicable to this Project because it does not impact the land, territories, or resource rights of Indigenous Peoples, local communities, or customary rights holders. CNBE has obtained all necessary legal authorizations and permissions for Project development at the landfill site and for the collection, use, and destruction of landfill gas.
Outcome of FPIC discussion	The Project does not affect Indigenous Peoples, local communities, or customary rights holders; therefore, no FPIC process or related discussions were required.

4.2.4 Grievance Redress Procedure

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Grievance received and steps taken to resolve the grievance including the outcomes of the resolution	CNBE reported that no grievances related to the Project were received during this monitoring period or the current crediting period. The verification team reviewed this with CNBE to confirm whether any grievances, comments, or feedback were received during or related to the monitoring period and found no evidence of any grievances.
Grievance redress procedure	The verification team confirmed that CNBE maintains a grievance redress procedure to receive and address grievances. Contact information for CRMC, the parent company of CNBE, and the District, including phone numbers and email addresses, is publicly available on their respective websites. In addition, the District operates an odor hotline for public reporting. Based on the evidence reviewed, the verification team concludes that the Project meets requirements for the grievance redress procedure.

4.2.5 Public Comments

CNBE reported that no public comments related to the Project were received during this monitoring period.

Comments received	Actions taken by the project proponent	Evidence gathering activities, evidence checked, and assessment conclusion
None	N/A	N/A

4.2.6 Risks to Local Stakeholders and the Environment

4.2.6.1 Management Experience

The verification team reviewed CNBE's description of management experience as presented in the Monitoring Report and discussed the management team's qualifications and experience with CNBE. The team also has firsthand experience working with CNBE on other LFG utilization projects.

Based on discussions and evidence reviewed, the verification team concludes that CNBE possesses the technical, environmental, and management expertise required to implement and operate the Project. Its experience in LFG utilization projects aligns with VCS Standard requirements. No gaps in expertise were identified, and therefore no additional partnerships or recruitment strategies are necessary.

4.2.6.2 Risk Assessment

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Natural and human induced risks to stakeholders' wellbeing	No risks identified by CNBE. The landfill was pre-existing prior to project implementation and underwent a comprehensive permitting and regulatory review process. Based on the evidence reviewed and discussions with CNBE, the verification team agrees with CNBE's assessment that the Project does not introduce additional natural or human-induced risks to stakeholder wellbeing.
Risks to stakeholder participation	No risks to stakeholder participation were identified by CNBE. The verification team confirmed that stakeholders have continued opportunities to provide feedback and raise concerns through established communication channels. Based on discussions with CNBE and a review of the plan, the verification team agrees with CNBE's assessment that no risks to stakeholder participation have been identified.

Working conditions	CNBE identified one potential risk associated with working conditions: operations-related risks. To mitigate these risks, the landfill maintains a comprehensive Safety Plan, a Spill Prevention Control & Countermeasures Plan for Project operations, safety training, logs, and insurance coverage. Based on discussions with CNBE and a review of the sample of the plans, the verification team confirms that CNBE's assessment is accurate and that the mitigation measures are appropriate.
Safety of women and girls	No risks to the safety of women and girls were identified by CNBE. The Project is located within the United States, where federal and state laws prohibit unsafe working conditions and establish strict labor and age-related protections. The Project has received no complaints related to the safety of women and girls. The verification team agrees with CNBE's assessment that no risks the safety of women and girls have been identified.
Safety of minority and marginalized groups, including children	No risks to the safety of minority and marginalized groups, including children, were identified by CNBE. The Project is located in the United States, where comprehensive federal and state laws prohibit discrimination and unsafe labor practices, providing protections for all workers, including minorities and children. The Project has received no complaints related to discrimination or safety concerns. Based on the evidence reviewed, the verification team agrees with CNBE's assessment that no risks to the safety of minority and marginalized groups, including children, have been identified.
Pollutants (air, noise, discharges to water, generation and release of hazardous materials and chemical pesticides and fertilizers)	CNBE identified one potential risk associated with pollutants: the uncontrolled release of landfill gas. However, the Project is specifically designed to collect and control landfill gas generated by the landfill, thereby reducing uncontrolled emissions and providing a net environmental benefit. The Project does not release hazardous materials, chemical pesticides, or fertilizers to the environment. Based on discussions with CNBE and the evidence reviewed, the verification team confirms that CNBE's assessment is accurate.

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
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Discrimination	CNBE identified no risks related to discrimination. Discrimination is explicitly prohibited by CNBE and is regulated under United States federal and Massachusetts state laws, which provide comprehensive labor protections and enforce workplace standards. Based on discussions with CNBE, the verification team confirms that no risks related to discrimination have been identified and that appropriate measures and legal safeguards are in place to prevent such risks during the monitoring period.
Sexual harassment	CNBE identified no risks related to sexual harassment. Sexual harassment is explicitly prohibited by CNBE and is regulated under United States federal and Massachusetts state laws, which provide comprehensive labor protections and enforce workplace standards. Based on discussions with CNBE, the verification team confirms that no risks related to sexual harassment have been identified and that appropriate measures and legal safeguards are in place to prevent such risks during the monitoring period.
Gender equity in labor and work	CNBE identified no risks related to gender equity in labor and work. Gender inequity is explicitly prohibited by CNBE and is regulated under United States federal and Massachusetts state laws, which provide comprehensive labor protections and enforce workplace standards. Based on discussions with CNBE, the verification team confirms that no risks related to gender equity in labor and work have been identified and that appropriate measures and legal safeguards are in place to prevent such risks during the monitoring period.
Forced labor	CNBE identified no risks related to forced labor. Forced labor is explicitly prohibited by CNBE and is regulated under United States federal and Massachusetts state laws, which provide comprehensive labor protections and enforce workplace standards. Based on discussions with CNBE, the verification team confirms that no risks related to forced labor have been identified and that appropriate measures and legal safeguards are in place to prevent such risks during the monitoring period.
Child labor	CNBE identified no risks related to child labor. Child labor is explicitly prohibited by CNBE and is regulated under United States federal and Massachusetts state laws, which provide comprehensive labor protections and enforce workplace standards. Based on discussions with CNBE, the verification team confirms that no risks related to child labor have been identified and that appropriate measures and legal

	safeguards are in place to prevent such risks during the monitoring period.
Human trafficking	CNBE identified no risks related to human trafficking. Human trafficking is explicitly prohibited by CNBE and is regulated under United States federal and Massachusetts state laws, which provide comprehensive labor protections and enforce workplace standards. Based on discussions with CNBE, the verification team confirms that no risks related to human trafficking have been identified and that appropriate measures and legal safeguards are in place to prevent such risks during the monitoring period.

4.2.7.2 Human Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
CNBE identified no risks related to human rights.	The Project is located on privately owned land in the United States with no indigenous or customary land claims and therefore does not affect the rights of Indigenous Peoples or local communities. The verification team reviewed the Monitoring Report, landfill permits, stakeholder agreements, and conducted site visit discussions, confirming compliance with U.S. laws and international human rights standards, including the UN Declaration on the Rights of Indigenous Peoples. No human rights risks were identified.

4.2.7.3 Indigenous Peoples and Cultural Heritage

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
CNBE identified no risks related to indigenous peoples and cultural heritage.	The Project does not affect Indigenous Peoples, local communities, or customary rights holders. As such, no mitigation or preventative measures were required, and this section is not applicable. Based on the evidence reviewed, the verification team confirms that no risks related to indigenous peoples and cultural heritage have been identified during the monitoring period.

4.2.7.4 Property Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
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CNBE identified no risks related to property rights.	The Project does not affect property rights of Indigenous Peoples, local communities, or customary rights holders. As such, no mitigation or preventative measures were required, and this section is not applicable. Based on the evidence reviewed, the verification team confirms that no property rights risks have been identified during the monitoring period.
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4.2.7.5 Benefit Sharing

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Summary of the benefit sharing plan	The verification team reviewed CNBE's benefit sharing plan which provides payments to the District for LFG utilized by the Project, along with additional contingent payments based on the sale of products generated by the Project. This arrangement benefits the District and its two host communities—the City of New Bedford and the Town of Dartmouth—by supporting the District's legislated solid waste management responsibilities.
Benefit sharing during the monitoring period	There were no changes to this plan during the Monitoring Period. This arrangement is documented in the Landfill Gas Purchase & Sale Agreement. Based on discussions and evidence reviewed, the verification team concludes that CNBE has made payments to the District in accordance with the agreement.

4.2.8 Ecosystem Health

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Impacts on biodiversity and ecosystems	CNBE identified no risks related to biodiversity and ecosystems as the Project has no impact on biodiversity and ecosystem health. The verification team confirms that CNBE's assessment is accurate.
Soil degradation and soil erosion	CNBE identified no risks related to soil degradation and soil erosion as the Project has no impact on soil degradation and soil erosion. The verification team confirms that CNBE's assessment is accurate.
Water consumption and stress	CNBE identified no risks related to water consumption and stress as the Project has no impact on water consumption and stress. The verification team confirms that CNBE's assessment is accurate.

4.2.8.1 Rare, Threatened, and Endangered species

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Species or habitat	CNBE identified no project impacts to habitats and areas needed for habitat connectivity for rare, threatened, or endangered species as the Project is not located in or adjacent to habitats for rare, threatened, or endangered species. The verification team confirms that CNBE's assessment is accurate.
Areas needed for habitat connectivity	CNBE identified no project impacts to habitats and areas needed for habitat connectivity for rare, threatened, or endangered species as the Project is not located in or adjacent to habitats for rare, threatened, or endangered species. The verification team confirms that CNBE's assessment is accurate.

	Evidence gathering activities, evidence checked, and assessment conclusion
Habitats for rare, threatened, and endangered species	CNBE identified no risks related to habitats for rare, threatened, and endangered species as the Project is not located in or adjacent to habitats for rare, threatened, or endangered species. The verification team confirms that CNBE's assessment is accurate.
Areas for habitat connectivity	CNBE identified no risks related to areas needed for habitat connectivity for rare, threatened, or endangered species as the Project is not located in or near such habitats. The verification team confirms that CNBE's assessment is accurate.

4.2.8.2 Introduction of Species

Species introduced	Evidence gathering activities, evidence checked, and assessment conclusion
None	The Project has no planting or species introduction and thus this section is not applicable.
Existing invasive species	Evidence gathering activities, evidence checked, and assessment conclusion
None	The Project has no planting or species introduction and thus this section is not applicable.

Evidence gathering activities, evidence checked, and assessment conclusion	
Invasive species	The Project has no planting or species introduction and thus this section is not applicable.

4.2.8.3 Ecosystem conversion

Item	Evidence gathering activities and evidence checked
Ecosystem conversion	The Project is not an ARR, ALM, WRC, or ACoGS project and thus this section is not applicable.

4.3 Accuracy of Reduction and Removal Calculations

CNBE calculated the Project's emission reductions using the equations described in ACM0001 and the validated PD. The verification team assessed the accuracy of these calculations by:

- Reviewing source data for each relevant parameter (see Table 1) to confirm accuracy of values applied,
- Checking calculation integrity, including spreadsheet formulas, conversions, and aggregation of data,
- Verifying that the equations and emission factors used align with the validated PD and the monitoring plan,
- Assessing default values for appropriateness and conformance with VCS Program rules, and
- Checking for transcription errors between data and calculated emission reductions.

The verification team independently recalculated emission reductions using verified parameters (Table 1) and confirmed that reported emission reductions are materially correct and quantified in accordance with the applied methodology and monitoring plan.

A summary of the review of each parameter and verified values is provided in Table 1.

Table 1. Assessment of Data and Parameters

Parameter	Description	Data Source	Review Summary and Evidence	Values Verified for Monitoring Period
OX _{top_layer}	Fraction of methane that would be oxidized in the top layer of the SWDS in the baseline scenario	Consistent with how oxidation is accounted for in the methodological tool “Emissions from solid waste disposal”	Confirmed consistency with PD for this validated parameter	0.1
GWP _{CH4}	Global warming potential of methane	IPCC – Fifth Assessment Report	Confirmed consistency with VCS program requirements	28
Regulatory requirements	Regulatory requirements applicable to the Project Activity to ensure continued compliance and regulatory additionality	Publicly available information on local, regional and national regulations	Confirmed no evidence of changes in local, state, or federal regulations that would affect the project’s additionality.	N/A
Methane oxidation efficiency for electricity generation	Quantity of methane oxidized during combustion for electricity generation	CDM Methodologies and Tools	Confirmed consistency with PD for this validated parameter	100
Methane oxidation efficiency for flare	Quantity of methane oxidized during combustion using flare	ACM0001 Flaring or use of landfill gas, version 16	This parameter is N/A for this monitoring period as no emission reductions are claimed for LFG destruction by the flare	N/A
Fuel Use by the Emergency Generator	Average consumption of a 150kW generator operating at $\frac{3}{4}$ load to be used to calculate fuel consumed annually	Diesel Service and Supply Company	Confirmed consistency with PD for this validated parameter and confirmed it was used in the calculation of FC _{Diesel,y}	8.4 gallons/hour
Methane content of LFG	Methane content of LFG	SCADA System at Facility, California Analytical 602P, Serial # S07002	Reviewed daily and selected hourly aggregated methane concentration averages from the SCADA reports; confirmed consistency with values used in emission reduction calculations.	The monitoring period average was 52%, ranging from 48% to 57% daily.

Parameter	Description	Data Source	Review Summary and Evidence	Values Verified for Monitoring Period
Methane content of biogas	Methane content of biogas	Bioenergy Facility (anaerobic digester system) tied to SCADA System at Facility	This parameter is N/A for this monitoring period as no emission reductions are claimed for biogas destruction by the engines	N/A
Volume of LFG to engines	Quantity of LFG combusted by engines	SCADA System at Facility, Oripac Model 5300, Serial #30154	Reviewed daily and selected hourly aggregated LFG volume to engines (kscf) from the SCADA reports; confirmed consistency with values used in emission reduction calculations.	Average daily LFG to engines during the monitoring period was 1,267 KSCF.
Volume of biogas	Quantity of biogas added to LFG, both used to fuel engines	Bioenergy Facility (anaerobic digester system) tied to SCADA System at Facility	This parameter is N/A for this monitoring period as no emission reductions are claimed for biogas destruction by the engines	N/A
Temperature of LFG to engines	Temperature of LFG	SCADA System at Facility	Reviewed a sample of raw data to confirm recording of this parameter. The SCADA system uses it to calculate standard cubic feet per minute from actual cubic feet per minute of LFG.	Typical range is 109 to 120 degrees F.
Temperature of biogas	Temperature of biogas	Bioenergy Facility (anaerobic digester system) tied to SCADA System at Facility	This parameter is N/A for this monitoring period as no emission reductions are claimed for biogas destruction by the engines	N/A
Pressure of LFG to engines	Pressure of LFG	SCADA System at Facility	Reviewed a sample of raw data to confirm recording of this parameter. The SCADA system uses it to calculate standard cubic feet per minute from actual cubic feet per minute of LFG.	Typical range is 1.9 to 2.4 psig

Parameter	Description	Data Source	Review Summary and Evidence	Values Verified for Monitoring Period
Pressure of biogas	Pressure of biogas	SCADA System at Facility	This parameter is N/A for this monitoring period as no emission reductions are claimed for biogas destruction by the engines	N/A
Volume of LFG to the flare	Quantity of LFG combusted by flare	Flare station	This parameter is N/A for this monitoring period as no emission reductions are claimed for LFG destruction by the flare	N/A
Fraction of total LFG collected attributable to District Initial System	Amount of LFG collected from the District Initial System that would have been destroyed in the baseline scenario	Well-head measurements	Reviewed well data and conservative assumptions (50% gas quality per well, 5 scfm flow rate) aggregated to estimate LFG from the initial system and confirmed this was noted as a PD deviation.	4.90%
EF _{EL,Grid,y}	Emission factor for electricity generation in year y	U.S. EPA eGRID2023 data	Reviewed most recent version of eGRID2023 and confirmed the relevant subregion factor was used to calculate project emissions from electricity consumption	0.25 tonnes CO _{2e} /MWh
TDL _{Grid,y}	Average technical transmission and distribution losses for grid in year y	U.S. Energy Information Administration (EIA) State Electricity Profiles. Table 10. Supply and disposition of electricity, 1990 through 2023, Massachusetts. November 6, 2024.	Reviewed the EIA method for T&D loss calculation, independently verified calculation of losses, and applied it to calculate project emissions from electricity consumption. Identified a small discrepancy (<0.002 tCO _{2e}) between the verifier's calculation and the reported value.	0.045

Parameter	Description	Data Source	Review Summary and Evidence	Values Verified for Monitoring Period
EC _{Grid,y}	Amount of grid electricity consumed by the project	Utility invoices	Reviewed the electric utility invoices for consumption during the monitoring period and confirmed the MWh in the invoices were consistent with the value used to calculate project emissions.	1.47 MWh
FC _{Diesel,y}	Amount of diesel consumed by the emergency generator	Run time (hours) multiplied by the validated fuel consumption rate (8.4 gallons/hour)	Reviewed the Emergency Generator Log Sheet, which records run-time totalizer values before startup and after shutdown. Independently calculated the run time for each session, summed these for the monitoring period, and multiplied by the validated fuel consumption rate. Confirmed this was consistent with the value used to calculate project emissions.	1,327.2 gallons
NCV _{diesel}	Energy content of the diesel	Draft 2011 US Greenhouse Gas Inventory Report	This value has been verified as unchanged since PD validation and is consistent with the PD. It is the value used to calculate project emissions.	0.13831 MMBtu/gallon
EF _{CO2,Diesel,y}	CO ₂ emissions factor for diesel	Draft 2011 US Greenhouse Gas Inventory Report	This value has been verified as unchanged since PD validation and is consistent with the PD. It is the value used to calculate project emissions.	0.073957 tCO ₂ /MMBtu

4.4 Quality of Evidence to Determine Reductions and Removals

The verification team reviewed multiple forms of evidence—including SCADA system logs, aggregated SCADA data, calibration records, utility invoices, and fuel consumption records—to assess the accuracy of the reported emission reductions. Evidence was sufficient and appropriate to support the reported emission reductions. For each monitored parameter, the team’s assessment is summarized in Table 1 (Section 4.3).

Cross-checks included comparing source records with aggregated data and confirming correct application in emission reduction calculations. Monitoring instruments were verified for calibration accuracy per the validated PD or documented as deviations where applicable.

Methane content was measured by a California Analytical analyzer from 1 January 2024 to 13 May 2024 and from 26 July 2024 to 31 December 2024. The instrument was sent for repair and calibration on 14 May 2024. It was returned to service on 26 July 2024. During the period the continuous analyzer was removed, a handheld instrument, a Landtec GEM2000, was used once per day to measure methane content of the LFG. The daily methane content was manually entered into SCADA. The use of the handheld instrument was reported as a project description deviation in the Monitoring Report.

Table 2 summarizes monitoring instruments, calibration frequency, and verification results.

Table 2. Monitoring Equipment Accuracy Review

Parameter	Instrument	Period of Use	Calibration Frequency in the PD	Calibration Review Summary
Volume of LFG to engines	Oripac Model 5300, Serial #30154	Entire monitoring period	Monthly	Monthly checks within +/-5% threshold. Frequency met PD requirement.
Methane Content of LFG	California Analytical Model 602P, Serial # S07002	1 Jan to 13 May and 26 Jul to 31 Dec 2024	Weekly	Third party calibration on 17 July 2024. Weekly checks within +/-5% threshold. Frequency met PD requirement.
Methane Content of LFG	Landtec GEM2000	14 May to 25 July 2024	Weekly (per deviation)	Weekly checks within +/-5% threshold. Frequency met deviation requirement.

The evidence reviewed was sufficient in quantity and appropriate in quality to support a determination that the reported emission reductions are materially correct and in accordance with the applied methodology and VCS Program requirements.

4.5 Non-Permanence Risk Analysis

This section is not applicable because the Project is not classified as an Agriculture, Forestry, and Other Land Use (AFOLU) activity under the VCS Standard. Therefore, a non-permanence risk rating is not required.

5 VERIFICATION OPINION

5.1 Verification Summary

TÜV SÜD America Inc. conducted a risk-based verification of the GHG statement for VCS138 Greater New Bedford LFG Utilization Project covering the monitoring period 01 January 2024 to 31 December 2024. The project activities include the expansion of an existing active LFG collection and destruction system that destroys LFG in four engine-generator sets at the Crapo Hill Landfill located in Dartmouth, Massachusetts.

The GHG statement is the responsibility of the project proponent. The verification team assessed whether the Project conforms to the criteria set out in the VCS Standard, the applied methodology, and other relevant program documents. Based on the assessment, the Project has been implemented in accordance with the validated Project Description and any subsequently validated deviations. Identified deviations from the methodology and the validated Project Description resulted in a Modified Opinion, as described below.

The verification was conducted to a reasonable level of assurance in accordance with ISO 14064-3:2019, with the objective of ensuring that the GHG statement is free from material misstatement and conforms to all relevant criteria, including:

- VCS Standard, v4.7, Issued 19 September 2019, Updated 16 April 2024 (VCS Standard);
- VCS Program Guide v4.4, Issued: 19 September 2019, Updated 29 August 2023;
- CDM Methodology ACM0001 Large-scale Consolidated Methodology – Flaring or use of landfill gas, v16, dated 16 October 2015
- VCS Validation and Verification Manual, v3.2, Issued 4 October 2012, Updated 19 October 2016;
- Validated Project Description, Greater New Bedford LFG Utilization Project Dartmouth, Massachusetts, v6, dated 12 May 2016; and
- ISO 14064-3:2019 Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas statements.

Based on the assessment, the verification team concludes, with reasonable assurance, that the GHG statement for the monitoring period 01 January 2024 to 31 December 2024, is free from material misstatement and has been prepared in accordance with the requirements of the VCS program. Accordingly:

- TÜV SÜD is issuing a Modified Opinion due to the identified deviations from the methodology and the validated Project Description.

A summary of the verified GHG statement is provided in the table in Section 5.2 below.

5.2 Verification Conclusion

The verification was conducted to a reasonable level of assurance on the quantity of GHG emission reductions achieved by the Project during the monitoring period 01 January 2024 to 31 December 2024, as reported in the Project's GHG statement.

Based on the verification, TÜV SÜD confirms that the quantity of GHG emission reductions is free from material misstatement and is presented in accordance with the requirements of the VCS Program. The verified quantities are summarized below:

Verification period: From 01 January 2024 to 31 December 2024

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 VCUs (tCO ₂ e)	Removal VCUs (tCO ₂ e)	Total VCUs (tCO ₂ e)
01-JAN-2024 to 31-DEC-2024	110,211	14	0	110,197	0	110,197
Total	110,211	14	0	110,197	0	110,197

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-JAN-2024 to 31-DEC-2024	88,437	110,197	25%	The VCS program updated the requirements for use of global warming potential for CH ₄ from 21 (IPCC Second Assessment Report) to 28 (IPCC Assessment Report Five), a

				33% increase. Combined with lower actual LFG quantities than projected, these factors explain the 25% difference.
Total	88,437	110,197	25%	

APPENDIX 1: DOCUMENTS REVIEWED

1. Project Description
2. Monitoring Report
3. Agreements demonstrating ownership
4. Methane Analyzer Service Report
5. QA/QC logs for analyzer and flow meter
6. Site Safety Plan
7. Evidence of stakeholder communication
8. Annual and Semi-Annual Compliance Reports
9. Emission reduction calculation spreadsheet
10. SCADA Daily Data Reports
11. SCADA Hourly Data
12. SCADA Minute Data
13. Power Sales Data
14. eGRID2023
15. EIA State Electricity Profiles Tables for Massachusetts

APPENDIX 2: LIST OF FINDINGS

Corrective Action Requests (CAR), Non-Material Findings (NMF), Additional Documentation Requests (ADR), and Clarification Requests (CR)

#	Finding	Project Proponent Response	Verification Team Response	Project Proponent Response	Verification Team Response
CAR1	10/15/2025: Make the following revisions to the Monitoring Report (MR) a. Correct the flow meter model number for the Oripac Reviewed with CNBE 11/6/2025: b. Verify the SDG contribution values for MWh generated during the monitoring period Added 12/1/2025: c. Section 1.11.2 does not acknowledge generation of RECs, despite RECs being mentioned elsewhere in the MR. d. Table 1: verify that reported current project contributions are accurate (e.g. 1,251 MWh of renewable electricity generation for 2024 is under-reported). e. In Section 4.2, for the Data Unit/Parameter, Methane content of landfill gas: verify the reported range of methane content during the monitoring period 50% to 54% f. In Section 5.1 there is a typo in equation 2 for BECH4,y = g. In Section 5.4, the Ex-ante estimated reductions/removals shown are inconsistent with the values in the PD; values shown are the estimated baseline emissions.	10/20/2025: The flow meter model number is Oripac Model 5300-08-5.00-304-150-HT. This correction shall be reflected in next revision of Monitoring Report. 12/03/2025: Changed 2024 production of renewable electricity to 16,881 MWhr. 12/03/2025: c. Added a description of RECs under 1.11.2 to show that the Project creates RECs but are separate and distinct from carbon offset credits. Added the quantity of RECs to Table 1. d. In Table 1, changed 2024 production of renewable electricity to 16,881 MWhr. e. Calculated daily minimum and maximum from Daily Reports. As a result, changed to daily range of 48% to 57% in Section 4.2 f. Section 5.1, Corrected typo in Equation 2. g. Section 5.4, Changed the Ex-ante estimated reductions/removals to be exactly equal to those values in the PD.	12/4/2025: Reviewed the revised MR for revisions: a. confirmed b. confirmed c. confirmed d. confirmed consistent with data e. revision is consistent with verified values f. confirmed g. confirmed Item closed.		
CAR2	Reviewed with CNBE 11/6/2025: Document the following Project Description deviations observed during the monitoring period: - Frequency of measurement and recording of methane content of LFG while the analyzer was out for service (see ADR 2) - Calculation approach for LFG collected by the District Initial System differs from the PD procedure (see CR 3)	12/03/2025: Section 3.2.2 - Both these Project Descriptive Deviations have been added.	12/4/2025: Please ensure the descriptions of the deviations meet the requirements of the template instructions for section 3.2.2 including "Whether the deviation impacts the applicability of the methodology, the project additionality, or the appropriateness of the baseline scenario."	12/08/2025: Section 3.2.2 - The explanations of the deviation impacts and outcomes have been added and/or expanded.	12/8/2025: Item closed.

#	Finding	Project Proponent Response	Verification Team Response	Project Proponent Response	Verification Team Response
NMF1	Reviewed with CNBE 11/6/2025: See ADR3 from small discrepancy resulting from the difference in method to calculate TDLGrid,y. The resulting difference in project emissions (and thus emission reductions) is <0.002 tCO2e. This is an under-reporting error, and it is conservative.	12/03/2025: Okay. This is a closed under ADR 3.	CNBE Ignored this non-material finding.		
ADR1	10/8/2025: Provide daily reports--with hourly or more frequent recordings--for the days with greatest LFG flows for each month: 1/20/2024, 2/18/2024, 3/31/2024, 4/5/2024, 5/5/2024, 6/21/2024, 7/2/2024, 8/14/2024, 9/11/2024, 10/28/2024, 11/13/2024, 12/27/2024	10/8/2025: Reports provided.	10/15/2025: Provide reports showing evidence of measurement of all monitored parameters identified in the PD/Monitoring Report (e.g., LFG temperature, pressure). LFG flow and CH ₄ concentration already included in daily reports.	10/20/2025: Temperature and Pressure are continuously monitored and recorded every minute. See attached a Raw Data log titled "Raw Data Log".	11/4/2025: Verified evidence for all monitored parameters. Item closed.
ADR2	10/15/2025: Why do the daily reports for 6/21/2024 and 7/2/2024 show zeros for all hours for LFG Flow to Engines (MMBTU) and Avg Methane (%) but there are totalized values for the day? Were hourly values recorded on this day?	10/20/2025: This occurred during the period that the California Analytical Analyzer was out for service and we were taking daily methane readings. The daily methane reading was applied only to the daily reading during this period.	Reviewed with CNBE 11/6/2025: This monitoring method deviates from the validated monitoring plan (section 5.3.1 of the PD) which states "At the Facility, the Supervisory Control and Data Acquisition (SCADA) system measures and records methane content and gas (LFG and biogas) volume to the engines and flare once per minute, and then calculates methane quantities each minute." Added to CAR2 above.		
ADR3	10/15/2025: Provide the source of data noted for the TDL Grid,y parameter: U.S. Energy Information Administration (EIA) State Electricity Profiles. Table 10: Supply and Disposition of Electricity Data for 2023, Table 10. Supply and disposition of electricity United States, 1990 through 2023, November 6, 2024.	10/20/2025: See attached file titled "EIA State Electricity Profiles Tables for US" downloaded from - U.S. Energy Information Administration (EIA) at link https://www.eia.gov/electricity/state/unitedstates/ TDLGrid,y = Average technical transmission and distribution losses for the regional grid in year y. In this case from attached Table 10, Year 2023, (171,579,708+19,423,609)/4,222,187,880 = 0.045 (Estimated losses + unaccounted)/total supply	Reviewed with CNBE 11/6/2025: Verifier traced the calculation using values from the file provided. The prescribed method is "To calculate T&D losses as a percentage, divide estimated losses by the result of total disposition minus direct use.", i.e. Estimated losses / (total supply - direct use). The resulting difference in project emissions (and thus emission reductions) is <0.002 tCO2e. This is an under-reporting error. Item closed.		

#	Finding	Project Proponent Response	Verification Team Response	Project Proponent Response	Verification Team Response
ADR4	10/15/2025: Provide evidence to support the assumption that each of the district initial system wells produces 5 cfm of LFG (Exhibit 4 states "Note 1: During January 1, 2024 through December 31, 2024, the Initial District System consists of 9 remaining active wells measuring less than 5 cfm at 50% methane lower detection limit of each well. Each of the 9 wells is assumed to collect 5 cfm for a total of 45 cfm, which overestimates that quantity of landfill gas being collected by the District Initial System.") (Also see CR3)	10/20/2025: The initial wells that remain functioning are short vertical wells on side slopes of the Phase 1 area of the landfill that contain waste from at least 25 to 30 years ago. The wellheads are designed to have measurable operating ranges of 5 to 125 scfm of landfill gas. Each contains a pitot tube to measure flow. The pitot tube and manometer measure flow by differential pressure across the velocity and static pressures. At low flow rates, the velocity pressure becomes very small. The differential pressure that corresponds to 1 to 5 scfm flow rate is 0.001 to 0.005 inches of water gauge, which is so small that the resolution, noise and fluctuations in the system make the accuracy of the measurement unreliable. Near and below the low-end (e.g., <5 SCFM for 2" models), readings typically default to "no flow" or show instability. The District's landfill technician stated that all the initial wells are near or at 0 flow rate, have poor gas quality and flow measurement below a 5 scfm lower limit are not accurate. Regardless, see attached "Initial Well data" that shows typical data from the initial wells. To be conservative, we assumed a gas quality of 50% for each well and the lower flow accuracy limit of 5 scfm, which overestimates the quantity of methane from the initial system.	11/5/2025: The data and explanation provided is sufficient for verifiers to understand the district initial system well production. The approach is conservative, though as noted in CR3 and CAR2, deviates from the validated PD. Item closed.		
ADR5	10/15/2025: Provide Excel versions of Exhibit 6: calibration of the LFG, composition meter, other instrumentation. Additionally a) Demonstrate percent error calculations for each check to show instrument accuracy and clarify which calibration gas (dry or wet) is used for the reference condition. b) Explain the missing check for the week of 10/21/2024.	10/20/2025: See attached Excel file titled "CAI Analyzer 2024". (a) Percent error is calculated for each calibration. Calibration gas wet is used for the reference condition. (b) facility was shut-down for the week of October 21, 2024 for scheduled Eversource maintenance, and	11/4/2025: The excel file and explanation provided is sufficient for verifiers to understand the weekly calibration checks. Item closed.		

#	Finding	Project Proponent Response	Verification Team Response	Project Proponent Response	Verification Team Response
	c) Explain the purpose of the checks performed while the instrument was sent back to the manufacturer (May to July).	(c) calibration checks were made each week on GEM 2000 that were used to measure daily methane content.			