



VALIDATION REPORT FOR THE CAPRICORN RIDGE 4 WIND FARM



Document Prepared by First Environment, Inc.

Project Title	Capricorn Ridge 4 Wind Farm
Version	v1
Report ID	1.0

Report Title	Validation Report for the Capricorn Ridge 4 Wind Farm Project
Client	NextEra Energy Marketing
Date of Issue	28-October-2021
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Summary:

This report is provided to NextEra Energy Marketing (NextEra) as a deliverable of the Verified Carbon Standard (VCS) project validation process for the Capricorn Ridge 4 Wind Farm Project (the Project) located in Sterling City, Texas. The Project is seeking a second crediting period and therefore undergoing a crediting period renewal validation for a renewed crediting period of January 1, 2020 to December 31, 2029.

The Project consists of consists of 75 wind turbines that supply renewable electricity to the grid, displacing fossil fuel-based electricity generation. These activities result in a net reduction of greenhouse gas emissions.

The validation process consists of the independent third-party assessment of the project design and ex-ante emission reduction estimate against the criteria stated in the Verified Carbon Standard (VCS) Version 4.1, 22 April 2021, and the approved Clean Development Mechanism (CDM) methodology ACM0002, Grid-connected electricity generation from renewable sources, Version 20.0.

During the validation process, First Environment, Inc. (First Environment) issued one clarification and twenty-two corrective action requests – all of which were addressed sufficiently by the project proponent.

In summary, First Environment is reasonably assured that the Project meets all relevant VCS Version 4.1 requirements and correctly applies the VCS-approved CDM methodology ACM0002. No uncertainties were identified during the validation process.

CONTENTS

1	INTRODUCTION.....	1
1.1	Objective.....	1
1.2	Scope and Criteria	1
1.3	Level of Assurance.....	1
1.4	Summary Description of the Project.....	1
2	VALIDATION PROCESS	2
2.1	Method and Criteria.....	2
2.2	Audit Team.....	2
2.3	Audit Kick-off.....	2
2.4	Development of the Validation Plan.....	3
2.5	Desktop Review	3
2.6	Site Visit.....	3
2.7	Corrective Actions and Supplemental Information	3
2.8	Validation Reporting	3
2.9	Document Review	3
2.10	Interviews.....	3
2.11	Site Inspections.....	4
2.12	Resolution of Findings.....	4
3	VALIDATION FINDINGS.....	4
3.1	Project Details.....	4
3.2	Safeguards.....	5
3.3	Application of Methodology	5
3.4	Non-Permanence Risk Analysis	9
4	VALIDATION CONCLUSION	9
	APPENDIX A: RESOLUTION OF FINDINGS.....	10

1 INTRODUCTION

1.1 Objective

This report is provided to NextEra as a deliverable of the Verified Carbon Standard (VCS) project validation process for the Capricorn Ridge 4 Wind Farm Project (the Project). This report provides a description of the steps involved in conducting the validation and the findings of the validation performed on the basis of the VCS Standard, as well as criteria given to provide for consistent project operation, monitoring, and reporting of greenhouse gas (GHG) emission reductions. The Project is seeking a second crediting period and therefore undergoing a crediting period renewal validation.

As outlined in the VCS Project Description (VCS PD), the VCS-approved methodology applied to the project activity is the Clean Development Mechanism (CDM) consolidated methodology ACM0002 “Grid-connected electricity generation from renewable sources,” Version 20.0. The Audit Team was provided the initial version of the VCS PD dated February 24, 2020. Based on this documentation, a document review and desktop audit took place which resulted in corrective action and clarification requests (discussed later in this report) and revisions to the VCS PD. The final version of the VCS PD, Version 7.0, dated October 21, 2021, serves as the basis of the final conclusions presented herewith.

1.2 Scope and Criteria

The validation scope is defined as an independent and objective review of the VCS PD. The Audit Team employed a risk-based approach, focusing on the identification of significant risks to project implementation and the generation of emission reductions. The validation process was informed by, and the VCS PD was reviewed against, the following criteria:

Standards of Validation	- VCS Standard: VCS Version 4.1, 22 April 2021 (VCS Standard) - Clean Development Mechanism (CDM) methodology ACM0002, Grid-connected electricity generation from renewable sources, Version 20.0, including all methodological tools referenced within. - CDM Tool: Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period, Version 03.0.1
Validation Process	- VCS Standard - VCS Program Guide, Version 4, 19 September 2019, v4.0 - ISO 14064-3: Specification with guidance for the validation and verification of greenhouse gas assertions, 2006

1.3 Level of Assurance

First Environment, Inc. (First Environment) and NextEra have agreed that a reasonable level of assurance be applied for the Project validation process.

1.4 Summary Description of the Project

The Project is located on approximately 11,000 acres of land five miles east of Sterling City, Texas at Latitude: 31.900878, Longitude: -100.817413. NextEra Energy Resources (a subsidiary of NextEra Energy, Inc.) is the owner of the project and project equipment. The Project consists of 75 GE 1.5MW wind turbines with an original total capacity of 112.5 MW. The project underwent a

repowering in December of 2017 which increased the capacity of each turbine to 1.62MW. The towers have a rate wind speed of 12 m/s, three rotor blades, a rotor diameter of 77 meters, sweep area of 4,657m², and a rotor speed of 10.1-20.4 rpm. The objective of the project is to increase the amount of wind-generated electricity that is supplied to the Lower Colorado River Authority (LCRA) substation in Coke County, Texas, a part of the Electricity Reliability Council of Texas (ERCOT) grid. The Project will produce renewable energy displacing traditional fossil-fueled energy sources, thereby reducing greenhouse gas emissions. These activities result in a net reduction of CO_{2e} emissions.

2 VALIDATION PROCESS

2.1 Method and Criteria

The following validation process was used:

- conflict of interest review;
- selection of Audit Team;
- kick-off meeting with NextEra;
- review of the updated VCS PD;
- development of the validation plan;
- site visit;
- desktop review of the project design and the baseline and monitoring methodology and other relevant project documentation;
- follow-up interaction with NextEra for supplemental information and corrective action and clarification as necessary; and
- final statement and report development.

The validation process was utilized to evaluate whether the Project's approach, as outlined in the VCS PD, is consistent with the VCS Standard and the ACM0002 methodology. A validation conformance checklist was developed for the Project which summarizes the criteria used to evaluate the Project, the Project's conformance with each criterion, and the Audit Team's validation findings.

2.2 Conflict of Interest Review

Prior to beginning any validation project, First Environment conducts an evaluation to identify any potential conflicts of interest associated with the project. No potential conflicts were found for this project.

2.3 Audit Team

First Environment's Audit Team consisted of the following individuals who were selected based on their validation experience, as well as familiarity with renewable energy operations:

- Jeff Daley – Lead Auditor
- Luca Nencetti - Auditor
- James Wintergreen – Internal Reviewer

2.4 Audit Kick-off

The validation process was initiated with a kick-off conference call on January 15, 2020 between First Environment and NextEra. The communication focused on confirming the validation scope, objectives, criteria, schedule, and the information required for the validation.

2.5 Development of the Validation Plan

The Audit Team formally documented its validation plan as well as determined the validation sampling plan. The validation plan was informed by the kick-off meeting where key elements of the validation scope were discussed including project team members, project level of assurance, materiality threshold, and standards of reporting and validation. The validation plan also provided an outline of the validation process and established project deliverables. The validation sampling plan was designed to review all project elements in areas of potentially high risk of inaccuracy or non-conformance.

2.6 Desktop Review

The Audit Team performed a desktop review of the VCS PD and supporting documentation, as further described in Section 3 below.

2.7 Site Visit

First Environment has previously been on-site for the validation of the projects original crediting period. Due to the highly regulated nature of power generators in the U.S. and the limited data and monitoring required for this project type, an in-person site visit was not conducted. Mr. Jeff Daley conducted a webinar and interviews with relevant project personnel on September 17, 2021 to review the Project's monitoring and data management systems. The meeting included interviews with relevant project personnel and project stakeholders; discussion of the Project's operations; data collection procedures and information management systems; as well as assessments of the Project's controls for sources of potential errors and omissions.

2.8 Corrective Actions and Supplemental Information

The Audit Team issued requests for supplemental information, corrective action, and clarification during the verification process. The corrective action and clarification requests and the responses provided by NextEra are summarized in Appendix A.

2.9 Validation Reporting

Validation reporting, represented by this report for NextEra, documents the validation process and identifies its findings and results. Validation reporting consists of this report and a separate Deed of Representation to be submitted to Verra.

2.10 Document Review

During the validation process, First Environment reviewed the VCS PD, ex-ante emissions estimates, and supporting documentation to ensure consistency with the VCS Standard, ACM0002 methodology, and applicable CDM Tools. Discrepancies between the VCS PD and the validation criteria were considered material and identified for corrective action. Deviations required appropriate justification from NextEra. First Environment assessed the GHG emission reduction assertion and underlying monitoring data to determine if either contained material or immaterial misstatements.

The results of the validation review are discussed in greater detail below.

2.11 Interviews

Through the course of validation activities, First Environment interviewed the following project personnel to inform the validation process:

- Carlyle Bruno – NextEra Energy Marketing – Senior Renewables Portfolio Coordinator
- Joe Mango – Florida Power & Light – Power Delivery Manager
- Jared Brown – NextEra Energy Marketing – Business Manager

2.12 Site Inspections

See Section 2.7 above.

2.13 Resolution of Findings

As described above, the Audit Team requested supplemental information and issued 22 requests for corrective action and one request for clarification during the validation process. The corrective action and clarification requests and the responses provided are summarized in the tables found in Appendix A.

2.13.1 Forward Action Requests

No forward action requests were issued during the validation process.

3 VALIDATION FINDINGS

3.1 Project Details

The Project applies the ACM0002 methodology, which is applicable to the project activity because it falls within the scope of the methodology. The project activity involves the installation and operation of wind turbines to generate renewable electricity which is supplied to the ERCOT electricity grid.

The Project activity is located on approximately five miles east of Sterling City, Texas at Latitude: 31.900878, Longitude: -100.817413.

The Project is the second phase of the Capricorn Ridge Wind Farm and became operational on May 20, 2008. The Project is a new addition that is metered separately from the existing phases of the Capricorn Ridge Wind Farm.

The Project start date is May 20, 2008, which is consistent with the start date identified in the originally validated VCS PD.

The first crediting period was 10 years in length from January 1, 2010 to December 31, 2019. The second 10-year crediting period is from January 1, 2020 to December 31, 2029. The forecasted emission reductions expected during the second crediting period are 1,865,780 tCO₂e, which classifies the project scale as “Projects” in accordance with Section 3.9.1 of the VCS Standard.

NextEra Energy Resources is the owner and operator of the Project activity and Project equipment and therefore is identified as the Project Proponent.

The Audit Team reviewed an attestation signed by NextEra Energy Marketing stating that it has not attempted to register the Project with another GHG programme other than VCS. The Project is eligible to receive renewable energy certificates (RECs) via the ERCOT REC program. The VCS PD specifically identifies that for creation of emission reductions in the VCS Program, NextEra will retire the associated RECs corresponding to the power output used to create GHG offset credits.

The REC retirement process will be observed in real time by the third-party verifier and once RECs are designated as “retired” in the ERCOT system, they cannot be “unretired.”

Overall, the Project Proponent provided an accurate, complete description of the Project providing a comprehensive understanding of the nature of the Project. First Environment has confirmed that the Project has been implemented according to the description provided in the VCS PD.

3.2 Safeguards

3.2.1 No Net Harm

The Project creates no negative environmental or socio-economic impacts.

3.2.2 Local Stakeholder Consultation

The Project did not activate any federal or state permitting process that required formal stakeholder input or public comment. However, any stakeholders have a right to file a complaint with the Public Utility Commission of Texas (PUCT). Any complaints deemed to be material would be coordinated between the Project and PUCT. To date no stakeholder comments or complaints have been made.

3.2.3 Environmental Impact

The project did not trigger any regulatory requirements for an Environmental Impact Assessment.

NextEra opted to perform a Phase I Environmental Site Assessment (ESA) for the project location. First Environment reviewed the ESA during the course of its validation.

NextEra also identified potential impacts on black-capped vireo populations in the area of the project activity. The species is an endangered bird whose habitat intersects the project location. NextEra has implemented a monitoring program to track the project’s effects on the bird’s environment and nesting habits.

3.2.4 Public Comments

As discussed above, any stakeholder comments would be handled through the Public Utility Commission of Texas (PUCT). The Project was initially validated under the Voluntary Carbon Standard 2007.1 and was therefore not subject to a public comment period.

3.2.5 AFOLU-Specific Safeguards

Not applicable.

3.3 Application of Methodology

3.3.1 Title and Reference

The VCS-approved methodology applied to the project activity is the following CDM approved consolidated methodology:

- ACM0002 “Grid-connected electricity generation from renewable sources,” Version 20.0.

The methodological tools applied to the project activity are the following CDM approved tools:

- CDM TOOL07.0 - Tool to calculate the emission factor for an electricity system, Version 07.0.
- CDM TOOL11 - Tool to assess the validity of the original/current baseline and to update the baseline at the renewal of a crediting period, Version 03.0.1.

3.3.2 Applicability

The project activity complies with the applicability requirements of ACM0002. The table below lists the relevant applicability requirements from ACM0002 and identifies how the Project meets them:

ACM0002 Requirement	Project Conformance	Comments/Findings
The methodology is applicable under one of the conditions identified in Section 2.2, Paragraph 3.	Yes	The project activity is the installation of a greenfield grid-connected renewable energy power generation project.
The methodology is applicable under one of the conditions identified in Section 2.2, Paragraph 4.	Yes	The project activity is a wind/power plant, and is not a capacity addition, retrofit, rehabilitation, or replacement to an existing grid-connected power plant.
In case of hydro power plants, the applicability conditions identified in Section 2.2, Paragraph 5 apply.	N/A	N/A – The Project is not a hydro plant.
In the case of integrated hydro power projects, the applicability conditions identified in Section 2.2, Paragraph 6 apply.	N/A	N/A – The Project is not an integrated hydro power project.
This methodology is not applicable: (a) Project activities that involve switching from fossil fuels to renewable energy sources at the site of the project activity, since in this case the baseline may be the continued use of fossil fuels at the site; (b) Biomass fired power plants/units.	Yes	The project activity does not involve fuel switching or biomass power plants/units.
In the case of retrofits, rehabilitations, replacements, or capacity additions, this methodology is only applicable if the most plausible baseline scenario, as a result of the identification of baseline scenario, is “the continuation of the current situation, that is to use the power generation equipment that was already in use prior to the implementation of the project activity and undertaking business as usual maintenance”.	N/A	N/A – The Project is not a retrofits, rehabilitations, replacements, or capacity addition.
In addition, the applicability conditions included in the tools referred apply.	Yes	The VCS PD applies each applicable tool as per the applicability conditions identified in the Tool(s).

The Project correctly applied the ACM0002 methodology, and all associated methodological tools as referenced in Section 3.4.1 above.

3.3.3 Project Boundary

The project boundary is defined by the geographical extent of the project activity including the 75 wind turbines generating electricity. The project boundary also includes all power plants physically connected to the electricity system that the Project activity is connected to (i.e., the ERCOT regional grid).

The Audit Team verified the boundary through discussion with Project personnel and review of project documentation.

The Audit Team reviewed the source, sink, and reservoir (SSR) determination included in the VCS PD and found the justification accurate and in accordance with the applied methodology.

Overall, the VCS PD provides an accurate description of the project boundary and a comprehensive justification for the project's SSR.

3.3.4 Baseline Scenario

For the renewal of a crediting period, the VCS Standard requires that the CDM Tool "Assessment of the validity of the original/current baseline and update of the baseline at the renewal of the crediting period" be applied. The Project's baseline scenario consists of fossil fuel produced electricity sent to the ERCOT regional electricity grid. The Tool requires a stepwise assessment of the original baseline scenario as discussed in detail below.

Step 1.1 requires the assessment of the current baseline with relevant national and/or sectoral policies. There are no existing federal or local laws that would require the construction of renewable power plants since the submission of the project for its initial crediting period. The Texas state renewable portfolio standard (RPS) was adopted in 1999 and called for power supplier/retail entities to supply a certain amount of renewable energy into the grid with the goal of 10,000MW of renewable energy by 2025. The RPS applies to retail entities or providers to purchase prescribed quantities of renewable energy. However, the RPS does not mandate that electricity generators (i.e., NextEra) build renewable plants.

Step 1.2 requires the assessment of the impact of circumstances existing at the time of requesting renewal of the crediting period on the baseline emissions. The VCS PD identifies that while there are alternatives to fossil electricity production, fossil electricity production continues to hold the market share of power being produced and put into the ERCOT grid. A review of the U.S. EPA eGRID subregion resource mix data confirms that the ERCOT grid is made up of approximately 70 percent fossil generated electricity. First Environment concluded that the current baseline remains plausible, and no new circumstances change the validity of the selected baseline.

Step 1.3 requires the assessment of whether the continuation of use of current baseline equipment(s) or an investment is the most likely scenario for the crediting period for which renewal is requested. The original baseline scenario is not the continuation of current practices. Therefore, this step does not apply.

Step 1.4 requires the assessment of the validity of the data and parameters. The VCS PD identifies data parameters that were only determined at the start of the original crediting period and not monitored during the original crediting period, which have been updated for the crediting period renewal. First Environment confirmed that relevant emission factors and default values have been updated accordingly.

Step 2.1 (Update the current baseline scenario) is not applicable as the original baseline scenario was determined to be valid.

Step 2.2 requires that data and parameters be updated. As discussed in Step 1.4 in the VCS PD, applicable baseline data and parameters have been updated for the crediting period renewal.

First Environment concluded that the originally identified baseline scenarios, updated data, and updated parameters remain valid for the second crediting period.

3.3.5 Additionality

Consistent with VCS Standard Section 3.8.9, a full reassessment of additionality is not required when renewing the project crediting period. The Audit Team confirmed through review of project

documentation, as well as interviews with project personnel, that the Project is not mandated by any law, statute, or other regulatory framework.

The Audit Team concluded that the Project met the regulatory surplus requirement and that the Project's original additionality assessment is justified and valid for the project's second crediting period.

3.3.6 Quantification of GHG Emission Reductions and Removals

The VCS PD presents a procedure for quantifying GHG emission reductions that is consistent with the procedures described in ACM0002 and the relevant CDM tools. The equations are correctly identified and the calculation of GHG emission reductions is presented in a transparent manner, incorporating all relevant GHG sources, sinks, and reservoirs. All data and parameter values identified in the VCS PD were reasonable and found to be within the context of the Project.

Baseline emissions are calculated ex-post as the total quantity of electricity produced by the Project activity ($EG_{\text{facility},y}$) multiplied by the combined margin electricity emission factor ($EF_{\text{grid,CM},y}$). The Audit Team confirmed through review of calculation spreadsheets, underlying raw data, and publicly available utilities databases (EPA e-Grid) that the combined margin emission factor is calculated in accordance with the Tool to calculate the emission factor for an electricity system, Version 7.0. The operating margin is identified as 0.5862 tCO₂/MWh using the simple operating margin calculation method. As identified in the VCS PD, the operating margin is determined ex-ante and is fixed for the duration of the crediting period. The build margin is calculated as 0.2060 tCO₂/MWh. As identified in the VCS PD, the build margin is determined ex-ante and is fixed for the duration of the crediting period. The weighted combined margin is calculated as 0.49114 tCO₂/MWh. The combined margin was calculated using a 75 percent operation margin weight and a 25 percent build margin weight as required per the Tool to calculate the emission factor for an electricity system.

There are no project emission sources specified in ACM0002 that are applicable to the Project activity.

As specified in ACM0002, no leakage emissions are considered.

The Audit Team reviewed the ex-ante estimates in order to confirm that they were correctly calculated and correctly apply all specified factors and defaults.

After reviewing the quantification procedure and supporting evidence, the Audit team concluded that the methodology and applicable tools have been applied correctly to calculate baseline emissions, project emissions, leakage, and net GHG emission reductions and removals. No uncertainties remained with the calculation of emissions.

3.3.7 Methodology Deviations

The Project does not apply any methodology deviations.

3.3.8 Monitoring Plan

The Project applies the monitoring methodology described in the ACM0002 methodology. The primary variable monitored in order to determine and account for emission reductions is listed below.

Parameter	Method of Monitoring	Frequency of Measurement	Frequency of Recording
Electricity Supplied to the Grid - Megawatt hours (MWh)	Revenue Grade Electricity Meter	Continuously	Hourly

The monitoring plan specified within the VCS PD includes all relevant data and parameters required to obtain a reliable result of generated emission reductions and meets the requirements of the ACM0002 methodology. The VCS PD includes a complete description of the frequency, responsibility, and procedures for recording, storing, monitoring, measurement, and reporting activities. The monitoring plan ensures the adequate measurement of emissions occurring from GHG sources through the installation of appropriate metering equipment. The monitoring plan also identifies appropriate procedures for quality assurance and quality control of project data.

The Audit team concluded that the monitoring plan included in the VCS PD is adequate and in accordance with the guidelines and requirements of the ACM0002 methodology.

3.4 Non-Permanence Risk Analysis

The Project activity does not require a non-permanence risk analysis.

4 VALIDATION CONCLUSION

First Environment has performed a validation of the Project's approach, as outlined in the VCS PD, as part of the VCS validation process. The validation process was conducted according to the requirements stated in the VCS Standard; the VCS Program Guide, 22 April 2021, v4.1; and the ISO 14064-3 standard. The VCS PD was assessed against the criteria in the VCS Standard, and the approved CDM consolidated methodology ACM0002 "Grid-connected electricity generation from renewable sources, Version 20.0. The objective of validation activities was as stated in Section 1.1 above.

The review of the VCS PD and the resolution of all corrective action and clarification requests have provided First Environment with sufficient evidence to determine the fulfillment of stated criteria to a reasonable level of assurance.

The total emission reductions from the Project are projected to be 1,865,780 metric tonnes of CO₂e over the second 10-year crediting period. The emission reduction forecast has been checked, and it is deemed likely that the stated amount will be realized given that the underlying assumptions do not change.

It is First Environment's opinion that the Capricorn Ridge 4 Wind Farm, as described in the VCS PD of October 21, 2021, Version 7.0, meets all relevant VCS requirements and correctly applies the CDM methodology ACM0002.

APPENDIX A: RESOLUTION OF FINDINGS

ID No.	Corrective Action Request	Summary of Participant Response	Validation Conclusion
1	The following non-conformances between the VCS PD Template and the Project's VCS PD were identified: a) Template language and instructions have been left in the VCS PD, Specifically in Sections 1.6, 1.10, and 3.3. b) The Project name on the title page is inconsistent with the project name identified in the VCS database. c) Section 1.1 does not identify the location of the Project. d) Section 1.1 does not identify an estimate of annual average and total GHG emission reductions and removals. e) Section 1.2 does not identify the CDM / VCS Sectoral Scope applicable to the Project activity. f) Section 1.3 does not describe and justify how the project is eligible under the scope of the VCS Program. g) Section 1.4 does not indicate whether the project has been designed as a single installation of an activity. h) Section 1.9 does not identify the total number of years in the crediting period. i) Section 1.10 identifies an incorrect project scale. j) The discussions in Sections 1.16.1 and 1.16.2 are reversed. k) Section 2.2 does not identify a mechanism for on-going communication with local stakeholders. l) Section 3.1 does not identify all Tools applicable to the crediting period renewal validation. Additionally, this section incorrectly identifies CDM Tool 01 (Additionality Tool) is applied. m) Section 3.2 does not identify and demonstrate how the project meets each applicability condition of the methodology. n) Section 3.3 does not include a diagram or map of the project boundary. o) The narrative description of the calculation of the electricity emission factor (EF_{grid,CM,y}) is split between Sections 4.1 and 4.4. Additionally, the sequence of the emission factor discussion in Section 4.4 is not consistent with the Emission Factor Tool description and steps.	The VCS PD has been revised to address each of these issues.	Response is acceptable.
2	Section 3.4 of the VCS PD does not apply the stepwise baseline crediting period renewal analysis as required per the VCS Standard,	Section 3.4 of the VCS PD has been revised to remove the old additionality discussion from the original VCS PD and	Response is acceptable.

ID No.	Corrective Action Request	Summary of Participant Response	Validation Conclusion
	Section 3.8.9, and the CDM Tool to assess the validity of the original/current baseline and to update the baseline at the renewal of a crediting period (CDM Tool 11, Version 03.0.1).	applies the baseline assessment Tool step-wise approach to assess the baseline.	
3	Section 3.5 of the VCS PD incorrectly contains a full additionality assessment. (Please see VCS Standard, Section 3.8.9, Paragraph 1 for the requirements of assessing additionality at the renewal of a crediting period.)	Section 3.5 of the VCS PD has been revised to correctly identify and discuss requirements for renewal of a crediting period and discusses how the project meets the VCS Standard regulatory surplus requirement.	Response is acceptable.
4	Both Section 5.2 (Electricity Supplied to the Grid (EGy) parameter box) and Section 5.3 do not identify a specific frequency for meter calibration. (i.e., ERCOT requirement(s) for meter calibration intervals and/or any additional QAQC that will take place on the Project meter)	The electricity supplied to the grid parameter box and Section 5.3 have been updated to identify that meter calibration takes place annually and in accordance with ERCOT requirements.	Response is acceptable.
5	The Project Boundary Table in Section 3.3 of the VCS PD contains a project emissions source of: "For all renewable energy plants, CO2 emissions from backup power generation" which is an artifact from ACM0002,v9.0.	Section 3.3 of the VCS PD has been revised and is now consistent with the ACM0002 Methodology, v20.	Response is acceptable.
6	The VCS PD identifies two project proponents ("NextEra Energy Resources, LLC" and "NextEra Energy Marketing, LLC") which is inconsistent with the VCS Project Database which only identifies "NextEra Energy Resources" as the project proponent.	Section 1.5 of the VCS PD has been revised and now only identifies NextEra Energy Resources as the project proponent, consistent with the VCS Database.	Response is acceptable.
7	The baseline emissions equation identified in Section 4.1 of the VCS PD is not consistent with the baseline emissions equation identified in the ACM0002 Methodology (i.e., Methodology Equation 11 and Equation 12).	Section 4.1 of the VCS PD has been revised to correctly identify the baseline emissions equation (Eqn. 11) from the Methodology, and identifies Eqn. 12 of the Methodology which clarifies that $EG_{pj,y} = EG_{facility,y}$.	Response is acceptable.
8	Section 4.1 of the VCS PD does not clearly identify that the calculation of EGy using the capacity factor is for the ex-ante emissions estimate.	Section 4.1 of the VCS PD has been revised to identify the ex-ante calculation method.	Response is acceptable.
9	Section 4.1 of the VCS PD, and the ex-ante emission reduction calculation workbook both identify and apply a turbine generating capacity of 1.62MW per turbine which is not consistent with Section 1.1 of the VCS PD which identifies that the Project's turbines are 1.5MW's each with a total capacity of 112.5MW.	The Project underwent a repowering in December of 2017 which increased turbine generating capacity from 1.5MW to 1.62MW per turbine. Therefore, the use of a 1.62MW capacity factor is correct for the ex-ante emissions estimates.	Response is acceptable.
10	The VCS PD incorrectly includes monitoring and reporting information related to project emissions from grid electricity consumption which are not applicable to Wind Projects. Specifically, see VCS PD Section 4.2, and Section 5.2 parameter box "Project Emissions (PEy)."	The VCS PD has been revised to remove artefactual discussion of project emissions. There are no project emissions identified in the ACM0002,v20 Methodology that are applicable to the project activity.	Response is acceptable.
11	Section 4.4 of the VCS PD (Equation 3) incorrectly includes the leakage emissions parameter, which is inconsistent with Equation 17 of the ACM0002 Methodology.	The VCS PD has been revised to remove discussion and quantification related to leakage emissions as this was an artifact from an old version of the Methodology. The current ACM0002,v20 Methodology	Response is acceptable.

ID No.	Corrective Action Request	Summary of Participant Response	Validation Conclusion
		does not require the inclusion or consideration of leakage emissions.	
12	The following parameters are not identified in Section 5 of the VCS PD: - Section 5.1 - Data and Parameters Available at Validation: a) W_{OM}: Weighting of operating margin emissions factor b) W_{BM}: Weighting of build margin emissions factor c) $EF_{grid,BM}$: Build margin CO2 emission factor - Section 5.2 - Data and Parameters Monitored: d) $EF_{grid,OM,y}$: Operating margin CO2 emission factor e) $FC_{i,m,y}$: Amount of fuel type i consumed by power plant/unit m f) $NCV_{i,y}$: Net calorific value (energy content) of fuel type i in year y g) $EF_{CO2,i,y}$: CO2 emission factor of fuel type i used in power unit m in year y h) $EG_{m,y}$: Net electricity generated by power plant/unit m,	Sections 5.1 and 5.2 of the VCS PD have been revised to identify the correct parameters. (Note: The emission factor calculation approach was revised during the validation process to apply the ex-ante approach and is therefore fixed for the crediting period. Therefore, the only monitored parameter relevant for Section 5.2 is the electricity generated parameter: $EG_{facility,y}$).	Response is acceptable.
13	The "Combined Margin CO2 Emission Factor" parameter box in Section 5.2 of the VCS PD does not clearly identify that both EPA (e-Grid) and Energy Information Administration (EIA) data are the underlying data sources for the emission factor calculation.	The VCS PD has been revised to include reference to EIA and e-GRID databases applied in the determination of the Combined Margin CO2 Emission Factor parameter.	Response is acceptable.
14	The VCS PD and emission factor calculation workbook do not specify if off-grid power plants are included or excluded from the determination of the grid emission factor as required per Section 6.2 of the Emission Factor Tool (CDM Tool 07).	The VCS PD and emission factor calculations have been revised to specify that off-grid power plants were not included in the EF grid calculation.	Response is acceptable.
15	Equation 5 identified on Page 32 of the VCS PD, for the calculation of simple Operating Margin (OM) according to Option A of the Emission Factor Tool is inconsistent with Equation (3) and Equation (4) of the Emission Factor Tool (CDM Tool 07).	Equation 4 of revised VCS PD is now consistent with equation 3 and equation 4 of the Tool.	Response is acceptable.
16	The analysis of Low-Cost/Must-Run resources is not conducted relative to the selection of the Simple Operating Margin as required per Section 6.3, Paragraph 40(a) of the Emission Factor Tool (CDM Tool 07).	The emission factor calculations have been revised and now include/conduct a low-cost/must-run analysis.	Response is acceptable.
17	Relative to the calculation of the CO2 emission factor for both the Operating Margin (OM) and Build Margin (BM), the use of e-grid data aggregated at plant level instead of the unit specific level is not identified and justified in Section 3.6 of the VCS PD as a methodology deviation.	The emission factor calculations have been revised to apply unit level data, grid calculation applying E-GRID data quantifying energy generation and emissions at unit level.	Response is acceptable.
18	Low cost must run power units/plants are not excluded from the determination of the simple	The emission factor calculations have been revised to exclude Low cost must	Response is acceptable.

ID No.	Corrective Action Request	Summary of Participant Response	Validation Conclusion
	operating margin factor, as required per Paragraph 46 of the Emission Factor Tool (CDM Tool 07).	run power units/plants from the operating margin calculation.	
19	The VCS PD does not explicitly identify and document that the Build Margin (BM) is calculated according to Option 1 as required per Paragraph 73 of the Emission Factor Tool (CDM Tool 07).	The VCS PD has been revised to identify that the build margin is calculated in accordance with the ex-ante method / Option 1 from the Tool.	Response is acceptable.
20	The SET5-units and SET-20 per cent analysis applied in the Build Margin calculation are incorrectly determined due to the use of inaccurate data from e-grid2018v2. Specifically, retired power plants are included in the analysis.	The build margin calculation has been revised and now correctly identifies the 20% analysis.	Response is acceptable.
21	The build margin calculation and VCS PD do not identify if an analysis was conducted to identify and exclude power plants registered under VCS and/or any other offset standards as required per Section 6.5, Paragraph 75(b) of the Emission Factor Tool (CDM Tool 07).	The VCS PD has been revised to specify that GHG offset projects were excluded from the build margin calculations.	Response is acceptable.
22	The Build Margin (BM) calculation of the net quantity of electricity generated and delivered to the grid is incorrectly determined on a power plant level instead of power unit level.	The build margin calculations have been revised to apply and use power unit level data as required per the Tool.	Response is acceptable.

ID No.	Clarification Request	Summary of Participant Response	Validation Conclusion
1	Please clarify if the information in Section 5.3 pertaining to sharing the project substation with other projects and obtaining project generation as a proportion of total generation has occurred or is expected to occur in the future.	The information originally discussed in Section 5.3 was artefactual to the original reporting period. Section 5.3 has been revised to identify the current metering/monitoring at the substation.	Response is acceptable.