



50 MW TSETSII WIND Farm in Mongolia



Document Prepared by

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¹ <https://registry.verra.org/app/projectDetail/VCS/1898>

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Summary:	

LGA Technological Center, S.A. (hereinafter referred to as Applus+ Certification) has been contracted^{/2/} by Clean Energy Asia LLC to conduct the fifth verification of the project - “50 MW Tsetsii Wind Farm in Mongolia”, VCS ID-1898^{/24/} regarding the relevant requirements of VCS programme guidelines and standard (VCS standard version 4.7, & VCS program guide version 4.4)^{/10/}. Relevant requirements of the UNFCCC for CDM project activities^{/16//17//25/}, as well as criteria for consistent project operations, monitoring and reporting have been applied for verification.

The monitoring period covered under this verification is from 01-April-2022 to 31-March-2023 (both days included).

The verification includes confirming the implementation of the monitoring plan of the registered VCS PD-MR^{/4/} (VCS ID 1898) and the application of the monitoring methodology as per ACM0002, Version 19: “Grid-connected electricity generation from renewable sources”^{/17/}.

The main purpose of this project activity is to generate clean form of electricity through renewable energy sources (Wind Energy). Clean Energy Asia LLC is the project proponent/developer, operator & owner of the project. The project consists of the construction and operation of a greenfield wind energy power plant located in Tsogtestsii Soum, Umnugovi Province, in the South Gobi region of Mongolia. It has a total installed capacity of 50.0 MW and consists of 25 wind turbine generators with a unit capacity of 2.0 MW. These wind turbine generators (referred to as “WTG”) are of Vestas make V110-2.0MW WTG model. The project activity generates clean electricity through renewable wind energy sources and supplies electricity to the central grid of Mongolia (National Power Transmission Grid (NPTG) Limited).

The project activity has been operational since commissioning (27-November-2017)^{/1/} and during 5th monitoring period i.e., from 01-April-2022 to 31-March-2023 (including both days) has generated 175,149.0 MWh net electricity, thereby resulting in emission reductions of 152,550 tCO_{2e}.

The project being a renewable energy generation activity, leads to reduction in fossil fuel dominated electricity generation. The project activity results in reductions of greenhouse gas (GHG) emissions that are real, measurable, and verifiable and plays beneficial role in the mitigation of climate change.

The scope of the verification is the independent and objective review of the Monitoring Report (MR)^{/6/}. The MR is reviewed against the relevant criteria and decisions by the CDM Executive Board and VCS executive board, including the approved baseline and monitoring methodology^{/17/}. The verification was based on the guidance given in the CDM validation and verification standard for project activities, version 03.0^{/16/}, review against registered VCS PD-MR, version 01.1 and final joint validation-verification report^{/4/}, VCS program guide version 4.4 and VCS Standard Version 4.7.^{/10/}

A risk-based approach has been followed to perform this verification. In the course of verification, 02 Corrective Action request (CARs), 00 Forward Action request (FARs), and 00 Clarification request (CLs) were raised. All the CARs and CLs have been closed successfully.

The review of the Monitoring report and additional documents related to baseline and monitoring methodology; the subsequent background investigation, follow-up interviews and project proponents have provided LGAI Technological Center S.A. (Applus+ Certification) with sufficient evidence to verify the fulfillment of the stated criteria of VCS.

The monitoring is transparent, adequate and in line with applied baseline and monitoring methodology of ACM0002, Version 19: "Grid-connected electricity generation from renewable sources".^{/17/}

The assessment team has employed a risk-based approach to assess the completeness and accuracy of the claims and conservativeness of the assumptions in the MR. The main focus of the assessment team is to identify the significant risks for the project implementation and the generation of VCU. The verification is not meant to provide any consulting towards the project proponent. However, stated requests for clarifications and/or corrective actions may have provided input for improvement of the monitoring report combined.

The only purpose of the verification is its usage during the issuance process as part of the VCS project cycle. Therefore, LGAI Technological Center S.A. (Applus+ Certification) can't be held liable by any party for decisions made or not made based on the verification opinion, which will go beyond that purpose. The verification has been planned and organized to achieve a Reasonable Level of assurance as per the requirement of VCS. No sampling procedure applied for document verifications. The entire documents checked/verification conducted to arrive at positive verification conclusions.

LGA Technological Center S.A. (Applus+ Certification) confirms that the project is implemented in accordance with the registered VCS PD-MR^{/4/}. The monitoring system is in place and the emission reductions are calculated without material misstatements. Our opinion relates to the project's GHG emissions, and the resulting GHG emission reductions reported and related to the valid and registered project baseline and monitoring and its associated documents. Based on the information seen and evaluated we confirm that the emission reductions from the project activity "50 MW Tsetsii Wind Farm in Mongolia" during the period 01-April-2022 to 31-March-2023 (including both days) amount to 152,550 tCO_{2e}.

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1 INTRODUCTION

1.1 Objective

LGAI Technological Center S.A. (hereinafter referred to as “Applus+ Certification” or the VVB) has been contracted^{/2/} by “Clean Energy Asia LLC” to perform the fifth periodic verification of the renewable energy project titled “50 MW Tsetsii Wind Farm in Mongolia” (VCS ID-1898) under VCS Program guide V4.4 and VCS standard version 4.7^{/10/}. The verifiers have reviewed the GHG data collected to date for monitoring period from 01-April-2022 to 31-March-2023 (both days included) covered in this verification. The objective of this verification is a thorough and independent assessment of the registered project activity against the applicable VCS requirements by the VVB. The verification process shall determine whether the proposed project activity complies with the requirements of latest VCS guidelines^{/10/}, applicability conditions of the selected methodology^{/17/}, relevant host country regulations and guidance issued by the VCS Board. The objective of this verification activity is to have an independent third party for the assessment of project design, Monitoring Report and Final Verification report and to ensure a thorough assessment of the proposed project activity against the applicable CDM and VCS requirements. In particular;

- the project's baseline is assessed against “ACM0002 – Version 19.0” ^{/17/}
- the project’s monitoring plan is assessed against “ACM0002 – Version 19.0” ^{/17/}
- CDM validation and verification standard for project activities, Version 03.0^{/16/}
- VCS Program Guide v.4.4^{/10/}
- VCS Standard Version v.4.7^{/10/}
- VCS Program Definitions v4.5 ^{/10/}
- VCS Registration & Issuance Process v4.5 ^{/10/}
- VCS Validation and Verification Manual v3.2 ^{/10/}

LGAI Technological Center, S.A. (Applus+ Certification) as the Validation/Verification Body (VVB) for the project activity is accredited as a DOE by UNFCCC and also meets the competence requirements as set out in the normative reference ISO 14065:2020.

Verification is a requirement for all VCS projects and is seen as necessary through the provision of objective evidence, provide assurance to stakeholders of the quality of the project and that the requirements for a specific intended future use or application have been fulfilled regarding its intended GHG claims (i.e. generation of verified certified units (VCUs)).

The objective of verification is to have an independent review and ex post determination by a Validation/Verification Body (VVB) of the monitored reductions in GHG emissions that have occurred as a result of the registration of VCS project and its continuous monitoring. Certification is the written assurance by the VVB that, during a specific time period, a proposed VCS project activity achieved an amount of reductions in anthropogenic emissions by sources of GHGs as verified.

1.2 Scope and Criteria

The scope of verification is to assess the claims and assumptions made in the VCS monitoring report (MR) against the VCS criteria ^{/10/}, including but not limited to, VCS standard^{/10/}, applied methodology^{/17/} and other relevant rules and requirements established for VCS project activities.^{/10/}

The scope is defined as an independent and objective review of the Monitoring report MR^{/6/} prepared as per the registered VCS PD-MR^{/4/} and registered approved methodology ACM0002 – Version 19.0^{/17/}. The MR is reviewed against the criteria (See Section 1.1 above) including the approved applied methodology ACM0002 – Version 19.0^{/17/}. The verification has been conducted in accordance with the VCS Standard version 4.7^{/10/}, other valid and applicable VCS Regulatory Documents and template (see Appendix 2 of this verification report below). UNFCCC rules and requirements (where applicable) and associated decisions of the VCS Secretariat and the UNFCCC Executive Board (where applicable) (hereinafter also can be referred to as regulatory documents).

The verification is not meant to provide any consulting towards the project proponent. However, stated requests for clarifications and/or corrective actions may have provided input for improvement of the Monitoring report. In line with Guidelines for Application of materiality in verifications (Version 02.0) ^{/20/}, the verification team has conducted a complete verification of all the information presented in the monitoring report and data monitored as presented in the emission reductions calculation spread sheet. It follows the paper trail back to the raw data such as meter reading records and invoices (sales records)^{/11/}. There are no material errors, overestimation of Emission Reductions, omission or misstatement. Verification team conducted a remote audit via video conferencing to verify metering/monitoring arrangement. The verification team has reviewed all the documents like commissioning certificate^{/1/}, technical specifications^{/3/}, O & M practices, Joint monthly electricity generation reports (monthly JMRs)^{/11/}, Invoices/sales records ^{/11/}, grievance register^{/15/}.

The only purpose of the verification is its usage during the issuance processes as part of the VCS project cycle. Therefore, LGAI Technological Center S.A. (Applus+ Certification) can't be held liable by any party for decisions made or not made based on the verification opinion, which will go beyond that purpose.

1.3 Level of Assurance

Applus+ Certification has planned and performed the verification by obtaining evidence and other information and explanations that assessment team considers necessary to give reasonable assurance that reported estimated GHG emission reductions are fairly stated. All documentary evidences were checked, remote audit was conducted through video conferencing using ICT tool “Microsoft Teams”. Technical details including metering/monitoring arrangement verified through photos and supportive evidences were shared by PP to arrive at a positive verification conclusion by the assessment team.

The level of assurance of the verification report falls under reasonable assurance engagements. Reasonable assurance is a high level of assurance regarding material misstatements, but not an absolute one.

Reasonable assurance includes the understanding that there is a remote likelihood that material misstatements will not be prevented or detected on a timely basis. To achieve reasonable assurance, the auditor needs to obtain sufficient appropriate audit evidence to reduce audit risk to an acceptably low level. This means that there is some uncertainty arising from the use of sampling, since it is possible that a material misstatement will be missed.

Through an exhaustive process of documentary review, interviews with the project proponents, remote audit, assessment on GHG Emission Reductions calculations against applicable methodology and any other regulatory document and reporting of objective evidence, the VVB is able to reach a reasonable level of assurance on the conduction of the verification process. The achieved level of assurance for this verification is thus a reasonable level of assurance as per the requirements set out in the applied VCS Standard version 4.7 clause 4.1.10 (1) ^{/10/}.

VVB applied a materiality threshold of 5% with respect to omission or misstatements concerning reported quantities as per VCS Standard version 4.7, clause 4.1.10 (4) ^{/10/}.

Additionally, according to the VCS Validation and Verification Manual version 3.2 ^{/10/}, while all material errors, omissions and misrepresentations must be addressed for a project to receive a positive validation or verification opinion, when non-material errors have been found in the project documents, VVB requested the project proponent to correct them and ensured that such errors have been addressed where applicable. The evidence used to achieve a reasonable level of assurance is specified in section 2.3 and 2.4 of this report. Materiality for the project is 5% which is in accordance with para 4.1.10(4) of VCS Standard v4.7, however the assessment team has verified 100% data (no sampling plan is applied), hence it is sufficient to meet the materiality requirements of the project.

In our opinion, the estimated GHG emissions reductions were calculated correctly on the basis of the approved baseline and monitoring methodology “ACM0002, Version 19.0”^{/17/} and the VCS standard v.4.7 (paragraph 4.1.10) ^{/10/}.

1.4 Summary Description of the Project

The project consists of the construction and operation of a greenfield wind energy power plant located in Tsogtestsii Soum, Umnugovi Province, in the South Gobi region of Mongolia. It has a total installed capacity of 50.0 MW and consists of 25 wind turbine generators with a unit capacity of 2.0 MW. These wind turbine generators (referred to as “WTG”) are of Vestas make^{/3/} V110-2.0MW WTG model. The project activity generates clean electricity through renewable wind energy sources and supplies electricity to the central grid of Mongolia (National Power Transmission Grid (NPTG) Limited). This clean energy supply thus implies a substantial reduction in the production of carbon from the predominantly thermal-based grid mix, thereby reducing the associated greenhouse impact upon the atmosphere.

The electricity generated by the WTGs is transmitted to the “Tssetsii” substation. From there, it is delivered to the central power grid network via 110kV overhead transmission lines, which connect the project to the 220/110/35kV “Tavantolgoi” substation. The National Power Transmission Grid Limited (referred to as “NPTG”) receives the electricity as per the Power Purchase Agreement^{/9/} between Clean Energy Asia LLC and the National Power Transmission Grid State Owned Stock Company, which serves as the national power system operator.

The project commissioning commenced on 27-November-2017^{/1/}. The project consists of 25 sets of wind turbine generators with a unit capacity of 2MW. The total installed capacity of the project is 50MW. Each wind turbine generator is equipped with one transformer. The power generated by the wind turbine generators is delivered to the 35/110kV on-site “Tssetsii” substation by 35kV underground transmission lines. The on-site “Tssetsii” substation increases the voltage of the electricity generated from 35kV to 110kV, where it is transported to the national power grid connection point at 220/110/35kV “Tavan Tolgoi Substation” via a 110kV overhead transmission line. It was noted that no alterations have been made to the project design during the reporting period.

The project’s monitoring equipment are composed of four bi-directional energy meters for import/export (Make: Elster, Meter types: A1802RAL-P4GB-DW-4(main) and A1805RAL-P4GB-DW-4(backup), Class: 0.2S)^{/3/} located at Tavantolgoi substation No. 1 and Tavantolgoi substation No. 2. The calibration frequency of meters is once in 8 years.

The verification team confirmed these technical details about the wind turbine generators by cross checking the manufacturer’s technical specification documents^{/3/}, photographs of component’s nameplates provided by PP^{/18/} and through remote audit^{/19/}.

The location details of the project are as follows:

Sr. No.	Name of Project Developer	Location	Latitude	Longitude
1.	Clean Energy Asia LLC	The site lies within the Tsogtsetsii Soum, in the province of Umnugovi Aimag in southern Mongolia.	43° 33' 6.904" to 43° 33' 58.186" N	105° 34' 50.16" to 105° 38' 28.0176" E

The location of the project activity mentioned in the MR is checked through the Google Maps, (<https://www.google.co.in/maps>) and found consistent with registered VCS PD-MR/^{4/} and it is accepted. The status of the project activity is verified through the maintenance records and breakdown records of the plant and confirmed that the project activity was fully operational during the monitoring period, with few incidents of breakdown./^{13/}

The project activity is developed by Clean Energy Asia LLC. The former entity has signed a Power Purchase Agreement with National Power Transmission Grid State Owned Stock Company (i.e. NPTG)/^{9/}, which is the state-owned utility in Mongolia that is responsible for generation, transmission and distribution of electricity.

Technical specifications/^{3/} of the equipments i.e. wind turbine generators (WTGs) involved in the project activity as reported under section 3.1 of the MR/^{6/} are verified through the remote audit, latest photographs/videos/^{18//19/} and are found to be consistent with the same as mentioned in the registered PD-MR and the MR for this verification period/^{4/}. The start date of the project activity is 27-November-2017, which is date of commissioning for the project activity, as verified through the commissioning documents/^{1/}. The project became fully operational on 08-May-2018. The designated lifetime of the project activity is 20 years, the same is verified through the registered PD-MR/^{4/}. VVB concluded that the project has been implemented as per the requirement of registered VCS PD-MR/^{4/} and approved monitoring plan.

As per the registered VCS PD-MR/^{4/}, the project crediting period is from 27-November-2017 to 26-November-2027, totally 10 years, renewable up to 2 times. The current verification period is from 01-April-2022 to 31-March-2023.

During the current monitoring period, it was observed that few unforeseen incidents/events evolved that can impact the operation of the project activity, which was verified from breakdown records/^{13/}. The project undergone continuous operation and the scheduled maintenance as per the manufacturer's specification was conducted. Some turbines observed breakdown during the current monitoring period and please refer to the Appendix 6 of this report for more information about the plant breakdowns.

The organisational roles and responsibilities as mentioned in the registered PD-MR/^{4/} are followed onsite. All the emergency preparedness as mentioned in the registered PD-MR/^{4/} are followed onsite and no discrepancies were found regarding the same as confirmed during interviews with the PP representatives.

The project activity uses the UNFCCC approved large-scale consolidated baseline and monitoring methodology: ACM0002 “Grid-connected electricity generation from renewable sources”, Version 19.0/^{17/} and pertains to the defined UNFCCC Sectoral Scope 1, Technical Area 1.2 Renewables.

The project is not registered under any other GHG Program other than the VCS and can be found in the following link: <https://registry.verra.org/app/projectDetail/VCS/1898>.

The VVB has cross-checked the available registries of UNFCCC CDM/^{25/}, Gold Standard (GS)/^{26/}, International Carbon Registry (ICR)/^{26/} and the Global Carbon Council (GCC)/^{27/} and has not found this project activity registered in any of these schemes.

The current monitoring period is covered from 01-April-2022 to 31-March-2023 (inclusive of both dates) and the project activity has exported 175,149.0 MWh of net electricity to the Mongolian grid (National Power Transmission Grid Limited, i.e. NPTG). As a result of exporting renewable energy to the fossil fuel intensive central grid of the host country, the accrued emission reductions 01-April-2022 to 31-March-2023 are calculated and certified as a result of this verification to be 152,550 tCO_{2e}.

Based on the assessment of the documents, the assessment team can confirm that the project activity is fully functional and implemented as described in the registered VCS PD-MR./^{4/}

2 VERIFICATION PROCESS

The registered VCS project is undergoing 5th verification period, the approach adopted to ensure the quality of emission reductions is described in the following sections.

2.1 Method and Criteria

Verification Process: The project assessment is based on the “CDM validation and verification standard for project activities, Version 03.0”/^{16/}, “VCS program guide v.4.4 and VCS standard v.4.7” /^{10/} and is conducted using standard auditing techniques and pre-approved audit plan/^{19/} to assess the correctness of the information provided by the project proponent as per following verification schedule(during remote audit):

The Verification process has been conducted in accordance with the Applus+ Certification’s procedures and in line with the applicable regulatory documents, *inter alia*, the VCS Standard version 4.7/^{10/}, other valid and applicable VCS Regulatory Documents and templates/^{10/}, the UNFCCC CDM M&P and the latest version of the applicable UNFCCC CDM regulatory documents/^{17//25/} and relevant requirements (where applicable); applying, as a minimum, standard auditing techniques.

The Verification process has been also conducted following the regulatory documents and based on the ISO 14064-3:2019 and ISO 14065:2020 using standard auditing techniques as required by the VCS Standard v4.7.^{10/}

The verification process has been conducted remotely and a risk analysis for remote inspections has been performed prior to the determination of the suitability to conduct the assessment using ICT (Information and Communication Technology) means², in accordance with the VCS Standard version 4.7 Para 4.1.13.

The ICT means have been used to an extent sufficient to cover all the verification process and have demonstrated enough effectiveness to conduct the verification in accordance with the relevant applicable regulatory requirements.

This process has included: the review of data and information presented to verify their completeness; the review of the monitoring plan and monitoring methodology, paying particular attention to the frequency of measurements and the QA/QC procedures; an evaluation of data management; and an evaluation of the QA/QC system in place in the context of its influence on the generation and reporting of emission reductions.

No virtual sites have been included in the verification process according to the definition in the IAF MD4:2023 document^{30/}. Instead, the documentation has been provided upon request from the VVB by other means (such as mail, transfer applications, etc.)

Before the assessment begins, members of the team covering the technical scope(s), sectoral scope(s), and relevant host country experience for evaluating the VCS project activity are appointed in accordance with the Applus+ Certification's procedures and policies, that are in accordance with the ISO 14065:2020 regulatory provisions.

Applus+ Certification has completed a strategic review and risk assessment of the project's activities and processes in order to gain a full understanding of:

- Activities associated with all the sources contributing to the project's emissions and emission reductions, including leakage if relevant;
- Protocols used to estimate or measure GHG emissions from these sources;
- Collection and handling of data;
- Controls on the collection and handling of data;
- Means of verifying reported data; and
- Compilation of the information in VCS monitoring report.

² According to the IAF MD4:2023, ICT is the use of technology for gathering, storing, retrieving, processing, analysing and transmitting information. It includes software and hardware such as smartphones, handheld devices, laptop computers, desktop computers, drones, video cameras, wearable technology, artificial intelligence, and others.

Based on the above, the VVB prepared a Verification Plan and applied an evidence-gathering plan designed to collect sufficient and appropriate evidence upon which to base the conclusion and to consider the inherent risk for the verification. The evidence-gathering plan is based on analytical procedures and tests and considers the thresholds for materiality as per the regulatory documents applied for this verification (5% as per the applied VCS Standard version 4.7)^{10/}.

The applied evidence-gathering plan is used by the VVB to determine the conformity of the statements made by the client against the principles and requirements of the applied regulatory documents during this verification.

The evidence-gathering plan designed by the VVB takes into consideration, as a minimum:

- The selection and management of the data and information;
- The processes for collecting, processing, consolidating, aggregating and reporting the data and information;
- Systems and processes in place to ensure the validity and accuracy of the data and information;
- The design and maintenance of the system to control the data and information;
- Systems, processes and personnel that support system in place, including activities for ensuring data quality;
- The results of instrument maintenance and calibration where appropriate;
- The results of previous validation activities and verifications, where available and appropriate.

The audit team has performed a Risk Assessment and elaborated a feasible audit plan^{19/} that covers all aspects of the audit and establishes measures to eliminate or reduce the identified risks:

Risks to address while conducting the remote audit:

Potential Risks	Risk identified	Description of mitigation measures in case the risk has been identified
The remote assessment cannot be done in quite environment	☒ Yes ☐ No	PP/stakeholder and VVB are able to provide a quite environment for remote audit in respective offices. If an interview with the stakeholders that may connect through mobile phone is done, the VVB will encourage them to go to the PP's office or provide a local support for the conduction of the interviews and can also

		be shared recorded in video. Otherwise, if there is noise not allowing VVB to understand well what the stakeholders in open place are saying, the VVB will stop that conversation until is able to hear everything appropriately. This may imply further rounds of remote inspection, if deemed necessary.
There is no option to terminate the remote assessment and continue in a later date, if there are problems or the VVB finds further risks not yet identified	☐ Yes ☒ No	VVB can terminate and continue in a later date, because there is no deadline approaching so there will be enough time to retake the audit if needed. In case of connectivity problems are found, the VVB can continue in a later date or interview PP's representatives separately.
There is no option to do a further round of remote inspection in case the VVB determines its necessity due to the answers provided to the findings	☐ Yes ☒ No	VVB always keep an option to do a further round remote inspection in case require.
The PPs may not authorize to take screenshots of documents or records or may not authorize to show them by ICT means	☐ Yes ☒ No	The PP has allowed to take screenshots of documents or records and will show them by ICT means in case this is required by the VVB.

Risks Related To The Project:

Potential Risks	Risk identified	Description of mitigation measures in case the risk has been identified
Risks related to organizational and procedural aspects		
Key stakeholders and/or	☐ Yes	The key stakeholders Project Proponent, local O & M staff, local stakeholders will join the remote

Potential Risks	Risk identified	Description of mitigation measures in case the risk has been identified
Risks related to organizational and procedural aspects		
end users of project technology not willing / able to be interviewed through ICT	☒ No	inspection through mobile application used as ICT tool.
High amount of documentation to be reviewed remotely	☒ Yes ☐ No	The documentation to be checked is available in digital form as well as in physical form with the PP. It will be ensured that all the required documents are made available/ displayed/shared by PP. If due to some technical issue during the video call, the concerned document could not be viewed/shared, the same will be noted down and PP will be asked to display/share it at later stage of audit.
Relevant data flows cannot be accessed remotely	☒ Yes ☐ No	The documentation and subsequent data flow to be checked is available in digital form as well as in physical form with the PP. It will be ensured that all the required documents are made available/ displayed/shared by PP. If due to some technical issue during the video call, the concerned document could not be viewed/shared, the same will be noted down and PP will be asked to display/share it at later stage of audit.
Established record-keeping system cannot be accessed remotely	☒ Yes ☐ No	A record keeping system is available in digital form as well as physical form. If due to some technical issue during the video call, the concerned record keeping system could not be accessed/displayed/viewed, the same will be noted down and PP will be asked to re-share it at later stage of audit.

Potential Risks	Risk identified	Description of mitigation measures in case the risk has been identified
Risks related to the project activity and its configuration		
The boundary of the project activity cannot be evaluated remotely	☐ Yes ☒ No	The boundary of the project activity can be evaluated remotely. VVB Team has cross checked the project location coordinates through Google Maps which were confirmed to be correct. It was also confirmed that the project activity is connected to the NPTG Grid by cross checking the PPA document. Hence, the project boundary was confirmed to be correct. Further, the PP can demonstrate the working wind power plant and its operation, its connection with national grid through electricity sub-station and official website of Mongolia Energy regulatory commission³.
The features of the project activity cannot be evaluated remotely	☐ Yes ☒ No	The features of the project activity can be evaluated remotely via live video/pics or supporting documents.
Is not possible to observe sources of emissions that are not included in the project activity	☐ Yes ☒ No	It is possible to observe sources of emissions that are not included in the project activity through the video/ picture taken of the site by PP and due to the type of project, this is unlikely to occur.
Is not possible to check how the controls of the activities are carried out	☐ Yes ☒ No	It is possible to check how the controls of the activities are carried out. VVB Team during the remote audit can check the controls of the activities through interviews with the O&M personnel and by cross-checking the monitoring system in place and the SCADA

³ <https://erc.gov.mn/web/en/energy-sector-map> last retrieved on 14-November-2024

		System.
Is not possible to check how the calculations are tracked	☐ Yes ☒ No	It is possible to check how the calculations are tracked as the PP can demonstrate the plant operations through video call and through documentary evidence such as generation records, invoices raised and emission reduction worksheet.
May be a non-conformity with core scheme's rules and requirements that cannot be observed through ICT	☐ Yes ☒ No	There is no potentially identified non-conformity with core scheme's rules and requirements that cannot be observed through ICT means.
Would not be possible to know about how any negative feedback / observations received from stakeholders are being sufficiently addressed by the project	☐ Yes ☒ No	The PP has a grievance mechanism in place that has been shared and contains detailed information enough to allow any required interview with stakeholders to know about how any negative feedback / observations received from stakeholders are being sufficiently addressed by the PP.

Potential Risks	Risk identified	Description of mitigation measures in case the risk has been identified
Risks related to monitoring aspects		
The monitoring parameters and the monitoring plan are complex	☐ Yes ☒ No	VCS PD-MR is checked and Monitoring parameters/plan found in line with applied methodology (ACM0002, Version 19.0) ^{17/} having monitoring parameter i.e., EG _{facility,y} and are not complex. The parameters are accessible based on the supporting data presented and interviews.
Data processing and reporting methods are not available through	☐ Yes ☒ No	The remote interview with PP/stakeholder is enough to know about data processing and reporting.

ICT		
A fiscal metering method is applied and its results cannot be accessed remotely	☐ Yes ☐ No ☒ N/A	Not applicable
The records and results of the sampling or surveys conducted at household or end-user level by PPs cannot be cross-checked through ICT	☐ Yes ☐ No ☒ N/A	N/A (no sampling)
Status of the monitoring period being verified cannot be checked through ICT	☐ Yes ☒ No	Status of the monitoring period can be checked through ICT means.
May be a non-conformity with potential reversal of GHG benefits and other SDG Impacts that cannot be observed through ICT	☐ Yes ☒ No	There are no observed SDGs in the PA and any potential non-conformity with potential reversal of GHG benefits are suitable to be observed through ICT means and/or desk review tasks.
Data and information may have not been properly checked during previous assessments for the project.	☐ Yes ☒ No ☐ N/A	Each audit is independent from the latest one and any information will be checked again for this verification covering those validation aspects suitable to any potential changes.
Based on previous assessments of the project there could be data and information that cannot be checked without an onsite inspection	☐ Yes ☒ No ☐ N/A	Based on previous assessments of this project, as evident from the documents available on registry page and the initial desk review documents, there is not any data and information which can't be checked through remote inspection. Hence, this risk is not identified.

There are aspects that may cease to exist after the Validation of the project.	☐ Yes ☐ No ☒ N/A	Not applicable as this is a verification.
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At the end of this phase, Applus+ Certification produced a verification plan which, based on the risk assessment of the parameters and data collection and handling processes for each of those parameters, describes the verification approach and the sampling plan (if applicable).

Applus+ Certification has verified the implementation of the monitoring plan and the data presented in the Monitoring Report (MR) version 03, dated on 27-November-2024^{6/} for the monitoring period applicable to this verification process.

The process of verification involved the following relevant milestones:

- The signature of the contract for verification between the PP and the VVB^{2/};
- A kick-off meeting/communication to require the documentary material to perform an initial desk review;
- An initial desk review of the documentary evidence prepared by the Project Proponent;
- The issuance of findings coming from this initial desk review (if any);
- The conduction of a remote inspection, including interviews and video-calls in substitution of a site visit (see Sections 2.3 and 2.4 below);
- The issuance of findings from the remote inspection and communication of such deviations (if any) to the Project Proponent;
- The assessment of their resolution and closure, when appropriate;
- Once all the findings have been closed, the elaboration of this Verification Report, in which such findings (if any) are described;
- The conduction of an independent Technical Review;
- Upon conclusion of the Technical Review, the VVB may perform a final quality check before the issuance of the Final Verification Report (FVR) and signature of the corresponding Verification Deed.

The process of this verification assessment has not implied any sampling plan.

Verification schedule is described in the below table:

Scope of the assessment	Date
Initial meeting/Interview	21-June-2024
Desk review	15-July-2024
Remote audit	20-August-2024

Initial DVR submission to PP	22-August-2024
Finalization of DVR and preparation of FVR	02-October-2024

Appointment of the assessment team

Before the assessment begins, members of the team covering the technical scope(s), sectoral scope(s), and relevant host country experience for evaluating the VCS project activity are appointed in accordance with the LGAI Technological Center S.A. (Applus+ Certification) procedures and policies, that are in accordance with the ISO 14065:2020 regulatory provisions.

According to the applicable sectoral scope / technical area and experience in the sectoral or national business environment, LGAI Technological Center S.A. (Applus+ Certification) has composed an assessment team in accordance to compliance with the contract review and Assessment Team appointment rules in the internal Quality Management System of LGAI Technological Center S.A. (Applus+ Certification) as well as in compliance with the applicable requirements in the Accreditation Standard.

The composition of audit team (Applus+ Certification's verification team) has been approved by the LGAI Technological Center S.A. (Applus+ Certification) Central site during its Contract Review process, ensuring that the required skills and capabilities are covered by the team.

The qualification levels for Assessment Team members that are assigned by aforementioned appointment rules are as presented below:

- Lead Auditor (LA).
- Auditor (A).
- Technical Expert (TE).
- Technical Reviewer (TR).
- Other supporting roles such as Country Expert (CE) or Financial Expert (FE) when needed.
- Any of the above-mentioned roles in training (iT, e.g. AiT for Auditor in Training, TEiT for Technical Expert in Training, etc.).

The Sectoral Scopes / Technical Areas required knowledge linked to the applied methodology(ies) is covered by the Assessment Team as shown below:

Name	Role	SS/TA Coverage	Financial Aspect	Attendance to on-site visit ⁴
Mr. Deepak Pundlik	LA/TE	YES (1.2)	N/A	N/A
Mr. Saurabh Gaikwad	A	YES (1.2)	N/A	N/A
Ms. Lily Liu	OBS	NO	N/A	N/A
Ms. Karen Elizabeth Vega Nonalaya	TR/TE	YES (1.2)	N/A	N/A
Mr. Ravi Kant Soni	TRIT	YES (1.2)	N/A	N/A

The complete list of CVs is included as Appendix 4 of this report.

Document review

The Monitoring report (Version 01)^{6/} submitted by the PP was reviewed against the approved methodology, registered VCS PD-MR/^{4/}, final joint validation-verification report/^{4/} and other relevant criteria to verify the correctness, credibility, and interpretation of the presented information.

Furthermore, a cross-check between information provided and information from other sources has been done. A complete list of all documents and evidence material reviewed is included in this report below in Appendix 2.

Remote Audit

A remote audit is conducted by LGAI Technological Center S.A. (Applus+ Certification) assessment team who performed video/telephonic conferences with project's stakeholders to confirm selected information and to resolve issues identified in the document review. The details are provided in this report in the below sections Resolution of Clarification and Corrective Action Request.

Resolution of Clarification and Corrective Action Request

The objective of this phase of the Verification was to resolve the requests for corrective actions and clarification and any other outstanding issues which need to be clarified for Applus+ Certification positive conclusion on the Monitoring report. The Corrective Action Requests and Clarification Requests raised by Applus+ Certification were resolved during communications between the Client and Applus+ Certification to guarantee the transparency of the verification process, the concerns raised, and responses given are summarized below in the Appendix 2.

⁴ The assessment has been conducted remotely, please refer to Section 2.3 and Section 2.4. below for further information.

The final MR Version 03/⁶/ submitted by PP serves as the basis for the final assessment presented. Additional changes to the project during the verification process are not considered to be significant with respect to the main CDM/VCS objectives. The two CDM/VCS main objectives are the reduction of anthropogenic GHG emissions and the contribution of sustainable development to the host country.

Internal quality control

As final step of a verification, the final documentation including the verification report have to undergo an internal quality control by the technical review committee.

Details of the Technical Reviewer(s) are provided within the verification Report in Section 2.1 and Appendix 4 for further references of knowledge and capability to conduct the quality checking.

After the Technical Review process, the final documentation may undergo a final quality checking process called Administrative Review, done by the Applus+ Certification's Project Manager and/or Technical Support.

For final approval, the final set of documents are prepared by the VVB's Technical Manager or its deputy and signed by the authorized signatory of the VVB.

In case any of the persons performing this final internal quality-control and approval process has acted as a part of the Assessment Team or Technical Review team, the approval can only be given by VVB's personnel who are not part of those teams.

After confirmation of the PP, the positive verification opinion and relevant documents are submitted to the VCS board through the VCS web-platform by the PP.

2.2 Document Review

The details of the documents observed during the verification process which included following:

- Compliance of the Monitoring Report with the current version of the template and its required contents;
- Monitored parameters and reporting requirements;
- Assessment of data and calculation of emission reductions or net removals (Conservativeness, use of calculation methods and assumptions, emission factors, reliability/reproducibility);
- Assessment on the differences from the estimated value of ERs in the registered PD-MR and the achieved ERs in the Monitoring Period;
- Remaining forward action requests from validation or previous verifications;

- Ongoing communication method with stakeholders;
- Sustainable development contributions.

The VCS Monitoring Report (MR) version 03, dated on 27-November-2024 ^{/6/} and the Emission Reductions (ER) Calculations^{/7/} were assessed as part of the verification. In addition, the registered Project Description-Monitoring Report (PD-MR) version 01.1, dated on 28-August-2019^{/4/}, in particular, the baseline estimations and the monitoring plan, and the VCS Validation-Verification Report and latest Verification Report, as well as relevant documents, were reviewed. A detailed list of the reviewed documents can be observed in the Appendix 2 of this Verification Report.

2.3 Interviews

In accordance with the paragraph 4.1.12 of VCS standard v.4.7 ^{/10/}, Site visit shall be conducted under the following circumstances:

- 1) The first verification of the project after validation;
- 2) Verification of project baseline reassessments; and,
- 3) Verifications that assess a project description deviation where the deviation impacts the applicability of the methodology, additionality or the appropriateness of the baseline scenario.

Since the current ongoing verification is fifth periodic verification for this project activity and there is no baseline reassessment involved and no project deviations identified, the onsite visit is not mandatory.

Hence, as part of verification, a remote inspection has been performed by VVB team via video conferencing using ICT tool Microsoft Teams on dated 20-August-2024^{/19/}.

Following ICT means have been used for the conduction of this Verification process. Those ICT means supporting the process in this sense, have been used as described above in Section 2.1 to an extent sufficient to cover the background necessities of the Verification process and have demonstrated enough effectiveness to conduct it in accordance with the relevant applicable regulatory requirements.

The audit team confirms that have been evaluated and provided appropriate measures to safeguard the confidentiality of data in any format as a result of the asynchronous documentary review, in line with the ISO 14065:2020 regulatory provisions. This implies:

- Take appropriate measures to safeguard the confidentiality of data in any format;
- Prevent the access and retention of more documented information than it would in a normal face to face audit;
- Agree a secure system to share information;

- Once the audit is complete, the Audit Team should delete from its system or remove access to any documented information and records not required to be retained as objective evidence;
- Any screenshots of documents or records or other kind of evidence that the Audit Team takes should be previously authorized by the project developer and proponents;
- This authorization can be given verbally during the remote inspection when there is a request to capture any shown information.

Based on the above, the VVB prepared a Verification Plan and applied an evidence-gathering plan designed to collect sufficient and appropriate evidence upon which to base the conclusion and to consider the inherent risk for the verification. The evidence-gathering plan is based on analytical procedures and tests and considers the thresholds for materiality as per the regulatory documents applied for this Verification (5% as per the applied VCS Standard version 4.7/^{10/}).

This is 5th periodic verification of the project activity and VVB checked the technical details and specifications of the equipment's mentioned in section 1.8 of registered VCS PD-MR/^{4/} & section 3.1 of previous monitoring report/^{4/} and the actual implementation status of the project activity during the current monitoring period. Detailed analysis of the same has been provided in section 1.4 and section 4 of this verification report. Further, there are no deviations from the project description occurred during this monitoring period. Furthermore, VVB has conducted remote audit/^{19/} and interviews with PP representatives after independent risk assessment which is in line with the requirement of the paragraph 4.1.13 of VCS Standard v.4.7/^{10/}. The VVB has taken alternative measures to reach reasonable level of assurance and conducted remote audit through Microsoft Teams ICT tool/Telephone with site personal & with the PP representatives.

Technical details & metering/monitoring arrangement/^{3/} verified through onsite photographs/name plates/^{18/} and calibration evidence /^{5/}shared by PP. All the documents were cross checked to ensure conservative estimation of emission reduction.

During the remote audit, the PP representatives were questioned about the implementation of the project activity. Several topics like the verification of commissioning dates of WTGs, the generation, recording, and monitoring of the data and the error accountability were discussed. To cross check the information provided by PP, various documents like technical specifications, commissioning certificate/^{1/}, Power Purchase Agreement (PPA)/^{9/}, Monthly electricity generation records (monthly JMRs)/^{11/}, invoices (sales records)/^{11/}, calibration evidences/^{5/} etc. were also verified. The names of the persons interviewed during remote audit through ICT tool Microsoft Teams meeting/video & telephonic interview is given below:

No.	Interviewee		Date	Subject	Team member
	Name	Role & Organization			
1.	Mr. Sodnomtseren Ganbat	Maintenance Manager, Clean Energy Asia LLC	20-August-2024 (through video conferencing via Microsoft Teams meeting)	Project Implementation, Electricity generation records & invoicing procedure, Operational data, Monitoring equipment, monitoring plan, safeguarding measures, HSE programmes, training programmes, Management practices, data collection, recording-storage and archiving procedure, data transferring and results achievement and reproducibility, Organigram, operation and maintenance staff of the plant, QA/QC, calibration, Grievance mechanism, Grievances identified during current monitoring, waste management and environmental impacts, Issues related to local area development, Awareness about the project under GHGs reductions, ER calculations	Mr. Deepak Pundlik (Lead Auditor/Technical Expert), Mr. Saurabh Gaikwad (Auditor), Ms. Lily Liu (Observer).
2.	Ms. Saruul Damdinbal	Health, Safety, and Environmental manager, Clean Energy Asia LLC			
3.	Mr. Balsanjamt Davaasambu	Production Manager, Clean Energy Asia LLC			
4.	Ms. ANU Enkhtuvshin	Technical, Estimation & Research Specialist, Clean Energy Asia LLC			
5.	Mr. Ekhlenmandah Khurelbaatar	Senior Maintenance Engineer, Clean Energy Asia LLC			
6.	Mr. Naranbold Tumurbaatar	Health, Safety, and Environmental Officer, Clean Energy Asia LLC			
7.	Mr. Borkhuu Ganbold	Tsogtsetsii Soum citizen. Founder and Teacher at “Ikh Shankh” Children's Checker Club			
8.	Mr. Otgonbayar	Tsogtsetsii Soum, Siirst bag			
9.	Ms. B. Gaamaa	Tsogtsetsii Soum citizen			

Interviews with local stakeholders:

The verification team has interviewed the local stakeholders (details mentioned in above table), and they were questioned for various topics as summarized below.

- a) Effect of project on their livelihood and income
- b) Any problem related to project installation in nearby areas
- c) Are they happy with the benefits and development as CSR activity of the PP?
- d) General feedback about the project
- e) Do they know about the grievance and feedback back register/mechanism?
- f) Any feedback; Concern (C) Positive (P) and Negative (N)

All the stakeholders expressed their satisfaction with the project activity and provided positive and satisfactory answers to the questions mentioned above.

2.4 Site Visits

In accordance with the paragraph 4.1.12 of VCS standard v.4.7/¹⁰/, Site visit shall be conducted under the following circumstances:

- 1) The first verification of the project after validation;
- 2) Verification of project baseline reassessments; and,
- 3) Verifications that assess a project description deviation where the deviation impacts the applicability of the methodology, additionality or the appropriateness of the baseline scenario.

Since the current ongoing verification is fifth periodic verification for this project activity and there is no baseline reassessment involved and no project deviations identified, the onsite visit is not mandatory.

Hence, as part of verification, a remote inspection/¹⁸/ has been performed by VVB team via video conferencing using ICT tool Microsoft Teams on dated 20-August-2024/¹⁹/.

To achieve a reasonable level of assurance, the assessment team has followed the alternative means to substantiate the verification criteria as described in the section 2.1 of this report.

Duration of remote audit: 20-August-2024			
Activity performed during remote audit	Site location	Date	Team member
No Physical site visit was performed (Refer Section 2.3 of this report for details). Assessment team checked the description of project activity and its implementation, Compliance of the project implementation with the registered project design	The Wind Farm is located in Tsogtestsii Soum, Umnugovi Province, in the South Gobi region of	20-August-2024	Mr. Deepak Pundlik (Lead Auditor/Technical Expert),

Duration of remote audit: 20-August-2024			
Activity performed during remote audit	Site location	Date	Team member
document, Compliance of the registered monitoring plan with applied methodology, calibration frequency requirements for measuring instruments Baseline emission, Emission reduction calculation, technical description of the project and Monitoring. Assessment team also checked that whether the monitoring plan as described in the VCS PD-MR ^{4/} is actually practised onsite. Also, assessment team checked any change in host country criteria which may affect the baseline of the project activity.	Mongolia (Remote audit conducted on 20-August-2024 through video conferencing via Microsoft Teams meeting)		Mr. Saurabh Gaikwad (Auditor), Ms. Lily Liu (Observer).

2.5 Resolution of Findings

As an outcome of the verification process, the assessment team may raise different types of findings.

Where a non-conformance arises the assessment team shall raise a Corrective Action Request (CAR). A CAR is issued, where:

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

The assessment team shall raise a Clarification Request (CL) if information is insufficient or not clear enough to determine whether the applicable requirements have been met.

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

All CARs and CLs raised during verification shall be resolved prior to submitting a request for issuance.

Raised CARs and CLs for this project activity's verification process are listed in Appendix 3 of this Verification Report.

The total number of CARs for this Verification has been 02 and no CLs have been raised for this Verification.

2.5.1 Forward Action Requests

This is 5th periodic verification of the project activity and no FAR was raised from validation or previous verification as verified from the validation report and previous verification report.

2.6 Eligibility for Validation Activities

This section is not applicable for present verification, as LGAI Technological Center, S.A. (Applus+ Certification) holds the necessary accreditation for the validation and verification for projects under Scope 1 / Technical Area 1.2.

3 VALIDATION FINDINGS

3.1 Methodology Deviations

PP has not sought any methodology deviations. Hence, this section is not applicable for present verification.

3.2 Project Description Deviations

There are no project description deviations sought during the current monitoring period and in previous monitoring periods. Hence, this section is not applicable for present verification.

3.3 New Project Activity Instances in Grouped Projects

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

3.4 Baseline Reassessment

Did the project undergo baseline reassessment during the monitoring period?

☐ Yes

☒ No

4 VERIFICATION FINDINGS

4.1 Project Details

Item	Evidence gathering activities, evidence checked, and assessment conclusion:			
Audit history	Audit type	Period	Number of years	Validation / verification body name
	VCS Joint Validation-Verification	27-November-2017 to 31-March-2019	One year and 124 days	Rina Services S.p.A
	VCS Verification 2	01-April-2019 to 31-March-2020	One year	Carbon Check India Pvt. Ltd.
	VCS Verification 3	01-April-2020 to 31-March-2021	One year	Carbon Check India Pvt. Ltd
	VCS Verification 4	01-April-2021 to 31-March-2022	One year	LGAI Technologica I Center, S.A. (Applus+ Certification)
	VCS Verification 5	01-April-2022 to 31-March-2023	One year	LGAI Technologica I Center, S.A. (Applus+ Certification)
	Total	27-November-2017 to 31-March-2023	5 years, 124 days	-
	The above audit history of the project has been verified and confirmed to be correct by the assessment team from the VERRA project portal ⁵ /24/, Validation-verification report, registered VCS PD-MR, the previous monitoring reports & respective verification reports of previous monitoring periods /4/.			
Double counting and	The current project activity is not receiving or seeking credits for			

⁵ <https://registry.terra.org/app/projectDetail/VCS/1766>

participation under other GHG programs	reductions and removals from a project activity under another GHG program other than VCS. Verification team checked independently other registries such as UNFCCC CDM⁶, Gold Standard for the Global Goals (GS4GG⁷), Global Carbon Council (GCC⁸), International Carbon Registry (ICR⁹) /25//26//27//26/ and confirmed that project is not participating in any other GHG programs other than VCS program. Also, International REC (I-REC) registry¹⁰ is cross-checked and found that this project is not under I-REC as well. Thus, double counting for the current monitoring period is ruled out. Verification team further confirms that project activity is not rejected by any other GHG program. The project proponent has submitted a declaration dated 12-August-2024/^{12/} to the verification team declaring that the project is not registered under any other carbon standard other than VCS and is not rejected or under the process of registration in any other GHG program.
No double claiming with emissions trading programs or binding emission limits	The project activity is not participating in other emission trading programs or binding emission limits as confirmed in declaration submitted by the project proponent/^{12/}. VVB confirms that project activity not included in ET program and not used for compliance with an emission trading program or to meet binding limits on GHG emissions. Project Proponent has submitted a declaration dated: 12-August-2024/^{12/} for no double counting with any other GHG program. PP also declared that that the credits claimed under VCS for the current monitoring period are not claimed under any other GHG mechanism and will not be claimed in the future either. This has also been confirmed by the assessment team by interview with the concerned person from the project proponent.
No double claiming with other forms of environmental credit	The project has not sought, received or planning to receive any other forms of environmental credit for reductions and removals from another GHG-related environmental credit system. The

⁶ <https://cdm.unfccc.int>

⁷ <https://www.goldstandard.org/>

⁸ <https://projects.globalcarboncouncil.com/>

⁹ <https://www.carbonregistry.com/>

¹⁰ [Product Code for Electricity • I-TRACK](#)

	project proponent has submitted a declaration dated: 12-August-2024/^{12/} to VVB team declaring that the project is not claiming any other form of GHG related environmental credit under any other emissions trading programs or binding emission limits. The assessment team has also cross-checked the issuance records available on the Verra/^{24/} website and thus confirmed & ensured that the emission reductions generated from the project activity are not & will not be double counted, hence accepted by the assessment team. The GHG credits from 01-April-2022 to 31-March-2023 (both days included) will be claimed under VCS only. At any point of time during the crediting period, the project proponent will abide by the declaration of “No Double Counting”./^{12/}
Supply chain (scope 3) emissions double claiming	The project activity is wind energy-based project developed by project proponent Clean Energy Asia LLC. The basic objective of the project is to generate electricity and supply to NPTG grid. The project proponent is not involved in any other business activity where they can act as a buyer or seller of a product whose emission footprint is changed by the project activity. The project activity is not a part of any supply chain. Hence, there is no possibility for double claim. This has been confirmed by the assessment team by interview with the concerned person from the project proponent.
Sustainable development contributions	The Project activity is claiming SDG 4, SDG 7 and SDG 13. The same is described in Section 1.12 of VCS MR/^{6/}. VVB confirmed that the project implementation has led in contribution to SDG 4, SDG 7 and SDG 13. The project supplies clean, affordable and renewable energy without reliance on fossil fuels for generation of electricity to meet the growing demands in the region. The generated electricity avoided release of 152,550 tCO_{2e} into the atmosphere. As declared by the project proponent in section 1.12 of the monitoring report/^{6/}, the project contributes to below sustainable development goals:

	SDG	SDG Target	SDG Indicator	VWB assessment
	4	4.3	4.3.1. The participation rate of youth and adults in formal and non-formal education and training in the previous 12 months	The project contributed to this SDG by providing scholarships to 5 local students from herder families below the average poverty line and supported the university participation rate of the project implementing territory. The project activity has provided scholarships to a total of 05 local students during the current monitoring period. The “Tsetsii Windfarm - Stakeholder Engagement and Ongoing Consultations” ^{/12/} report provided by the project proponent has been verified to confirm the same and it was further cross-checked during remote audit interviews with local people and PP representatives. Till date, the project has supported 27 local students for attending higher-degree universities during the project implementation period.
	7	7.2	7.2.1 Renewable energy share in the total final energy consumption	The project contributes to this SDG by delivering 175,149.0 MWh electricity to the central grid during the current monitoring period. The verification team has verified the reported electricity export/import data through monthly generation records (monthly JMRs)^{/11/} and the monthly invoices^{/11/} issued by Clean Energy Asia LLC to the utility company NPTG (Grid company) which were

				shared by the PP and found it to be consistent. The project has supplied 867,426 MWh of electricity to the grid till date i.e. from the date of commissioning of the project till end of this monitoring period. The project has provided 175,149.0 MWh electricity in the current monitoring period. This has been verified from the previous period verification reports^{/4/} and the current monitoring report^{/6/}.														
				<table><tr><th>Verification Term</th><th>Net Electricity Generation Value (MWh)</th></tr><tr><td>1st Verification</td><td>195,590</td></tr><tr><td>2nd Verification</td><td>157,719</td></tr><tr><td>3rd Verification</td><td>168,045</td></tr><tr><td>4th Verification</td><td>170,923</td></tr><tr><td>5th Verification</td><td>175,149</td></tr><tr><td>Total till date</td><td>867,426</td></tr></table>	Verification Term	Net Electricity Generation Value (MWh)	1 st Verification	195,590	2 nd Verification	157,719	3 rd Verification	168,045	4 th Verification	170,923	5 th Verification	175,149	Total till date	867,426
	Verification Term	Net Electricity Generation Value (MWh)																
	1 st Verification	195,590																
	2 nd Verification	157,719																
	3 rd Verification	168,045																
	4 th Verification	170,923																
	5 th Verification	175,149																
	Total till date	867,426																
	13	13.0	Tonnes of greenhouse gas emissions avoided or removed	The project contributes to this SDG by avoiding GHG emission due to reduction in consumption of fossil fuels in electricity production and using wind energy instead for electricity generation. The project has avoided 755,516 tCO_{2e} being emitted to the environment till date i.e. from the date of commissioning of the project till end of this monitoring period. The														

				project has avoided 152,550 tCO ₂ e in the current monitoring period. This has been verified from the previous period verification reports ^{/4/} and the current monitoring report ^{/6/} .	
				Verification Term	ER Value (tCO ₂ e)
				1 st Verification	170,352
				2 nd Verification	137,373
				3 rd Verification	146,367
				4 th Verification	148,874
				5 th Verification	152,550
				Total till date	755,516
Additional information relevant to the project	No commercially sensitive information has been mentioned in the monitoring report to have been excluded from the public version of the project documents. This has also been confirmed during interview with the concerned person from the project proponent.				

4.2 Safeguards and Stakeholder Engagement

4.2.1 Stakeholder Identification

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Stakeholder identification	It was noted that, the project proponent conducted a stakeholder analysis on 23-August-2022, as per the ISO9001:2015 Quality Management System requirements. This stakeholder analysis process is conducted on an annual basis.^{/28/} This was confirmed by the assessment team during the remote audit. During the analysis, the following stakeholders have been identified:

	1. Shareholders 2. Board members 3. Chief Executive Officer 4. Management team 5. Contractors 6. Employees 7. Lenders 8. Business partners 9. Customer – The National Power Dispatching Center 10. Companies with similar operation 11. Government agencies overseeing health, safety, and environment 12. Local community 13. Visitors Assessment team confirmed these details during the remote audit and concludes that the stakeholders have been appropriately identified by PP, in accordance with their procedures./28//4/
Legal or customary tenure/access rights	Assessment team confirms that there are no legal rights to territories and resources, including collective and conflicting rights held by stakeholders, indigenous people (IPs), Local communities (LCs), and customary rights holders with regards to the project. However, it was noted that the local community (herders and citizens) has customary access rights to natural resources such as the grazing land around the unfenced wind turbine generators and the Tsetsii Mountain. Same was confirmed during the interview with PP/19/. The project is wind-based energy generation, and it is established on the project proponent's land. The project obtained a 21-year land ownership permit from the local government, and there are no conflicting rights with the local community or other parties/33//9/. This was also confirmed during interviews with the local stakeholders through remote audit./19/
Stakeholder diversity and changes over	Verification team reviewed the stakeholder engagement and Ongoing Consultations reportError! Reference source not found. and confirmed that

time	stakeholders identified for this project activity are diverse in nature – in terms of socio-economic status, age and gender wise and the diversity is unlikely to change over time. Project proponent confirmed during the remote audit that the project involves various stakeholder groups, including the project owner, lender, customer, and the residents who live near the project implementing area. Notably, there is no indigenous community within this stakeholder group, and this composition has remained unchanged since the project's commissioning. This was further confirmed from the PP representatives during the remote interviews conducted by the audit team.^{/19/}
Expected changes in well-being	As confirmed from the monitoring report, the project proponent informed that, due to the increasing nearby heavy coal mining activities (leaving unclaimed areas) by other parties, it is expected that the local community's attention to the ecosystem services may change. Additionally, the representatives of Project proponent during the remote audit confirmed the following expected changes in well-being: 1. Social well-being: The project helped in generating employment opportunities during the construction and operation phases. The project activity leads development of infrastructure like roads, livelihood and promotes small scale business with improved power generation. Verification team confirmed the same through interview with PP representative. ^{/19/} 2. Economic well-being – The project activity results in employment generation which helps economic well-being of people provided as confirmed during the interviews. ^{/19//14/} 3. Environmental well-being: Wind energy being a renewable source of energy, it reduces the dependence on fossil fuels and conserves natural resources which are on the verge of depletion. Due to its zero emissions, the Project activity also helps in avoiding significant amount of GHG emissions as verified from the emission reduction calculation sheet^{/7/}. During the current monitoring period, the project activity has reduced 152,550 tCO₂e.
Location of	The local stakeholders consist of both local herders and citizens

stakeholders	residing within the Siirst Bag, Tsogtsetsii Soum, which is part of Umnugovi Aimag (province) Mongolia. The project activity is also predicted to have a positive impact on local citizens residing in the Tsogtsetsii Soum area outside the project boundaries. This was confirmed by assessment team during the remote audit ^{/19/} and by checking the project locations.
Location of resources	The local community (herders and citizens) has customary access rights to natural resources such as the grazing land around the unfenced wind turbine generators and the Tsetsii Mountain. The project areas that are fenced and contain the substation and operation and maintenance buildings are owned by the project shareholders and board of directors. This was confirmed by assessment team during the remote audit and through interviews with PP representatives and local stakeholders.

4.2.2 Stakeholder Consultation and Ongoing Communication

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Ongoing consultation	Project Proponent has submitted the copies of grievance registers^{/15/} kept at site and office for the ongoing communication with the local stakeholder. VVB confirmed that at the project site, the grievance register is kept in plant site office for seeking complaints/grievances from local community as a part of ongoing communication with stakeholders in line with clause 3.18.3 of VCS Standard, v.4.7.^{/10/} Moreover, it was noted that the project implements a Stakeholder Engagement Plan and conducts ongoing stakeholder consultation. Due to the local herder's nomadic lifestyles, the project representatives visit their homes in person for the herder's convenience. Assessment team confirmed this by checking the report "Tsetsii Windfarm - Stakeholder Engagement and Ongoing Consultations" provided by the PP and further confirmed during the interviews with local stakeholders and PP representatives. The assessment team concludes that the PP has effective communication channels for the local stakeholders.
Date(s) of stakeholder consultation	During the current monitoring period, four stakeholder consultation meetings were conducted by the PP on following dates:

	05-April -2022 25-May-2022 27-May-2022 24-January-2023 These dates were verified by checking the report “Tsetsii Windfarm - Stakeholder Engagement and Ongoing Consultations”^{/28/} provided by the PP and further confirmed during the interviews with local stakeholders and PP representatives.
Communication of monitored results	Verification team has checked the report “Tsetsii Windfarm - Stakeholder Engagement and Ongoing Consultations”^{/28/} provided by the PP and confirmed that the stakeholder consultation meeting was focused towards making aware local stakeholders including local community, local herders, local administration representatives, etc., about the project activity that involves electricity generation using wind energy produced by the wind farm with the primary objective of reducing emissions of GHGs in compared to pre-project or baseline scenario. During the current monitoring period, four stakeholder consultations were conducted by the PP representatives on following dates and communicated the monitored results with them: 05-April-2022: The project staff met with the local Government representatives and Children’s Checker Club teacher, introduced the project activity, and environmental benefits, and handed over donations to the local Children’s Checker Club operation. 25-May-2022: During the meeting with the members of the Citizens Representative Khural on 25-May-2022, PPs discussed the project’s environmental impacts and shared the results of their emission reduction efforts. 27-May-2022: The project staff visited the local herders (3 herder families were present at the time), provided project operation, and distributed grievance forms. No grievances were recorded. 24-January-2023: The project staff met with a total of 25 local people with disability and 25 local elderly citizens of Tsogtsetsii Soum, communicated their project operation, introduced its environmental benefits, and donated support for their Lunar New Year celebration.

	Assessment team has cross-checked the above-mentioned details by reviewing the report “Tsetsii Windfarm - Stakeholder Engagement and Ongoing Consultations”^{/28/} provided by PP and further confirmed during the remote interviews with local stakeholders and PP representatives and confirmed to be correct. The grievance logbook^{/15/} is always available at the site and office for stakeholders to write in or ask for assistance to write any inquiry. The verification team confirmed from the grievance register maintained by the PP that no comments were received during the current monitoring period.
Consultation records	The consultation records for the respective consultation meetings are as below: 05-April-2022: This consultation meeting results were published in the local community’s Citizens Representative Khural’s public Facebook page. 25-May-2022: The Citizens Representative Khural meeting was documented in the form of a meeting protocol. 27-May-2022: This meeting with the local herders was documented in a meeting report. 24-January-2023: It was documented in Siits Bag Governor’s letter of request, and company’s CEO decree, and the list of participants for the meeting. The above-mentioned details are collated by the PP in report “Tsetsii Windfarm - Stakeholder Engagement and Ongoing Consultations”^{/28/} which is reviewed by the assessment team and confirmed to be appropriate. The PP maintains grievance registers^{/15/} for the records of all the comments/ grievances received for the project activity. The verification team confirmed from the grievance register maintained by the PP that no comments were received during the current monitoring period.
Stakeholder input	The following inputs were received from the stakeholders during stakeholder consultations conducted for current monitoring period: 05-April-2022: No written responses or objections were received. 25-May-2022: During this meeting, the local representatives inquired

about the possibility of increasing local employment, expressed their interest in organizing cultural events among the herders, and discussed renewing the existing Memorandum of Understanding established between the project proponent and the local government. Details about the stakeholder queries and its assessment is provided below.

Comments received	Actions taken by the project proponent	Evidence gathering activities, evidence checked, and assessment conclusion
The Siirst Bag Governor, Mrs. Enkhtsetseg, commented that the project should increase local employment.	The project aims to increase employment in the local community. Due to a shortage of skilled workforce in the area, we are specifically focusing on increasing the unskilled employment rate.	The comment was received during the stakeholder consultation meeting conducted during the current monitoring period 24-January-2023. /28/ During the remote audit, it was confirmed by project proponent that the project aims to increase local employment in the future period. Also, due to shortage of skilled workforce in the area, project proponent will be focusing on increasing the unskilled employment in coming days. Moreover, assessment team checked the employment register^{14/} and noted that out of total 42 employees, 8 are local. Therefore, the justification provided by the project proponent and planned actions were found to be appropriate and acceptable to the assessment team.
The Siirst Bag Governor, Mrs. Enkhtsetseg, commented that the project proponent should assist in planting grass and establishing fences in certain areas.	This comment was deemed irrelevant to the project activity.	This comment was received during the stakeholder consultation meeting conducted during the current monitoring period on 24-January-2023. /28/ The project proponent considered this comment to

			be irrelevant as it was not related to project operations or not related to any impact due to the project. Moreover, PP has already done fencing in the dangerous zones such as substation, etc./^{18/} Therefore, the justification provided by the project proponent was found to be appropriate and acceptable to the assessment team.
	The Siirst Bag Governor, Mrs. Enkhtsetseg, inquired about the possibility of providing donations to organize sports and cultural events among the herders.	This comment was deemed irrelevant to the project activity.	This comment was received during the stakeholder consultation meeting conducted during the current monitoring period on 24-January-2023./^{28/} The project proponent considered this comment to be irrelevant as it was not related to project operations or not related to any impact due to the project. Therefore, the justification provided by the project proponent was found to be appropriate and acceptable to the assessment team.
	The member of the Citizens Representative Khural inquired about the possibility of contributing to organizing experience-sharing events among the herders.	This comment was deemed irrelevant to the project activity.	This comment was received during the stakeholder consultation meeting conducted during the current monitoring period on 25-May-2022./^{28/} The project proponent considered this comment to be irrelevant as it was not related to project operations or not related to any impact due to the project. Therefore, the justification provided by the project proponent was found to be appropriate and acceptable to the assessment team.

	27-May-2022: No written responses or objections were received. 24-January-2023: No written responses or objections were received. Assessment team has cross-checked the above-mentioned details by reviewing the report “Tsetsii Windfarm - Stakeholder Engagement and Ongoing Consultations”^{/28/} provided by PP and further confirmed during the remote interviews with local stakeholders and PP representatives and confirmed to be correct. The project proponent has provided employment to 8 local people during the current monitoring period, which was confirmed by assessment team by cross checking the employee register^{/14/}. Hence, it is confirmed that stakeholder’s inputs were taken into consideration by the project proponent. As verified by the assessment team from the grievance register^{/15/}, no comments were received during the monitoring period.
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4.2.3 Free, Prior, and Informed Consent

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Consent	There are no conflicting rights with the local community or other parties. Consequently, no customary rights holders were affected or required consent. It was noted that, during the meeting on 25-May-2022, the local community and members of the Citizens Representative Khural expressed their support for the project. This consent was documented in the meeting protocol. Additionally, the concurrent Decree by the Citizens Representative Khural indicates that an agreement was reached to approve the project’s Environmental impact assessment as well as its Environmental management plan.^{/21/} Assessment team has cross-checked the above-mentioned details by reviewing the report “Tsetsii Windfarm - Stakeholder Engagement and Ongoing Consultations”^{/28/} provided by PP and further confirmed during the remote interviews with local stakeholders & PP representatives and confirmed to be correct.

	The project activity was accepted by all the stakeholders involved. It was further confirmed from the local stakeholders and the representatives of project proponent during the remote interviews that there are no outstanding issues and conflicts related to project activity. Also, during remote interviews, it was confirmed by project developers and local stakeholders that, there are no ongoing conflicts on the project site or with local inhabitants.
Outcome of FPIC discussion	It was confirmed that, the project did not acquire any land from the local community^{/33/}; therefore, there was no forced physical or economic displacement. During the stakeholders meeting, the project proponent distributed grievance forms, but no grievances were raised. As confirmed by Project proponent and local stakeholders during the remote interviews, no relocation or physical/economical displacement of people occurred related to the project site. Main reason is that the project site is surrounded by plain fields and site is in a very remote location (desert region). The same was cross checked by the assessment team from the pictures of the project site^{/18/} and by checking the project location through google maps.

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	PP has placed the feedback cum grievance registers^{/15/} at the project site and in the office. The other means of communication are also available to local stakeholders such as grievance contact information available on company's Facebook page, periodic meetings conducted by the project proponent and direct inquiries locally with the project's site managers. Moreover, the grievance procedure was explained during the meeting with the herders and grievance forms were distributed to the herders during the meeting, but no grievances were raised. The grievance register^{/15/} is always easily available on site for stakeholders to write in or ask for assistance to write any inquiry. The copy of the same is provided to verification team. Verification team checked the grievance register^{/15/} submitted by project proponent and found that no grievance/feedback was received in

	grievance register during the current monitoring period: 01-April-2022 to 31-March-2023. Thus, no resolution of grievance is required. This was further confirmed from the PP representatives during remote interviews.^{/19/} Verification team concludes that the ongoing stakeholder mechanism is adequate and appropriate.
Grievance redress procedure	Grievance redressal mechanism is established as per registered VCS PD-MR/^{4/} and local law. PP has placed grievance cum feedback register at project site offices for registering grievances if any related to the project activity by the stakeholders. The other means of communication are also available to local stakeholders such as grievance contact information available on company's Facebook page, periodic meetings conducted by the project proponent and direct inquiries locally with the project's site managers. Assessment team checked the evidence of grievance register/^{15/} submitted to VVB. The same was also confirmed during interview with PP representatives and found appropriate. During remote audit, it was confirmed that Stakeholder's feedback is monitored continuously, and the stakeholders are well aware of the grievance redressal procedure. Thus, verification team concludes grievances redressal process is adequate and appropriate.

4.2.5 Public Comments

As identified in section 5.4 of the VCS-PD-MR/^{4/} and checked from the VCS project webpage/^{24/}, this project was open for public comments from 10-June-2019 to 10-July- 2019 on the VCS platform; No comments were received during this period or as a part of the current monitoring period.

Comments received	Actions taken by the project proponent	Evidence gathering activities, evidence checked, and assessment conclusion
NA	NA	NA

4.2.6 Risks to Local Stakeholders and the Environment

4.2.6.1 Management Experience

Evidence gathering activities:

During the remote audit, the assessment team has interviewed PP representatives and have confirmed that the management team is with the PP for a long time and having a vast experience of implementing such projects. Operation and maintenance team has years of experience on the renewable energy sector. /8//14/

It was noted that, during the project construction phase, the project proponent contracted SgurrEnergy LLC, which is a globally reputable engineering and project management consultant. Their consultancy services varied from developing the Environmental and Social Impact Assessment, and overseeing the project, to creating the Stakeholder Engagement Plan. In addition to the owner's engineer, the project proponent employed skilled employees who have relevant experience in managing the project construction, operation, and community engagement or its environmental and social aspects. /8//14/

The project team operates within a defined organizational structure approved by the board members^{8/}. The project management team consists of experienced professionals with diverse backgrounds in environmental management, data, and project management. Their combined expertise ensures the effective implementation and monitoring of the project, adhering to the Verra requirements.^{8/}

Few carbon advisors/consultants were hired by the project proponent in previous verifications^{24/} such as VNV Advisory Services, EKI Energy Services Limited, etc. for the consultancy purposes. No such third-party consultant is hired during the current verification period.

Evidences checked:

The above details were confirmed by the assessment team by reviewing the registered project documentation, previous verifications^{4/}, by reviewing Employee register^{14/} and through interviews with project proponent representatives^{19/}. VVB noted that for the current monitoring period, PP has taken a help of any experience carbon consultant for preparation of MR and ER sheet. However, the submitted MR and ER sheet has given enough confidence to VVB that the PP has the necessary experience to prepare these documents. VVB noted during the interviews, the PP representatives confirmed that the project operation team has remained the same for all the verifications which has been conducted till date. This means the operation team was involved in carbon project related documentation preparation form year 2017 and the assessment team is of the opinion that these 06 years of experience being involved in the carbon project verification is sufficient for preparing documentation for the current monitoring period.

Conclusion:

Thus, assessment team noted that the team has all the expertise or experience needed to support the current project activity.

4.2.6.2 Risk Assessment

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Natural and human induced risks to stakeholders' wellbeing	No Natural or human induced risks to stakeholder's wellbeing were identified for this project activity. As per the section 3.4 of joint validation-verification report dated 26-October-2019^{/4/}, it was stated that there are no risks from the project. The project adheres to the environmental and social performance standards set by the European Bank for Reconstruction and Development (EBRD). Furthermore, assessment team through the documentary review, reviewing the project location and remote interviews confirmed that the project is located in a remote area, The nearest town is located at 23 Kms and the closest family lives at least 5km from the project area. Therefore, the project operation did not pose any risks to the stakeholder's well-being. Regardless of the project location, the project proponent has a Community Health and Safety Plan^{/22/} to prevent risks from occurring. They appointed site HSE personnel who are responsible for ensuring community health and safety near the site and detecting any early signs of risks through regular meetings with the local stakeholders. This practice was confirmed by the assessment team through remote interviews^{/19/} with local stakeholders and PP representatives. Proper safety protocols are followed in and around the project premises.^{/18//22/} Also, it was confirmed that the local community did not experience any adverse impacts from the project. No grievances were raised. Assessment team confirmed the same through remote interviews and by reviewing the grievance register.^{/15//19/} Thus, assessment team confirms that there are no Natural and human induced risks identified pertaining to stakeholders' wellbeing.
Risks to stakeholder participation	No risks to stakeholder participation were identified for this project activity.

	Assessment team through documentary review and remote audit confirmed that, the project has a Stakeholder Engagement Plan^{/28/} to ensure equal participation of all stakeholders. Since construction, a grievance register^{/15/} has been actively maintained and regular meetings with the local community groups have been conducted. During the current monitoring period, 4 such regular meetings were conducted as explained in earlier sections of this report. Verification team has checked grievance register^{/15/} and found that there is no risk to stakeholder for registering the grievances. It was found that local stakeholders can anytime freely lodge their grievances if any, in the register over the operational lifetime of project. The same was confirmed during the remote interviews with local stakeholders. Moreover, during current monitoring period no grievances were received.^{/15/} Thus, assessment team confirms that no risks have been identified regarding stakeholder participation during the monitoring period.
Working conditions	Assessment team noted that the Occupational Health and Safety Management System^{/22/} and Site Regulations are applied on-site during the monitoring period^{/18/}. All workers are provided with the necessary training and inductions regularly.^{/22//14/} Electrical protection equipment was calibrated as per schedule. Necessary personal protective equipments were issued and the standard safety practices have been applied. The site operation is compliant with ISO45001:2018 Occupational Health and Safety Management System requirements. Assessment team confirmed about the protection equipments and site operations through the site photos shared by the PP and during the remote audit video call.^{/18//19/} Assessment team during the remote audit confirmed that all the safety provisions/measures are in place as per the Health and Safety regulations^{/22/}. The workforce is provided with appropriate safety equipment and PPE. Their consistent use at the project site is ensured by the HSE team and also safety trainings^{/22/} are provided to the workers. This was confirmed by assessment team by checking the training records and remote interviews^{/22//19/} with the employees at site. The risks about occupational health and safety were considered to be negligible during the operation phase. Verification team checked the training records^{/14//22/} provided by project proponent and confirms that the necessary safety trainings are imparted

	by the competent training providers and the same was confirmed during interviews with project staff. Moreover, no accidents occurred during the current monitoring period as verified by assessment team during the interviews. Thus, it can be concluded that, the project proponent has undertaken necessary safety measures to reduce and avoid any risks related to working conditions and safety of the employees. No such risks identified during the current monitoring period.
Safety of women and girls	No risks to safety of women and girls were identified for this project activity. Project proponent informed that it complies with the EBRD's environmental and social performance standards and abides by all local laws and regulations that protect the safety and well-being of women and girls. No complaints have been received regarding the mistreatment of women and girls. The company has a Human Resource Policy/^{22/} in place. Regarding the safety of women and girls, VVB checked that protection against sexual harassment is part of Clean Energy Asia's HR policy/^{22/}, same is cross checked by the VVB team and confirmed during the remote audit interviews/^{19/} with the PP representatives and the employees. Also, it was confirmed through remote audit and cross checked through employee register/^{14/19/}, that several women are employed by the PP. During the interviews, PPs mentioned that there have been no cases of discrimination and sexual harassment observed and the management team has experience with handling such issues. Therefore, the implementation of the project does not pose any threat to safety of women and girls, thus they are safe. Thus, assessment team confirms that no risks have been identified regarding safety of women and girls during the monitoring period.
Safety of minority and marginalized groups, including children	No risks to safety of minority and marginalized groups, including children were identified for this project activity. Project proponent informed that the company is governed by and complies with EBRD's environmental and social performance standards and follows the local laws and regulations which protect the safety and well-being of children and marginalized groups. No complaints have been received regarding the mistreatment of children and marginalized

	groups. This was confirmed during the remote audit and by reviewing the grievance register.^{/15//19/} Assessment team confirmed that the children work is forbidden, and no children are employed on the platform. During remote audit, it was confirmed with PP and local stakeholders that, there are no children employed in the project and the child labour is strictly forbidden. Moreover, no risks related to minority and marginalized group were noticed. The assessment team concludes that there is no impact of project implementation in Tsogtsetsii Soum on the safety of minority and marginalized groups, including children.
Pollutants (air, noise, discharges to water, generation and release of hazardous materials and chemical pesticides and fertilizers	As described in the monitoring report^{/6/}, few minor risks were identified along with mitigation measures as mentioned below: a) Project impact on air quality (air pollutants, dust, and noise) is identified as low during the operation phase as per the EIA^{/21/}. - Mitigation or preventative measure taken: Implemented an Environmental Monitoring Program to monitor air quality regularly. Managed the impacts as per the Environmental Management Plan.^{/21//22/} No risks have been identified during the monitoring period. The proposed mitigation/monitoring measures were found to be appropriate to the assessment team and already implemented at the site, as confirmed during interviews with the project proponent representatives.^{/19/} b) Impact on surface water and groundwater quality are identified as minor as per the EIA. - Mitigation or preventative measure taken: There are no surface water flow and groundwater wells established within the project implementation territory. The project transports its purchased bottled drinking water from the Tsogtsetsii Soum. The wastewater is transported by a designated contractor to the local waste treatment plant for treatment and disposal. Regular sanitation and cleaning of the temporary storage tanks are conducted regularly. The proposed mitigation measures and course of action were found to be appropriate to the assessment team and already implemented at the site, as confirmed during interviews with the project proponent representatives.^{/19/}

c) Chemicals are identified as medium risk during the project operation.

- **Mitigation or preventative measure taken:**

A designated bunded chemical storage area is established to prevent chemical spills. Spill kits were placed. A contingency plan is in place.

The proposed mitigation measures and course of action were found to be appropriate to the assessment team and already implemented at the site, as confirmed during interviews with the project proponent representatives. /19/

4.2.7 Respect for Human Rights and Equity

4.2.7.1 Labor and Work

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Discrimination	No risks related to Discrimination were identified for this project activity. It was confirmed that, the project proponent adheres to its Code of Ethics and Business Conduct/^{22/} and bans all types of discrimination. No complaints have been received relating to workplace discrimination. Assessment team verified this by checking the grievance register/^{15/} and through remote interviews with PP representatives and employees. /19/ During the remote audit, representative of the PP confirmed that the national laws prohibiting the discrimination and sexual harassment are being followed strictly. Further, verification team did not find any complaint regarding the same registered in grievance register/^{15/} and through independent search. PP representative confirmed during the remote audit that there has been no reports of workplace discrimination or sexual harassment for this monitoring period. The project staff including women also provided assurance that there have been no incidents of any discrimination or sexual harassment in the workplace.
Sexual harassment	No risks related to Sexual Harassment were identified for this project activity. The project proponent has an Anti-Harassment Policy/^{22/} to prevent

	sexual harassment in the workplace. No complaints or reports of sexual harassment have been filed during the monitoring period. During the remote audit, representatives of the PP confirmed that the national laws prohibiting the discrimination and sexual harassment is being followed strictly. Further, verification team did not find any complaint regarding the same registered in grievance logbook/^{15/} and through independent search. PP representative confirmed during the remote audit that there has been no reports of discrimination or sexual harassment for this monitoring period. The project staff including women also provided assurance that there have been no incidents of any discrimination or sexual harassment in the workplace.
Gender equity in labor and work	No risks related to Gender equity in labor and work were identified for this project activity. The project proponent adheres to its Code of Ethics and Business Conduct/^{22/} and hires and pays staff irrespective of gender or race. PP provides equal opportunities in the context of gender equity and pay for labour and work as confirmed during the remote audit/^{19/} by the PP representatives. The same has been confirmed during the remote audit./^{19/} Moreover, the project is operated in Mongolia, which is an ILO member state since 24-May-1968, and which ratified the following conventions: C100 - Equal Remuneration Convention, 1951 (No. 100)¹¹, since 03-June-1969 C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)¹², since 03-June-1969. Thus, as per legislation, there is an equal opportunity for men and women to obtain a job. As per employee register/^{14/}, several women are employed by Clean Energy Asia (17 females and 25 males (site and office based combined) are employed by the PP, totalling the employee count to 42 Employees). Therefore, through the review of public resources, employee register

¹¹ https://normlex.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:103142

¹²https://normlex.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:103142

	of PP company/^{14/} it can be concluded that the Gender equity in labor and work is followed by the PP.
Forced labor	The project proponent bans all types of forced labour. No complaints relating to forced labour have been received. The PP strictly follows the national laws prohibiting human trafficking, forced labour and child labour. There have been no reports of human trafficking, forced labour and child labour during this monitoring period as observed during the remote audit and confirmed through interview with project staff. The project aligns with the labour convention and labour rights of Mongolia, which is a member of the International Labour Organisation (ILO). No human trafficking, no forced labour (all employees declared) and no children are employed by the project.
Child labor	The project proponent bans all types of child labour via its policy. No complaints related to child labour have been received. The PP strictly follows the national laws prohibiting human trafficking, forced labour and child labour. There have been no reports of human trafficking, forced labour and child labour during this monitoring period as observed during the remote audit and confirmed through interview with project staff. /^{19/} The project aligns with the labour convention and labour rights of Mongolia, which is a member of the International Labour Organisation (ILO). No human trafficking, no forced labour (all employees declared) and no children are employed by the project.
Human trafficking	The project proponent adheres to the Environmental and Social Performance Standards set by the EBRD and intolerances all forms of human rights violations, including human trafficking. The company staff are hired on a consensual and contractual basis. No complaints related to human trafficking have been received. The PP strictly follows the national laws prohibiting human trafficking, forced labour and child labour. There have been no reports of human trafficking, forced labour and child labour during this monitoring period as observed during the remote audit and confirmed through interview with project staff. /^{19/} The project aligns with the labour convention and labour rights of Mongolia, which is a member of the International Labour Organisation (ILO). No human trafficking, no forced labour (all employees declared)

and no children are employed by the project.

4.2.7.2 Human Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
No risk identified	The project is situated approximately 23km from the nearest local town, Tsogtsetsii Soum, and the project activity does not affect indigenous people, local communities, or customary right holders. The project is governed by all human rights laws and regulations¹³. Project Proponent is following the International human rights law¹⁴, and ILO Convention 169¹⁵. The project is operated in Mongolia, which is an ILO member state since 24-May-1968, and has ratified the following conventions¹⁶: • C029 - Forced Labour Convention, 1930 (No. 29) since 15-March-2005 • C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) since 03-June-1969 • C098 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98) since 03-June-1969 • C100 - Equal Remuneration Convention, 1951 (No. 100) since 03-June-1969 • C105 - Abolition of Forced Labour Convention, 1957 (No. 105), since 15-March-2005 • C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111), since 03-June-1969 • C138 - Minimum Age Convention, 1973 (No. 138) Minimum age specified: 15 years, since 16-December-2002 • C182 - Worst Forms of Child Labour Convention, 1999 (No. 182), since 26-February-2001 There are no human rights violation of any kind to any of the stakeholders during construction and operation of the project activity.

¹³ "Legal information website", 23-January-2020, <https://legalinfo.mn/mn/detail/15152>

¹⁴ <https://www.ohchr.org/sites/default/files/Documents/Publications/fs9Rev.2.pdf>

¹⁵ https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C169

¹⁶ https://normlex.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:103142

	The project complies with all regulation and laws on human rights. The land on which the project was developed was previously vacant and undeveloped. The project is a wind energy based project activity which is implemented without cultural or social biases, safeguarding the rights of IPs, LCs, and customary rights holders to be free from discrimination. The same was confirmed through remote audit with the PPs/^{19/}, project staff and local stakeholders and also checked by declaration by the PP in the monitoring report/^{6/} and verifying the company HR policies/^{22/}
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4.2.7.3 Indigenous Peoples and Cultural Heritage

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
No risk identified to the cultural heritage	No indigenous people are present near the project implementation territory and no cultural heritage sites are nearby. The project activity is conducted on land which was privately owned prior to and during the project activity. No risks are posed to the indigenous peoples or customary rights holders. Pre-construction archaeological surveys and excavations were carried out by the Archaeology Institute of the Mongolian Academy of Sciences and no significant cultural sites were identified. These details were confirmed by assessment team during the remote interviews with PP representatives and local stakeholders/^{19/} and found to be correct. There are no indigenous people and cultural heritage near the project. No risks are identified to the cultural heritage and indigenous people.
“Tsetsii” Mountain State Protected Area	The project is not deemed to have an adverse impact on any international or nationally recognized heritage, and a study by the Archaeological Institute of the Mongolian Academy of Sciences confirmed that there are no significant cultural resources within the project implementing area. The nearest culturally significant area is “Tsetsii Mountain”, and the project activity does not affect this area. The project is located 5km from the “Tsetsii” Mountain, a state-protected area. The locals worship the Tsetsii Mountain for religious purposes. Mountain rituals link communities to the land. The cult of the Mountain rituals is usually dedicated to mountain spirits, sacred trees, lakes, or springs. Typically, Tsogtestsii Soum's local

	community and its governor held annual ceremonies to honor the mountain. The Mountain will not be disturbed or experience any direct impact from the project. The project prohibited hunting activities among the employees or access to the Tsetsii Mountain and areas to the south. Hence, based on the above details, assessment team confirmed that there are no potential risks from the project activity to the “Tsetsii” Mountain State Protected Area. Same was confirmed during the remote audit interviews with the PP representatives and local stakeholders. /19/
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4.2.7.4 Property Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
No risk identified	Assessment team confirmed that physical displacement was not required to operate this wind project. The project activity was conducted on land that was privately owned during the monitoring period^{/33/}. No conflict emerged during this monitoring period. To minimize economic displacement for the local herders, the fenced area for the project is only confined to a small geographical area around the main substation^{/18//19/}, and the operation and maintenance building and transects across other grazing land areas were minimized to the extent practicable. This was confirmed during the remote interviews with the local herders. /18//19/ Also, the project provides detailed and regular information to local community members about the project activity to mitigate community concerns as a result of misinformation. As verified by the assessment team from the registered PD-MR^{/4/} and from the local stakeholders during the remote interviews^{/19/}, there are no agreement signed on property rights, and project activity was conducted on land that was privately owned^{/33/}. There were no pending property rights conflicts and disputes as confirmed by the local stakeholders in the interviews during the current monitoring period. No conflict emerged during this monitoring period. Thus, no risks related to the property rights were identified.

4.2.7.5 Benefit Sharing

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Summary of the benefit sharing plan	The project does not have any adverse impact on other stakeholders' property rights. Since the benefits of the carbon credits lies with the project proponent and there is no benefit sharing plan. Hence, this section not applicable.
Benefit sharing during the monitoring period	The project does not have any adverse impact on other stakeholders' property rights. Since PP is the sole owner of the revenue generated from the project activity and no agreement was affected during the monitoring period, there is no benefit sharing plan. Hence, this section not applicable.

4.2.8 Ecosystem Health

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Impacts on biodiversity and ecosystems	No risk identified related to impacts on biodiversity and ecosystems identified during current monitoring period. It was anticipated that during operation, potential impacts are a disturbance of fauna from WTG noise, shadow flicker, people, traffic, and loss of fauna from collision with WTGS (birds and bats). Project proponent informed that a ban was enforced on all hunting activities and speed limits were strictly adhered to within the project implementing area. There are species of vertebrates (Ibex, Argali, and Gazelle) that potentially could be more sensitive to operational disturbance (noise and shadow flicker) as they are highly wary of effects. However, it is considered unlikely that the project area is subject to high levels of activity of these species due to the amount of existing human and grazing activity in this area. The location of the project area is 3.5km from Tsetsii Mountain and it is therefore considered that the impact of operational disturbance from noise and shadow flicker will not be significant on ecological receptors of medium and high sensitivity. The project carries out control measures, including no access outside

	of the project area, no hunting, and control of lighting and night-time vehicle movements were incorporated in the project schedule. This will ensure no operational disturbance outside of the project area. The project implements a Biodiversity Management plan/^{22/} and monitors biodiversity annually since 2017. Assessment team discussed these points during the remote interviews with project proponent representatives/^{19/} and confirmed that the commensurate measures proposed above by the project proponent are adequate and appropriate. Proper preventative measures are implemented nearby the project area to avoid loss of biodiversity. No records of birds or bats death were noted during the current monitoring period. It is worth noting that, during the remote audit it was confirmed with PP representatives and project staff that, the above-mentioned mitigation measures have been implemented by the project proponent during project implementation onsite in order to reduce the identified risks.
Soil degradation and soil erosion	Identified risks: <i>Vulnerability to erosion has been identified as a medium risk during construction phase and low risk during the operation phase.</i> Mitigation or preventative measure(s) taken during the monitoring period: The project construction is deemed to have a significant adverse impact on soil, causing soil erosion. The soil erosion was mainly from vehicle traffic along dirt tracks used during the construction of on and off-site roads, power lines, control buildings, and WTGs. The project proponent has conducted biological and technical reclamation at the end of the construction period. During the project operation phase, the proponent carries out soil monitoring on regular basis to monitor its impacts and established paved roads to minimize impacts from vehicles. During the project operation phase, the main impacts on soils would be from continued vehicle traffic movement. However, there is no need for vehicles to travel off the improved access roads, and this activity has been strictly prohibited. As described under construction above, the main risk to soils would be where vehicles leave prepared roads and drive cross-country. If designated roads are not used, vehicle movements will cause damage over a wide area around the

	WTGs or other off-road areas. The soils are a highly sensitive receptor, but the magnitude of the effect during operation is low since there will be much less frequent traffic than during construction and only occasional use of heavy equipment. In addition, vehicles will keep to improved access roads. The significance of the impact is assessed as moderate adverse. The project confined all vehicles to roadways, and monitored the road condition regularly, and carried out soil quality monitoring. /²²/ Also, the project implements a waste management plan/²². No adverse impacts were identified as per the Environmental Monitoring report/²¹/²². VVB Opinion/Assessment: A risk related to soil erosion during the construction phase is mentioned by PP in the monitoring report/⁶. However, such risk was considered to be moderate/minor for the operational phase, as project proponent has implemented necessary mitigation/preventive measures in the form of established paved roads to minimize impacts from vehicles. Moreover, the project confined all vehicles to roadways, and monitored the road condition regularly, and carried out soil quality monitoring. /²²/ These measures were found to be appropriate and adequate to the assessment team. Verification Team concludes that the risk identified for construction phase although significant, is considered to be low, as it is a short-term activity and there are no such significant risks noticed for operational phase as mitigation measures are already in place. The same was confirmed through remote interviews with PP representatives and local stakeholders./¹⁹/
Water consumption and stress	No risk identified related Water consumption and stress identified during current monitoring period. Assessment team noted that, there is no surface water flow and groundwater wells established within the project implementation territory. The project transports its purchased bottled drinking water from the Tsogtsetsii Soum. There was no adverse impact or stress on water consumption during the monitoring period. This was confirmed by project staff and local stakeholders during remote interviews. /¹⁹/ Since there are no permanent streams near the project, the sensitivity is considered low, and the significance of the impact is assessed as negligible. The project will not establish a new groundwater well and hence it will not have a significant impact on the groundwater. The potential sources of pollution to the groundwater during the operation phase comprise leaks and spills of oils from the WTGs. Assessment

	team checked the EIA report confirming these details. /21//22/ The project stores all fuel, oil, and chemical storage in the designated secure areas. Established a designated storage area with an impervious base and impermeable bund walls and protected from precipitation. Capacity is sufficient to contain full volume within a secured location to protect the groundwater. This practice was confirmed during the remote interviews by the PP representatives/^{19/} and found to be appropriate. Proper management of fuel, oil leakages is taken care by the project proponent. Moreover, measures are in place to avoid the spills and leakages of fuel, oil or chemicals. Verification Team confirmed that the mitigation measures proposed for the risks identified for construction and operational phase were found to be appropriate. During remote audit, PP representatives were asked about the above-mentioned risks and respective mitigation measures for minimization, and they confirmed that the proposed measures have been implemented.
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4.2.8.1 Rare, Threatened, and Endangered species

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Species or habitat	The environmental impact assessment/^{21/} of the project indicated that no sensitive fauna or flora species were documented and no rare, threatened, or endangered bird species were found within the vicinity of the project implementing territory. The only possible species could be the Saker falcon – IUCN – endangered, Mongolian Redbook – vulnerable During the remote audit/^{19/}, project proponent informed that there are no sensitive, rare, threatened, or endangered flora or fauna species or habitat within the project implementing territory. Same was confirmed by the local stakeholders too. Moreover, the bird species called “Saker Falcon” which is considered as endangered by IUCN and vulnerable in the Mongolian Redbook, was not found in the project vicinity during current monitoring period. The habitats/nests of this bird species were not noticed/recorded during current verification period. During the current monitoring period, PP have not observed any loss of birds or electrocution due to the project activity.

	Therefore, assessment team confirms that there is no impact due to project activity on the species or habitat. The project will not and has not adversely impacted habitats and areas needed for habitat connectivity for rare, threatened, or endangered species during the monitoring period.
Areas needed for habitat connectivity	The project does not have adverse impacts on habitat connectivity because it has not installed long fences. The only fenced areas are the substation and the operation and maintenance building^{/18/}. The project prohibited all types of hunting and access to the Tsetsii Mountain among employees. The project is located 3.5km from the “Tsetsii” Mountain. These details were confirmed during the remote audit interviews^{/19/} with project proponent representatives and also local stakeholders. The project does not act as barrier in habitat connectivity. The only fenced areas were identified to be substation and office building. Therefore, assessment team confirms that there is no impact on areas needed for habitat connectivity due to project activity. The project has not adversely impacted areas needed for habitat connectivity during the monitoring period.

Evidence gathering activities, evidence checked, and assessment conclusion	
Habitats for rare, threatened, and endangered species	This section is not applicable. Since, there is no impact on Habitats for rare, threatened, and endangered species. The project has not adversely impacted areas needed for habitat connectivity during the monitoring period. Assessment team through the review of project location and geo-coordinates confirmed that the project is relatively located in a remote area, which makes the project isolated. There are no habitats of people or any bird or animal species nearby the project area and land is mostly barren. Moreover, during the remote audit, PP representatives and local stakeholders informed that there are currently no other planned wind farms in the area. Also, during the current monitoring period, the presence “Saker Falcon” and it’s nests were not found within project territory. Therefore, it was confirmed that project did not impact the potential endangered species during current monitoring period. Hence, this

	section is not applicable.
Areas for habitat connectivity	This section is not applicable. Since, there is no impact on areas needed for habitat connectivity. The project has not adversely impacted areas needed for habitat connectivity during the monitoring period.

4.2.8.2 Introduction of Species

Species introduced	Evidence gathering activities, evidence checked, and assessment conclusion
Not applicable, as no species introduced.	This section is not applicable since no new species have been introduced in the project implementation area as verified by the assessment team during the remote interviews with PP representatives.

Existing invasive species	Evidence gathering activities, evidence checked, and assessment conclusion
Not Applicable, as no invasive species exists.	This section is not applicable since there are no existing invasive species in the project implementation area as verified by the assessment team during the remote interviews with PP representatives.

Evidence gathering activities, evidence checked, and assessment conclusion	
Invasive species	This section is not applicable since no new species have been introduced in the project implementation area and there are no invasive species in the project implementation area as verified by the assessment team during the remote interviews with PP representatives.

4.2.8.3 Ecosystem conversion

Item	Evidence gathering activities and evidence checked
Ecosystem conversion	The project activity is not ARR, ALM, WRC or ACoGS project. Hence it is not applicable.

4.3 Accuracy of Reduction and Removal Calculations

Means of verification	The verification team assessed whether the data and calculations of GHG emission reductions achieved resulting from the VCS PD-MR/4/. The verification team has checked whether calculations of baseline GHG
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	emissions, project GHG emissions and leakage GHG emissions have been carried out in accordance with the formulae and methods described in the monitoring plan of the VCS PD-MR/ ^{4/} .
Findings	CAR01 was raised during the verification process and closed successfully. Please refer Appendix 3 of this report for the detailed closure of the findings.
Conclusion	Baseline Emissions: The baseline emissions include only CO₂ emissions from electricity generation in fossil fuel power plants that are displaced due to the project activity. The baseline emissions for a given year are calculated by multiplying the Net Electricity Generation value with the grid emission factor. The grid in this case would be the 'Central Grid of Mongolia' Formula Used: - $BE_y = EG_{PJ,y} \times EF_{grid,CM,y} \dots \dots \dots (Equation 1)$ Where; BE_y = Baseline Emissions (tCO₂e/year) $EG_{PJ,y} = EG_{PJ,facility,y}$ = Quantity of net electricity generation that is produced and fed into the grid as a result of the implementation of the project activity in year y (MWh/year) $EF_{grid,CM,y}$ = Combined margin CO₂ emission factor for grid connected power generation in year y calculated using the Tool-7 "Tool to calculate the emission factor for an electricity system" (tCO₂/MWh)^{17/} Ex-ante parameters: As per the registered VCS PD-MR/^{4/} and requirement of the registered methodology/^{17/}, the following parameter is fixed Ex-ante: $EF_{grid,CM,y}$: Combined Margin CO₂ emission factor in year y in tCO₂/MWh The baseline emission factor is taken ex-ante in line with the registered VCS PD-MR/^{4/} as well as cross checked with section 3.3.8 of the validation-verification report/^{4/} and found correct. Combined margin CO₂ emission factor ($EF_{grid,CM,y}$) is equal to 0.871 tCO₂/MWh. The calculation approach was in line with the VCS PD-MR/^{4/}. The project activity ex-ante CO₂ emission factor for the national grid of Mongolia, to which project activity is connected comes under Central Energy System (CES). For the determination of grid emission factor, PP considered the CDM standardized baseline, ASB0039-2018, Grid emission factor for Mongolia's national electricity grid (version 01.0)¹⁷ /^{17/}. The CDM approved standardized baseline lists the grid emission

¹⁷ https://cdm.unfccc.int/methodologies/standard_base/2015/sb125.html

factor for Wind power project activity for this crediting period as 0.871 tCO₂/MWh. The value is consistent with registered VCS PD-MR/^{4/} and fixed ex-ante for the project activity.

Ex-post parameter:

As per the registered monitoring plan and requirement of the registered methodology, the following parameter needs to be monitored:

EG_{facility,y}: Quantity of net electricity generation supplied by the project plant to the grid in year y in MWh.

The value of the net electricity generation supplied to the grid is directly sourced from the monthly electricity generation records (monthly JMRs)^{11/}. Electricity outputs are recorded hourly, measured continuously and invoiced monthly to NPTG by the PP- Clean Energy Asia LLC, based on main meter (or Backup meter in case of main meter unavailability or default). Electricity outputs are electronically stored by officials of Clean Energy Asia LLC. The electricity generation supplied by the project activity is measured by the dedicated Bi-directional electronic electricity meters (Main and Backup meters) installed at the Tavantolgoi substation (metering point). These details were confirmed by the verification team during the remote audit and by checking the plant layout/^{23/}.

The details of electricity meters are follows:

Meter Type	Main export/import meter at Tavantolgoi substation No. 1	Main export/import meter at Tavantolgoi substation No. 2	Backup export/import meter at Tavantolgoi substation No. 1	Backup export/import meter at Tavantolgoi substation No. 2
Make and Meter Type	Elster ¹⁸ A1802RAL-P4GB-DW-4	Elster A1802RAL-P4GB-DW-4	Elster A1805RAL-P4GB-DW-4	Elster A1805RAL-P4GB-DW-4
Serial No	1311267	1311265	1311263	1311262
Accuracy class	0.2S	0.2S	0.2S	0.2S
Date of Calibration	19-July-2017	19-July-2017	19-July-2017	19-July-2017
Date of next calibration	18-July-2025	18-July-2025	18-July-2025	18-July-2025
Calibration Certificate Number	Mongolian Agency for Standardization and Metrology 54520	Mongolian Agency for Standardization and Metrology 54524	Mongolian Agency for Standardization and Metrology 54519	Mongolian Agency for Standardization and Metrology 54522

¹⁸ Elster A1800 Alpha Meter Polyphase Meter - Direct Connected or CT Rated | Rayleigh Instruments

	The export and import data are measured continuously by the electricity meters^{3/}, recorded hourly and monthly aggregated in the form of Joint monthly electricity generation and the invoices^{11/} are generated monthly. Monthly meter readings are taken from the main and backup meters installed at metering point. The net electricity supplied to grid is calculated as the difference of the measured values of export and import of electricity. The net electricity supplied to the grid by the project activity during the current monitoring period (01-April-2022 to 31-March-2023) is 175,149.0 MWh. The verification team has checked the entire monthly electricity generation reports^{11/} between CEA & NPTG grid for net electricity generated which is based on electricity export and import values mentioned in the generation records and crosschecked same with the sales records^{11/} raised by PP towards State Utilities for the monitoring period. All values are found correct. All the parameters are monitored and recorded as per the monitoring plan in the MR^{6/}. PP gets value of net electricity supplied to grid and hence this parameter is mentioned as a part of monitoring plan. The Verification Team has checked the calibration evidences for electricity meters^{5/} and noted that the calibration was conducted on 19-July-2017 for all the meters and thus it was confirmed that electricity meters are still in compliance with the calibration frequency of once in 8 years as per the Mongolian national standards and as fixed in section 4.2 of the registered VCS PD-MR^{4/}, as the due date of calibration is 18-July-2025. Therefore, no delayed calibrations were observed. The verification team has checked the net electricity generation supplied to the grid from the monthly “Joint monthly electricity generation reports between CEA & NPTG grid for net electricity generated & supplied to the grid (Monthly JMRs)^{11/}” and cross verified with the sales records^{11/} raised by the Project proponent (Clean Energy Asia LLC) to the Grid Company (National Power Transmission Grid, NPTG) and found consistent. All relevant monitoring parameters have been verified with regard to the appropriateness of the applied measurement/determination method, the correctness of the values applied for ER calculation, the accuracy, and applied QA/QC measures. Baseline emission factor ($EF_{grid,CMY}$) for this project activity is applied from the standardized baseline, “ASB0039-2018, Grid emission factor for Mongolia’s national electricity grid (version 01.0)^{19/17/}
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¹⁹ https://cdm.unfccc.int/methodologies/standard_base/2015/sb125.html

BE_y baseline emissions, tCO₂e:

$$\begin{aligned}
 BE_y &= EG_{PJ,y} \times EF_{grid, CM, y} \\
 &= 175,149.0 \text{ MWh} \times 0.871 \text{ tCO}_2\text{e/MWh} \\
 &= \mathbf{152,550 \text{ tCO}_2\text{e}} \text{ (round down value)}
 \end{aligned}$$

The vintage wise calculation of emission reductions is provided in the below table:

	EG _{PJ,y}	EF _{grid,y}	BE _y
	MWh	(tCO ₂ /MWh)	(tCO ₂ e)
Year 2022 (01-April-2022 to 31-December-2022)	135,743.0	0.871	118,228
Year 2023 (01-January-2023 to 31-March -2023)	39,406.0	0.871	34,322
Total	175,149.0	0.871	152,550

As per applied methodology ACM0002, version 19.0 ^{/17/} and the VCS PD-MR^{/4/}, project emission is considered zero as the project activity involved wind-based power generation with no auxiliary fossil fuel consumption.

Leakage: As per applied methodology ACM0002, version 19.0 ^{/17/} and VCS PD-MR^{/4/} Leakage emissions are not considered for the project activity.

Hence, ER_y = BE_y – PE_y

$$\begin{aligned}
 ER_y &= 152,550 \text{ tCO}_2\text{e} - 0 \text{ tCO}_2\text{e} \\
 &= \mathbf{152,550 \text{ tCO}_2\text{e}} \text{ (round down value)}
 \end{aligned}$$

According to the applied methodology, the conservativeness of the achieved emission reduction was checked, and the detailed emission reduction calculation has been transparently provided in the ER sheet^{/7/}. All the formulae and the calculation procedure were checked by the verification team. In the opinion of verification team, the assumptions, emission factors and default values that were applied in the calculations have been justified. Also, the verification team confirms that there were no manual transposition errors between the data sets in the ER Sheet^{/7/} during the current monitoring period. It is confirmed that the data has been measured directly from meters and it was cross checked from the monthly electricity generation records and the invoices raised and was able to verify the same.

Verification team confirms that the monitoring has been carried out in accordance with the monitoring plan, trainings and QA/QC procedure and

	emergency preparedness contained in the registered VCS PD-MR/ ^{4/} . Assessment team confirmed that the GHG emission reductions and removals have been quantified correctly in line with the registered VCS PD-MR/ ^{4/} .
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4.4 Quality of Evidence to Determine Reductions and Removals

Means of verification	The verification team checked the Calibration details of the monitoring meters with the calibration evidence ^{/5/} and whether the monitoring has been carried out in accordance with the applicable regulatory documents, inter alia, the applied methodology and registered monitoring plan. ^{/4//17/}				
Findings	CAR01 was raised during the verification process and closed successfully. Please refer Appendix 3 of this report for the detailed closure of the findings.				
Conclusion	The metering arrangement is dedicated bi-directional electronic energy meters ^{/3/} of accuracy class 0.2s (main and backup) at the Tavantolgoi substation. These meters record several parameters including electricity exported & imported. These electricity meters are being used by PP and grid company for monthly generation reports ^{/11/} . The details of meters are as follow:				
	Meter Type	Main export/import meter at Tavantolgoi substation No. 1	Main export/import meter at Tavantolgoi substation No. 2	Backup export/import meter at Tavantolgoi substation No. 1	Backup export/import meter at Tavantolgoi substation No. 2
	Make and Meter Type	Elster ²⁰ A1802RAL-P4GB-DW-4	Elster A1802RAL-P4GB-DW-4	Elster A1805RAL-P4GB-DW-4	Elster A1805RAL-P4GB-DW-4
	Serial No	1311267	1311265	1311263	1311262
	Accuracy class	0.2S	0.2S	0.2S	0.2S
	Date of Calibration	19-July-2017	19-July-2017	19-July-2017	19-July-2017
	Date of next calibration	18-July-2025	18-July-2025	18-July-2025	18-July-2025
	Calibration Certificate Number	Mongolian Agency for Standardization and Metrology 54520	Mongolian Agency for Standardization and Metrology 54524	Mongolian Agency for Standardization and Metrology 54519	Mongolian Agency for Standardization and Metrology 54522
	All the meters are of same accuracy class i.e., 0.2s as per the requirement of the registered PD-MR ^{/4/} . The same is checked with photographs submitted by the PP ^{/18/} and were found to be correct.				

²⁰ Elster A1800 Alpha Meter Polyphase Meter - Direct Connected or CT Rated | Rayleigh Instruments

	Verification team has checked the calibration evidence^{/5/} submitted for the electricity meters and confirmed that they are calibrated as per calibration frequency (once in 8 years as per the Mongolian national standards and as fixed in section 4.2 of the registered VCS PD-MR^{/4/}). Error! Reference source not found. The Verification Team has checked the calibration evidences for electricity meters^{/5/} and noted that the calibration was conducted on 19-July-2017 for all the meters and thus it was confirmed that electricity meters are still in compliance with the calibration frequency of once in 8 years as per the Mongolian national standards and as fixed in section 4.2 of the registered VCS PD-MR^{/4/}, as the due date of calibration is 18-July-2025. Therefore, no delayed calibrations were observed. Project activity is in continuous operation No major breakdowns except a few minor incidents were found to have occurred^{/13/} during the current monitoring period (please refer to Appendix-6 of this report for more details). Project proponent clarified that the breakdown incidents occurred during current MP did not affect the production, monitoring and measurement, so no conservative measure shall be applied to the ER calculations. Assessment team cross-checked the plant breakdowns sheet ^{/13/} to confirm about this and noted that the breakdown incidents that occurred during the current MP did not have any effect on the plant production. Overall, the plant was operating satisfactorily during the current MP. Hence, PP's clarification was found to be appropriate and acceptable. No unforced errors were observed. No sampling procedure applied for monitoring of the data parameter and entire documents were checked by the assessment team to arrive at positive verification conclusions. The monitoring plan is followed at the project site. Emergency procedure preparedness is ensured at site thanks to the check and internal control meters. The immediate response capability is achieved through the implementation of a system of supervision and control that will transfer real-time all information about the state of the equipment (SCADA) connected to each transformer's measuring unit as a back-up energy metering in case of feed-in points meters failure. All relevant documents were checked to assess the correctness and quality of data submitted by the project proponent, which are used to determine emission reductions. All the records needed for monitoring are archived in line with the requirements of the registered monitoring plan. No significant lack of evidence and missing data were detected during remote audit discussion. Hence, the verification team confirms that the monitoring system ensures required quality of the monitoring system to ensure the quality of the monitored data. All internal data are subjected to QA/QC measures. The monitoring parameters have been measured / determined without material misstatements and is in line with all applicable standards and relevant requirements. The information inflow (from data generation, aggregation, to recording, calculation and reporting) is included
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	in section 4 under each parameter and confirms to the requirement of the PD-MR/^{4/}. The export and import data are measured by the electricity meters, recorded continuously through electronic means and the invoices are generated monthly. The data is then reported annually on the VCS Monitoring Report as verified by the verification team through remote assessment. It was also verified through remote audit inspection/^{19/} that the plant's team involved in the monitoring of project activity is well experienced. Hence, the verification team concludes that competent staff is employed by the project proponent to carry out the relevant tasks with sufficient accuracy. Furthermore, it was confirmed during remote audit discussion that internal training program for the monitoring staff is conducted on regular basis. The VVB confirms that the monitoring has been carried out in accordance with the applicable regulatory documents, <i>inter alia</i>, the applied methodology/^{17/} and that there are no material discrepancies between the project implementation and the project description, the implementation of the monitoring plan, its completeness and adequacy to the methodology. If any discrepancies have been found, these are reported, assessed and closed accordingly in the form of CLs or CARs (see Appendix 3), as well as if any project/methodology deviation is sought for this monitoring period, can be found in Section 3 of this Verification Report/^{4/}. As a result of verification of the Emission Reductions calculation process, the VVB confirms that all the parameters required for their determination have been included in the Monitoring Report/^{6/} and ER Calculation sheet/^{7/} for which this verification applies. After verifying the data sources, data collection and aggregation processes and final calculations and reported figures, it is confirmed that the values of the parameters from the data sources are consistent with those finally reported in the Monitoring Report and ER Calculation sheet. /^{6//7/} The verification process for the same and the quality of used evidence have been clearly described above in Section 4 of this Verification Report/^{4/}. The verification team can confirm that sufficient evidence is available for the whole monitoring period and the same is verifiable and that the data collection system meets the requirements of the monitoring plan and the applied methodology according to the assessment carried out during the remote audit/^{19/} and in the document review.
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4.5 Non-Permanence Risk Analysis

Not applicable as this is a renewable project type.

5 VERIFICATION OPINION

5.1 Verification Summary

LGAI Technological Center S.A. (Applus+ Certification) has been contracted^{/2/} by Clean Energy Asia LLC to perform the fifth periodic verification of GHG Emission Reductions for the project activity “50 MW Tsetsii Wind Farm in Mongolia” (VCS project ID #1898)^{/24/}.

The monitoring period included in the Monitoring Report^{/6/} for which this verification applies is: 01-April-2022 to 31-March-2023 (both days included).

The management of Clean Energy Asia LLC is responsible for the preparation of the GHG emissions data and the reported GHG emissions reductions on the basis set out within the project’s Monitoring Plan in the registered Project Description-Monitoring Report (PD-MR) version 01.1, dated on 28-August-2019^{/4/} and the approved methodology, ACM0002, version 19.0.^{/17/}

VVB confirms that, GHG statement is the responsibility of the project proponent. The project activity fulfills the criteria for the verification as established in section 4 of the VCS standard version 4.7^{/10/}. Verification team has reviewed the monitoring report including registered VCS PD-MR and subsequently carried out the remote audit/ follow-up interviews^{/19/} with PP representatives and confirm the fulfilment of stated criteria. Verification team has the unmodified opinion regarding the project activity, VVB team has checked all the details and found it consistent and free of material errors or misstatements.

Applus+ Certification’s verification approach has been based on the requirements of the applicable regulatory documents (defined within this Verification Report and listed in the Appendix 2). Our approach is risk-based, drawing on an understanding of the risks associated with reporting GHG emissions data and the controls in place to mitigate these.

The verification can confirm that:

- The project is implemented and operated as per the registered PD-MR^{/4/};
- The monitoring plan in registered PD-MR is as per the applied methodology^{/17/};
- The monitoring complies with the monitoring plan in the registered PD-MR^{/4/};
- The monitoring report and other supportive documents provided are complete and verifiable and in accordance with the applicable VCS requirements and any other applied regulatory document;
- The installed equipments being essential for generating emission reductions runs reliably and are calibrated appropriately (where applicable);
- The monitoring system is in place and generates GHG emission reductions data;
- The GHG emission reductions are calculated without material misstatements.

A Reasonable Level of assurance was achieved as planned, during verification process.

As per VCS Standard version 4.7 Para 4.1.10, VVB team verified that, the criteria for verification of the project activity are in line with the relevant VCS Version 4 criteria^{/10/}. The objective of this verification activity is to have an independent third party for the assessment of the Monitoring report, emission reduction sheet and to ensure a thorough assessment of the project activity against the applicable regulatory requirements.

VVB concluded the assessment, as per para 4.1.18 of the VCS standard version 4.7 ^{/10/}, with a positive verification opinion regarding the project activity. The VVB team has raised 02 Corrective action requests (CARs), 00 Clarification (CLs) and no FAR (forward action request). All the issues identified as CARs and/or CLs have been successfully closed and mentioned in Appendix 3 of this verification report. The VVB team clearly state that there is no material misstatement at the level of the GHG statement and GHG declarations made by the Project Proponent. VVB declared that the validation and/or verification of the GHG statement was conducted in accordance with ISO 14064-3:2019.

5.2 Verification Conclusion

Our verification approach was based on the requirements as defined under the applicable VCS regulatory requirements^{/10/}. The verification has been conducted in accordance with the VCS standard version 4.7^{/10/}, other valid and applicable VCS regulatory documents and templates ^{/10/}(see under appendix 2 of this report), UNFCCC rules and requirements^{/17/} (where applicable) and associated decisions of the VCS secretariat and the UNFCCC Executive Board (where applicable) and VCS requirement. Our approach is risk-based, drawing on an understanding of the risks associated with reporting GHG emissions data and the controls in place to mitigate these. Further, the verification has been planned and organized to achieve a Reasonable Level of assurance as per the requirement of paragraph 4.1.10(1) of the VCS standard V4.7^{/10/}. No sampling procedure applied for document verifications. The entire documents checked/Power plant verification conducted to arrive at positive verification conclusions.

The verification team can confirm that:

- the project is implemented and operated as planned and described in the project documents;
- the monitoring plan is as per the applied methodology^{/17/};
- the monitoring process in Monitoring Report is as per the registered VCS PD-MR^{/4/}
- the development and maintenance of records and reporting procedures are in accordance with the monitoring plan;
- the installed equipments being essential for generating emission reduction runs reliably and are calibrated appropriately;
- the monitoring system is in place and generates GHG emission reductions data;
- the GHG emission reductions are calculated without material misstatements.
- A Reasonable Level of assurance was achieved as planned, during verification process.

Verification period: From [01-April-2022] to [31-March-2023]

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

Vintage period	Baseline emissions (tCO ₂ e)	Project emissions (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Reduction VCU (tCO ₂ e)	Removal VCU (tCO ₂ e)	Total VCUs (tCO ₂ e)
Year 2022 (01-April-2022 to 31-December-2022)	118,228	0	0	118,228	0	118,228
Year 2023 (01-January-2023 to 31-March - 2023)	34,322	0	0	34,322	0	34,322
Total	152,550	0	0	152,550	0	152,550

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
Year 2022 (01-April-2022 to 31-December-2022)	131,825 tCO ₂ e	118,228 tCO ₂ e	10.31% lower than the estimated ER for 8 months	The actual emission reductions achieved during this vintage are 10.31% lower than the estimated emission reductions in VCS PD-MR/ ^{6/} for corresponding vintage period. This is mainly due to the variations in wind flow patterns and the National Power Transmission Grid's unavailability. This unavailability is detailed in Appendix-2 of the monitoring report/ ^{6/} and Appendix-6 of this verification report. The

				variations in the wind flow are not in control of the PP and hence the justifications provided are acceptable.
Year 2023 (01-January-2023 to 31-March -2023)	43,942 tCO ₂ e	34,322 tCO ₂ e	21.89% lower than the estimated ER for 3 months	The actual emission reductions achieved during this vintage are 21.89% lower than the estimated emission reductions in VCS PD-MR/ ^{6/} for corresponding vintage period. This is mainly due to the variations in wind flow patterns and the National Power Transmission Grid's unavailability. This unavailability is detailed in Appendix-2 of the monitoring report/ ^{6/} and Appendix-6 of this verification report. The variations in the wind flow are not in control of the PP and hence the justifications provided are acceptable.
Total	175,767 tCO₂e	152,550 tCO₂e	13.21% lower than the estimated total ER	The actual emission reductions achieved during this monitoring are 13.21% lower than the estimated emission reductions in VCS PD-MR/ ^{6/} for corresponding monitoring period. This is mainly due to the variations in wind flow patterns and the National Power Transmission Grid's unavailability. This unavailability is detailed in Appendix-2 of the monitoring report/ ^{6/} and Appendix-6 of this verification report. The variations in the wind flow are not in control of the PP and hence the justifications provided are acceptable.

APPENDIX 1: COMMERCIALLY SENSITIVE INFORMATION

<i>Section</i>	<i>Information</i>	<i>Justification</i>	<i>Assessment method and conclusion</i>
N/A	N/A	N/A	Not applicable as there is No commercially sensitive information has been included in this report.

APPENDIX 2: DOCUMENTS REVIEWED OR REFERENCED (VERIFICATION)

No.	Author	Title	References to the document	Provider
/1/	NDC	Commissioning certificate issued by National Dispatch Centre ref. 2/1446 dated 24-Nov-2017	ref. 2/1446 dated 24-Nov-2017	Project Proponent
/2/	VVB	Contract of the project Proponent with the VVB	Contract document signed between PP and VVB, Version 1.0, dated 17-June-2024	Project Proponent
/3/	Various Manufacturers (Vestas and Elster)	Technical Specifications for the WTGs as well as metering equipment	Manufacturer technical specifications	Project Proponent
/4/	Project Proponent & VVBs	VCS PD-MR (PDD_50MW_wind_project_Mongolia.pdf) VCS Joint Validation-Verification Report (VCS-Joint-Validation-Verification_Mongolia_v1.1Aa_28.10.2019.pdf) VCS Monitoring Report for 2nd Verification (MR_MP02_50MW_wind_project_Mongolia.pdf) VCS Verification Report for 2nd Verification (VCS-Final_Verification-Report_CCIPL_830.pdf) VCS Monitoring Report for 3rd Verification (MR_MP03_50MW_wind_project_Mongolia_clean-redacted.pdf) VCS Verification Report for 3rd Verification (CCIPL_921_VCS-FVR_03082021_clean_copy.pdf)	Version 01.1, dated 28-August-2019 Version 1.1Aa, dated 26-October-2019 Version 1.1, dated 29-July-2020 Version 1.0, dated 03-August-2020 Version 1.2, dated 26-July-2021 Version 1.2, dated 03-August-2021	Others

No.	Author	Title	References to the document	Provider
		VCS Monitoring Report for 4 th Verification (VCS MR_V02_1898_01092022.pdf)	Version 02, dated 01-September-2022	
		VCS Verification Report for 4 th Verification (FVR_Clean Energy Mangolia-VCS_1898_TQC_23022.pdf)	Version 01, dated 07-September-2022	
/5/	Mongolian Agency for Standardization and Metrology	Calibration Certificates of energy meters	-	Project Proponent
/6/	Project Proponent	Monitoring Report version 01 (Initial) Monitoring Report version 02 Monitoring Report version 03 (Final)	09-July-2024 02-October-2024 27-November-2024	Project Proponent
/7/	Project Proponent	Emission reduction sheet version 01(Initial) Emission reduction sheet version 02 (Final)	09-July-2024 02-October-2024	Project Proponent
/8/	Project Proponent	Organization structure of the Clean Energy Asia LLC	-	Project Proponent
/9/	Project Proponent And Grid Company	Power Purchase Agreement (PPA) Between PP (Clean Energy Asia LLC) and National Power Transmission Grid State Owned Stock Company (Grid company)	Dated 15-October-2014	Project Proponent
/10/	VERRA	Standard documents used in the project activity - VCS Standard, v4.7 - VCS Program Guide, v4.4 - VCS Program Definitions, v4.5 - Registration and Issuance Process, v4.5 - Validation and Verification Manual, v3.2 - VCS Monitoring Report Template, v4.4 - VCS Verification Report Template, v4.4	VCS web site (https://verra.org/programs/verified-carbon-standard/vcs-program-details/)	VERRA
/11/	Project Proponent	Monthly Generation Records (Monthly JMRs) and respective invoices/sales records for the monitoring period 01-April-2022 to 31-March-2023	For the monitoring period 01-April-2022 to 31-March-2023	Project Proponent
/12/	Project Proponent	Self-Declaration regarding no double counting or participation in other GHG program or emissions trading program or	12-August-2024	Project Proponent

No.	Author	Title	References to the document	Provider
		any other mechanism that includes GHG allowance trading for the concerned monitoring period		
/13/	Project Proponent	Breakdown details for the monitoring period	Shutdown breakdown records of the current monitoring period	Project Proponent
/14/	Project Proponent	Employment evidence for plant persons and Training Certificates for the trainings conducted	For the monitoring period 01-April-2022 to 31-March-2023	Project Proponent
/15/	Project Proponent	Grievance Registers maintained at site	For the monitoring period 01-April-2022 to 31-March-2023	Project Proponent
/16/	UNFCCC	CDM validation and verification standard for project activities, Version 03.0	https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20210921115831128/reg_stan06_v03.0.pdf	Others
/17/	UNFCCC	Applied Methodology, ACM0002.: Grid-connected electricity generation from renewable sources — Version 19.0 Standardized Baseline: ASB0039-2018: Grid emission factor for Mongolia's national electricity grid (version 01.0) Tool 07: Tool to calculate the emission factor for an electricity system (Version 07.0)	Version 19.0 (https://cdm.unfccc.int/UserManagement/FileStorage/58IAGB7SZUDE02VN6LYM30K41HFPRQ) Version 1.0 (https://cdm.unfccc.int/methodologies/standard_base/2015/sb125.html) Version 07.0 (https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-07-v7.0.pdf)	Others
/18/	NA	Onsite photographs of WTGs, components /Videos /Meters photographs, etc	-	Project Proponent
/19/	VVB	Remote audit records	Dated 20-August-2024	VVB
/20/	UNFCCC	Guidelines for Application of materiality in verifications (version 02.0)	Version 02.0	UNFCCC
/21/	General	Environmental Impact Assessment (EIA)	2014	Project

No.	Author	Title	References to the document	Provider
	Directory of Sunny Trade LLC Consulting company in Mongolia	Report compiled by General Directory of Sunny Trade LLC Consulting company in Mongolia		Proponent
/22/	Project Proponent	Tsetsii Training Records Community Health and Safety Plan HSE Policy HR Policy Anti-Harassment Policy Code of Ethics and Business Conduct Environmental Management Plan Waste Management Plan Soil Quality Monitoring Report Biodiversity Management Plan	For the monitoring period 01-April-2022 to 31-March-2023	Project Proponent
/23/	Project Proponent	Plant Layout	-	Project Proponent
/24/	VERRA	VCS webpage for the project, VCS ID 1898	https://registry.terra.org/app/projectDetail/VCS/1898	Others
/25/	UNFCCC	Official registry website of Clean Development Mechanism https://cdm.unfccc.int/Projects/projsearch.html	Last retrieved data on 27-September-2024	Others
/26/	GS	Official registry website of Gold Standard https://www.goldstandard.org/	Last retrieved data on 27-September-2024	Others
/27/	GCC	Official registry website of Global Carbon Council https://www.globalcarboncouncil.com/	Last retrieved data on 27-September-2024	Others
/28/	Project Proponent	Tsetsii Windfarm - Stakeholder Engagement and Ongoing Consultations	-	Project Proponent

No.	Author	Title	References to the document	Provider
		report		
/29/	Project Proponent	Organization Chart for Clean Energy Asia LLC	-	Project Proponent
/30/	IAF	<u>IAF MD4:2023 Document</u>	Version 04, dated 14-June-2023	Others
/31/	ICR	Official registry website of International Carbon Registry: https://www.carbonregistry.com/	Last retrieved data on 04-November-2024	Others
/32/	I-REC	Official registry website of International REC (I-REC) registry: https://www.irecstandard.org/	Last retrieved data on 04-November-2024	Others
/33/	PP	Land Lease Agreement	-	PP

APPENDIX 3: CORRECTIVE ACTION REQUESTS, CLARIFICATION REQUESTS AND FORWARD ACTION REQUESTS (CAR/CL/FAR)

Table 1. Remaining FAR from validation and/or previous verification

FAR ID	XX	Section no.	XX	Date : DD Month YYYY
Description of FAR				
NA.				
Project Proponent's response				Date : DD Month YYYY
NA.				
Documentation provided by project Proponent				
NA.				
VVB assessment				Date: DD Month YYYY
NA.				

Table 2. CL from this verification

CL ID	XX	Section no.	XX	Date: DD Month YYYY
Description of CL				
NA.				
Project Proponent's response				Date: DD Month YYYY
NA.				
Documentation provided by project proponent				
NA.				
VVB assessment				Date: DD Month YYYY
NA.				

Table 3. CAR from this verification

CAR ID	01	Section no.	4.1	Date: 22-August-2024
Description of CAR				
As per VCS MR template ver. 4.4, following corrections shall be made in the MR				
1. The header is missing on the 1st page as per the template				
2. As per joint validation and verification report, VCS standard 3.7 was applied at the time of				

registration. The most recent version no. is 4.7. PP shall correct and use appropriate version of VCS standard in the table on page no. 1. 3. In section 1.1, Please ensure that, project description does not exceed one page 4. Date format shall be consistent throughout the MR as DD-MONTH-YYYY 5. In section 1.7, justify how the crediting period selected conforms with the VCS Program requirements 6. In section 1.12, a. Provide a brief description that includes the following (no more than 100 words): b. Evidence of the project's SD contributions shall be provided as appendices to this report c. In the table 1 - Please add SDG indicator no. for better clarity and in the last column, please add cumulative details over the period of project's life time till date. 7. In section 2.1.4, as per the template guidelines, Where no grievances were raised, indicate this with NA and demonstrate that the procedure is easily accessible to stakeholders for ongoing consultation. 8. In section 2.2.1, add management experience w.r.t preparation of MR, ER sheet etc. too 9. In section 2.2.2, demonstrate why risks are not present for the current monitoring period 10. Appendix 1: Commercially sensitive information is missing which is mandatory as per the template.	
Project Proponent's response	Date: 12-September-2024
Clean Energy Asia LLC (CEA) has addressed the necessary corrections to the MR. Please review our response below. 1. Inserted the header on the 1st page of the MR as per the template. 2. We've corrected our mistake and used the most recent VCS Standard Version no 4.7. We've also updated the version no in the table on page number 1 in our MR. 3. We've shortened and updated the Project Description in Section 1.1, ensuring it does not exceed one page. 4. We've standardized all inconsistent date formats in the report to DD-MONTH-YYYY. 5. We've made a justification for our crediting period in Section 1.7. 6. CEA has made the following corrections in Section 1.12: a. Provided a brief description of our sustainable development contributions, ensuring it does not exceed 100 words. b. Provided evidences of our sustainable development contributions in Appendix 3 of the MR. c. Added sustainable development indicator numbers in Table 1 and included applicable cumulative details project to date. 7. CEA explained the grievance redress process in Section 2.1.4 of the MR and demonstrated that our procedure and grievance forms are readily available to stakeholders. 8. In section 2.2.1, CEA included management experience and individual profiles 9. In section 2.2.2 of the monitoring report, CEA explained why no risks are present during the current monitoring period. 10. Added the Commercially Sensitive Information in Appendix 1.	
Documentation provided by project proponent	
Documentation has been provided in the revised MR report	
WVB assessment	Date: 20-September-2024

1. The project proponent has now inserted the header on the 1st page of the MR, in accordance with the MR template format. This was found to be correct and acceptable to the assessment team. Hence, **Comment 1 is closed.**
2. PP has now mentioned the latest version (v.4.7) of VCS standard in the cover page table of revised MR. This was found to be appropriate and acceptable to the assessment team. Hence, **Comment 2 is closed.**
3. The Summary description of implementation status of the project is now limited to one page by the project proponent in line with MR template guidelines. This was found to be correct. Hence, **Comment 3 is closed.**
4. The dates are now corrected in the updated MR as per the format (DD-MONTH-YYYY) required by MR template guidelines. Hence, **Comment 4 is Closed.**
5. The project proponent has now included the necessary justification about how the selected crediting period conforms with the VCS Program requirements, in section 1.7 of revised MR. It was found to be appropriate and acceptable to the assessment team. Hence, **Comment 5 is Closed.**
6. The project proponent has now made the necessary corrections in section 1.12 of the MR in line with template guidelines and provided the respective supportive evidences in Appendix-3 of MR, which were found to be appropriate and acceptable to the assessment team. Hence, **Comment 6 is closed.**
7. Project Proponent has now explained the grievance redress process in Section 2.1.4 of the revised MR and provided the necessary demonstration that their procedure and grievance forms are readily available to stakeholders. The provided details were confirmed to be correct by the assessment team based on the observations of remote audit and interviews with PP representatives and local stakeholders. Hence, **Comment 7 is Closed.**
8. The project proponent has now included the requested information about management experience of the project staff w.r.t preparation of MR, ER sheet etc. in section 2.1.1 of revised MR. This was found to be appropriate and acceptable to the assessment team. Hence, **Comment 8 is Closed.**
9. In section 2.2.2 of the revised MR, PP has now included the relevant details, clarifying why no risks are present during the current monitoring period. Those explanations were found to be appropriate and acceptable to the assessment team. Hence, **Comment 9 is closed.**
10. The “Appendix 1: Commercially Sensitive Information” is now included in the revised MR by the PP, fulfilling the requirements of MR template format. This was found to be correct and acceptable. Hence, **Comment 10 is Closed.**

Thus, **CAR01 is Closed.**

CAR ID	02	Section no.	4.1	Date:	22-August-2024
Description of CAR					
Please check font, font size throughout the MR and make it consistent as per the MR template requirements.					
Ensure that consistent date format is used throughout the MR.					

Project participant response	Date: 12-September-2024
CEA has checked all font and font sizes of the MR and rectified all inconsistent formats as per the MR template requirements.	
Documentation provided by project participant	
Revised Monitoring Report which was submitted along with this CAR.	
VVB assessment	Date: 20-September-2024
The necessary corrections for font, font size and date format are now made throughout the monitoring report by project proponent. Assessment team checked the same and found to be correct. Thus, CAR02 is Closed.	

Table 4. FARs from this Project Verification

FAR ID	xx	Section no.	Date: DD-Month-YYYY
Description of FAR			
NA			
Project participant response			Date: DD-Month-YYYY
NA			
Documentation provided by project participant			
NA			
VVB assessment			Date: DD-Month-YYYY
NA			

APPENDIX 4: COMPETENCE OF TEAM MEMBERS AND TECHNICAL REVIEWERS

Before the assessment begins, members of the team covering the technical scope(s), sectoral scope(s), and relevant host country experience for evaluating the VCS project activity are appointed in accordance with the LGAI Technological Center S.A. (Applus+ Certification) procedures and policies, that are in accordance with the ISO 14065:2020 regulatory provisions.

According to the applicable sectoral scope / technical area and experience in the sectoral or national business environment, LGAI Technological Center S.A. (Applus+ Certification) has composed an assessment team in accordance to compliance with the contract review and Assessment Team appointment rules in the internal Quality Management System of LGAI Technological Center S.A. (Applus+ Certification) as well as in compliance with the applicable requirements in the Accreditation Standard.

The composition of audit team (Applus+ Certification's verification team) has been approved by the LGAI Technological Center S.A. (Applus+ Certification) Central site during its Contract Review process, ensuring that the required skills and capabilities are covered by the team.

The qualification levels for Assessment Team members that are assigned by aforementioned appointment rules are as presented below:

- Lead Auditor (LA).
- Auditor (A).
- Technical Expert (TE).
- Technical Reviewer (TR).
- Any of the above-mentioned roles in training (iT, e.g. AiT for auditor in training, TEiT for Technical Expert in Training, etc.).

The Sectoral Scopes / Technical Areas required knowledge linked to the applied methodology(ies) is covered by the Assessment Team as shown below:

No.	Role	Type of resource	Last name	First name	Affiliation (e.g. name of central or other office of VVB or outsourced entity)	Involvement in			
						Desk review	On-site inspection	Interview(s)	Verification findings
1.	Lead Auditor (LA), Technical Expert (TE)	OE	Pundlik	Deepak	True Quality Certifications Private Limited (Outsourced entity)	Yes	No	Yes	Yes
2.	Auditor (A)	IR	Gaikwad	Saurabh	LGAI Technological Center S.A. (Applus+ Certification)	Yes	No	Yes	Yes
3.	Observer (OBS)	IR	Liu	Lily	LGAI Technological Center S.A. (Applus+ Certification)	No	No	Yes	No

Technical reviewer and approver of the verification and certification report

No.	Role	Type of resource	Last name	First name	Affiliation (e.g. name of central or other office of DOE or outsourced entity)
1.	Technical Reviewer (TR), Technical Expert (TE)	IR	Vega	Karen	LGAI Technological Center S.A. (Applus+ Certification)
2.	Technical reviewer in Training (TRiT),	EI	Soni	Ravi Kant	LGAI Technological Center S.A. (Applus+ Certification)

	Technical Expert (TE)				
3.	Approver	IR	Calle de Miguel	Agustin	LGAI Technological Center S.A. (Applus+ Certification)

Short CVs of the Team:

Mr. Deepak Pundlik	Mr. Deepak Pundlik has of experience in climate change, waste management and environmental management. After completing Masters in Environment Sciences from Pune university, India. He has worked in waste management field. As a GHG consultant, He handled projects under renewable energy, waste management sectors during his stint with companies - MITCON and Thermax. Post Thermax, Deepak was involved in organic farming research project with Tata Institute of Social Sciences. As a GHG auditor, He has validated/verified projects under CDM/VCS/GS and GCC mechanisms from renewable energy, energy demand, waste management sectors. He is based in Pune, India. Mr. Deepak Pundlik works with True Quality Certifications Pvt. Ltd. which is an outsourced entity of Applus+ certification. Mr. Deepak Pundlik participated as part of the Audit Team as Lead Auditor and Technical Expert.
Mr. Saurabh Gaikwad	Mr. Saurabh Gaikwad holds a Bachelor of Technology (B. Tech) degree in Environmental Engineering from KIT's College of Engineering in Kolhapur, Maharashtra, India. With more than 3 years of experience, he has worked extensively in the field of Carbon Markets and Climate Change, specifically focusing on UNFCCC CDM and other carbon-related schemes such as VCS, GS, GCC, etc. During this time, he has been involved in audit teams for various projects under CDM/VCS/GS/GCC, assuming the roles of Trainee Validator, Verifier, and Auditor in Training. Since June 2022, Mr. Saurabh Gaikwad has been working at Applus+ Certification as Technical Support for the CDM Department. In this role, he actively participates in different stages of the VVC processes and conducts administrative reviews of final submission documents and post submission registry findings reviews to ensure the quality of reports, project documents and compliance with standard requirements. Additionally, he serves as Auditor and Technical Expert for the Validation and Verification of Project Activities, encompassing both renewable and non-renewable projects, under the CDM/VCS/GS4GG/GCC, etc. programs. Mr. Saurabh Gaikwad is based in Pune, India. Mr. Saurabh Gaikwad participated as part of the Audit Team as Auditor (A).
Ms. Lily Liu	Ms. Lily Liu has a Master's Degree in Environmental and Energy Engineering from the University of Shieffield, UK. Lily has more than 4 years of experience in the field of voluntary carbon market as a GHG consultant. As a consultant, she has provided consultancy services for project proponent to complete validation and verification for more than 20

	projects in different fields under universally recognized standards (VCS/GS), for example, afforestation, rice, cookstove, animal manure management, etc. Currently, she works in the Applus + Shanghai, as Sustainability Auditor, being especially involved in GHG audits, Carbon footprint Audits, CBAM, LCA and CDM projects. Ms. Lily Liu is based in Shanghai, China. Ms. Lily Liu participated in the project as Observer.
Ms. Karen Elizabeth Vega Nonalaya	Ms. Karen Vega has a Bachelor's Degree in Environmental Sciences from the University of Barcelona, she has post-graduate studies in renewable energies, and a master's degree in finances. Karen has more than 7 years of professional experience in the sector of quality, environment, and climate change. Her professional career has been mainly focused, but not limited to, on the sector of validation and verification of GHG emission compensation and mitigation projects, in different countries and under universally recognized standards (CDM-UNFCCC, VS, GS4GG, GCC). She has also worked as Sustainability and Environment consultant mainly for the metal coating sector, conducting transversal roles and opening successfully the sustainability department in the company. Currently, she works in Applus + Certification Project Manager, being especially involved in technical and management tasks in the DOE/VVB to ensure the quality of the performance of different assessments, coordinate the global team, and maintenance of the Accreditations. Karen has attended different CDM, VCS, GS4GG, GCC, ISO 9001, and ISO 14001 training processes. She has conducted consultancy services for ISO 9001 and ISO 14001 implantation in various companies, being in charge from its beginnings until final certification and certificate obtain; in the same way she has conducted Carbon Footprint Analysis and Reports. Holds experience as Verifier for GHG mitigation projects and programmes of activities in Sectoral Scope 1.1 (Thermal energy generation) and 1.2 (Renewables), qualified as per Applus+’ procedures. She is already qualified as an auditor for ISO 9001, ISO 14001, GHG audits, Carbon footprint Audits and CDM renewable projects audits (Sectoral Scopes 1.1 and 1.2). Ms. Karen Vega is based in Barcelona, Spain. Ms. Karen Vega participated as part of the Technical Review experts’ panel.
Mr. Ravi Kant Soni	Mr. Ravi Kant Soni is a certified Lead Auditor ISO 17029:2019, ISO 14065:2020 & Lead Auditor ISO 14064:2019 GHG Inventory and verification. He has more than 10 years of work experience across Climate Change, Environmental Management & Monitoring, Health & Safety Management, and Statutory Compliance. He was involved in more than 150 CDM validation and verifications activities and Gold Standard, VER projects as a team leader/technical reviewer / validator /

	verifier covering the sectoral scope 1 (technical area 1.1 & 1.2) and scope 3 (technical area 3.1). He has done Master in Technology (Energy Management) from a premier institute, School of Energy & Environmental Studies, DAVV, Indore (M.P.), India and Bachelor of Engineering (Mechanical Engineering) from M.I.T.S Gwalior Jiwaji University Gwalior, India. Mr. Ravi Kant Soni is based in Indore, India. Mr. Ravi Kant Soni participated in the project assessment as Technical Reviewer in Training (TRiT).
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APPENDIX 5: ABBREVIATIONS

Abbreviations	Full texts
BM	Build Margin
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CER	Certified Emission Reduction(s)
CEA	Clean Energy Asia LLC
CL	Clarification request
CM	Combined Margin
CMS	Central Monitoring system
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent
DNA	Designated National Authority
DOE	Designated Operational Entity
DR	Document Review
EF	Emission Factor
EIA	Environmental Impact Assessment
ER	Emission Reductions
FAR	Forward Action Request
GHG	Greenhouse gas(es)
GWP	Global Warming potential
NPTG	National Power Transmission Grid
PD	Project Description
JMR	Joint Meter Reading
JPD-MR	Joint Project Description and Monitoring Report
PP	Project Proponent
QA/QC	Quality Assurance and Quality Control
SDGs	Sustainable Development Goals
UNFCCC	United Nations Framework Convention on Climate Change
VCS	Voluntary Carbon Standard
VCSA	Voluntary Carbon Standard Association
VCS PD	VCS Project Description
VCUs	Voluntary Carbon Units
VVB	Validation Verification Body
WTG	Wind Turbine Generator

APPENDIX 6: BREAKDOWN RECORDS

From (DD-Month-YYYY, Hrs:Min: Sec)	To (DD-Month-YYYY, Hrs:Min: Sec)	Breakdown Hrs (Hrs:Min: Sec)	Break-down remark	Turbine no.
09-March-2023 8:31:45 PM	11-March-2023 15:05:00PM	42:34:04	WTG frequency error 1: 0.55Hz	WTG02
09-March-2023 8:31:45 PM	11-March-2023 11:04:52 PM	50:33:07	NPTG unavailability	WTG01
09-March-2023 8:31:45 PM	11-March-2023 15:47:20 PM	43:15:35	NPTG unavailability	WTG03
09-March-2023 8:31:45 PM	11-March-2023 17:01:49 PM	44:30:04	NPTG unavailability	WTG04
09-March-2023 8:31:45 PM	11-March-2023 15:48:10 PM	43:16:25	NPTG unavailability	WTG05
09-March-2023 8:31:45 PM	11-March-2023 15:27:05 PM	42:55:20	NPTG unavailability	WTG06
09-March-2023 8:31:45 PM	11-March-2023 16:43:18 PM	44:11:30	NPTG unavailability	WTG07
09-March-2023 8:31:45 PM	11-March-2023 15:13:35 PM	42:41:50	NPTG unavailability	WTG08
09-March-2023 8:31:45 PM	11-March-2023 22:28:55 PM	49:57:10	NPTG unavailability	WTG09
09-March-2023 8:31:45 PM	11-March-2023 17:43:16 PM	45:11:30	NPTG unavailability	WTG10
09-March-2023 8:31:45 PM	11-March-2023 15:23:10 PM	42:51:25	NPTG unavailability	WTG11
09-March-2023 8:31:45 PM	11-March-2023 21:47:52 PM	49:16:07	NPTG unavailability	WTG12
09-March-2023 8:31:45 PM	11-March-2023 17:50:41 PM	45:18:56	NPTG unavailability	WTG13
09-March-2023 8:31:45 PM	11-March-2023 14:58:47 PM	42:27:02	NPTG unavailability	WTG14
09-March-2023 8:31:45 PM	11-March-2023 15:32:33 PM	43:00:48	NPTG unavailability	WTG15
09-March-2023 8:31:45 PM	11-March-2023 22:45:52 PM	50:14:07	NPTG unavailability	WTG16
09-March-2023 8:31:45 PM	11-March-2023 15:56:09 PM	43:24:24	NPTG unavailability	WTG17

From (DD-Month-YYYY, Hrs:Min:Sec)	To (DD-Month-YYYY, Hrs:Min: Sec)	Breakdown Hrs (Hrs:Min: Sec)	Break-down remark	Turbine no.
09-March-2023 8:31:45 PM	11-March-2023 17:55:41 PM	45:23:56	NPTG unavailability	WTG18
09-March-2023 8:31:45 PM	11-March-2023 16:46:55 PM	44:15:10	NPTG unavailability	WTG19
09-March-2023 8:31:45 PM	11-March-2023 17:09:50 PM	44:38:05	NPTG unavailability	WTG20
	11-March-2023 15:48:00	43:17:14	NPTG unavailability	WTG21
	11-March-2023 19:51:00	47:19:40	NPTG unavailability	WTG22
	11-March-2023 15:45:00	43:14:14	NPTG unavailability	WTG23
	21-February-2023 8:10:00	1028:27:48	NPTG unavailability	WTG24
	11-March-2023 16:29:00	43:53:34	NPTG unavailability	WTG24
	11-March-2023 18:08:00	45:36:27	NPTG unavailability	WTG25
	19-May-2022 19:00:00	107:59:32	NPTG unavailability	WTG01
	19-May-2022 18:59:00	107:58:11	NPTG unavailability	WTG02
	19-May-2022 18:53:00	107:51:39	NPTG unavailability	WTG03
	19-May-2022 18:54:00	107:53:04	NPTG unavailability	WTG04
	19-May-2022 19:00:01	107:58:33	NPTG unavailability	WTG05
	19-May-2022 19:55:00	108:54:10	NPTG unavailability	WTG06

From (DD-Month-YYYY, Hrs:Min:Sec)	To (DD-Month-YYYY, Hrs:Min: Sec)	Breakdown Hrs (Hrs:Min: Sec)	Break-down remark	Turbine no.
	19-May-2022 18:53:00	107:51:51	NPTG unavailability	WTG07
	19-May-2022 19:08:00	108:06:22	NPTG unavailability	WTG08
	19-May-2022 19:56:00	108:54:18	NPTG unavailability	WTG09
	19-May-2022 19:45:00	108:43:20	NPTG unavailability	WTG10
	19-May-2022 19:00:01	107:58:18	NPTG unavailability	WTG11
	19-May-2022 18:49:00	107:47:17	NPTG unavailability	WTG12
	19-May-2022 19:04:00	108:02:56	NPTG unavailability	WTG13
	19-May-2022 18:24:00	107:22:00	NPTG unavailability	WTG14
	19-May-2022 18:55:00	107:53:33	NPTG unavailability	WTG15
	19-May-2022 18:57:00	107:55:22	NPTG unavailability	WTG16
	19-May-2022 21:54:00	110:52:23	NPTG unavailability	WTG17
	19-May-2022 19:20:00	108:18:02	NPTG unavailability	WTG18
	19-May-2022 19:22:00	108:20:06	NPTG unavailability	WTG19

From (DD-Month-YYYY, Hrs:Min:Sec)	To (DD-Month-YYYY, Hrs:Min: Sec)	Breakdown Hrs (Hrs:Min: Sec)	Break-down remark	Turbine no.
	19-May-2022 10:09:00	123:07:28	NPTG unavailability	WTG20
	19-May-2022 19:11:00	108:08:48	NPTG unavailability	WTG21
	19-May-2022 18:42:00	107:40:11	NPTG unavailability	WTG22
	19-May-2022 18:26:00	107:24:11	NPTG unavailability	WTG23
	19-May-2022 18:38:00	107:35:33	NPTG unavailability	WTG24
	19-May-2022 18:41:00	107:38:26	NPTG unavailability	WTG25