



**Verified Carbon
Standard**

READING WIND ENERGY, LLC



Southern Power

Project title	Reading Wind Energy, LLC
Project ID	1754
Monitoring period	01-January-2024 to 31-December-2024
Original date of issue	11-June-2025
Most recent date of issue	
Version	3.0
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Prepared by	Southern Power Company

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PROJECT DETAILS

1.1 Summary Description of the Implementation Status of the Project

Reading Wind Energy, LLC (Project or Project Activity) consists of 62 new (greenfield) wind power turbines on approximately 20,000 acres of land leased by the Project Proponent near Reading in Lyon and Osage Counties, Kansas, USA. The wind turbines consist of the following technologies, totalling a nameplate capacity of over 200 megawatts (MW):

- 14 x Siemens SWT-2.415-108 @ 80m HH turbines, 2.415 MW capacity each; and
- 48 x Gamesa G132 @ 101.5 HH turbines, 3.465 MW capacity each.

The Project Activity will generate greenhouse gas (GHG) emission reductions through the displacement of grid-connected fossil fuel-powered electricity generation by wind-powered electricity generation supplied by the turbines and delivered to the Southwest Power Pool (SPP) electricity grid system.

The Project is quantified and will be monitored according to the United Nations Framework Convention on Climate Change (UNFCCC) Clean Development Mechanism (CDM) methodology “Grid-connected electricity generation from renewable sources, Version 18.1” and falls under CDM/VCS Sectoral Scope 1, Energy industries (renewable/ non-renewable sources).

Consistent with the methodology, the baseline scenario prior to project implementation is grid-connected electricity generated by fossil fuel power plants. The Project generated 456,149 tonnes carbon dioxide equivalent (CO2e) in GHG emission reductions between January 1, 2024 and December 31, 2024. The wind power turbines were constructed between December 29, 2016 and May 21, 2020. The project’s first crediting period is 10-years beginning on May 21, 2020 and ending on May 20, 2030. The wind power turbines were commissioned over the period of December 25, 2019 through May 26, 2020 and have an operational life of 20 years.

1.2 Audit History

Audit type	Period	Program	Validation/verification body name	Number of years
Verification	(21-May-2020–31-December-2020)	VCS	Ruby Canyon Environmental, Inc.	One year
Verification	(01-January-2021 – 31-December-2021)	VCS	Internat Energy Solutions Canada, Inc.	One Year
Verification	(01-January-2022 – 31-December-2022)	VCS	SustainCERT S.A.	One Year
Verification	(01-January-2023 – 31-December-2023)	VCS	SustainCERT S.A.	One Year

Verification	(01-January-2024 – 31-December-2024)	VCS	SustainCERT S.A.	One Year
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1.3 Sectoral Scope and Project Type

Sectoral scope ¹	Energy Industries (renewable/non-renewable)
Project activity type	Renewable Wind Generation Facility

1.4 Project Proponent

Organization name	Southern Power Company
Contact person	Kerri M. Keith
Title	Manager, Commercial Markets
Address	3535 Colonnade Parkway, Birmingham, AL 35243
Telephone	205-992-0194
Email	kmkeith@southernco.com

1.5 Other Entities Involved in the Project

Organization name	No additional organizations are currently involved in this project. Dilon Consulting was involved in the first verification as a consultant and all responsibility now falls to Southern Power Company.
Role in the project	
Contact person	
Title	
Address	
Telephone	
Email	

¹ Projects, activities, or methodologies may be developed under any of the 16 VCS sectoral scopes: <https://verra.org/programs/verified-carbon-standard/vcs-program-details/#sectoral-scopes>

1.6 Project Start Date

Project start date	21-May-2020
Justification	This corresponds with the end of commissioning as outlined in the Turbine Supply Agreement (TSA).

1.7 Project Crediting Period

Crediting period	☐ Seven years, twice renewable ☒ Ten years, fixed ☐ Other (state the selected crediting period and justify how it conforms with the VCS Program requirements)
Start and end date of first or fixed crediting period	21-May-2020 to 20-May-2030

1.8 Project Location

The Project is located near Reading in Lyon and Osage Counties, Kansas, USA on parcels totaling approximately 20,000 acres. Approximately 25% of the planned turbine layout is in Osage County, with the remainder in Lyon County (Gaston, 2016). Coordinates of the individual turbines are presented in **Table 1** below.

Table 1: Project Activity Locations

Turbine	UTM14 NAD27 Coordinates		Diameter (m)
	Easting	Northing	
S1	753650.00	4265198.00	80
S2	753918.00	4265465.00	80
S3	754288.00	4265521.00	80
S4	754925.00	4266749.00	80
S5	755286.00	4266635.00	80
S6	755593.00	4266411.00	80
S7	753369.00	4264959.00	80
S8	754271.51	4266315.20	80
S9	756641.80	4265649.24	80

Turbine	UTM14 NAD27 Coordinates		Diameter (m)
	Easting	Northing	
S10	755856.00	4266222.00	80
S11	755032.00	4264813.00	80
S12	755390.00	4264644.00	80
S13	757058.00	4265639.00	80
S14	757660.00	4265691.00	80
T11	756756.00	4268887.00	101.5
T12	757192.00	4268900.00	101.5
T13	758123.00	4269510.00	101.5
T15	758328.00	4266296.00	101.5
T16	758843.00	4266304.00	101.5
T17	758709.50	4264975.58	101.5
T18	759148.00	4264900.00	101.5
T19	759991.00	4267150.00	101.5
T20	760501.00	4267345.00	101.5
T21	761911.00	4265214.00	101.5
T22	762480.00	4265243.00	101.5
T23	763087.00	4265286.00	101.5
T24	763664.00	4265254.00	101.5
T25	760248.34	4264040.00	101.5
T26	760893.23	4263584.91	101.5
T27	761706.00	4263423.00	101.5
T28	762162.00	4263482.00	101.5
T29	763511.00	4263362.00	101.5
T30	763831.00	4263657.00	101.5
T31	764913.00	4264273.00	101.5
T32	759019.48	4262316.24	101.5
T33	759370.54	4262133.01	101.5
T34	760386.00	4261944.00	101.5
T35	761835.81	4261821.62	101.5
T36	762180.33	4262019.13	101.5

Turbine	UTM14 NAD27 Coordinates		Diameter (m)
	Easting	Northing	
T37	762607.52	4261932.00	101.5
T38	764785.73	4262084.49	101.5
T39	765247.00	4262477.00	101.5
T40	765750.00	4262482.00	101.5
T41	766658.31	4261819.91	101.5
T42	767028.00	4262019.00	101.5
T43	768045.00	4261984.00	101.5
T44	768458.00	4261846.00	101.5
T45	769061.00	4261900.00	101.5
T46	765674.00	4260268.00	101.5
T47	766627.03	4259465.64	101.5
T48	767075.93	4259538.36	101.5
T49	767442.00	4260167.00	101.5
T50	761562.74	4261532.82	101.5
T51	767421.98	4262222.69	101.5
T52	761913.20	4268259.23	101.5
T53	757211.93	4264064.35	101.5
T55	757611.69	4264068.91	101.5
T56	758288.00	4264691.00	101.5
T58	761475.35	4268301.80	101.5
T59	764885.00	4259455.00	101.5
T60	764257.72	4259382.76	101.5
T61	761646.00	4264774.00	101.5

1.9 Title and Reference of Methodology

Type (methodology, tool or module).	Reference ID, if applicable	Title	Version
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UNFCCC CDM large-scale consolidated methodology	ACM0002	Grid-connected electricity generation from renewable sources,	Version 18.1, April 26, 2018 (CDM Methodology)
UNFCCC CDM methodological tool	...	Tool to calculate the emission factor for an electricity system,	Version 06.0 (CDM EF Tool)
UNFCCC CDM methodological tool		Tool for the demonstration and assessment of additionality,	Version 07.0 (CDM Additionality Tool)
UNFCCC CDM Guidelines on the assessment of investment analysis			Version 05 (CDM Investment Analysis Guidelines)

1.10 Double Counting and Participation under Other GHG Programs

1.10.1 No Double Issuance

Is the project receiving or seeking credit for reductions and removals from a project activity under another GHG program?

☐ Yes ☒ No

If yes, provide required evidence of no double issuance as outlined by the VCS Standard.

1.10.2 Registration in Other GHG Programs

Was the project registered or seeking registration under any other GHG programs?

☐ Yes ☒ No

1.11 Double Claiming, Other Forms of Credit, and Scope 3 Emissions

1.11.1 No Double Claiming with Emissions Trading Programs or Binding Emission Limits

Are project reductions and removals or project activities also included in an emissions trading program or binding emission limit? See the *VCS Program Definitions* for definitions of emissions trading program and binding emission limit.

☐ Yes☒ No

1.11.2 No Double Claiming with Other Forms of Environmental Credit

Has the project activity sought, received, or is planning to receive credit from another GHG-related environmental credit system? See the *VCS Program Definitions* for definition of GHG-related environmental credit system.

☐ Yes☒ No

1.11.3 Supply Chain (Scope 3) Emissions

Do the project activities affect the emissions footprint of any product(s) (goods or services) that are part of a supply chain?

☐ Yes☒ No

1.12 Sustainable Development Contributions

The Project does not contribute to achieving any specific sustainable development priorities at the national level.

Table 2: Sustainable Development Contributions

Row number	SDG target	SDG indicator	Net impact on SDG indicator	Current project contributions	Contributions over project lifetime
1	7.2	Affordable and Clean Energy	Implemented activities to increase.	Reading Wind Energy brings 200 MW of clean energy to the SPP grid in every available hour of the year. In this monitoring period, over 650,000 MWh of clean energy was provided to the SPP market.	This clean energy will continue to be available throughout the life of the project and will help reduce reliance on other energy sources. Since the facility went online, the project has provided over 3 Million MWh of clean energy to the market helping to offset other sources of energy.
2	8.5	Decent Work and Economic Growth	Implemented activities to increase.	Reading Wind Energy provides an inclusive work environment and decent work for several members of the surrounding community. There were two full time employees at the facility with a number of contract employees at the facility during the monitoring period	Reading Wind Energy is committed to providing a productive work environment in the renewable energy industry at the same or similar levels throughout the life of the project. Throughout the life of the project, there have been one to two full time employees and contract employees of varying levels that contribute to this indicator.

3	9.0	Industry, Innovation and Infrastructure	Implemented activities to increase.	Reading Wind Energy offsets CO2 emissions for every MWh of generation produced through innovative wind technology. This wind project offset over 450,000 tons of CO2 during this monitoring period.	These CO2 emission reductions will continue throughout the life of the project. This project has contributed in a sustainable way each year to a reduction of CO2. These totals are outlined throughout this report.
4	13.0	Tones of greenhouse gas emissions avoided or removed	Implemented activities to increase.	By providing wind energy to the market, the reliance on fossil fuels will decrease and greenhouse gas emissions will be avoided. The 650,000 + MWh of generation provided and the 450,000 + tons of CO2 offset helped to reduce the reliance on fossil fuel during this monitoring period.	With over 3 Million MWh of generation from the project so far, this project is continuing to avoid greenhouse gases and is anticipated to do so throughout the life of the project.

1.13 Commercially Sensitive Information

No commercially sensitive information has been excluded.

2 SAFEGUARDS AND STAKEHOLDER ENGAGEMENT

2.1 Stakeholder Engagement and Consultation

2.1.1 Stakeholder Identification

No stakeholders have changed since validation and all stakeholders were identified at that time.

Stakeholder Identification	No new stakeholders have been identified.
Legal or customary tenure/access rights	No new legal or customary tenure/access rights have been identified.
Stakeholder diversity and changes over time	No new social, economic and cultural diversity has been identified within stakeholder groups.
Expected changes in well-being	No new changes to well-being have been identified.
Location of stakeholders	No new stakeholders have been identified.
Location of resources	No new stakeholders have been identified.

2.1.2 Stakeholder Consultation and Ongoing Communication

Ongoing consultation	• Direct communication with the Operations and Corporate Real Estate teams via email and phone channels • Direct communication with the Operations and Corporate Real Estate teams via email and phone channels • Open office hours for stakeholders to register questions and concerns in person
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Date(s) of stakeholder consultation	02-June-2016 and 26-October-2017
Communication of monitored results	The Project documented all meetings and/or communications with stakeholders stored in secure electronic storage.
Consultation records	Any concerns or issues raised during consultation with the stakeholders regarding the Project were considered and addressed on a case-by-case basis.
Stakeholder input	Reclamation progress impacted by externalities (i.e. weather) Response: • Site visit with stakeholders dedicated to land inspection to address ongoing reclamation concerns and issues • RES and SPC performed erosion, grading, and seeding work to address outstanding reclamation needs • SPC offered stakeholders option to self-perform reclamation work on their property

2.1.3 Free, Prior, and Informed Consent

Consent	The public was notified of the proposed Project and provided opportunity for public comment and engagement. County authorities heard from the Project Proponent through action sessions dated June 2, 2016 (Robinson, 2016) and October 26, 2017 (Brooks, 2017), and Conditional Use Permits were granted on December 29, 2016 for Lyon County and December 19, 2016 for Osage County. No concerns were identified that required consent. There are no ongoing or unresolved conflicts.
Outcome of FPIC	No FPIC was required for this project.

2.1.4 Grievance Redress Procedure

Grievances received	Resolution and outcome
None	No grievances were filed during this period. Site personnel are available to receive the public during normal business hours. Additionally, the Southern Power Operations and Corporate Real Estate teams can be reached via the public website (https://www.southernpowercompany.com/who-we-are/contact-us.html) Additionally, the grievance procedure is accessible through the VCS portal throughout the project.

2.1.5 Public Comments

No new comments were received during this reporting period as a part of stakeholder consultation.

Summary of comments received	Actions taken
NA	NA

2.2 Risks to Stakeholders and the Environment

2.2.1 Management Experience

All management involved in this project have experience engaging with the community around them and work closely with our corporate teams to receive any assistance or outside expertise that they may need. As members of the community where the project is located, they are constantly representing the facility and company and working to address any concerns that might exist. No new management is involved in project design or implementation.

2.2.2 Risk assessment

	Risk identified	Mitigation or preventative measure(s) taken
Natural and human-induced risks to stakeholders' wellbeing	No risk identified.	All facilities maintain compliance with company principles.
Risks to stakeholder participation	No risk identified.	Open process for expressing concerns.

Working conditions	No risk identified.	All facilities maintain compliance with company principles.
Safety of women and girls	No risk identified.	All facilities maintain compliance with company principles.
Safety of minority and marginalized groups, including children	No risk identified.	All facilities maintain compliance with company principles.
Pollutants (air, noise, discharges to water, generation of waste, and release of hazardous materials and chemical pesticides and fertilizers)	No risk identified.	Project is a renewable facility that is monitored by our Environmental Compliance team.

2.3 Respect for Human Rights and Equity

2.3.1 Labor and Work

	Risks identified ²	Mitigation or preventative measure(s) taken
Discrimination	No risk identified	All Southern Power facilities adhere to the Southern Company Values and Principles that can be found on our website: https://www.southerncompany.com/about/company-values.html
Sexual harassment	No risk identified	All Southern Power facilities adhere to the Southern Company Values and Principles that can be found on our website: https://www.southerncompany.com/about/company-values.html
Gender equity in labor and work	No risk identified	All Southern Power facilities adhere to the Southern Company Values and Principles that can be found on our website: https://www.southerncompany.com/about/company-values.html

² The identified risks and commensurate mitigation or preventative measure(s) for forced labor, child labor, and human trafficking, must be inclusive of staff and contracted workers employed by third parties.

Forced labor	No risk identified	All Southern Power facilities adhere to the Southern Company Values and Principles that can be found on our website: https://www.southerncompany.com/about/company-values.html
Child labor	No risk identified	All Southern Power facilities adhere to the Southern Company Values and Principles that can be found on our website: https://www.southerncompany.com/about/company-values.html
Human trafficking	No risk identified	All Southern Power facilities adhere to the Southern Company Values and Principles that can be found on our website: https://www.southerncompany.com/about/company-values.html

2.3.2 Human Rights

Risks identified	Mitigation or preventative measure(s) taken
No risk identified.	All Southern Power facilities adhere to the Southern Company Values and Principles that can be found on our website: https://www.southerncompany.com/about/company-values.html

2.3.3 Indigenous Peoples and Cultural Heritage

Risks identified	Mitigation(s) or preventative measure taken
No risk identified.	All Southern Power facilities adhere to the Southern Company Values and Principles that can be found on our website: https://www.southerncompany.com/about/company-values.html

2.3.4 Property Rights

Risks identified	Mitigation or preventative measure(s) taken
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No risk identified.	These rights are monitored by our Corporate Real Estate group who are available to address any concerns that may be raised by these groups.
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2.3.5 Benefit Sharing

Summary of the benefit sharing plan	At the time of project development, leases were executed with affected landowners. As a part of these leases, payments are made on a quarterly basis to the landowners.
Benefit sharing during the monitoring period	Landowners are compensated as described in their leases.

2.4 Ecosystem Health

	Risk identified	Mitigation or preventative measure(s) taken during the monitoring period
Impacts on biodiversity and ecosystems	While wind turbines could pose a risk to birds and bats, no federally or state protected species fatalities have occurred at Reading Wind.	SPC Environmental Affairs collaborates with the site team to monitor bird and bat activity, including fatalities, and evaluate risk of any protected species.
Soil degradation and soil erosion	No risk identified.	Project is a wind generation facility.
Water consumption and stress	No risk identified.	Project is a wind generation facility.

2.4.1 Rare, Threatened, and Endangered species

Project does not have an adverse impact on any habitats for rare, threatened, or endangered species.

Species or habitat	No habitats have been identified during this monitoring period. Our Environmental Compliance group monitors the site.
Areas needed for habitat connectivity	No areas needed for habitat connectivity have been identified during this monitoring period. Our Environmental Compliance group monitors the site.

Use the table below to identify and summarize any risks related to habitats for rare, threatened, and endangered species, and for areas for habitat connectivity. Describe the commensurate mitigation or preventative measure(s) in place to prevent or mitigate the identified risk during the monitoring period. Where no risk is identified, write "No risk identified" in the first column, and provide justification in the second column. Add rows as needed.

	Risks identified	Mitigation or preventative measure(s) taken
Habitats for rare, threatened, and endangered species	No habitats have been identified during this monitoring period.	Southern Power Company has an Environmental Compliance group that monitors this site.
Areas for habitat connectivity	No areas needed for habitat connectivity have been identified during this monitoring period.	Southern Power Company has an Environmental Compliance group that monitors this site.

2.4.2 Introduction of species

Species introduced	Classification	Justification for use	Adverse effects and mitigation
N/A			

Existing invasive species	Mitigation measures to prevent the spread or continued existence of invasive species
N/A	

	Risks identified	Mitigation or preventative measure(s) taken
Invasive species	No risk identified.	Southern Power Company has an Environmental Compliance group that monitors this site.

2.4.3 Ecosystem conversion

This is not an ARR, ALM, WRC or ACoGS project.

3 IMPLEMENTATION STATUS

3.1 Implementation Status of the Project Activity

The Project was implemented as of May 21, 2020. Further notes regarding implementation status of the Project Activity include:

- Commissioning occurred on an individual turbine basis in stages over the period of December 25, 2019 through to May 26, 2020, with the majority commissioned and operating prior to the May 21, 2020 Commercial Operation Date (COD).
- No changes to the project proponent were implemented since the development of the Registered Project Description (PD) dated September 20, 2018.
- Turbine layout, specifications, and counts were implemented as identified in the *PD*.

3.2 Deviations

3.2.1 Methodology Deviations

No methodology deviations were applied to the Project during this monitoring period.

3.2.2 Project Description Deviations

At the time the PD was written the COD, the Project was anticipated to be December 31, 2019. However, due to delays during the construction and commissioning of the project, commercial operation was not reached until May 21, 2020. Given the revised COD of May 21, 2020, the first crediting period will run from May 21, 2020 to May 20, 2030.

3.3 Grouped Projects

The Reading Wind Project is not a grouped project.

3.4 Baseline Reassessment

Did the project undergo baseline reassessment during the monitoring period?

☐ Yes ☒ No

4 DATA AND PARAMETERS

4.1 Data and Parameters Available at Validation

The tables below detail the data and parameters determined or available at validation and remain fixed throughout the Project crediting period.

Data / Parameter	$FC_{i,m,y}$
Data unit	MMBtu
Description	Quantity of fuel type i consumed by power plant m in year y.
Source of data	United States Energy Information Administration (EIA) 860 and 923 datasets, 2012-2016 (EIA, 2017) (EIA, 2018).
Value applied	Varies by power plant.
Justification of choice of data or description of measurement methods and procedures applied	Published values from the EIA dataset.
Purpose of data	Calculation of the emission factor for all plants in the Project electricity system.
Comments	--

Data / Parameter	$EF_{i,m,y}$
Data unit	kg CO ₂ / MMBtu
Description	CO ₂ emission factor for fuel type i consumed by power plant m in year y.
Source of data	EIA and United States Environmental Protection Agency (EPA) published emission factors as detailed in the Project Description (including Appendix C) (EIA, 2016) (EPA, 2014) (EPA, 2009).
Value applied	Varies by fuel type.
Justification of choice of data or description of measurement methods and procedures applied	Published values from the EIA and EPA datasets, by fuel type.
Purpose of Data	Calculation of the emission factor for all plants in the Project electricity system.
Comments	--

Data / Parameter	$EG_{m,y}$
Data unit	MWh
Description	Net quantity of electricity generated by power plant m in year y.
Source of data	EIA 860 and 923 datasets, 2012-2016 (EIA, 2017) (EIA, 2018).
Value applied	Varies by power plant.

Justification of choice of data or description of measurement methods and procedures applied	Calculated according to the CDM EF Tool, as demonstrated in the Project Description (including Appendix C) .
Purpose of Data	Calculation of the operating and build margin emission factors for project electricity system.
Comments	--

Data / Parameter	$EF_{grid,OM}$
Data unit	tCO ₂ / MWh
Description	Simple operating margin CO ₂ emission factor, calculated ex ante for the Project crediting period.
Source of data	EIA 860 and 923 datasets, 2012-2016 (EIA, 2017) (EIA, 2018).
Value applied	0.852
Justification of choice of data or description of measurement methods and procedures applied	Calculated according to the CDM EF Tool, as demonstrated in the Project Description (including Appendix C) .
Purpose of Data	Calculation of the combined margin emission factor for the Project electricity system.
Comments	---

Data / Parameter	$EF_{grid,BM}$
Data unit	tCO ₂ / MWh
Description	Build margin CO ₂ emission factor, calculated ex ante for the Project crediting period.
Source of data	EIA 860 and 923 datasets, 2012-2016 (EIA, 2017) (EIA, 2018).
Value applied	0.151
Justification of choice of data or description of measurement methods and procedures applied	Calculated according to the CDM EF Tool, as demonstrated in the Project Description (including Appendix C) .
Purpose of Data	Calculation of the combined margin emission factor for the Project electricity system.

Comments	---
Data / Parameter	W_{OM}
Data unit	%
Description	Weighting of build margin CO ₂ emission factor.
Source of data	CDM EF Tool.
Value applied	0.75
Justification of choice of data or description of measurement methods and procedures applied	Default value for wind power projects in the CDM EF Tool.
Purpose of Data	Calculation of the combined margin emission factor for the Project electricity system.
Comments	---

Data / Parameter	W_{BM}
Data unit	%
Description	Weighting of build margin CO ₂ emission factor.
Source of data	CDM EF Tool.
Value applied	0.25
Justification of choice of data or description of measurement methods and procedures applied	Default value for wind power projects in the CDM EF Tool.
Purpose of Data	Calculation of the combined margin emission factor for the Project electricity system.
Comments	---

Data / Parameter	$EF_{grid,CM,y}$
Data unit	tCO ₂ / MWh
Description	Combined margin CO ₂ emission factor in year y, calculated ex ante for the Project crediting period.
Source of data	EIA 860 and 923 datasets, 2012-2016 (EIA, 2017) (EIA, 2018).

Value applied	0.677
Justification of choice of data or description of measurement methods and procedures applied	Calculated according to the CDM EF Tool, as demonstrated in the Project Description (including Appendix C) .
Purpose of Data	Calculation of the baseline GHG emission reductions representing the Project Activity emission reductions.
Comments	---

4.2 Data and Parameters Monitored

The tables below detail the data and parameters monitored during the Project crediting period.

Data / Parameter	$EG_{\text{facility},y}$
Data unit	MWh / y
Description	Total electricity produced by the Project Activity, including the electricity supplied to the grid and the electricity supplied to internal loads, in year y.
Source of data	Project Activity site
Description of measurement methods and procedures to be applied	There exist three sources of electricity generation metering data: • SQG Billing (revenue quality) meter at the Interconnection Point, as required by the PPA. This meter represents net power generation from the entire turbine system, delivered to the grid (Interconnection Point). • Project Proponent's PI data collection system (DCS), as measured through the revenue check meter at the Interconnection Point. This meter also represents net power generation from the entire turbine system, delivered to the grid (Interconnection Point); however, it is located within the Project Proponent's property at the Interconnection Point. • Manufacturer DCS' (Siemens and Gamesa), which are measured through metering at each individual turbine. The SQG Billing meter continuously monitors net electricity generation and logs data on a frequency of every 5 minutes. The PI and Siemens/Gamesa systems log on a frequency of every 10

	minutes. Periodic data downloads and real time monitoring by the Project Proponent are stored securely on their servers. Metering is in accordance with the executed Generation Interconnection Agreement (GIA) and SPP Integrated Marketplace protocols guidelines for accuracy. Under the GIA Transmission Owner shall install, calibrate, and test revenue quality Metering Equipment in accordance with applicable ANSI standards. SQG Billing meter data is used as the primary source for electricity generation data. Where SQG Billing data is missing or unavailable, PI system data from the Revenue Check meter is used.
Frequency of monitoring/recording	Continuous measurement and recording every 5 minutes for the SQG Billing metering, and every 10 minutes for the PI and manufacturer DCS'.
Value monitored	For calculated ex-ante GHG emission reductions, the annual net electricity generation in 2024 is 673,787 MWh.
Monitoring equipment	SQG Billing meter - Model: Landis + Gyr E850 MAXSys Elite - Serial Number: 21443809 Revenue Check meter - Model: SEL-735 MET T-1 Check Meter - Serial Number: 3190590420
QA/QC procedures to be applied	The Project Proponent stores the factory calibration certificate(s) of the main SQG Billing meter and Revenue Check meter electronically in a secure format. Calibrations are conducted at least once every two years, Evergy for the SQG Billing meter and Electric Power Systems for the Revenue Check meter. Any accuracy drift observed during routine operations and maintenance, or field checks will be managed according to the PPA. Qualified personnel, either from the Project Proponent or through third party organization, perform all routine meter maintenance checks and calibrations on the project site.
Purpose of the data	Calculation of the baseline GHG emission reductions representing the Project Activity emission reductions.
Calculation method	Not applicable; direct measurement.
Comments	---

4.3 Monitoring Plan

The following Monitoring Plan (Table 3) details the process and schedule for obtaining, recording, compiling, and analyzing the monitored data and parameters set out in **Sections 4.1** and **Section 4.2** above.

Table 2: Monitoring Plan

Component	Details
Methods for measuring, recording, storing, aggregating, collating, and reporting data and parameters.	Monitoring methods for the main revenue meter is detailed in Section 4.2 . All data will be stored on the Project Proponent's secured and backed-up servers for a minimum of two years following the end of the first crediting period (12 years from the start date). The Project Proponent will invoice SPP for the generation from the check meter and SPP will provide payment records to the Project Proponent, indicating data reconciliation and acceptance. Monitored data and GHG emission reduction calculations will be compiled at least annually to support third party verification.
Calibration of monitoring equipment	Calibration of the main revenue meter is detailed in Section 4.2 .
Organizational structure, responsibilities, and competencies of personnel carrying out monitoring activities.	The Project Proponent is responsible for the ongoing operation of the turbine systems, while the turbine supplier is responsible for ongoing maintenance and regular servicing of the turbine components per the TSA with the Project Proponent. The Project Proponent is responsible for the operation, maintenance, and regular calibration of the electricity revenue meter. A qualified person within the Project Proponent's organization, or certified third party service, will be used to perform all required calibrations in accordance with the manufacturer recommendations. All data will be received, stored, and monitored by the Project Proponent. The person(s) identified in this document will act on behalf of the Project Proponent to carry out the duties described herein.
Policies for oversight and accountability of monitoring activities.	The Project Proponent's contact identified in this document is accountable for monitoring activities and project oversight.
Procedures for internal auditing, quality assurance and quality control (QA/QC)	The GHG emission reductions will undergo third party verification on an annual basis. Internally, the Project Proponent will conduct quarterly or annual reviews of monitoring data and GHG emission

and handling non-conformances with the validated monitoring plan.	reduction calculations to ensure compliance with the validated project plan. Periods of non-conformance with the validated monitoring plan will be removed from emission reduction calculations in accordance with the VCS Program Guide. *Note that in October 2024, the original meter data was not submitted correctly for 10/2. This caused the official generation for that month to appear low. Telemetry data was used to fill during this time. The Telemetry data is recorded every five minutes in parallel to the SQG data. Because the SQG and Telemetry data are measured at the same place, no transmissions losses need to be applied.
Sampling approaches, sizes, locations, frequencies, and QA/QC procedures.	All monitored data will be collected and stored by the Project Proponent in their offices consistent with the VCS requirements for data storage and retention. Data monitoring frequencies and QA/QC procedures are detailed in Section 4.2 and Section 4.3 above.

5 QUANTIFICATION OF GHG EMISSION REDUCTIONS AND REMOVALS

5.1 Baseline Emissions

Baseline emissions include only CO₂ emissions from electricity generation in fossil fuel-fired power plants that are displaced due to the Project Activity. The CDM Methodology assumes that all project electricity generation above baseline levels would have been generated by existing grid-connected power plants and the addition of new grid-connected power plants. The baseline emissions are to be calculated as follows:

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

Where:

BE_y = Baseline emissions in year y (tCO₂ / y)

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

$EF_{grid,CM,y}$ = Ex ante combined margin CO₂ emission factor for grid connected power generation in year y calculated using the CDM EF Tool (t CO₂ / MWh)

Calculation of $EG_{PJ,y}$

The Project is a greenfield wind power plant, and the quantity of net electricity generation, $EG_{PJ,y}$, is calculated as follows:

$$EG_{PJ,y} = EG_{facility,y}$$

Where:

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

$EG_{facility,y}$ = Quantity of net electricity generation supplied by the project plant/unit to the grid in year y (MWh / y)

Calculation of $EF_{grid,CM,y}$

The grid emission factor ($EF_{grid,CM,y}$) is calculated through a step-wise approach, according to the CDM EF Tool, Version 06.0, as further detailed in the **Project Description (Appendix C)**.

Calculation of Baseline Emissions

The baseline emissions in year y are thus calculated as follows:

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

And for the January 1, 2024 to December 31, 2024 monitoring period:

$$BE_{2024} = 673,787 \text{ MWh} \cdot 0.677 \text{ tCO}_2/\text{MWh} = 456,149 \text{ tCO}_2e$$

5.2 Project Emissions

For the wind energy power generation Project Activity:

$$PE_y = 0.$$

5.3 Leakage Emissions

Leakage emissions are not considered per the CDM Methodology. Emissions associated with power plant construction and upstream emissions from fossil fuel use (such as extraction, processing, and transport) are not considered. The Project is a greenfield facility and all equipment is new.

5.4 GHG Emission Reductions and Carbon Dioxide Removals

Net emission reductions are calculated as follows:

$$ER_y = BE_y$$

The tables below presents the ex-ante calculation of baseline emissions/removals and net GHG emission reductions for the vintage periods.

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)
21-May-2020 to 31-Dec-2020	241,686	---	---	241,686	0	241,686
01-Jan-2021 to 31-Dec-2021	451,694	---	---	451,694	0	451,694
01-Jan-2022 to 31-Dec-2022	478,595	---	---	478,595	0	478,595
01-Jan-2023 to 31-Dec-2023	424,503	---	---	424,503	---	424,503
01-Jan-2024 to 31-Dec-2024	456,149	---	---	456,149	---	456,149
Total	2,052,627					

Vintage period	Ex-ante estimated reductions/removals	Achieved reductions/removals	Percent difference	Explanation for the difference
21-May-2020 to 31-Dec-2020	314,729	241,686	-23.2%	COD delays caused the total estimated reductions for the year to be reduced from 512,840 to 314,729. The difference in achieved reductions and estimated reductions were due to scheduled maintenance and downtime and variances in wind speeds.
01-Jan-2021 to 31-Dec-2021	512,840	451,694	-11.9%	Achieved reductions lower than estimated reductions due to wind speed variances as well as scheduled maintenance and downtime. All turbines

				remain operational and a part of the project.
01-Jan-2022 to 31-Dec-2022	512,840	478,595	-6.7%	Achieved reductions lower than estimated reductions due to wind speed variances as well as scheduled maintenance and downtime. All turbines remain operational and a part of the project.
01-Jan-2023 to 31-Dec-2023	512,840	424,503	-17.2%	Achieved reductions lower than estimated reductions due to wind speed variances as well as scheduled maintenance and downtime. All turbines remain operational and a part of the project.
01-Jan-2024 to 31-Dec-2024	512,840	456,149	-11.1%	Achieved reductions lower than estimated reductions primarily due to wind speed variances as well as scheduled maintenance. All turbines remain operational and a part of the project.
Total	2,366,089	2,052,627	-13.2%	Variance due to wind speed variances and scheduled maintenance and downtime of the turbines. All turbines remain operational and a part of the project.

APPENDIX 1: COMMERCIALY SENSITIVE INFORMATION

Section	Information	Justification
<u>N/A</u>	N/A	