



GENNEIA WIND PROJECTS IN ARGENTINA



Document Prepared by KBS Certification Services Ltd

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Summary:

The “KBS Certification Services Ltd.” has been commissioned by Swiss Carbon Value Ltd. to carry out the VCS verification of the project “Genneia Wind Projects in Argentina” for the monitoring period 01-January-2023 to 31-December-2023 (including both days), with regards to the requirements of VCS Standard Version 4.7.

“Genneia Wind Projects in Argentina” consists of 6 wind farms (Chubut Norte I, Chubut Norte II, Pomona I, Pomona II, Villalonga I and Villalonga II) connected to the Argentine electricity system (SADI, due to its name in Spanish) with a total installed capacity of 223.38 MW.

The project applies the CDM consolidated methodology ACM0002 – “Grid-connected electricity generation from renewable sources” (version 19.0).

The VCS Verification was based on monitoring report, emissions reduction calculation spreadsheet, the monitoring plan as set out in the registered PD and supporting documents made available to the KBS Certification Services Ltd by the project participant. The process was performed through a combination of desk review, site visit, interviews, and communications with relevant PP personnel.

During the VCS Verification, 01 Correction Action Requests (CAR) and 05 Clarification Requests (CL) were raised and successfully closed. No Forward Action Requests (FAR) have been raised.

As a result of this verification, the verifier confirms that:

- All operations of the project are implemented and installed as planned and described in the registered VCS PD.
- The monitoring plan is in accordance with the applied approved CDM methodology, i.e., ACM0002 version 19.0.
- the equipment essential for measuring parameters required for calculating emission reductions are properly maintained.
- the monitoring system is in place and functional. The project has generated GHG emission reductions.

In addition, the verifier confirms that the GHG emission reductions are calculated without material misstatements in a conservative and appropriate manner.

KBS herewith confirms that the project has achieved 402,681 tCO₂e emission reductions in the above-mentioned monitoring period (vintage year 2023).

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1 INTRODUCTION

1.1 Objective

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

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

1.2 Scope and Criteria

The verification scope is defined as an independent and objective review of monitoring report/1/, VCS project description (VCS PD)/D/, including the monitored data, and other relevant documents made available to verifier and information collected through performing interviews during a site visit to Genneia's main office, CECO (Control Centre of the six parks) and Chubut Norte I and II Wind Parks and remote assessment with the other 4 projects.

The project is assessed against the requirements of VCS standard, version 4.7 and related rules and guidance/C/. Based on the recommendations in Verified Carbon standard, KBS has employed a rule-based approach (as criteria) in the verification, focusing on the identification of significant reporting rules and the reliability of project monitoring.

The aspects covered under the purview of verification have been:

- Ensure that the project activity has been implemented and operated as per the registered VCS PD/D/ and that all physical features (technology, project equipment, and monitoring and metering equipment) of the projects are in place as per the documents provided by the client and as per observed on site and through remote audit,
- Ensure that the monitoring report and other supporting documents provided are complete,
- Ensure that the practiced monitoring system and procedures comply with the monitoring systems and procedures described in the monitoring plan and the approved CDM methodology/B/, and
- Evaluate the data recorded and stored are as per the monitoring methodology.

1.3 Level of Assurance

The verification has been planned and organized to achieve a reasonable level of assurance of conformance against the defined audit criteria and materiality thresholds within the audit scope.

The verification has been based on the registered VCS PD, MR, proof of title, proof of right, additional documents related to baseline and monitoring methodology, the subsequent background investigation, monitoring plan, follow-up interviews and supporting documents made available to the verification team by the PP. The information in these documents has been reviewed against the requirements of VCS Standard, Version 4.7. KBS has employed a rule-based approach in the verification, focusing on the fulfillment of the rules determined by the VCS Standard.

The items covered in the verification are described below:

- Criteria of VCS Version 4 (VCS Program Guide, Version 4.4 & VCS Standard, Version 4.7),
- Criteria of CDM approved methodology, ACM0002 Version 19.0,
- VCS Monitoring Report;
- Monitoring Plan;
- Background investigation and follow up interviews;
- Stakeholder feedback;
- Registered VCS PD and Validation Report;
- Previous verification documents; and

- Project's compliance with other relevant rules, including the project country (Argentina) legislation.

Furthermore, the verification team used additional documentation by third parties like host country legislation and technical reports referring to the project design. A desk review and site visit has been carried out to assess the following:

- Compliance with relevant law and regulations,
- Stakeholder comments,
- Proof of title;
- Site location maps;
- Technical specifications of meters and calibration certificates;
- Commissioning Letters;
- Publicly available electricity data records from the Argentine Wholesale Electricity Market Administration Company (CAMMESA).

The Verification team has checked all the above-mentioned details and confirms that all the information provided is accurate.

Through the interviews performed on site, host country rules and regulations related to project activity, project description, technological measures, implementation, operation, management of project activity, training of personnel, baseline and monitoring plan, stakeholders consultation, etc., have been checked and found appropriate.

KBS applies the rule-based approach aimed at focusing on the fulfillment of the rules determined by the VCS Standard, in order to assure not omitting any part of the mandatory processes. A few discrepancies were found during the verification and there were submitted to the project proponent, indicated under the titles of Corrective Action Requests (CARs) and Clarification Requests (CL). CARs and CLs were required to be addressed by the PP.

Hence the above steps has been followed to achieve a reasonable level of assurance in verification report. Based on the process and procedures conducted, KBS confirms that the information in the MR:

- is materially correct and is a fair representation of the actual project details, and;
- is prepared in accordance with VCS requirements and the applied CDM methodology ACM0002 Version 19.0 for information pertaining to GHG qualification, monitoring and reporting.

The verification work has been carried out as per this requirement and the verification opinion is assured, provided the credibility of all above. Details are presented in the Verification statement in section 5 below.

1.4 Summary Description of the Project

Genneia Wind Projects in Argentina consists of six Greenfield wind farms (Chubut Norte I, Chubut Norte II, Pomona I, Pomona II, Villalonga I and Villalonga II) located in different regions in Argentina and connected to the Argentine Interconnected System (SADI, due to its name in Spanish). The total installed capacity of the project is 223.38 MW.

The electricity generated by the project is exported to the SADI. The project activity applies the approved CDM methodology ACM0002 (Version 19.0). In the baseline scenario, all the electricity supplied to the grid by the project activity would otherwise have been generated by the operation of grid-connected power plants.

A summary of the project and its six wind farms is below provided:

Wind farm	Installed capacity (MW)	Province, city or town	Wind Turbines	Operation start date and commercial operation start date
Chubut Norte I	28.80	Northwest of the city of Puerto Madryn, Province of Chubut	8 Vestas V126, 3.6 MW each one	12/11/2018 12/12/2018
Chubut Norte II	26.28	Northwest of the city of Puerto Madryn, Province of Chubut	6 Nordex N149-4.5, 4.38 MW each one	12/02/2021 27/03/2021
Pomona I	101.40	Vicinity of the town of Pomona, Province of Río Negro	26 Nordex N131, 3.90 MW each one	01/06/2019 12/07/2019
Pomona II	11.70	Vicinity of the city of Choele Choel, Province of Río Negro	3 Nordex N131, 3.90 MW each one	26/07/2019 14/08/2019
Villalonga I	51.75	Vicinity of the city of Villalonga, Province of Buenos Aires.	15 Vestas V126, 3.45 MW each one	16/11/2018 19/12/2018
Villalonga II	3.45	Vicinity of the city of Villalonga, Province of Buenos Aires.	1 Vestas V126, 3.45 MW each one	01/01/2019 22/02/2019

During the site visit inspection, location (as mentioned in section 1.8 of MR) and all the technical aspects of the project activity mentioned in the VCS PD have been verified. The same was also cross-checked during the desk review of supporting documents.

2 VERIFICATION PROCESS

Based on the desk review and site visit the team leader follows the verification protocol to identify and record the findings in the context of the project activity. The findings are communicated to the client in the findings document (Appendix III). The project documentation, including responses to the findings is reviewed by the team leader in consultation with team members, wherever appropriate. The team leader prepares the draft verification report subject to closure or non-closure of the findings.

2.1 Method and Criteria

The verification process has been carried out in line with the requirements of VCS Standard, Version 4.7. In addition, the verification team followed standard auditing techniques and KBS's VCS Procedures were also applied during the verification. A rule-based approach has been followed to carry out verification and access all the factors and concerns that relate to the issuance of GHG emission reductions from a project activity. They include:

- Identification of all the sources contributing to the project GHG emissions and emission reductions.
- Authenticity of the provided data has been checked.
- A rule-based analysis has been carried out to ensure a clear and transparent assessment. The findings identified in this process have been mainly with regards to the operation of the project activity and QA/QC procedures and registries.

KBS has followed a rule-based verification approach, wherein a desk review of the project documentation has been undertaken, which has been followed by a site visit discussion/ inspection by the members of the verification team. The verification protocol has been filled by the verification team based on standard auditing practices and VCS requirements. The verification protocol provides transparent means to record the observations by the verification team members and the non-conformities, if any. The verification protocol is an internal document, and available on request.

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

- Sufficient evidence available: The PP has provided the 100% of data used in the calculations to achieve the final amount of GHG emission reductions reported, or the source of data in case of default values, or conservative approaches in case of estimated values.
- Nature of evidence: The raw data were collected from reliable sources. They are detailed in the project documents and have been provided to the verification team and were checked during the interviews.
- Cross-checked evidence: KBS has cross-checked the collected information through interviews with stakeholders, public available data from the Wholesale Electricity Market Company (CAMMESA) and reproducing calculations.

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

The verification schedule has been as follow:

Verification Contract	30-April-2024
PP submission of MR, ER spreadsheet and supporting documents	20-May-2024
NOVS notification	21-May-2024
Desk Review	03-June-2024 – 10-June-2024
Site visit	11-June-2024 to 14-June-2024
Draft Verification Report	14-June-2024 25-July-2024
First Technical Review	23-Aug-2024
Second Technical Review	27-Aug-2024
Final Verification Report	27-Aug-2024

2.2 Document Review

A detailed review of all project documentation (project description, monitoring report and supporting documents), has been conducted to ensure the accomplishment VCS program requirements, the methodology applied (ACM0002 version 19.0), and the registered VCS PD. The desk review undertaken has involving, but not limited to:

- A review of the data and information presented to verify their completeness,
- A review of the monitoring plan and monitoring methodology, paying particular attention to the frequency of measurements, the quality of metering equipment including calibration requirements, and the quality assurance and quality control procedures,
- An evaluation of data management and the quality assurance and quality control system in the context of their influence on the generation and reporting of emission reductions.
- A review of all supporting documents provided and crosscheck with information presented in the Monitoring report and Emission Reductions calculations.

The list of documents reviewed is included in the section 'References'.

2.3 Interviews

Interviews with relevant PP personnel have been undertaken by members of the verification team, involving:

- Interviews to confirm the operational and data collection procedures are implemented in accordance with the approved monitoring plan,
- Assessment of the implementation and operation of the proposed VCS project activity as per the registered VCS PD,
- Cross-check between information provided in the monitoring report and data from other sources such as CAMMESA publicly available electricity generation reports,
- Check of the monitoring equipment, including calibration performance and observations of monitoring practices against the requirements of the VCS PD and the selected methodology,
- Identification of quality control and quality assurance procedures in place, to prevent or identify and correct any errors or omissions in the reported monitoring parameters.
- Check of the safeguards and stakeholders' engagement.

The interviews for this verification assessment were undertaken by Sofia Castro (Auditor, Technical Expert for scope 1.2) and Raul G. Mitre (Team Leader, Technical Expert for scope 1 and Local Expert).

The details of the PP personnel interviewed on 12-June-2024 to 13-June-2024 are provided below:

No.	Name	Role	Organization
1	Antonella Martinelghy	Carbon Senior (Carbon Projects) (on-site)	Genneia

2	Ricardo Monzón	Analysis and performance Chief (generation projects) (on-site)	Genneia
3	Denis Pais	Control Center CECO Coordinator (on-site)	Genneia
4	Alejandro Ugarte	Control Center CECO operator (on-site)	Genneia
5	Marcelo Rossetti	Responsible of node Madryn (including wind farms Chubut Norte) (on-site)	<u>Genneia – Chubut Norte</u>
6	Fernando Macoratti	Chubut Norte I and II Maintenance and Park Supervisor (on-site)	<u>Genneia – Chubut Norte</u>
7	Emmanuel Cipriano	O&M leader (on-site)	<u>Genneia – Chubut Norte</u>
8	Emilia Conde	Seguridad, Higiene y Medio Ambiente (on-site)	<u>Genneia – Chubut Norte</u>
9	Nicolas Krasowski	Pomona I and II wind farms Chief (remote)	<u>Genneia</u>
10	Leandro Maidana	Villalonga I and II O&M Supervisor (remote)	<u>Genneia</u>
11	Santiago González	Regional Technical Lead	South Pole

2.4 Site Visits

According to VCS Standard v4.7 a site visit is not required given that this is the fourth verification of the project after validation, and neither project baseline reassessments nor assessment of a project description deviation where the deviation impacts the applicability of the methodology, additionality or the appropriateness of the baseline scenario, had to be conducted as part of the verification.

However, a site visit was done on 12-June-2024 to visit Genneia's Main Offices in Buenos Aires. First the verifier met with the Carbon Senior and the Analysis and performance Chief, and later on, the verifier visited the CECO (Control Centre) where the personnel (control centre operators and coordinator) monitor and operate all six wind parks remotely 24h, seven days a week. On 13-June-2024 the verifier visited the sites Chubut Norte I and Chubut Norte II located in the Northwest of the city of Puerto Madryn, Province of Chubut.

It is important to reinforce that the six wind farms that conform the VCS project are connected and dispatch electricity to the national electricity system (SADI). The project' wind farms must comply with the national electricity system rules and standards, including the national "Commercial Measurement System" (SMEC, due to its name in Spanish), which rules the power plants electricity meters operation and calibration or verification. Additionally, the operation of the power plants connected to the SADI is continuously monitored remotely by the Argentine Wholesale Electricity Market Administration Company (CAMMESA) and there are specific rules and procedures in case of failures of operation of the power plants or the electricity meters. Furthermore, there is publicly available data in CAMMESA website (<https://cammesaweb.cammesa.com/>) to cross-check the wind farms operation, installed capacity, electricity generation data, among others.

Furthermore, during planning stage, the following has been taken into consideration:

- Composing a verification team with sufficient members that have the knowledge, skill and solid professional judgement required in an on-site inspection in conjunction with additional competence in applying ICT tools,
- Conducting a desk review to gain a prior understanding of records and documentation control processes of the project participants,
- Establishing a verification plan to clearly define the tasks to be done during the remote inspection, considering the established measures to eliminate or reduce the identified risks,
- Determining ICT tools to be used before the remote inspection and ensuring a backup plan in case there is a connection issue.

For the assessment KBS has used other standard auditing techniques for verification as referred to in VCS Rules/requirements, VCS Validation and Verification Manual version 3.2 /C/. Specifically, the verification team has used the following alternative means for its assessment and to justify that they are sufficient for the purpose of verification. Along with desk review, audit team has conducted on site and remote audit interview as follows:

- A complete desk review of the MR /1/, as well as all applicable country legal requirement and supportive evidence have been checked by the verification team.
- Verification team has performed a site visit to Genneia's main offices, Control Centre and Chubut Norte I and II Wind Parks, also Google Meets interviews and remote inspection of Pomona I and Pomona II wind parks and Villalonga I and Villalonga II wind parks, to check implementation, project boundary, current situation, monitoring and metering equipment (including remote inspection of the metering equipment installed at each wind farm), monitoring procedures, calibration, etc.
- Cross-check evaluation, for information received from interviews, under the scope of all information and references provided in MR and supporting documents.

- An assessment of the implementation and operation of the VCS project activity as per the registered VCS PD Genneia Wind Projects in Argentina, Version 07 27-December-2019 /D/.
- A review of information flows for generating, aggregating, and reporting the monitoring parameters.
- A check of the monitoring equipment including performance and observations of monitoring practices against the requirements of the registered VCS PD and the selected methodology ACM0002 'Grid-connected electricity generation from renewable sources'. Version 19.0. /B/.
- A review of calculations and assumptions made in determining the GHG data and emission reductions /2/.
- An identification of quality control and quality assurance procedures in place to prevent or identify and correct any errors or omissions in the reported monitoring parameters.

Consequently, the remote assessment performed for some of the Parks, was done using ICT tools and confirms that they were sufficient for the purpose of this verification.

2.5 Resolution of Findings

KBS applies the rule-based approach aimed at focusing on the fulfillment of the rules determined by the VCS Standard. A few discrepancies were found during the verification and the verification report was submitted to the project proponent, indicated under the titles clarification requests (CLs). CLs had to be addressed by PP. Criteria for judging items as CAR, CL or FAR are as follows:

Corrective action request (CAR):

- The project participants have made mistakes that will influence the ability of the project activity to achieve real, measurable additional emissions reductions,
- The Voluntary Carbon Standard's requirements have not been met, or
- There is a risk that emission reductions cannot be monitored or calculated.

Clarification request (CL):

Information is insufficient or not sufficiently clear to determine whether the applicable VCS requirements have been met.

Forward Action Request (FAR):

FARs is to be raised to highlight issues related to project implementation that require review during the first verification of the project activity. FARs does not relate to VCS requirements for registration.

CLs and CARs are to be resolved or closed out if the PP modifies the project description, rectifies the MR or provides adequate additional explanations or evidence that satisfies the concerns. If this is not completed, the project activity cannot be recommended for issuance under VCS registry.

The monitoring report was revised addressing the CLs by KBS. After reviewing the revised and resubmitted MR; resolving the CLs raised and outstanding concerns, KBS issues this final verification report and opinion.

The list of CLs and CARs raised and the response provided, the means of verification, reasons for their closure and references to correction in the MR are provided in appendix 3 of this report. The revised MR with changes incorporated as per the issues raised were rechecked with the documentary evidences and found to be inline.

A summary of all raised findings is provided below:

Areas of verification findings	No. of CL	No. of CAR	No. of FAR
Compliance of the monitoring report with the monitoring report form	CL 03	--	--
Compliance with Sustainable Development Contributions requirements	CL 01	--	
Compliance of the project implementation and operation with the registered PD	CL 04	--	--
Deviations	--	--	--
Compliance of the registered monitoring plan with the methodologies including applicable tools and standardized baselines	--	--	--
Compliance with the calibration frequency requirements for measuring instruments	CL 05	--	--
Compliance of monitoring activities with the registered monitoring plan		--	--
Assessment of data and calculation of emission reductions or net removals	-	CAR 01	--
Safeguards and Stakeholder engagement	CL 02	--	--
Total	05	01	0

2.5.1 Forward Action Requests

No FARs have been raised during validation, previous verifications and the current verification.

2.6 Eligibility for Validation Activities

KBS Certification Services Ltd. is accredited for validation and verification for sectoral scope 1 under the VCS scheme.

The name and reference numbers of five registered projects KBS has validated under the VCS Program and CDM are below provided:

	GHG Program	Name	ID/Ref.
1	VCS	AAC blocks manufacturing unit based on an energy efficient brick/block manufacturing technology by Biltech Building Elements (Budge-Budge)	1338
2	VCS	Bundled Wind Power Projects in Rajasthan by Friends Group	842
3	CDM	Solar PV power project based on polycrystalline technology by Aravali Infrapower Limited	8379
4	CDM	25 MW Solar PV Project in Gujarat	6151
5	CDM	Mampuri Wind Power Project 2	7374

3 VALIDATION FINDINGS

3.1 Methodology Deviations

The verification team confirms that the registered VCS PD complies with the requirements in the applied monitoring methodology ACM0002 version 19.0 /A/. As a result of the documental review of the Monitoring Report for the present monitoring period and PP documents indicated in Appendix II, it is concluded that there are no methodology deviations.

3.2 Project Description Deviations

For this monitoring period, no additional project description deviations have been made. However, the monitoring report for the present monitoring period contains 3 project description deviations, assessed in previous verifications, regarding:

1. Project start date: this deviation was raised and assessed during the first verification. The validated Project Description identified the Project start date as 12 December 2018. However, the VCS project actual start date is 12 November 2018, when Chubut Norte I wind farm started to operate under testing phase dispatching electricity to the electricity system. The verification team assessed if the deviation had any impact in the applicability of the methodology, additionality, and the appropriateness of the baseline scenario and concluded that the change in the project start date did not cause any impacts.

2. Electricity meters calibration frequency: this deviation was raised and assessed during the second verification. The validated PD stated that "The verification of the meters will be done as established by the national authorities or alternatively at least once every three years." However, since the energy market in Argentina is well regulated, the PP clarified in section 3.2.2 of the second MR that the electricity meters are calibrated as established by the national authorities and that the PP does not have free access to intervene the meters and perform the calibration.

It has been verified that the Electric-Commercial Metering System (Sistema de Medición Eléctrico Comercial – SMEC) meters (main and back-up) of each power plant are sealed and that the national grid coordinator (CAMMESA) is responsible for their verification as per CAMMESA's Technical Procedure 14 (SMEC External Audits: <https://cammesaweb.cammesa.com/auditoria/>; <https://cammesaweb.cammesa.com/normativa/>) and that there is not a fixed calibration frequency established for the meters.

As stated in the procedure, annually CAMMESA determines the sample of SMEC meters to be verified.

Regarding CAMMESA quality measurement audits (verifications or calibrations) and how CAMMESA determines the sample of SMECs to be audited in a given year, CAMMESA webpage (<https://cammesaweb.cammesa.com/auditoria/#acalidad>) indicates:

"The Measurement Quality Audits are intended to verify that the SMEC nodes that are already commercially enabled continue to meet the quality standards with which they were originally audited and are in line with current regulatory requirements. Within this framework, 240 measurement points are audited per year, divided equally between the North and South zones. The selection of the nodes to be audited is random, following a sampling grid that allows a global panorama of the entire SMEC node park. In this way, the audits to be carried out are proportionally distributed among the different types of MEM Agents in order to obtain a balanced sample. In addition to the annual audit plan, the regulations provide that CAMMESA may require a specific audit to be carried out on a SMEC node in the event of alleged deviations in its quality." Thus, it is confirmed that the project electricity meters' calibration and their frequency is out of the control of the PP.

Thus, the PP description of the calibration frequency deviation from the registered PD in section 3.2 of the MR was found acceptable and correct.

Furthermore, the PP assessed if the deviation impacts the applicability of the methodology, additionality, or the appropriateness of the baseline scenario as per section 3.20 of VCS Standard v4.5 and given that the PD deviation only encompasses a change of the meters' calibration frequency, which is in accordance with the national regulations, the PP assessment conducted is found correct and acceptable based on the below VVB assessment:

- As per project additionality: The project additionality has been demonstrated in the registered PD through investment analysis and common practice analysis. The present PD deviation do not apply under the category of changes that may impact the validity of investment analysis, as per the CDM Guidelines on assessment of different types of changes from the project activity as described in the registered PDD, such as: changes in the effective output capacity due to increased installed capacity or number of units, addition of component or extension of technology, removal or addition of one (or more) site of a project activity registered with multiple-sites, or different values of those actual operational parameters relevant to determination of emission reduction which are within the control of project participant and which result in the IRR passing the benchmark as described in the registered PD. For all this explained above, this PD deviation does not affect the additionality of the project activity.
- As per appropriateness of the baseline scenario: The present project activity, as stated in the registered PD it is a greenfield project, and according to the applicable methodology ACM0002 (version 19.0): “If the project activity is the installation of a Greenfield power plant, the baseline scenario is the electricity delivered to the grid by the project activity would have otherwise been generated by the operation of grid-connected power plants and by the addition of new generation sources, as reflected in the combined margin (CM) calculations described in the Tool to calculate the emission factor for an electricity system.” The present PD deviation does not affect the project activity connection to the Argentinean national grid (SADI). For the reasons explained above, this PD deviation does not impact the appropriateness of the baseline scenario of the project.
- As per applicability of the methodology: The present PD deviation does not impact the applicability of the methodology since the calibration frequency does not affect or impact any of the ACM0002 (version 19.0) applicability criteria that were demonstrated in section 2.2 of the registered PD. Thus, the project remains in compliance with the applied methodology.

Consequently, it was verified during the second verification that the above-described PD deviation does not impact the applicability of the methodology, additionality or the appropriateness of the baseline scenario, and the project remains in compliance with the applied methodology.

3. Amount of electricity meters at each wind farm: this deviation was raised and assessed during the second verification. The registered VCS PD states that “A main and a backup meter will be installed for each power plant.”

However, during the remote site inspection of the second verification, the main and back-up meters installed at each wind farm were checked through videocalls with the wind farms’ O&M personnel and it was found that at Chubut Norte I, Chubut Norte II and Pomona I wind farms there are two sets of main meter and back-up meter at each wind farm and they declared that this is the meters configuration since the project start date and CAMMESA commercial authorization and calibration/verifications.

Thus, a CAR was raised and the PP described all the meters installed at each wind farm in MR section 4.3 and provide reference documents of their calibration/verification and the line diagrams of the meters at each wind farm.

Additionally, as per section 3.21 of VCS Standard v4.7 the PP described the PD deviation in section 3.2 of the second MR and assessed if the deviation impacts the applicability of the methodology, additionality, or the appropriateness of the baseline scenario and concluded that this deviation has no impact.

Given that this PD deviation only encompasses an increase in the number of electricity meters in Chubut Norte I, Chubut Norte II and Pomona I wind farms (2 sets of main meters and back-up meter at each wind farm instead of 1 set), that were authorized by CAMMESA before the projects’ operation start date, the assessment conducted by the PP is found correct and acceptable based on the below VVB assessment:

- As per project additionality: The project additionality has been demonstrated in the registered PD through investment analysis and common practice analysis. The present PD deviation do not apply under the category of changes that may impact the validity of investment analysis, as per the CDM Guidelines on assessment of different types of changes from the project activity as described in the registered PDD, such as: changes in the effective output capacity due to increased installed capacity or number of units, addition of component or extension of technology, removal or addition of one (or more) site of a project activity registered with multiple-sites, or different values of those actual operational parameters relevant to determination of emission reduction which are within the control of project participant and which result in the IRR passing the benchmark as described in the registered PD.

For all this explained above, this PD deviation does not affect the additionality of the project activity.

- As per appropriateness of the baseline scenario: The present project activity, as stated in the registered PD it is a greenfield project, and according to the applicable methodology ACM0002 (version 19.0): “If the project activity is the installation of a Greenfield power plant, the baseline scenario is the electricity delivered to the grid by the project activity would have otherwise been generated by the operation of grid-connected power plants and by the addition of new generation sources, as reflected in the combined margin (CM) calculations described in the Tool to calculate the emission factor for an electricity system.”

The present PD deviation does not affect each wind farm connection to the Argentinean national grid (SADI). For the reasons explained above, this PD deviation does not impact the appropriateness of the baseline scenario of the project.

- As per applicability of the methodology: The present PD deviation does not impact the applicability of the methodology since the calibration frequency does not affect or impact any of the ACM0002 (version 19.0) applicability criteria that were demonstrated in section 2.2 of the registered PD. Thus, the project remains in compliance with the applied methodology.

Consequently, during the second verification it was concluded that the above-described PD deviation does not impact the applicability of the methodology, additionality or the appropriateness of the baseline scenario, and the project remains in compliance with the applied methodology.

3.3 New Project Activity Instances in Grouped Projects

Not applicable as the Project is not a Grouped Project.

3.4 Baseline Reassessment

Did the project undergo baseline reassessment during the monitoring period?

☐ Yes

☒ No

4 VERIFICATION FINDINGS

4.1 Project Details

Item	Evidence gathering activities, evidence checked, and assessment conclusion:																
Audit history	The audit history is as follows: <table> <tr> <th>Milestone</th><th>Date (including both days)</th></tr> <tr> <td>Project Start Date (Chubut Norte I operation start date)</td><td>12/11/2018</td></tr> <tr> <td>VCS registration date</td><td>10/September/2020</td></tr> <tr> <td>Crediting Period</td><td>From 12/11/2018 to 11/11/2028</td></tr> <tr> <td>1st Verification Period</td><td>12-November-2018 to 31-December-2020</td></tr> <tr> <td>2nd Verification Period</td><td>1-January-2021 to 31-December-2021</td></tr> <tr> <td>3rd Verification period</td><td>01-January-2022 to 31-December-2022</td></tr> <tr> <td>4th Verification Period</td><td>01-January-2023 to 31-December-2023</td></tr> </table>	Milestone	Date (including both days)	Project Start Date (Chubut Norte I operation start date)	12/11/2018	VCS registration date	10/September/2020	Crediting Period	From 12/11/2018 to 11/11/2028	1 st Verification Period	12-November-2018 to 31-December-2020	2 nd Verification Period	1-January-2021 to 31-December-2021	3 rd Verification period	01-January-2022 to 31-December-2022	4 th Verification Period	01-January-2023 to 31-December-2023
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3 rd Verification period	01-January-2022 to 31-December-2022																
4 th Verification Period	01-January-2023 to 31-December-2023																
Double counting and participation under other GHG programs	The project has never received or seek credits under another GHG program. This has been confirmed through interviewing with PD and review of main GHG programs /F,H,I,J/ such as CDM, GS, CAR and GCC. No discrepancies were identified. The project has never provided information required to be on another GHG programs, and it has never been registered, active or rejected under any other GHG programs. Furthermore, this has been also declared in the MR, section 1.10. Hence, it can be concluded that the project is not registered or participating under any other GHG program.																

No double claiming with emissions trading programs or binding emission limits	The project does not participate in the other emissions trading program. This has been confirmed through interviewing with PP and review of main GHG programs / F,H, I, J/ such as CDM, GS, CAR and GCC. No discrepancies were identified. Furthermore, this has been also declared in the MR, section 1.10. Hence, it can be concluded that the project is not registered or participating under any other GHG program.									
No double claiming with other forms of environmental credit	The project does not participate in the other emissions trading program. This has been confirmed through interviewing with PP and review of main GHG programs / F,H, I, J/ such as CDM, GS, CAR and GCC. No discrepancies were identified. Furthermore, this has been also declared in the MR, section 1.10. Hence, it can be concluded that the project is not registered or participating under any other GHG program.									
Supply chain (scope 3) emissions double claiming	According to the MR, the grouped project does affect the emissions footprint of any product(s) (goods or services) that are part of a supply chain. Furthermore, it was also confirmed that the project proponent(s) or authorized representative is not a buyer or seller of the product(s) (goods or services) that are part of a supply chain. This has been confirmed during on site assessment. No discrepancies were identified. Hence, no further action from the PD is required.									
Sustainable development contributions	The project contribution to sustainable development is addressed by the following SDGs: • Goal 7.2.1: Renewable energy share in the total final energy consumption: - Contribution: The project was able to supply the Argentinian power grid with 898,045.05 MWh of renewable energy, taking advantage of the wind potential in the country. The project has contributed over project lifetime (4 years) with 4,233,463.94 MWh of renewable energy supplied to the Argentinian national power grid. - Assessment: the Projects consists of: <table><tr><td>Park</td><td>Installed nominal capacity</td><td>N. of turbines and capacity</td></tr><tr><td>Chubut Norte I</td><td>28.8 MW</td><td>8 / 3.60 MW</td></tr><tr><td>Chubut Norte II</td><td>26.28 MW</td><td>6 / 4.38 MW</td></tr></table>	Park	Installed nominal capacity	N. of turbines and capacity	Chubut Norte I	28.8 MW	8 / 3.60 MW	Chubut Norte II	26.28 MW	6 / 4.38 MW
Park	Installed nominal capacity	N. of turbines and capacity								
Chubut Norte I	28.8 MW	8 / 3.60 MW								
Chubut Norte II	26.28 MW	6 / 4.38 MW								

Pomona I Wind Farm	101.4 MW	26 / 3.9 MW
Pomona II Wind Farm	11.7 MW	3 / 3.9 MW
Villalonga I Wind Farm	51.75 MW	15 / 3.45 MW
Villalonga II Wind Farm	3.45 MW	1 / 3.45
	223.38	

The project lifetime is 20 years. Hence the project addresses the established SDG.

- Goal 8.5.2: Unemployment rate, by sex, age and persons with disability:

Contribution: During the current monitoring period the project reported 21 permanent direct jobs related to operation and maintenance of the project/9/:

- In Pomona I and II: Internal: 5 people from Genneia (4 men and 1 women).
- In Villalonga I and II: Internal: 4 people from Genneia (3 men and 1 women).

Chubut Norte I and II: Internal: 12 people from Genneia (10 men and 2 women). Since the start of operation, the project has provided a total of 33, 33 and 21 jobs during the 2020, 2021 and 2022 monitoring periods, respectively

- Assessment: data of employment has been provided. The report of employees has been checked. Detailed information of employment is available regarding sex, all personnel is on its legal age, and no persons with disability. Hence the project addresses the established SDG.

Finding: CL 01 was raised in this regard and subsequently closed. Kindly refer to Appendix 3 for further details.

- Goal 13: Tonnes of greenhouse gas emissions avoided or removed:
 - Contribution: The project has reduced 402,681 tCO₂e through the delivery of renewable energy. Up to the end of this period, the project has reduced 402,681 tCO₂e.

Additional information relevant to the project	- Assessment: The project activity displaces energy generates through the cohort of power plants in the National electric system of Argentina. The project reduces GHG emissions. Hence the project addresses the established SDG. As confirmed during the verification, it has also been confirmed that the project implementation has led in significant environmental and socio-economic benefits (as stated in the submitted MR) and contributes to the social, economic, technological and environmental well-being. The project activity has generated renewable electricity during the current monitoring period, which increase the share of renewable energy related to the total primary energy supply. Also, the implementation of the project is providing employment to locals with a decent and secure work environment by reducing emissions otherwise generated by the operation of fossil fuel-based power plants. The sustainable Development contributions were evaluated and it can be concluded that the project contributes to the selected SDGs. No commercially sensitive information is declared.
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4.2 Safeguards and Stakeholder Engagement

4.2.1 Stakeholder Identification

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Stakeholder identification	All the institutions and communities possibly impacted and interested in the project development within the Area of Influence of the Project were mapped and duly identified from the construction stage at the time of the Environment Impact Assessment. It is confirmed that the stakeholder makeup has not changed since validation. Any stakeholder possibly impacted and interested in the project development within the Area of Direct Influence (AID) and Area of Indirect Influence (AII) of the project were mapped^{5/} and duly identified since the construction stage. The stakeholder matrix is constantly updated by the Sustainability Department. The information

	provided was checked. No errors, miscalculations, omissions, misstatements, or incomplete information have been identified.
Legal or customary tenure/access rights	Genneia has legal ownership of the properties of several projects (Chubut Norte I and II and Villalonga I & II), the other property of Pomona I & II has usufruct rights /21/ provided by the communities through lease agreements. Description stated in the MR is accurate and according to the situation observed during on site assessment and interviews performed. No discrepancies were found. Furthermore, interviews were performed for cross checked purposes. It is confirmed that this has not changed since validation.
Stakeholder diversity and changes over time	There are no ethnic or indigenous groups in the areas of the project. Due to the location of the project (rural-industrial area within the estimated zone of influence) the affected population is very small. There are practically no critical receptors in the vicinity of the wind farms included in this project. The community is composed of people involved in livestock and in some Parks agriculture in low proportion. No identified changes over time. Description stated in the MR is accurate and according to the situation observed during on site assessment and interviews performed. Furthermore, interviews were performed for cross checked purposes. No discrepancies were found.
Expected changes in well-being	The negative impacts on the well-being of the population in the immediate vicinity of the wind farms are negligible. Positive impacts are expected in the well-being of the stakeholders due to the Social Investment Strategy as part of the Sustainability Report/15/of Genneia explained in the MR. A summary of the activities performed and evidences were checked on site for each of the Parks/15. Description stated in the MR is accurate and according to the situation observed during on site assessment and interviews performed. No discrepancies were found.

Location of stakeholders	As per the PD and MR, the stakeholders are in the municipalities of Puerto Madryn, South of the Province of Buenos Aires Municipality and near Pomona town in the Patagonian region of Argentina.
Location of resources	The community is composed of people involved in agriculture in less proportion and extensive for all the three sites within this project. The wind farms are located in flat territories composed of Patagonian steppes and access to the wind turbines sites is restricted.

Finding: CL 02 was raised in this regard and subsequently closed. Kindly refer to Appendix 3 for further details.

4.2.2 Stakeholder Consultation and Ongoing Communication

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Ongoing consultation	The project has implemented an open request system to communicate and serve the community, hence a mechanism was defined for ongoing communication with local stakeholders including: brochures, email, telephone numbers, mailbox, complaints, queries and claims book, news bulletin. Log book was checked with the inquiries of the stakeholders/6 During the interviews it was explained that also a consultancy company is in charge of the follow up the local stakeholders: including constant visits and meetings. This as part of the Sustainable Department. Description stated in the MR is accurate and according to the evidence provided and situation observed during on site assessment. Furthermore, interviews were performed for cross checked purposes. No discrepancies were found.
Date(s) of stakeholder consultation	Independent visits were made to the most relevant stakeholders on the dates established below: Chubut Norte site: 06-February-2023 05-June-2023 06-June-2023

	07-June-2023 Pomona site: 10-April-2023 11-April-2023 Villalonga Site: 16-March-2023 13-April-2023 14-April-2023 15-April-2023 Description stated in the MR is accurate and according to the evidence provided in the document “Social Baseline and Social Management Plan” for each of the Project sites /6/ and situation observed during remote site assessment. Furthermore, interviews were performed for cross checked purposes. No discrepancies were found /17. Finding: CL 02 was raised in this regard and subsequently closed. Kindly refer to Appendix 3 for further details.
Communication of monitored results	As per the MR, the open request system is implemented, when it applies to all stakeholders (verbal, written and visits) or specific actions to a stakeholder group and in the case of Community Investment Works they are made fully inform from start to close of all activities. Description stated in the MR is accurate and according to the evidence provided and situation observed during on site assessment. Furthermore, interviews were performed for cross checked purposes. No discrepancies were found.
Consultation records	As per the MR, through the communication plan, several recording methods are used, depending on the activity: Notes (signatures of receipt) Inquiry calls and emails (MQCYR form) Meetings (attendance list) Telephone records for counting calls received and/or made (or text messages). The logbook of inquires/6/ was checked.

Stakeholder input	Description stated in the MR is accurate and according to the evidence provided and situation observed during on site assessment. Furthermore, interviews were performed for cross checked purposes. No discrepancies were found.
	As per the MR, the Stakeholder can submit applications through the communication system implemented. According to the type of request the necessary measures are taken to address and respond after receipt. The logbook o inquires/6/ was checked.
	Description stated in the MR is accurate and according to the evidence provided and situation observed during remote site assessment. Furthermore, interviews were performed for cross checked purposes. No discrepancies were found.

4.2.3 Free, Prior, and Informed Consent

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Consent	Consent was reached with the interested parties before starting the construction and operation of the parks as part of the work done in the EIA. The identification of actors/stakeholders/14/ and the mapping of actions in case of conflicts was carried out by Genneia's Head of Sustainability. Description stated in the MR is accurate and according to the evidence provided and situation observed during on site assessment. Furthermore, interviews were performed for cross checked purposes. No discrepancies were found.
Outcome of FPIC discussion	The issuance of the Environmental Impact Statement, which approves the EIA, demonstrates that informed consent was obtained from the project's immediate stakeholders. Assurance was made that the project has not encroached on land, relocated people without consent, and forced physical or economic displacement. Genneia legally acquired land directly and through leases for the implementation of the wind farms. Furthermore, ongoing communication with stakeholders happens through different channels generated by the company for dialogue (as explained above).

	Description stated in the MR is accurate and according to the evidence provided and situation observed during on site assessment. Furthermore, interviews were performed for cross checked purposes. No discrepancies were found.
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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	During the monitoring period, several requests have been received and properly register in the grievance mechanism, such as: - Requests for donations - Support for whale health study program - Requests for site visits - Requests for information for practical work The evidence was checked in “Excel file “MQCYR Eolicos 2023”: logbook of inquiries of stakeholders/^{6/} and how Genneia responded to each of the inquires. The project’s procedure is clearly identified. In general, all issues have been attended and communicated after an internal analysis of the requests. No discrepancies were identified. This has been cross checked during the site visit assessment.
Grievance redress procedure	A robust grievance mechanism/^{6/} is in place to ensure transparency and commitment with the stakeholders. In this document, it is explained the mechanism to receive and resolve any comment, request of information, suggestion or grievances received. No discrepancies were identified. This has been cross checked during the site visit assessment.

Finding: CL 02 was raised in this regard and subsequently closed. Kindly refer to Appendix 3 for further details.

4.2.5 Public Comments

Comments received	Actions taken by the project proponent	Evidence gathering activities, evidence checked, and assessment conclusion
No comments were received during or outside of the public comment period.	N/A	N/A

4.2.6 Risks to Local Stakeholders and the Environment

4.2.6.1 Management Experience

The verifier checked the background of the project developer and it was concluded that the latter has years of experience in the project type activities and highly qualified personnel with experience in the execution of projects in the energy sector, also related to sustainability and Environmental compliance. Furthermore, it is also supported by a world class experienced consultancy firm.

4.2.6.2 Risk Assessment

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Natural and human induced risks to stakeholders' wellbeing	No risks have been identified. The project is implemented in private lands or with usufruct rights agreements and the PD has all permits and licenses in place according to host country requirements. This has been cross checked against evidence provided/5, 10, 21/ and interviews performed during remote assessment. No discrepancies were identified.
Risks to stakeholder participation	No risks have been identified. The PD has implemented an open request system to communicate and serve the community, hence a mechanism was defined for ongoing communication happens in different means, such as email, telephone numbers or directly communication. Hence, no risks to stakeholders' participation have been identified. There is also a robust grievance mechanism as explained above. Evidence provided was checked and through interviews performed during assessment. No discrepancies were identified.
Working conditions	No risks have been identified. The PD has all permits and licenses in place according to host country requirements. Genneia is regulated under the law of Argentina and complies with all the requirements demanded by it,

Safety of women and girls	guaranteeing work under dignified conditions and providing all the necessary safety elements for the different operations, as well as a healthy working environment. This is supported by the SIG Policy (Management Integrated System Policy)/13/, which includes incidents management, employees' safety measures, occupational security and health, above others) and the company's code of conduct/13/. This has been cross checked against evidence provided and interviews performed during remote assessment. No discrepancies were identified. No risks have been identified. The project is implemented in private lands and the PD has all permits and licenses in place according to host country requirements. Genneia is regulated under the law of Argentina and complies with all the requirements demanded by it, guaranteeing work under dignified conditions and providing all the necessary safety elements for the different operations, as well as a healthy working environment. This is supported by the company's codes of conduct/13/.
Safety of minority and marginalized groups, including children	No risks have been identified. The project is implemented in private lands and the PD has all permits and licenses in place according to host country requirements. Genneia is regulated under the law of Argentina and complies with all the requirements demanded by it, guaranteeing work under dignified conditions and providing all the necessary safety elements for the different operations, as well as a healthy working environment. This is supported by the company's codes of conduct/13/.
Pollutants (air, noise, discharges to water, generation and release of hazardous materials and chemical pesticides and fertilizers	The only potential risk identified was the noise generation: Increase in noise levels on the wind farm property, in the vicinity of the wind turbines. No significant increase outside the site. The noise levels in the external environment/20/ are checked annually as per the IRAM Normative (checked by the verifier)/11/. Furthermore, the PD has all permits and licenses in place according to host country. Furthermore, annual Reports are presented to ENRE/5/, in order to comply with the Environmental Plan, established as part of the EIA. This is a requirement to maintain in place (valid) the Environmental Impact Declaratory (license)/5/. This has been cross checked against reviewing the evidence provided and interviews performed during remote assessment. No discrepancies were identified.

4.2.7 Respect for Human Rights and Equity

4.2.7.1 Labor and Work

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Discrimination	The project is implemented in private lands and the PD has all permits and licenses in place according to host country requirements. Genneia is regulated under the law of Argentina and complies with all the requirements demanded by it, guaranteeing work under dignified conditions. This is supported by the company's code of conduct/13/ and interviews performed during site visit assessment. No discrepancies were identified.
Sexual harassment	The project is implemented in private lands and the PD has all permits and licenses in place according to host country requirements. Genneia is regulated under the law of Argentina and complies with all the requirements demanded by it, guaranteeing work under dignified conditions. This is supported by the company's code of conduct/13/ and interviews performed during site visit assessment. No discrepancies were identified.
Gender equity in labor and work	The project is implemented in private lands and the PD has all permits and licenses in place according to host country requirements. Genneia is regulated under the law of Argentina and complies with all the requirements demanded by it, guaranteeing work under dignified conditions. This is supported by the company's code of conduct/13/ and interviews performed during site visit assessment. No discrepancies were identified.
Forced labor	The project is implemented in private lands and the PD has all permits and licenses in place according to host country requirements. Genneia is regulated under the law of Argentina and complies with all the requirements demanded by it, guaranteeing work under dignified conditions. This is supported by the company's code of conduct/13/ and interviews performed during site visit assessment. No discrepancies were identified.
Child labor	The project is implemented in private lands and the PD has all permits and licenses in place according to host country requirements. Genneia is regulated under the law of Argentina and complies with all the requirements demanded by it, guaranteeing work under dignified conditions. This is supported by the company's code of conduct/13/

	and interviews performed during site visit assessment. No discrepancies were identified.
Human trafficking	The project is implemented in private lands and the PD has all permits and licenses in place according to host country requirements. Genneia is regulated under the law of Argentina and complies with all the requirements demanded by it, guaranteeing work under dignified conditions. This is supported by the company's code of conduct/13/ and interviews performed during site visit assessment. No discrepancies were identified.

4.2.7.2 Human Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
No risks identified	The PD has all permits and licenses in place according to host country requirements. Genneia protects and respects human rights in line with international standards. This is supported by the company's code of conduct/13/ and interviews performed during site visit assessment. No discrepancies were identified.

4.2.7.3 Indigenous Peoples and Cultural Heritage

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
No risks identified	The project is implemented in private lands or with usufruct rights agreements and the PD has all permits and licenses in place according to host country requirements. No Peoples or cultural heritage identified within the project's influence. This was verified in the interviews performed during site visit assessment. No discrepancies were identified.

4.2.7.4 Property Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
No risks identified	The project is implemented in private lands or with usufruct rights agreements and the PD has all permits and licenses in place according to host country requirements. Ownership and usufruct rights are clearly defined and known by the communities. This was

verified in the interviews performed during site visit assessment. No discrepancies 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 is implemented in private lands or with usufruct rights agreements therefore, it is not sharing any benefit. This was verified in the interviews performed during site visit assessment. No discrepancies were identified.
Benefit sharing during the monitoring period	The project is implemented in private lands or with usufruct rights agreements therefore, it is not sharing any benefit. This was verified in the interviews performed during site visit assessment. No discrepancies were identified.

Finding: CL 03 was raised in this regard and subsequently closed. Kindly refer to Appendix 3 for further details.

4.2.8 Ecosystem Health

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Impacts on biodiversity and ecosystems	Potential interference of wind turbines with migratory bird routes. The verifier checked the periodic monitoring that was conducted to determine the mortality rate of the fauna. As the rate is marginal, no mitigation measures have been implemented so far. It was checked by means of an interview with the Environmental person in charge. It was checked that Semiannual Monitoring Reports/19/ are done in each of the sites, as per the Monitoring plan established according to provincial regulations/11/. Annual Reports regarding flying fauna are presented to ENRE¹, in order to comply with the Environmental Plan, established as part of the EIA. This is a requirement to maintain in place (valid) the Environmental Impact Declaratory/5/.

¹ National Electricity Regulatory Authority (ENRE =Ente Nacional Regulador de la Electricidad)

	This has been cross checked against reviewing evidence provided and interviews performed during remote assessment. No discrepancies were identified.
Soil degradation and soil erosion	No impacts were identified during the EIA and the project operation. This has been cross checked against reviewing evidence provided and interviews performed during remote assessment. No discrepancies were identified.
Water consumption and stress	No impacts were identified during the EIA and the project operation. This has been cross checked against reviewing evidence provided and interviews performed during remote assessment. No discrepancies were identified.

4.2.8.1 Rare, Threatened, and Endangered species

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Species or habitat	The PD has all the Environmental permits (valid) and licenses in place according to host country requirements/5/. No impacts were identified during the EIA and during the project operation as per the Semiannual Monitoring Reports of migratory birds/16/. This has been cross checked against reviewing the evidence provided and interviews performed during remote assessment. No discrepancies were identified
Areas needed for habitat connectivity	No impact has been identified for Areas needed for habitat connectivity. The assessment was done as part of the Environmental Impact Assessment and the environmental license was received and is valid/5/. This has been cross checked against reviewing the evidence provided and interviews performed during remote assessment. No discrepancies were identified

	Evidence gathering activities, evidence checked, and assessment conclusion
Habitats for rare, threatened, and endangered species	The PD has all permits and licenses in place according to host country requirements. No impacts were identified during the EIA and the project operation. This has been cross checked against reviewing the evidence

	provided and interviews performed during remote assessment. No discrepancies were identified
Areas for habitat connectivity	The PD has all permits and licenses in place according to host country requirements. No impacts were identified during the EIA and the project operation. This has been cross checked against reviewing the evidence provided and interviews performed during remote assessment. No discrepancies were identified

4.2.8.2 Introduction of Species

Species introduced	Evidence gathering activities, evidence checked, and assessment conclusion
Not applicable	No introduction of species is applicable. The project has all permits and licenses in place according to host country requirements. This has been cross checked against reviewing the evidence provided and interviews performed during remote assessment. No discrepancies were identified

Existing invasive species	Evidence gathering activities, evidence checked, and assessment conclusion
Not applicable	No existing invasive species is applicable. The project has all permits and licenses in place according to host country requirements. This has been cross checked against reviewing the evidence provided and interviews performed during remote assessment. No discrepancies were identified

	Evidence gathering activities, evidence checked, and assessment conclusion
Invasive species	Not applicable as explained above.

4.2.8.3 Ecosystem conversion

Item	Evidence gathering activities and evidence checked
Ecosystem conversion	No ecosystem conversion is applicable. The project has all permits and licenses in place according to host country requirements. This has been cross checked against reviewing

the evidence provided and interviews performed during remote assessment. No discrepancies were identified

4.3 Accuracy of Reduction and Removal Calculations

The verification team has reviewed the emission reduction (ER) spreadsheet /2/ and checked all the formulae and verified them to be correct and in line with the monitoring plan of the registered VCS PD and the applied monitoring methodology.

All the monitored parameters are described above in section 4.1. All the ex-ante parameters which are used in the calculation of emission reduction are presented in section 4.1 of the MR transparently. It is confirmed that all the ex-ante parameters have been correctly used in the emission reduction calculation.

Baseline emissions:

According to ACM0002 Version 19.0 baseline emissions include only CO₂ emissions from electricity generation in fossil fuel fired power plants that are displaced due to the project activity. The methodology assumes that all project electricity generation would have been generated by existing grid-connected power plants and the addition of new grid-connected power plants. The baseline emissions are to be calculated as follows:

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

Where:

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

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

The calculation of the actual net GHG removals by sinks is calculated as follow:

According to ACM0002, Version 19.0 the quantification of net GHG emission reductions is as follow:

$$ER_y = BE_y - PE_y$$

Where:

ER_y = Emission reductions in year y (tCO₂e/yr)

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

PE_y = Project emissions in year y (tCO₂e/yr).

As no project emissions (PE_y) were identified for Genneia Wind Projects in Argentina, $ER_y = BE_y$.

Therefore,

$$ER_y = EG_{\text{facility},y} \times EF_{\text{grid,CM},y}$$

For the Combined margin CO_2 emission factor ($EF_{\text{grid,CM},y}$), it is calculated ex-ante according to the Tool to calculate the emission factor for an electricity system” (Version 7.0.). The value applied for the entire Monitoring Period is 0.4484 t CO_2 e/MWh.

Project Emissions:

No project emissions are considered for the project activity as the project activity has no fossil fuels consumption for electricity generation. The same has been checked and according to the applied methodology and compliance with the registered VCS PD.

Leakage:

As per the methodology ACM0002, version 19.0. and as defined in the registered VCS PD, no leakage is considered in the project activity and the same is followed in this monitoring period also. Thus, it is in compliance with the registered VCS PD.

All arrangements described in the Monitoring Plan have been checked. No deviations have been identified.

Project implementation status:

The project activity is in operative stage as evidenced by the inspection of the sites. All the physical components and project boundary are in conformity with the description in registered VCS PD. The capacity of project equipment's has been confirmed during the inspection at the site, also through the technical specifications and found in-compliance with the registered VCS PD. All equipment of the project activity has been commissioned as commissioning certificates.

The activity of the proposed project consists of the installation of six wind grid-connected power plants located in different regions of the country of Argentina. The total installed capacity of the six wind power plants is 223.38 MW as per:

Park	Installed nominal capacity	N. of turbines and capacity
Chubut Norte I	28.8 MW	8 / 3.60 MW
Chubut Norte II	26.28 MW	6 / 4.38 MW
Pomona I Wind Farm	101.4 MW	26 / 3.9 MW
Pomona II Wind Farm	11.7 MW	3 / 3.9 MW
Villalonga I Wind Farm	51.75 MW	15 / 3.45 MW
Villalonga II Wind Farm	3.45 MW	1 / 3.45

	223.38	
--	--------	--

This information was checked in the Control Centre, using the Bludence software in real time connection, for each of the Parks.

Finding: CL 04 was raised in this regard and subsequently closed. Kindly refer to Appendix 3 for further details.

Management and operational system:

Verification team was able to verify that authorities and responsibilities for monitoring and reporting of all data related to the emission reductions were clearly defined for the related monitoring period.

The allocation of the responsibilities is documented in a written form and is followed as described in the registered VCS PD.

The monitoring plan described in the MR is confirmed to be correct. All the parameters of the monitoring plan are monitored using appropriate metering system.

The verification team has interviewed the plant personnel who is involved in the monitoring of the parameters that are used to determine the emission reductions of the project. The personnel is located in the CECO (Control room) where the operation, data analysis and monitoring of each park is performed. It is confirmed based on the interviews that the plant's team is competent enough to monitor the parameters as described in the monitoring plan.

As discussed above, the verification team concludes that management and operational system of the project is implemented and operated well. Thus, it ensures the quality of data which is required in calculating the emission reductions.

Implementation status of the monitoring plan:

Verification team confirms through inspection on site and from the document review that the actual monitoring system complies with the monitoring plan mentioned in the registered VCS PD /D/ and there is no deviation in monitoring plan and procedures.

During the verification, all relevant monitoring parameters of the registered monitoring plan have been verified concerning the appropriateness of the verification method; the correctness of the values applied for ER calculation, the accuracy and applied QA/QC measures. All monitoring parameters have been measured / determined without material misstatements and are in line with all applicable standards and relevant requirements. It is confirmed that the monitoring mechanism is effective and reliable.

Therefore, from the document review and inspection on site, it is confirmed that all the parameters were monitored in accordance with the registered monitoring plan during the monitoring period. Following are the details of monitoring in accordance with the monitoring plan of the registered VCS PD:

All arrangements described in the Monitoring Plan have been checked. No deviations have been identified.

Ex-post parameters

Data / Parameter	EG _{facility,y}														
Data unit	MWh/yr														
Description	Quantity of net electricity generation supplied by the project plant/unit to the grid in year y.														
Source of data	Measurement in the power plant.														
Description of measurement methods and procedures to be applied	The meters installed are bi-directional, taking into account both the quantity of electricity supplied by the project plant to the grid and the quantity of electricity delivered to the project plant from the grid. In this case, the individual values are not required. During remote site visit it has been verified that there are main meters and a back-up meters at each wind farm. The electricity data from the main meters is used as the official data for invoicing purposes and the back-up meters data is available in case of failure of the main meters. It was confirmed that no failures of the meters occurred in 2023.														
Frequency of monitoring/recording	Continuous measurement and at least monthly recording. Typically, the measured data is read once every 24 hours using tele-metering technology (remotely). During remote assessment, it was verified that the energy is monitored continuously and reported on a daily basis.														
Value monitored	The following was monitored: <table border="1"> <thead> <tr> <th></th><th>MWh</th></tr> </thead> <tbody> <tr> <td>Chubut Norte I</td><td>130,881.90</td></tr> <tr> <td>Chubut Norte II</td><td>84,795.04</td></tr> <tr> <td>Pomona I</td><td>392,757.79</td></tr> <tr> <td>Pomona II</td><td>49,377.40</td></tr> <tr> <td>Villalonga I</td><td>224,837.34</td></tr> <tr> <td>Villalonga II</td><td>15,395.58</td></tr> </tbody> </table> This has been checked against the: - Meters raw data		MWh	Chubut Norte I	130,881.90	Chubut Norte II	84,795.04	Pomona I	392,757.79	Pomona II	49,377.40	Villalonga I	224,837.34	Villalonga II	15,395.58
	MWh														
Chubut Norte I	130,881.90														
Chubut Norte II	84,795.04														
Pomona I	392,757.79														
Pomona II	49,377.40														
Villalonga I	224,837.34														
Villalonga II	15,395.58														

	- CAMESA hourly data downloaded directly from, the official webpage. - SMEC data provided by Genneia No discrepancies were identified between evidence provided. The most conservatives' values have been also considered. The ER calculation spread sheet is traceable and free from mistakes.			
Monitoring equipment	According to the revised PD, the following is the monitoring equipment, and it was confirmed during the assessment.			
	Serial	Model	Brand	Accura-cy
Chubut Norte I				
Circuit 1				
Main meter	351608675	402-MT5A-26D	Circutor	0.2%
Back-up meter	351608684	402-MT5A-26D	Circutor	0.2%
Circuit 2				
Main meter	351608687	402-MT5A-26D	Circutor	0.2%
Back-up meter	351608663	402-MT5A-26D	Circutor	0.2%
Chubut Norte II				
Circuit 1				
Main meter	351806297	402-MT5A-26D	Circutor	0.2%
Back-up meter	351806295	402-MT5A-26D	Circutor	0.2%
Circuit 2				
Main meter	351806294	402-MT5A-26D	Circutor	0.2%
Back-up meter	351806296	402-MT5A-26D	Circutor	0.2%
Pomona I				
Circuit 1				
Main meter	351803677	402-MT5A-26D	Circutor	0.2%
Back-up meter	351803678	402-MT5A-26D	Circutor	0.2%
Circuit 2				

	Main meter	351803679	402-MT5A-26D	Circutor	0.2%
	Back-up meter	351803680	402-MT5A-26D	Circutor	0.2%
	Pomona II				
	Main meter	351803681	402-MT5A-26D	Circutor	0.2%
	Back-up meter	351803682	402-MT5A-26D	Circutor	0.2%
	Villalonga I				
	Main meter	MW-1706B236-02	ION8650	SCHNEIDER ELECTRIC	0.2%
	Back-up meter	MW-1706B242-02	ION8650	SCHNEIDER ELECTRIC	0.2%
	Villalonga II				
	Main meter	MW-1706B261-02	ION8650	SCHNEIDER ELECTRIC	0.2%
	Back-up meter	MW-1706B601-02	ION8650	SCHNEIDER ELECTRIC	0.2%
	During the site visit inspection to Chubut and through virtual site visits to Villalonga and Pomona, it was confirmed that the data has been monitored continuously by the bidirectional meters above described.				
	QA/QC procedures to be applied				
	The calibration/verification of the meters and their frequency has been established by the national authorities. In addition, the generation values are cross-checked with the information publicly available on the website of the electricity wholesale market management company (CMMESA). Calibration/Verification dates of the energy meters at each wind farm are as follow:				

Wind farm	Calibration/Verification dates of main and back-up meters
Chubut Norte I	24/10/2018
Chubut Norte II	11/09/2020
Pomona I	24/05/2019 13/03/2023

	Pomona II	24/05/2019
	Villalonga I	23/11/2018
	Villalonga II	21/01/2019
	There is not an established calibration/verification frequency by CAMMESA and the SMEC electricity meters (that are sealed by CAMMESA) and their calibration/verification are out of the control of the PP. As stated in <i>CAMMESA's Technical Procedure 14 (SMEC External Audits:</i> https://cammesaweb.cammesa.com/auditoria/; https://cammesaweb.cammesa.com/normativa/ , annually CAMMESA determines the sample of SMEC meters to be verified randomly. The verifications report from CAMMESA's Certificate of 13/03/2023, shows a maximum error for the main electricity meters of less than $\pm 0.2\%$. The meters complied with all the requirements. The net electricity generation used in the ER calculation has also been cross-checked with the data generation from Genneia wind farms' meters available in CAMMESA web site. The audit team raised CAR 01 regarding some differences in the values. The PP answered the CAR and the verification team could verify the corrected data for each month of this monitoring period is correct and in case of slight differences between the wind farms' and CAMMESA' values the PP has conservatively selected the lowest values.	
Purpose of the data	Calculation of baseline emissions.	
Calculation method	Measured directly. During the inspection and through document review, it has been confirmed that the readings of net electricity supplied can be taken from the main and back- up meters installed at each wind farm. The metering readings are used for emission reduction calculation purpose. The net electricity can also be downloaded from CAMMESA web site in monthly reports.	
Comments	As confirmed during the remote and onsite inspection, all data collected as part of the monitoring process is archived electronically and kept for at least two years after the end of the last crediting period.	

Ex-ante parameters

The following are the ex-ante parameters used in the ER calculation which are in compliance with registered VCS PD:

Parameter	Description	Source/Justification
EF _{grid,CM,y} tCO ₂ /MWh	Combined margin CO ₂ emission factor for grid connected power generation in year y calculated using the latest version of the “Tool to calculate the emission factor for an electricity system”	The combined margin emission factor has been calculated in accordance with “Tool to calculate the emission factor for an electricity system”, version 7.0. The value 0.4484 tCO₂e/MWh is used for the calculation of the Baseline Emission and is found to be consistent with the registered VCS PD.

Findings: Please refer to CL 05 and CAR 01 and its closure for details in Appendix 3.

Final Assessment

The verification team confirms that:

- 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.
- 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 spreadsheets during the current monitoring period.
- It is confirmed that the data has been measured directly from meters and it was cross-checked from the official monthly records downloaded from CAMMESA web site.
- All the formulae have been found to be correctly applied in the GHG emission removals calculations.
- The excel spreadsheets were cross checked with the archived monitored data and no discrepancies were found.
- After revision of the MR /1/ and calculation spreadsheet /2/, it is concluded that the GHG emission reductions spreadsheets are transparent and clearly referenced.
- Thus, the verification team is confident that the GHG calculation is correct, accurate, traceable, and conservative.

4.4 Quality of Evidence to Determine Reductions and Removals

For the evidence assessment the following activities have been performed:

- Assessment of all calibration certificates of the main and back-up meters.
- Assessment of all installed meters to confirm that they are state of the art and bidirectional.
- Review of all energy generation data from PP.
- Review of the energy generation directly from the web site of CAMMESA to cross- check the information.

All relevant documents were checked to assess the correctness and quality of data submitted by the project participants, which are used to determine GHG emissions reductions.

All 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 and on site audit discussion and video inspection.

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 in section 4.1 under each parameter and confirms to the requirement of the registered VCS PD /14/. The electricity data is measured by the electricity meters and recorded continuously, and CAMMESA reports are generated monthly.

It was also verified through the audit inspection 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.

All documents were verified through visit interviews, remote assessment and cross-check of the information between the different data sources. The verification team finds to be sufficiency of quantity, and appropriateness of quality, of the evidence used to determine the GHG reductions and removals. The verification team finds the quality to be of adequate level to assure confidence in the accurate quantification of the GHG emission removals and reductions.

- Final Assessment:

Documents used as evidence for input values of GHG emissions reductions calculation were assessed and found to be reliable and authentic. The verification team concludes that there is sufficient evidence available, and that the evidence and the data have an acceptable level of quality. All input parameters and monitoring methods can be confirmed as per best project praxis.

4.5 Non-Permanence Risk Analysis

Not applicable for this project.

5 VERIFICATION OPINION

5.1 Verification Summary

KBS Certification Services Ltd. was commissioned by Swiss Carbon Value Ltd. to carry out the fourth Verification of the project “Genneia Wind Projects in Argentina” regarding the requirements of VCS standard, Version 4.7. The verifier has reviewed the implementation of the monitoring plan (MP) in the VCS project for the monitoring period 01-Jan-2023 to 31-Dec-2023 (including both days).

The project involves the GHG emissions reductions through renewable solar energy in the host country Argentina.

The management of the project participant/owner is responsible for the preparation of the GHG emissions data and the reported/estimated GHG emissions reductions on the basis set out within the project’s Monitoring Plan in the VCS PD and the applied approved VCS methodology.

The project applies the CDM large-scale consolidated methodology ACM0002 –Grid-connected electricity generation from renewable sources, version 19.0.

During the VCS Verification, 05 Clarification Requests (CL) and 01 CAR were raised and successfully closed. No Forward Action Requests (FAR) were raised.

The VCS Verification was based on the monitoring report, emission reduction calculation spreadsheet, the monitoring plan as set out in the registered VCS PD and supporting documents made available to the KBS Certification Services Pvt. Ltd. by the project participant.

The verification of the GHG statement was conducted based on the VCS Standard v4.7 requirements and it can be confirmed that the project conforms with the verification criteria for projects set out in VCS v4.7 and in accordance with ISO 14064-3:2019.

As a result of this verification, the verifier confirms that:

- All operations of the project are implemented and installed as planned and described in the registered VCS PD /14/,
- The monitoring plan is in accordance with the applied approved CDM methodology, i.e., ACM0002, version 19.0 /11/,
- The equipment essential for measuring parameters required for calculating emission reductions are properly maintained,
- The monitoring system is in place and functional. The project has generated GHG emission reductions.

5.2 Verification Conclusion

The verifier confirms that the GHG emission reductions are calculated without material misstatements in a conservative and appropriate manner, with high level of assurance. KBS herewith confirms that the project has achieved GHG emission reductions in the proposed verification period as follows:

Verification period: From *01-January-2023* to *31-December-2023*

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

For projects that are not required to assess permanence risk, use the following table:

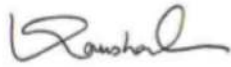
Vintage period	Baseline emissions (tCO ₂ e)	Project emissions (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Reduction VCUs (tCO ₂ e)	Removal VCUs (tCO ₂ e)	Total VCUs (tCO ₂ e)
01-Jan-2023 to 31-Dec-2023	402,681	0	0	402,681	0	402,681
Total	402,681			402,681		402,681

5.3 Ex-ante vs Ex-post ERR Comparison

Vintage period	Ex-ante estimated reductions/removals	Achieved reductions/removals	Percent difference	Explanation for the difference
01-Jan-2023 to 31-Dec-2023	444,180	402,681	9.34%	Lower than the ex-ante value. Fluctuations in wind potential are common and are due to numerous factors, including wind availability and stoppages due to low demand and maintenance. A difference in emission reductions between predicted and actual is a normal variation.
Total	444,180	402,681	9.34%	

Location: Faridabad, Haryana, India

Date: 06-September-2024



Authorized Signatory: Kaushal Goyal
Designation: Managing Director
KBS Certification Services Ltd.

APPENDIX 1: COMMERCIALLY SENSITIVE INFORMATION

No commercially sensitive information has been reported.

APPENDIX 2: REFERENCES

PP Documents

Reference	Document
1.	Monitoring Report of the current Monitoring Period: - Version 01, 14-May-2024 - Version 02, 03-July-2024 - Version 03, 16-Aug-2024 - Version 04, 26-Aug-2024
2.	Emission reductions spreadsheet: - Genneia Wind - 4th Verification – ER (version 1, 14-May-2024) - Genneia Wind -4th Verification – ER (version 2, 03-July-2024) - Genneia Wind-4th Verification – ER (Version 3, 26-Aug-2024)
3.	Commissioning and operation start date: - Commercial authorization letter from CAMMESA of each wind farm “Habilitación commercial de los parques) - Evidence of operation start date of each wind farm under testing
4.	Technical documents of the project activity: - Technical specification of the wind turbine generators - Project engineering
5.	Environmental Compliance - EIA - Environmental licenses of each wind farm - Annual report presented to ENRE (2023) - Genneia ISO 14001:2015 certificate - Genneia ISO 45001:2018 certificate
6.	Local Stakeholders consultation: - Registry of 2023 comments, complaints, and claims. Excel file “MQCYR Eolicos 2023”: logbook of inquiries of stakeholders - Evidence of meeting with stakeholders and attendance records see document “Social Baseline and Social Management Plan”.
7.	Electricity generation data: - Raw electricity generation data from each wind farm, - Monthly electricity generation reports from CAMMESA, https://cammesaweb.cammesa.com/
8.	Metering System: - Calibration/Verification certificates of the meters - Pictures and videos of the meters. - Unifilar Diagram-PEPO1-11_A Unifilar 33kV (Pomona) - Unifilar Diagram Villalonga - Unifilar Diagram Chubut
9.	SDG Evidence: - Registry of personnel per wind farm in December 2023
10.	Project ownership: - Commissioning letters - Legal ownership contracts and usufruct rights through lease agreements.
11.	Normative: • Law: 27191 (2015). Régimen de Fomento Nacional para el uso de Fuentes Renovables de Energía destinada a la Producción de energía eléctrica (modificación). Metas de penetración de energía renovable. • Law: 26190 (2007). Régimen de Fomento Nacional para el uso de Fuentes Renovables de Energía destinada a la Producción de energía eléctrica (modificación). • IRAM normative 4062-2: Methodology for Noise monitoring

	• ENRE normative 30999 and 558 (2022) • Resolution 37 – 2007 (Environmental Ministry of Chubut) – Migratory birds
12.	Pictures of the Control room
13.	- SIG Policy - Code of conduct
14.	- Document: “Diálogos con partes interesadas.pdf” - Map of actors - Stakeholders’ matrix
15.	- Sustainability Report - Social Investment Strategy - Community actions of each of the Parks.
16.	- Birds Monitorings
17.	- Noise Reports: “Informe de Ruido PECHN.pdf” –(Chubut Norte I and II) - Noise Reports: Villalonga - Noise Reports: Pomona

Regulatory Documents searched and referred by VVB

Reference	Document
A.	ACM0002, Version 19.0. “Consolidated baseline methodology for grid-connected electricity generation from renewable sources”
B.	• Tool for the demonstration and assessment of additionality, version 07.0.0. • Tool to calculate the emission factor for an electricity system, version 07.0. • Baseline, project and/or leakage emissions from electricity consumption and monitoring of electricity generation, version 03.0. • Methodological Tool: Investment Analysis (version 09.0).
C.	• Verified Carbon Standard v4.7 • VCS Program Guide, v4.4 • Program Definitions, v4.4 • Registration and Issuance Process, v4.4 • Monitoring Report Form, v4.4 • Verification Report Form v4.4 • VCS Validation and Verification Manual v3.2
D.	• Project Description Genneia Wind Projects in Argentina. Version 07. 27-December-2019. • Validation Report for Genneia Wind Projects in Argentina. Ruby Canyon Environmental, Inc. 28-December-2019. • Verification Report for Genneia Wind Projects in Argentina. Ruby Canyon Environmental, Inc., 15-July-2021. • Verification Report for Genneia Wind Projects in Argentina. KBS Certification Services Ltd, 17-April-2023. • Verification Report for Genneia Wind Projects in Argentina. KBS Certification Services Ltd, 02-November-2023.
E.	IPCC publications, www.ipcc-ggip.iges.or.jp

F.	UNFCCC, http://cdm.unfccc.int
G.	VERRA VCS https://verra.org/programs/verified-carbon-standard/
H.	GS web site: https://registry.goldstandard.org/projects?q=&page=1
I.	The Climate Action Reserve: https://thereserve2.apx.com/myModule/rpt/myrpt.asp?r=111
J.	Global Carbon Council: https://projects.globalcarboncouncil.com/

APPENDIX 3: FINDINGS

Summary of findings	CL	CAR	FAR
	05	01	00

Table 1. Remaining FAR from validation and previous verifications

FAR		Section no.		Date:
Description of FAR				
Nil				
Project participant response		Date:		
Documentation provided by project participant				
DOE assessment			Date:	

Table 2. CL from this validation/verification

CL ID	CL 01	Section no.	Section 1.12	Date: 13/06/2024
Description of CL				
Please provide data of employment, regarding sex, age and persons with disability. Provide evidence of the personnel in each of the project instances.				

Project participant response	Date: 02/07/2024
The section has been updated and the requested support has been sent.	
Documentation provided by project participant	
“Listado Personal Genneia 2023”	
DOE assessment	Date: 15/07/2024
The Verifier checked the documentation provided and the personnel was specified by sex. All personnel comply with the requirements of the Argentinian law. The finding is CLOSED.	

CL ID	CL 02	Section no.	Section 2.1	Date: 13/06/2024
Description of CL				
2.1.1 - Clarify de Legal or customary tenure/Access rights of each park. Provide the contracts and agreements. - Location of Stakeholders: Pomona site and jurisdiction is missing. - Location of resources: Describe the location of territories and resources which stakeholders own or to which they have customary access				
2.1.2 Stakeholder Consultation and Ongoing communication - Clarify the dates stated in section “Dates of stakeholder consultation” correspond to what kind of consultation and if applicable add meetings performed.				
2.1.4 Table of “Grievances received”, last column seems incomplete. Please clarify				
Project participant response		Date: 02/07/2024		
The sections have been updated and a summary has been sent by the owner of the project with details of ownership and access to the properties. Contracts involving third parties could not be shared.				
Documentation provided by project participant				
“Datos sobre parques TIERRAS”				
DOE assessment			Date: 22/07/2024	
All sections were updated as solicit by the MR Report Template and verifier. Also, the PP explained in the documentation provided the legal and customary tenure/access rights of the project. This hasn’t changed since validation. Finding is CLOSED.				

CL ID	CL 03	Section no.	Section 2.3	Date: 13/06/2024
Description of CL				
As per template for filling the MR, please explain why in section “Benefit Sharing” is not applicable.				
Project participant response		Date: 02/07/2024		
The sections have been updated and clarification has been provided.				
Documentation provided by project participant				
N/A				
DOE assessment			Date: 22/07/2024	
The section has been revised accordingly. Finding is closed.				

CL ID	CL 04	Section no.	Section 3.1	Date: 13/06/2024
Description of CL				
No information regarding the operation of the project activity(s) during the present monitoring period, including any information on events that may impact the GHG emission reductions or removals and monitoring has been provided has been provided in section 3.1. The PP is requested to clarify in section 3.1 of the MR if each project instance operated under normal conditions during the present monitoring period or report any event that may have occurred that impacted the GHG emission reductions and monitoring.				
Project participant response		Date: 02/07/2024		
The sections have been updated and clarification has been provided.				
Documentation provided by project participant				
N/A				
DOE assessment			Date: 22/07/2024	
The updated monitoring report contains the clarification statement regarding the operation of the project activity. The PP clarified that no relevant impacts occurred during the present monitoring period that would affect generation from any of the project activity instances. CL is closed.				

CL ID	CL 05	Section no.	Section 4.3	Date: 13/06/2024
Description of CL				
Calibration information and installation date of the meters is missing. Please update the MR and send evidence.				
Project participant response		Date: 02/07/2024		
Calibration information has been included in the report. According to Resolution 472 / 1998, a back-up meter is not required for generators with a gross capacity of less than 20 MW. Although the POMONA II and VILLALONGA II wind farms go beyond the regulation and have back-up meters installed, they were not the focus of calibration and verification procedures by CAMMESA.				
Documentation provided by project participant				
Folder “Annex_8”				
DOE assessment			Date: 22/07/2024	
All the Commercial Authorization Acts, where the calibration of each of the meters is specified, were checked and are in accordance with what its established in the MR.				
However, no Calibration Certificates were found for the Pomona II and Villalonga II back up meters. The document P-49888-1-GENNEIA-PE VILLALONGA 2 – Proyecto SMEC NODO VILL2M62, states that as the Project is less than 20MW there is no need for a backup meter. This is also the case of the Pomona II Project. Also, as per the Resolution 472/1998 (which was checked by the verifier), the meters are installed but have not received a calibration from CAMMESA as it is not part of the requirements. Clarification was also included in the MR v2.				
The finding is CLOSED.				

Table 3. CAR from this validation/verification

CAR ID	CAR 01	Section no.	ER calculation spreadsheet	Date: 13/06/2024
Description of CAR				
During this verification it was observed that PP's hourly net electricity generation records have been cross-checked with CAMMESA reports data, which is the official source of data of electricity generated by all power plants connected to the National Electricity System (SADI) publicly available.				

However, the data from CAMMESA stated in the spreadsheet was also cross-checked directly from CAMMESA's webpage, where the data is publicly available and differences were found, and since it is supposed to be the same data, please explain and use the publicly data available to do the crosscheck.

Furthermore, both data come from the same SMEC meters of the wind farms. However, differences between both sources were found. PP is requested to clarify the causes of the differences between PP's hourly net electricity generation records and CAMMESA records.

Update accordingly in the spreadsheet and if applicable in the MR.

Project participant response

Date: 02/07/2024

Cammesa's public information has been used to cross-check with SMEC readings.

The difference between sources is due to adjustments made by Cammesa considering all generating agents that are registered at a common measurement/connection point.

The MR has been updated accordingly.

Documentation provided by project participant

"VCS MR_1987_01012023_31122023_v2"

"1987_ER Calculation_GENNEIA WIND_v.2"

DOE assessment

Date: 22/07/2024

The hourly generation from CAMMESA and the data in the file "1987_ER Calculation_GENNEIA WIND_v.2", were cross checked. The PP used the most conservative data between CAMMESA and SMEC meters, hence found appropriate.

The finding is CLOSED.

Table 4. FAR from this verification

FAR		Section no.		Date:
Description of FAR				
Nil				
Project participant response		Date:		
Documentation provided by project participant				

DOE assessment	Date:

APPENDIX 4: ABBREVIATIONS

BAU	Business as usual
CL	Clarification request
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent
CP	Certification Program
CL	Clarification Request
DNA	Designated National Authority
EB	CDM Executive Board
EIA	Environmental Impact Assessment
ER	Emission Reduction
FAR	Forward Action Request
GHG	Greenhouse gas(es)
GWP	Global Warming Potential
IPCC	Intergovernmental Panel on Climate Change
MP	Monitoring Plan
MR	Monitoring Report
PP	Project Proponent
QC/QA	Quality control/Quality assurance
UNFCCC	United Nations Framework Convention on Climate Change
VCS	Verified Carbon Standard
VCS – PD	VCS – Project Description
VCU	Verified Carbon Unit
VT	Verification team
VVB	Validation/Verification Body
WTG	Wind Turbine Generator
XLS	Emission Reduction Calculation Spread Sheet

APPENDIX 5: COMPETENCE OF TEAM MEMBERS

Personnel Name		Raúl González Mitre			
Schemes	☒ CDM	☒ GCC	☒ GS	☒ VCS	☒ Other GHG Schemes (Cercarbono)
Qualified to work as					
Team Leader			☒	Technical Expert	
Validator/Verifier			☒	Financial Expert	
Technical Reviewer			☒	Local Expert (Latin America)	
Area(s) of Technical Expertise					
Sectoral Scope			Technical Area		
SS: 01: Energy industries (renewable/non-renewable sources)			TA 1.1: Thermal energy generation from fossil fuel and biomass including thermal electricity from solar		
			TA 1.2: Energy generation from renewable energy sources		
SS 3: Energy demand			TA 3.1: Energy Demand		
SS 4: Manufacturing Industries			TA 4.1: Cement and lime production		
SS 7: Transport			TA: 7.1: Transport		
SS 13: Waste handling and disposal			TA 13.1: Waste Handling and Disposal		
			TA 13.2: Manure		
SS 14: Afforestation and reforestation			TA 14.1: Afforestation and reforestation		
Approved by (Manager Competence & Training)			Shikha Sharma		
Approval date			06-12-2021		

Personnel Name		Sofia Castro			
Schemes	☒ CDM	☒ GCC	☐ GS	☒ VCS	☐ Other GHG Schemes
Qualified to Work as					
Team Leader			☒	Technical Expert	☒
Validator/Verifier			☒	Financial Expert	☐
Technical Reviewer			☐	Local Expert (Costa Rica, Honduras, Nicaragua)	☒
Area(s) of Technical Expertise					
Sectoral Scope			Technical Area		
SS 01 – Energy Industries (Renewable/Non-Renewable Sources)			TA 1.1: Thermal energy generation from fossil fuel and biomass including thermal electricity from solar		
			TA 1.2: Energy generation from renewable energy sources		
Approved by (Manager Quality)			Dushyant Parashar		
Approval date			27/05/2024		

Personnel Name		Bharath S.			
Schemes	☐ CDM	☒ GCC	☒ GS	☒ VCS	☒ Other GHG Schemes (Cercarbono)
Qualified to work as					
Team Leader			☒	Technical Expert	☒
Validator/Verifier			☒	Financial Expert	☐
Technical Reviewer			☒	Local Expert	☒
Area(s) of Technical Expertise					
Sectoral Scope			Technical Area		
SS 3: Energy Demand			TA 3.1: Energy Demand		

Approved by (Manager Competence & Training)	Mr. Dushyant Parashar
Approval date	28-05-2024

Personnel Name		Ms. S Meera			
Schemes	☒ CDM	☒ GCC	☐ GS	☒ VCS	☐ Other GHG Schemes
Qualified to Work as					
Team Leader			☐	Technical Expert	☐
Validator/Verifier			☒	Financial Expert	☐
Technical Reviewer			☐	Local Expert (India)	☒
Area(s) of Technical Expertise					
Sectoral Scope			Technical Area		
SS 1 – Energy Industries (Renewable/Non-Renewable Sources)			TA 1.2: Renewables		
SS 13- Waste Handling and Disposal			TA 13.1 - Waste Handling and Disposal		
Approved by (Manager Quality)			Mr. Praveen N Urs		
Approval date			15/03/2024		

Personnel Name		Mr. S Thyagaraj			
Schemes	☒ CDM	☒ GCC	☒ GS	☒ VCS	☒ Other GHG Schemes (ISO 14064, ICR, UCR)
Qualified to Work as					
Team Leader			☒	Technical Expert	☒
Validator/Verifier			☒	Financial Expert	☒
Technical Reviewer			☒	Local Expert (India)	☒

Area(s) of Technical Expertise	
Sectoral Scope	Technical Area
SS 1 – Energy Industries (Renewable/Non-Renewable Sources)	TA 1.1: Thermal energy generation from fossil fuels and biomass including thermal electricity from solar TA 1.2: Energy generation from renewable energy sources
SS 4: Manufacturing Industries	TA 4.1: Cement and lime production
SS 5: Chemical industries	TA 5.1: Chemical Industries
SS 9: Metal production	TA 9.2: Iron, steel, and Ferro-alloy production
SS 12: Solvent use	TA 12.1: Chemical industry
SS 13- Waste Handling and Disposal	TA 13.1: Waste Handling and Disposal TA 13.2: Manure
Approved by (Manager Competence)	Mr. Dushyant Parashar
Approval date:	08/03/2021