



**Verified Carbon
Standard**

SCATEC RMI HYBRID CLUSTER

Document Prepared by

Carbon Check (India) Private Ltd.



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Summary:

- **A description of the project**

The Scatec RMI Hybrid Cluster (the "Project") is a single site with multiple (3) equivalent project activities, dispatchable power facility, comprising of solar photo-voltaic power feeding into a battery energy storage system (BESS) technology prior to feeding into the national grid at the Rooidam switching station. The Project is located approximately 20 km North-East of the town of Kenhardt in the Northern Cape province of South Africa and is located near Eskom's Nieuwehoop Substation. The Project has a Contracted Capacity of 150 MW at the Delivery Point and comprises an area of around 880ha. The solar PV portion is split over three project activities located adjacent to one another in close proximity to the central BESS, Rooidam switching station and Operating infrastructure and forms a combined total installed capacity of approximately 540 MW peak. The installed capacity for each solar PV portion is 180 MW (DC). The BESS has a combined energy capacity of 1140 MWh, and 225 MW dispatch capacity, at the Delivery Point.

The Project achieved its Commercial Operation Date (COD) with the signature of the Notice of Commencement of the Facility between the facility operating entity and the national power utility formally commencing the Power Purchase Agreement /19/. This was achieved for the first project activity (cluster) of the project on 19 November 2023. This is the start date of the project and its associated GHG reduction activity. From this date, the plant operated, with remaining two project activities (clusters) going live with the achievement of COD on 26 November 2023 and 09 December 2023/31/ respectively. No other changes from the project implementation outlined in this document were experienced in this initial verification period. No additional project activities (Cluster) will be added to the project. Financial close for the project was reached in June 2022 with construction commencing in July 2022 /41/. All Operations and Maintenance of the project are conducted by a subsidiary Scatec company from the start date/04/.

Prior to implementing this project, electricity was supplied by the current fleet of power plants owned and operated by Eskom, the majority of which are fossil fuel based. The Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) is an initiative of the South African government aimed at increasing electricity capacity through private sector investment in solar photovoltaic and concentrated solar, onshore wind power, small hydro, landfill gas, biomass, and biogas /18/. Since coal is an emissions-intensive energy carrier, South Africa's economy is very emissions-intensive, especially when compared to other countries at a similar stage of development as measured by the Human Development Index/42/. South Africa's energy sector is by far the largest contributor to the country's emissions, contributing 94.7% to the country's predominant GHG, which is carbon dioxide (CO₂).

On average the project activity is expected to reduce annual GHG emissions equivalent to circa 810,840 tCO₂e and 8,108,400 tCO₂e over the crediting period of 10 years (From 19-November-2023 to 18-November-2033).

The total GHG emission reductions generated in the monitoring period from 19 November 2023 to 30-June-2025, is 1,266,749 tCO₂e

- **A description of the validation and verification**

Anthesis has appointed Carbon Check (India) Private Ltd., to carry out the validation of the project "Scatec RMI Hybrid Cluster project in South Africa", with regards to the relevant

requirements of VCS Standard Version 4.7/B01/. The combined validation and verification are based on the desk review of the VCS Joint PD & MR/01/ and the corresponding supporting emission reduction calculation spread sheets /02/ and other relevant supporting documents made available to the validation and verification team by the project proponent accompanied by on site interviews. This verification involves the period of 19-November-2023 to 30-June-2025

- **The purpose and scope of validation and verification**

Purpose: The purpose of validation is to have a thorough and independent assessment of the proposed project activity against the applicable VCS requirements, in particular, the project's baseline, monitoring plan, and compliance with the relevant VCS and host Party criteria. These are validated in order to confirm that the project design, as documented, is sound and reasonable and meets the identified criteria. Validation is a requirement for all VCS projects and is seen as necessary to provide assurance to stakeholders of the quality of the project and its intended generation of emission reductions. Carbon Check's objective is to perform a thorough, independent assessment of the validation of the project activity.

Scope: Validation scope is defined as an independent and objective review of the Project Description (PD). The PD is reviewed against the relevant criteria and guidance documents provided by VCS which include the following: VCS Program Guide v4.4, VCS Standard, v4.7, Program Definitions, v 4.5, Registration & Issuance Process, v4.6. VCS Validation and Verification Manual v3.2 applicable at the time in order to confirm that the project meets the applicability conditions of the selected baseline and monitoring CDM methodology ACM0002, version 22.0) /B02/, also assess the claims and assumptions made in the PD without limitation on the information provided by the project participants.

- **The method and criteria used for validation and verification**

The validation consists of the following four phases:

- I. A desk review of the project description documents.
 - A review of data and information.
 - Cross checks between information provided in PD and information from sources with all necessary means without limitations to the information provided by the project proponent.
- II. Onsite interviews with project stakeholders
 - Interviews with relevant stakeholders in a host country with personnel having knowledge of project development via telephone, email or direct on-site visits.
 - Cross checking between information provided by interviewed personnel with all necessary means without limitations to the information provided by the project proponent.
- III. Reference to available information relating to projects or technologies similar to project under validation and review based on the approved methodology being applied for the appropriateness of formulae and accuracy of calculations.

IV. The resolution of outstanding issues and the issuance of the final validation report and opinion.

- **The number of findings raised during validation and verification**

During the course of validation, a total of 13 findings were raised, which include:

05 Corrective Action Requests (CARs).

08 Clarification Requests (CLs).

01 Forward Action Requests (FARs).

All the findings raised have been resolved by the PP.

- **Any uncertainties associated with the validation and verification**

There are no uncertainties associated with the validation of the project activity. The validation has been done with a reasonable level of assurance.

- **Summary of the validation and verification conclusions**

Carbon Check (India) Private Ltd. Concludes the validation and verification with a positive opinion that the VCS a single locations or project activity instances “ Scatec RMI Hybrid Cluster Project in South Africa” as described in the PD (version 2.4, dated 3-October--2025) /01/, meets all applicable VCS requirements, including those specified in the VCS Standard v4.7 /B01/, relevant methodology, tools, and guidelines.

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1 INTRODUCTION

1.1 Objective

Anthesis BV has appointed the VVB, Carbon Check (India) Private Ltd/50/. to perform a validation and verification of the VCS Project “**Scatec RMI Hybrid Cluster Project**” in South Africa. This report summarizes the findings of validation and verification of the project, performed on the basis of the VCS Program Guide v4.4/B01/, VCS Standard, v4.7/B01/, Program Definitions, 4.5/B01/, Registration & Issuance Process v4.6/B01/, VCS Validation and Verification Manual, v3.2/B01/. Validation & Verification are required for all VCS project activities intending to register a grouped project under the VCS program. This report contains the findings and resolutions from the validation and verification of the project. register project under the VCS program. The purpose of validation and verification is to have a thorough and independent assessment of the proposed project against the applicable VCS requirements, in particular, the project s baseline, monitoring plan and the project’s compliance with relevant VCS and host Party criteria. These are validated in order to confirm that the project design and monitoring report, as documented, is sound and reasonable and meets the identified criteria. Validation and verification are a requirement for all VCS projects and is seen as necessary to provide assurance to stakeholders of the quality of the project and its intended generation of emission reductions, VCU. Through joint validation and verification activities, it is to be confirmed that:

- The project is implemented as described in the VCS Joint P D & M R/01/
- The monitoring system is implemented and fully functional to generate emission reductions without any double counting, and
- The data reported are accurate, complete, consistent, transparent and free of material error or omission by checking the monitoring records and the emissions reductions calculation.

The joint validation and verification followed the requirements of the current version of the VCS standard version 4. 7 and VCS Program Guide v4.4/B01/ to ensure the quality and consistency of the joint validation and verification work and the report.

1.2 Scope and Criteria

The validation scope is defined as an independent and objective review of the Project Description (PD), project design, the project’s baseline study and monitoring plan and other relevant documents. The PD is reviewed against the relevant criteria and decisions by the VCS, including the approved baseline and monitoring methodology.

Carbon Check has employed a risk-based approach in the validation, focusing on the identification of significant risks and reliability of project monitoring and generation of emission reductions.

The validation and verification are not meant to provide any consulting towards the project proponents. However, stated requests for clarifications and/or corrective actions may have provided input for improvement of the project design.

The validation is carried out on the basis of the following requirements applicable for this grouped project:

- VCS Standard (v4.7, dated 16-April-2024)/B01/
- VCS Program Guide (v4.4, dated 29-August-2023)/B01/
- VCS Validation and Verification Manual version (v3.2, dated 19/10/2016)/B01/
- Registration & Issuance Process (v4.6, dated 16-October-2024) /B01/
- VCS Program Definitions version (v4.5, dated 16-April-2024) /B01/
- CDM Methodology: ACM0002: Grid-connected electricity generation from renewable sources" (Version 22). /B02/

Other relevant rules, including the host country legislation.

1.3 Reasonableness of Assumptions and Level of Assurance

☒ Reasonable level of assurance

☐ Limited level of assurance

The threshold for quantitative materiality with respect to the aggregate of errors, omissions and misrepresentations, relative to the total reported GHG emission reductions and/or removals was limited to one percent, as required by section 4.1.8 of the VCS Standard version 4.7 /B01/.

1.4 Summary Description of the Project

The Scatec RMI Hybrid Cluster (the "Project") which has multiple locations or project activity instances (but is not a grouped project) with(3) equivalent project activities located adjacent to each other on a single operational site, is a dispatchable power facility, comprising of solar photo-voltaic power feeding into a battery energy storage system (BESS) technology and being dispatched through the hybrid power plant controller (HPPC) prior to feeding into the national grid at the Rooidam switching station located onsite. The Project is located approximately 20 km North-East of the town of Kenhardt in the direction of Groblershoop in the !Kheis Local Municipality of the Northern Cape province of South Africa and is located near Eskom's Nieuwehoop Substation. The Project has a Contracted Capacity of 150 MW (AC) at the Delivery Point. The solar portion is spread over 6 clusters located adjacent to one another and forming a combined total installed capacity of an approximately 540 MW peak (DC). The installed

capacity for each solar PV portion is 180 MW (DC). The BESS has a combined energy capacity of 225 MW dispatchable capacity, at the Delivery Point.

A project owned 132/33kV switching step-up substation (Rooidam switching station) is located within the project footprint with a 85 MVA 132/33kV Step-up transformer and transformer bay. The isolators on the HV Site of the IPP Transformer are the location of the Main Metering Installation, the Point of Connection (POC) and where energy will be exported from the Project to the national grid at the Delivery Point. The interconnection works include a 132 kV switching station, located adjacent to the IPP Substation, connected to the 132 kV network.

2 VALIDATION AND VERIFICATION PROCESS

2.1 Method and Criteria

Anthesis BV has appointed Carbon Check (India) Private Ltd., to carry out the validation of the grouped project “Scatec RMI Hybrid Cluster”, with regards to the relevant requirements of VCS Standard, version 4.7 /B01/.

The validation includes a thorough and independent assessment of the proposed single locations or project activity instances (but not a grouped project) against the applicable VCS requirements, in particular, the project's baseline, monitoring plan and the project's compliance with relevant VCS and host Party criteria. The validation involves assessment of the project and confirming that the project meets the applicability conditions of the selected CDM methodology, ACM0002 (Ver. 22.0)/B02/ and assessing the claims and assumptions made in the PD/01/ without limitation on the information provided by the project proponents. The overall validation was conducted using Carbon Check's internal procedures.

2.2 Document Review

During the document review, Carbon Check has applied standard auditing techniques including but not limited to document reviews and interviews, review of the applicable/applied methodology and its underlying formulae and calculations to assess the quality of information provided.

This report contains the findings and resolutions from the validation and a validation opinion on the proposed Multiple locations or project activity instances (but not a grouped project) thus confirming the project design as document is sound and reasonable and meets the stated requirements and identified criteria.

The VCS project description/01/, emission reduction calculation spread sheet/02/ and supporting documents related to the project design and baseline were reviewed as per VCS standard version 04.7 /B01/ requirements. The desk review included:

- A review of the data and information presented to verify completeness and consistency in accordance with VCS standard version 4.7 requirements.
- A review of the project description and monitoring methodology, paying particular attention to the applicability conditions of the methodology and baseline and additionality related requirements.
- A review of the monitoring plan and the project's compliance with relevant VCS criteria.
- Furthermore, the validation team used additional documentation by third parties like host-party legislation, technical reports referring to the project design or to the basic conditions and technical data.
- The VCS PD version 2.4 dated 3-October-2025/01/ was initially reviewed and Carbon Check requested the PP to present the supporting information and documents. The documents reviewed by Carbon Check are listed below in Appendix 1. Through the process of the validation, the revised VCS JPD-MR/01/ and the supporting documents were evaluated to confirm the actions taken by the PP to the CARs and CLs issued by the validation team.
- The table in Appendix 1 outlines the documentation reviewed during the validation.

2.3 Interviews

The table below describes the onsite interview process and further identifies personnel, including their roles, who were interviewed and/or provided information additional to that provided in the Joint PD-MR /01/ and any supporting documents.

VVB has conducted onsite interviews on 14-May-2025 and 15-May-2025 as part of validation activities. List of Implementation partners and Local stakeholders interviewed during onsite visits are listed below

Sr. No.	Name	Organization	Date	Topic	Interviewing Persons
/1/	Grant Little	Anthesis	14/05/2025 & 15/05/2025	- Project Design - Project start date and	Pankaj Kumar

/2/	Witness Netshitumbu	Anthesis	14/05/2025 & 15/05/2025	- Project Location - Baseline Scenario - Baseline Identification and Additionality - Monitoring and reporting documentation - Quality Assurance – Management and operating system - Social and Environmental Impacts - Compliance with relevant laws	
/3/	Charles Lubbe	SCATEC	14/05/2025 & 15/05/2025		
/4/	J Schuurman	SCATEC	14/05/2025 & 15/05/2025		
/5/	Albie De Plessis	SCATEC	14/05/2025		
/6/	Cornell Mouton	SCATEC	15/05/2025		
/7/	Lennox Plaatgion	SCATEC	15/05/2025		
/8/	HH Buur	Career Centre	14/05/2025	- Local Stakeholder Consultation - Social and Environmental Impacts	Pankaj Kumar
/9/	Eugene Benyeri	Career Centre	14/05/2025		
/10/	Charles R. Tangi	Groblershoop High School	14/05/2025		
/11/	Auicko Smith	Groblershoop SSME	14/05/2025		
/12/	Janine Smith	Groblershoop Women Enough	14/05/2025		
/13/	Palesa Maseko	Lima Rural Development Foundation	14/05/2025		
/14/	Alexa Beukes	Lima Rural Development Foundation	14/05/2025		

/15/	Golden Van Ross	SMME	14/05/2025		
/16/	Marshall Matthys	Kai! Garib	15/05/2025		
/17/	Christoffel Kleyn	Talita Koemi Solution SMME	15/05/2025		
/18/	Peter Townsend	SMME & NPO (TT General Work CBH Caregivers)	15/05/2025		

2.4 Site Visits

Where a site visit occurs prior to the end of the monitoring period, describe the additional evidence gathering activities that were conducted and demonstrate that a reasonable level of assurance was achieved. Carbon Check has conducted an on-site inspection on 14-May-2025 and 15-May-2025 to confirm the implementation and operation status of the project activity. A reasonable level of assurance has been maintained through the on-site visit for the purpose of validation and verification as follows:

- An assessment of the implementation and operation of the project activity through onsite interviews with the representatives of project proponent and end users.
- Confirmation of the pre-project scenario
- Confirmation of the applicability of the methodology and monitoring and controlling instruments and operational arrangements.
- Confirm the data collection procedures are implemented in accordance with the MP
- Assessment of the project boundaries
- Assessment of the monitoring provisions by checking the monitoring arrangement.
- A review of information aggregating and reporting of monitoring parameters
- A check of the observations of monitoring practices against the requirements of the VCS PD and the applied monitoring methodologies
- A review of calculations and assumptions made in determining the GHG data and ERs, and

- An identification of QA/QC procedures in place to prevent, or identify and correct, any errors or omissions in the reported monitoring parameters.

2.5 Resolution of Findings

Provide a summary of each finding, including the issue raised, the response(s) provided by the project proponent, and the final conclusions and any resulting changes to project documents. Unless this fits on one page, put all findings in an appendix. This section summarizes the findings from the joint validation & verification of the project activity. In this section the findings from the document review, assessments and onsite interviews are provided. Material discrepancies identified in the course of the validation are addressed either as CARs, CLs or FARs.

- Clarification requests (CLs): Project reporting lacks transparency and further information is needed to determine if a material discrepancy is present.
- Corrective action requests (CARs): The VVB has identified a material discrepancy or non-conformance that the project proponent must address.

The validation & verification team identified 05 CAR, 08 CL and 01 FAR. All CAR and CLs raised by Carbon Check during this joint validation & verification have been resolved. And one FAR is added. Please refer to Appendix 4 below for the details of the CARs/CLs and their closure.

2.5.1 Forward Action Requests

No forward action request raised during an assessment.

3 VALIDATION FINDINGS

3.1 Project Details

Item	Evidence gathering activities, evidence checked, and assessment conclusion					
	Audit type	Period	Program	Validation/verification body name	Number of years	
Audit history	<i>Validation</i>	19-November-2023 to 18-	VCS	Carbon Check (India) Private Ltd.	10	

		November-2033				
	Verification	19-November-2023 to 30-June-2025	VCS	Carbon Check (India) Private Ltd.	1.5	
Sectoral scope	Scope: 01 - Energy (renewable / non-renewable)					
AFOLU project category, if applicable	Not Applicable					
Project activity type	Large Project					
General eligibility of the project to participate in the VCS Program	- The project is not excluded from the VCS program as demonstrated in section 1.4.1 of the PD. As per section 2.1.3 of the VCS Standard v4.7, the exclusion for " Grid- connected electricity generation activity using a solar photovoltaic (PV) but the exclusion does not apply to the energy storage system (battery storage) which feeds to the grid and does not apply to concentrated solar thermal-to-electricity, floating solar PV, or energy storage systems (e.g., batteries). The VVB based on the review of the project design, project technology and onsite visit to the project location confirms that the proposed project activity is integrated BESS with Solar PV power plant with hybrid controller and thus eligible under the VCS program. - The project activity was listed on the VERRA registry in April 2025. The public commenting period for the activity lasted from 21-April-2025 to 21-May-2025. VVB has confirmed the same through review of the project page on VERRA registry (https://registry.terra.org/app/projectDetail/VCS/5488). VVB submitted the NOVS for validation of the project activity on 24-April-2025. The opening meeting with the VVB was carried out on 14-May-2025 which is 15 business days after submission of NOVS. The validation is expected to complete during November 2025 which is within 2 years of the expected start date of crediting period thus meeting the validation deadline. - Based on review of the JPD-MR/01/, VVB confirms that the applied methodology is eligible under the VCS Program. The applied methodology, ACM0002 version 22 is a large scale					

	consolidated CDM methodology and can be applied to large scale projects in VCS. The project is not a fragmented part of a larger project or activity that would otherwise exceed such limits.
AFOLU project eligibility, if applicable	Not Applicable
Transfer project eligibility, if applicable	Not Applicable
Project design	The proposed project activity is multiple locations or project activity instances (but not a grouped project)
Project ownership	Anthesis and the Scatec PPs
Project start date	19-November-2023
Project crediting period	19-November-2023 to 18-November-2033
Project scale	$\geq 300,000$ tCO ₂ e/year (large project)
Likelihood of achieving estimated GHG emission reduction or removals	VVB has reviewed the project design and cross-checked the estimated emission reductions by reproducing the ER calculations. VVB has reviewed the assumptions, methods and limitations involved in estimating the emission reductions and found them to be reasonable. Therefore, VVB confirms that the project activity is likely to achieve the estimated GHG emissions reductions.
Technologies and measures implemented by the project activity	The Scatec RMI Hybrid Cluster (the "Project") is a single site with multiple (3) equivalent project activities, dispatchable power facility, comprising of solar photo-voltaic power feeding into a battery energy storage system (BESS) technology prior to feeding into the national grid at the Rooidam switching station. The Project is located approximately 20 km North-East of the town of Kenhardt in the Northern Cape province of South Africa and is located near Eskom's Nieuwehoop Substation. The Project has a Contracted Capacity of 150 MW at the Delivery Point and comprises an area of around 880ha. The solar PV portion is split over three project activities located adjacent to one another in close proximity to the central BESS, Rooidam switching station and Operating infrastructure and forms a combined total installed capacity of approximately 540 MW peak. The installed capacity for each solar PV portion is 180 MW (DC). The BESS has

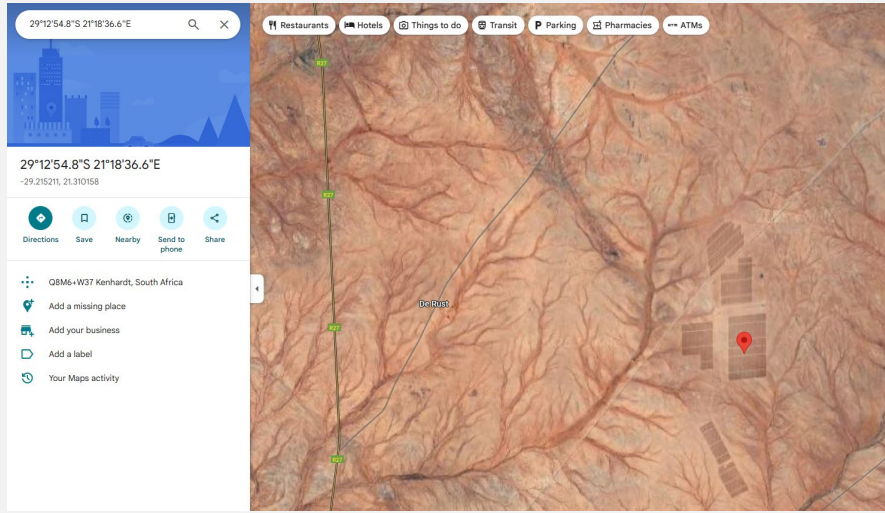
a combined energy capacity of 1140 MWh, and 225 MW dispatch capacity, at the Delivery Point.

The Project achieved its Commercial Operation Date (COD)/31/ with the signature of the Notice of Commencement of the Facility between the facility operating entity and the national power utility formally commencing the Power Purchase Agreement /19/. This was achieved for the first project activity (cluster) of the project on 19 November 2023. This is the start date of the project and its associated GHG reduction activity. From this date, the plant operated, with remaining two project activities (clusters) going live with the achievement of COD/31/ on 26 November 2023 and 09 December 2023 respectively. No other changes from the project implementation outlined in this document were experienced in this initial verification period. No additional project activities (Cluster) will be added to the project. Financial close for the project was reached in June 2022 with construction commencing in July 2022 /41/. All Operations and Maintenance of the project is conducted by a subsidiary Scatec company at the start date.

Prior to implementing this project, electricity was supplied by the current fleet of power plants owned and operated by Eskom, the majority of which are fossil fuel based. The Renewable Energy Independent Power Producer Procurement Programme (REIPPPP) is an initiative of the South African government aimed at increasing electricity capacity through private sector investment in solar photovoltaic and concentrated solar, onshore wind power, small hydro, landfill gas, biomass, and biogas /18/. Since coal is an emissions-intensive energy carrier, South Africa's economy is very emissions-intensive, especially when compared to other countries at a similar stage of development as measured by the Human Development Index/42/. South Africa's energy sector is by far the largest contributor to the country's emissions, contributing 94.7% to the country's predominant GHG, which is carbon dioxide (CO₂).

On average the project activity is expected to reduce annual GHG emissions equivalent to circa 810,840 tCO₂e and 8,108,400 tCO₂e over the crediting period of 10 years (From 19-November-2023 to 18-November-2033).

The total GHG emission reductions generated in the monitoring period from 19 November 2023 to 30-June-2025, is 1,266,749 tCO₂e

Implementation schedule of the project activity or activities	At the time of physical site visit to the plant, VVB is able to verify that the project has already been commissioned and operational since 19-November-2023/31/.
Project location	The Project is located approximately 20 km North-East of the town of Kenhardt in the direction of Groblershoop in the !Kheis Local Municipality of the Northern Cape province of South Africa and is located near Eskom's Nieuwehoop Substation. The coordinates verified are as follows: 
Conditions prior to project initiation	The project activity is an emission-avoidance project where no emissions will be generated in the construction, operation and maintenance phases of the project. The electricity generation conditions in South Africa, prior to including this BESS system plant into the national grid, are described under Section 3.4 (Baseline Scenario).
Project compliance with applicable laws, statutes and other regulatory frameworks	PP has identified and described relevant legislations that the project will comply with in section 1.15 of the PD. Based on its own review of legislations applicable in host country South Africa and interview with representatives of PP, VVB confirms that the legislations identified are sufficient and PP will adhere to these legislations during the crediting period. - Constitution of the Republic of South Africa (Act 108 of 1996) - National Development Plan, Agenda 2030 - Environmental Conservation Act (No. 73 of 1989) - National Environmental Management Act, (No. 107 of 1998) - National Water Act (No. 36 of 1998)

	- Conservation of Agricultural Resources Act (No. 43 of 1983) - Occupational Health and Safety Act (No. 85 of 1993) - The Basic Conditions of Employment Act (No. 75 of 1997) - Electricity Regulation Act (Act 4 of 2006) and the Electricity Regulation on New Generation Capacity R399 of 4 May 2011, as amended by R1366 of 04 November 2016 - Integrated Resource Plan (IRP2019), and the draft IRP 2023 - Carbon Tax Act 15 of 2019 and supporting regulations
Double counting and participation under other GHG programs	The VVB has checked for double counting at the verification stage by reviewing all the relevant registries that could hold RECs from the project. The project activity is not registered under any other emissions trading program or any other mechanism that includes GHG allowance trading. Following registries have been assessed: • https://www.climateactionreserve.org/ • https://registry.goldstandard.org/projects?q=&page=1 • https://iceland.itmoregistry.net/Public/Project • https://biocarbonregistry.com/en/projects/ • https://projects.globalcarboncouncil.com/pages/submitted_projects • https://registry.verra.org/app/search/VCS/All%20Projects • https://cdm.unfccc.int/Projects/projsearch.html • The project is not registered under the international REC Mechanism e.g. I-REC Device Registry and the same is confirmed through the I-REC web site (https://v-1.evident.app/Public/ReportDevices/). • The project has provided all information required on double counting and double claiming in section 1.16 and 1.17 of the VCS PD. VVB has confirmed through interviews with representatives of PP that the project is not claiming and does not plan to claim GHG credits under any other GHG program. Further, PP has confirmed that the project activity has not been rejected under any other GHG program. A signed declaration stating the same is provided by PP to the VVB/15/.
No double claiming with emissions trading programs or	The VVB has checked for double counting at the verification stage by reviewing all the relevant registries that could hold RECs from the project. The project activity is not registered under any other emissions trading program or any other mechanism that includes GHG allowance trading. Following registries have been assessed:

binding emission limits	• https://www.climateactionreserve.org/ • https://registry.goldstandard.org/projects?q=&page=1 • https://iceland.itmoregistry.net/Public/Project • https://biocarbonregistry.com/en/projects/ • https://projects.globalcarboncouncil.com/pages/submitted_projects • https://registry.verra.org/app/search/VCS/All%20Projects • https://cdm.unfccc.int/Projects/projsearch.html • The project is not registered under the international REC Mechanism e.g. I-REC Device Registry and the same is confirmed through the I-REC web site (https://v-1.evident.app/Public/ReportDevices/). The project has provided all information required on double counting and double claiming in section 1.16 and 1.17 of the VCS PD. VVB has confirmed through interviews with representatives of PP that the project is not claiming and does not plan to claim GHG credits under any other GHG program. Further, PP has confirmed that the project activity has not been rejected under any other GHG program. A signed declaration stating the same is provided by PP to the VVB/15/.
No double claiming with other forms of environmental credit	No double counting in line with clause 3.24.5 of the VCS standard 4.7
Supply chain (Scope 3) emissions double claiming	Based on review of the proposed project design, VVB confirms that the project proponent(s) or authorized representative is not a buyer or seller of a product whose emissions footprint is changed by the project activities. Same is clearly indicated in section 1.17.3 of the PD.
Sustainable development contributions	PP has identified three SDG contributions achievable through implementation of the project, assessment of which is as follows: 1. The project activity will contribute towards SDG target 7.2 through increase in amount of renewable energy in South Africa. The activity aims to displace 870,00 MWh of emission intensive grid electricity through generation of low emission BESS integrated with Solar. Based on review of the proposed project design, technology involved, and the monitoring plan, VVB confirms that the SDG target is relevant and applicable to the project activity and the SDG indicator chosen (7.2.1) is appropriate. VVB concludes that the estimated contribution over lifetime is likely to be achievable and can be monitored.

	2. The project activity will contribute an average annual emission reduction of 810,820 tons of CO₂ equivalent, totalling 8,108,400 tons of CO₂ equivalent over the project lifetime. Based on review of the proposed project design, technology involved, and the monitoring plan, VVB confirms that the SDG target is relevant and applicable to the project activity and the SDG indicator chosen is appropriate. VVB concludes that the estimated contribution over lifetime is likely to be achievable and can be monitored. 3. The project activity will contribute towards SDG target 8.5 through creation of 17,918.44 (5,972.81 per cluster) jobs in people months across all the project sites during the operational phase. Over the 10-year operational period. Based on review of the proposed project design and interview with management of the project plant, VVB confirms that the SDG target is relevant and applicable to the project activity and the SDG indicator chosen is appropriate. VVB concludes that the estimated contribution over lifetime is likely to be achievable and can be monitored.
Additional information relevant to the project	• As per the applied methodology ACM0002 (Ver. 22.0), no leakage emissions are considered in the project activity. • No commercially sensitive information has been excluded from the public version of the project description. • VVB confirms that based on review of the project design and overall assessment of the project activity, VVB did not find any additional relevant information that may have a bearing on the eligibility of the project, the reductions or removals, or the quantification of the project's reductions or removals

3.2 Project Activity Instances in Grouped Projects

This is not a Grouped project. Hence, this section is not applicable.

3.3 Safeguards

3.3.1 Stakeholder Engagement and Consultation

3.3.1.1 Stakeholder Identification

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Stakeholder identification	The VVB, through review of JPD-MR/01/ and interviews with representatives of PP confirms that sufficient mechanism is in place to identify stakeholders, and PP has identified relevant stakeholders as described in section 2.1.2 of the PD-MR.
Legal or customary tenure/access rights	The VVB confirms that the project activity is greenfield integrated BESS with solar power plant using hybrid controller constructed on leased land bound by lease agreement between the Project and the landowner was entered on the 6th of June 2022 /19/. Therefore, there are no legal or customary tenure/access rights to territories and resources, including collective and conflicting rights, held by stakeholders, indigenous people (IPs), local communities (LCs), or customary rights holders which can be conflicted due to the distribution of the clean energy products. Hence, not applicable.
Stakeholder diversity and changes over time	VVB confirms that implementation of project is as described in the VCS JPD-MR/01/. The stakeholders identified have not changed over time and reassessment of stakeholder diversity is not required during the current monitoring period. The relevant stakeholders have been sufficiently described in the JPD-MR/01/.
Expected changes in well-being	The project activity leads to the economic and social well-being of stakeholders by creating local employment opportunities. This has been confirmed by VVB through PP and stakeholder's interviews during on site audit.
Location of stakeholders	The VVB confirms that stakeholders are impacted by the closest local communities.
Location of resources	The VVB confirms that the project activity is integrated BESS with Solar power plant using hybrid controller constructed on private leased land and hence does not interfere with rights to lands, territories and/ or resources.

3.3.1.2 Stakeholder Consultation and Ongoing Communication

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Stakeholder engagement process	Stakeholder identification process is described by PP in section 2.1.1 of JPD-MR/01/. And PP stated that the stakeholder engagements were led by an independent external consulting company, to facilitate communication between the communities, the project developers and Anthesis Group. A database was collated through the PPP and formed part of the database for the VCS Stakeholder Engagement. Stakeholders were contacted primarily via email to inform them about the carbon project, prior to the quarterly stakeholder meeting on the 17th of March 2025 by CLO. Meetings were held at various locations (including Kenhardt and Groblershoop). Advertisements were also placed in local newspapers in English, Afrikaans and Setswana language prior to project listing inviting stakeholder and public comment. VVB has interviewed the local stakeholders to confirm that the same and found in line with VCS requirement.
Consultation outcome	No adverse comments were received for both the meetings, and this is addressed in the JPD-MR/01/. This was also confirmed by the validation team during the on-site interviews.
Ongoing communication	The mechanism for ongoing communication with local stakeholders has been described in the JPD-MR/01/.
Stakeholder input	VVB confirms that no changes to the project design have been made owing to the positive reception of the project as confirmed during the on-site audit.

3.3.1.3 Free, Prior, and Informed Consent

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Obtaining consent	VVB has confirmed through review of land lease agreement/19/ that the owner has consented to the project activity that is constructed and operational on the property.

	Additionally, VVB has interviewed the local stakeholders particularly the SME who have confirmed that the project activity does not impact customary rights of Indigenous people and local communities.
Outcome of FPIC discussion	Based on review of the evidence and interviews with representatives of PP and relevant local stakeholders, VVB confirms that VVB did not find any evidence such that the proposed project activity would negatively impact free, prior and informed consent of stakeholders involved.

3.3.1.4 Grievance Redress Procedure

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Development process	VVB has reviewed the grievance redressal procedure and confirms that the mechanism is sufficiently described in 2.1.4 of the PD. VVB has validated the mechanism designed by checking the following: 1. Grievance forms and a grievance box located at the project site 2. The grievance portal on the Anthesis or Scatec website 3. Scatec also maintains a global grievance and whistleblower system that allows for anonymous raising of grievances that will be logged and handled on all issues raised (both internally and externally).
Grievance redress procedure	VVB confirms that the procedure established by PP to receive and address the feedback is sufficiently described in section 2.1.4 of the PD. The mechanism is sufficiently designed as per VCS requirements.

3.3.1.5 Public Comments

Comments received	Actions taken by the project proponent	Evidence gathering activities, evidence checked, and assessment conclusion
Comment 1 – Anonymous – submitted 16 May 2025 It has recently come to our attention that several projects	Stakeholder engagement for the project followed the requirements stipulated in §3.18 of the VCS Standard.	The VVB has reviewed the public comments and the actions taken by the Project Developer (PD), and confirms

listed below have recently completed their public stakeholder consultation, along the process of applying for registration to generate carbon credits under the VCS. 1. Scatec RMI Hybrid Cluster (https://registry.verra.org/app/projectDetail/VCS/5488) 2. De Aar Hydra Storage (https://registry.verra.org/app/projectDetail/VCS/5337) 3. Oya Hybrid Project (https://registry.verra.org/app/projectDetail/VCS/5312) 4. Umoyilanga Hybrid Project (https://registry.verra.org/app/projectDetail/VCS/5272) 5. Redstone CSP project (https://registry.verra.org/app/projectDetail/VCS/5146) We have not received any notification from any of the project developers of their intention to pursue registration. As a significantly interested and affected stakeholder, we therefore object to the registration and request further consultation on several issues of concern.	This included building on the extensive stakeholder process undertaken during the EIA phase of the project and augmenting this through a renewed review of the stakeholder database to identify and add to it, confirming any stakeholders with legal or customary rights tenure or access rights or any conflicting rights. The stakeholder engagement process included physical notices located in public areas (municipal buildings, local supermarkets etc.) near the project activity, meetings with local stakeholders, advertisements in newspapers, electronic (email) communication, some telephonic calls and a dedicated website link is maintained (https://www.anthesisgroup.com/za/project-comments/) that remains open for stakeholder concerns, complaints, grievances and engagement. As part of the operational phase, each project also has a dedicated team of specialists located on site specifically focused on stakeholder engagement. A 30-day Global Stakeholder Consultation (GSC) managed on the Verra registry website was also part of the process as per §3.18.9 – 3.18.13 of	they are appropriate based on the stakeholder consultation documents listed in Appendix 2 of the validation report. To further verify this, the VVB interviewed stakeholders (listed in Section 2.3 of this report) and seen the posted for continuous stakeholders at site during the on-site audit. The VVB finds that the Local Stakeholder Consultation (LSC) meets the requirements of §3.18 of the VCS Standard, Version 4.7.
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	the stakeholder engagement process. The stakeholder engagement process was validated and checked by the independent VVB during the validation process, and included verification of documentation and communication, interviews with the project team members who were involved in the implementation and interviews with a sample of stakeholders themselves. The comments received from VERRA were anonymised, so it was unsure who the stakeholder was in order to review any possible comments or concerns raised during the engagement process. As part of our ongoing stakeholder engagement (as per §3.18.5 – 3.18.6 of VCS Standard) stakeholder may engage, comment, raise a grievance or be added to the stakeholder database. Various mechanisms are available, the primary ones being through the project operational stakeholder teams or via the weblink (https://www.anthesisgroup.com/za/project-comments/). While the stakeholder engagement process sought to identify and include all	
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	relevant stakeholders, any stakeholders missed, still have the opportunity to engage and be part of the ongoing process by accessing the weblink above.	
Comment 2 – Anonymous – submitted 17 May 2025 Projects 5488, 5337, and 5146 have all been awarded tenders under South Africa’s REIPPPP and were procured by Eskom through government-backed bidding rounds. The tariff structure is designed to ensure the bankability and long-term viability of the projects. These are large-scale renewable energy projects with significant credit generation potential. We reached out to Eskom and confirmed that the renewable energy from these projects is counted toward the national grid emission intensity. This raises several concerns, including; additionality, ownership, double or triple counting - reflected in the national grid factor, at least one project is selling electricity to a steel manufacturer that is using the green power to reduce its	The response to the comment has been split into the primary issues raised as follows: • Additionality • Ownership of project/Vcus • Potential for double or triple counting • Reflection in national Grid Emission Factor • Potential selling green power to a non-Eskom offtaker • Engagement with Eskom as a stakeholder • Potential for (non-public) legal disputes ADDITIONALITY: In accordance with the VCS Standard (§3.14) and the applied methodology (§5.2.3 and the associated Tools that were applied), additionality	VVB has reviewed the public comment and assessed the following aspects of project concerning the comment: 1. Additionality: The VVB assessed the section 3.5 of the PDMR and the evidence provided by the Project Developer, including official information from the IPP Office (Home · Starter Portal), NERSA listings (ANNEXURE A List of 119 Section 34 IPPs.xlsx), and DMRE announcement^{1,2}. The documentation demonstrates that the Scatec RMI Hybrid Cluster is the first project in South Africa combining Solar PV and BESS under a hybrid power plant controller to reach commercial operation (COD: 19 November 2023). Other RMIPPPP projects with similar configurations remain under construction.

¹<file:///C:/Users/panka/Downloads/Media%20Statement%20Signing%20of%20RMIPPPP%20Agreements%202%20June%202022%20FINAL.pdf>

² [Energising tomorrow: Scatec ignites one of the world's largest hybrid solar and battery project in South Africa - Scatec](#)

emissions intensity, raising the possibility of multiple claims on the same environmental benefits. There's also a stakeholder engagement concern - one project listed Eskom as having been engaged in April, but Eskom later indicated they were unaware of any such engagement. There could also be potential (non-public) legal disputes related to the projects.ss	was evaluated within the framework applicable to the Verra VCS requirements, including CDM TOOL1 v7, CDM TOOL 24 v3.1 and CDM TOOL 27 v14. All parameters used in the assessment of additionality were valid at the time of investment decision, and were verified by the carbon project developer as well as the independent VVB before being submitted to Verra as part of the Registration process. Even though the REIPPPP is a program implemented by the South African government, it is not a government subsidized program, but rather a price-competitive procurement programme. We acknowledge that REIPPPP tariffs are structured to provide cost recovery. However, the assumption that all awarded projects are fully bankable without carbon revenue is not borne out in practice. Of the projects commented on, only the Redstone CSP project is a REIPPPP project. The other projects were all granted licenses under the Risk Mitigation IPP Programme. Despite this subtle difference, the projects still	The list is provided by PD in section 3.5.2 of the PDMR. Based on this, the VVB found that project meets First-of-its-Kind (FOIK) in line with the applicability conditions of CDM Tool 23 for first-of-its-kind additionality 2. Ownership of project VCUs: VVB has reviewed the license issued by NERSA (National Energy Regulator of South Africa) /19/ to the project proponent SCATEC KENHARDT 1 (PTY) LTD, SCATEC KENHARDT 2 (PTY) LTD and SCATEC KENHARDT 3 (PTY) LTD. Therefore, the legal ownership of the project activity is confirmed through review of the same. Further, VVB has reviewed an agreement between the PPs SCATEC KENHARDT 1 (PTY) LTD, SCATEC KENHARDT 2 (PTY) LTD and SCATEC KENHARDT 3 (PTY) LTD whose name the IPP is issued and Anthesis B.V. ('Anthesis') who are involved in developing the project under VERRA.
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	had to demonstrate additionality in compliance with the Verra rules, irrespective if they were part of the REIPPP programme or not. Additionally, risks such as capex overruns, long development lead times, logistics issues at remote greenfield sites and currency (ZAR) devaluation and volatility impacted financial viability, reinforcing the importance of a carbon revenue stream. As such, the projects meet the criteria for additionality as per VCS rules. Ownership of project/Vcus: In accordance with the VCS Standard (§3.7), project proponents need to demonstrate the legal right to control and operate the project activities. This and the proof of right were demonstrated to the VVB during the validation through legally binding agreements that the various project proponents had signed. These agreements covered commercial aspects of the project, including responsibilities for various project activities (such as	Based on this agreement, VVB confirms that both parties will have joint ownership of the carbon project when registered. 3. The VVB has checked for double counting at the validation stage by reviewing all the relevant registries that could hold RECs from the project. The project activity is not registered under any other emissions trading program or any other mechanism that includes GHG allowance trading. Following registries have been assessed: • https://www.climateactionreserve.org/ • https://registry.goldstandard.org/projects?q=&page=1 • https://iceland.itmoregistry.net/Public/Project • https://biocarbonregistry.com/en/projects/ • https://projects.globalcarboncouncil.com/pages/submitted_projects • https://registry.terra.org/app/search/VCS/All%20Projects
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	operations, offtake, carbon development etc.). While the comment suggests a contractual obligation limiting the ownership of the carbon credits to the project proponent, independent legal opinion and review obtained by both project proponents has a differing opinion in this, as the relevant clauses of both the PPA and the Implementation Agreements (IA) are ambiguous regarding the ownership. Where a contract is ambiguous, then one can rely on general principles of law to interpret the contract, and in this instance reliance can be placed on the general principle of property law that the (carbon) project owner (the IPP) is also owner of the environmental attributes with the right to monetize such environmental attributes. Legal review was conducted in the light of these comments and a letter to the IPP from the IPPO dated 1 July 2025. The review was unable to identify any substantive contractual foundation that differs from the PP's current understanding and interpretation of the contracts and the eligibility to register a project and gain VCUs from the project.	• https://cdm.unfccc.int/Projects/projsearch.html • The project is not registered under the international REC Mechanism e.g. I-REC Device Registry and the same is confirmed through the I-REC web site (https://v-1.evident.app/Public/ReportDevices/). The project has provided all information required on double counting and double claiming in sections 1.16 and 1.17 of the VCS PD. VVB has confirmed through interviews with representatives of PP that the project is not claiming and does not plan to claim GHG credits under any other GHG program. Further, PP has confirmed that the project activity has not been rejected under any other GHG program. A signed declaration stating the same is provided by PP to the VVB. 4. Reflection of project activity in national grid emission factor: VVB has reviewed the grid emission factor calculation
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	Furthermore, these contractual obligations also made provision for changes to the operating environment in the future that may arise from changes in ownership, legal disputes, legislation, contractual amendments, policy changes or changes to the international voluntary carbon market, which the PP acknowledge may change any future claim or eligibility. These documents formed part of the independent validation by the VVB during the audit process. Potential for double or triple counting: In accordance with the VCS Standard (§3.23), project proponents need to demonstrate that there is no double counting, or double selling of any GHG emission reductions. This was confirmed by cross referencing a number of local and international registries, including Renewable Energy Certificates (RECs). Further to this, during the project development process, each project owner provided a signed declaration that no other environmental benefits are sought, and no offtake agreements or GHG benefits have been allocated outside	demonstrated in Grid Emission factor calculation sheet/03/. Based on the review, VVB confirms that the EF is calculated as per CDM TOOL 07. All the data sources referenced to determine the EF are found to be relevant, credible and latest. Therefore, VVB confirms that PP has determined the grid emission factor appropriately and sufficiently justified the sources. 5. Selling of renewable energy generated by the project activity: Based on the review of the PPA between the PP and ESKOM/19/, VVB confirms that PP will sell the renewable energy generated through Scatec project activity only to ESKOM as per terms of agreement outlined in the PPA. Further, VVB based on on-site inspection confirms that there is no other grid present in proximity of project area at the time of validation site visit.
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	of the listed Verra project. These documents formed part of the independent validation by the VVB during the audit process. Reflection in national Grid Emission Factor: Under the VCM, South Africa does not have a published and approved national grid emission factor or standardized baseline, and each project has to determine the Grid Emission Factor in accordance with the VCS Standard (§3.13) and the applied methodology. In the case of this project, CDM methodology ACM 0002 (v 22.0) was applied, and as per §5.2. CDM TOOL07 (in conjunction with the new Verra tool, VT011) were applied in order to determine the grid emission factor. This process is approved by Verra and takes cognizance of all components of the national grid, including renewable energy projects. As per the prescribed tools, the projects seeking registration with Verra, as well as other REIPPP projects not yet commissioned at the time of publishing the PDD are not included in the baseline scenario and hence	6. Engagement of ESKOM as stakeholder: VVB has reviewed the local stakeholder consultation records of the project activity and confirms that the stakeholders have been identified as per §3.18.1 and LSC meetings were carried out prior to the validation as per §3.18.2 of VCS standard v 4.7. Further, VVB confirms that PP has designed an on-going stakeholder consultation mechanism to enable communication of grievances throughout the crediting period of the project activity. 7. Potential Legal dispute: PP has acknowledged the risk of legal disputes over the project lifetime. However, VVB did not find evidence of any ongoing legal dispute during the validation stage.
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are excluded from the grid emission factor calculation. However, the effect of other large scale renewable energy projects already feeding into South Africa's grid at the time of publishing the PDD was taken into account through the Build Margin (BM) calculation. The build margin refers to the group of prospective power plants whose construction and future operation would be affected by the proposed project activity. This was demonstrated to the VVB during the validation and met the requirements.

Potential selling green power to a non-Eskom offtaker: This had been checked during the project design and was confirmed again when addressing these comments. No evidence was found to substantiate this, and in line with the point above on double counting it was also validated by the VVB.

VVB has validated that the GHG emission reductions claimed by the project are based solely on the electricity produced and sold to Eskom in accordance with the PPA. Verification for emission reductions claimed is based on the calibrated

meters measuring electricity that is fed to the national grid and there is no additional grid or feed that could be used for an additional offtake (wheeling) agreement or direct feed to an independent offtaker. The sites are also remote and have little potential to feed adjacent plants or municipalities.

Engagement with Eskom as a stakeholder: During the stakeholder identification process, Eskom had been identified as a key stakeholder, and representatives of Eskom had been included on the stakeholder register and contacted via email. They were provided with stakeholder updates and feedback was requested. While it is acknowledged that Eskom is a large organization, the project proponent is open to engage with more than one Eskom representative or department should they be added to the stakeholder register.

The stakeholder engagement process was validated, and evidence and source documentation were verified by the independent VVB

	during the validation process. Potential for (non-public) legal disputes: It is acknowledged by the project proponents that legal disputes may arise with the project in the future for a number of reasons. While this comment is rather widely framed, it is acknowledged that a number of risks existing in these (and most other projects) such as Force Majeure, Liability and Indemnity clauses, penalty clauses, third party obligations and changes and change to governing frameworks (including legislation, regulations, policy or the international voluntary carbon market requirements) or the amendment of contracts. Note the following acronyms are used: • REIPPPP: Renewable Energy Independent Power Producer Procurement Programme • RMI: Risk Mitigation Independent Power Producer Procurement Programme • PPA: Power Purchase Agreement (concluded between Eskom and an IPP)	
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	• IA: Implementation Agreement (concluded between the DMRE and/or its predecessor or successor government department and the IPP) • IPPO: Independent Power Producer Office (an office within the Department of Mineral Resources and Energy) • DMRE: Department of Mineral Resources and Energy • IPP: Independent Power Producer (a project proponent)	
Comment 3 – Anonymous – submitted 20 May 2025 PUBLIC COMMENTARY PERIOD: PROJECT VCS 5488 Clarity is sought regarding the potential to generate carbon offsets from projects registered under the South African Renewable Energy Independent Power Producer Procurement Programme (REIPPPP). It is noted project Scatec RMI Hybrid Cluster (5488), as well as projects De Aar Hydra Storage (5337) and Redstone CSP Project (5146) have been awarded contracts under this national renewable energy procurement programme.	The response to the comment has been split into the primary issues raised as follows: • Clarity regarding potential to generate carbon credits • Management of carbon-related environmental attributes to avoid double counting • Environmental attributes already embedded in the GEF • If national utility (Eskom) acknowledges the	VVB has reviewed the public comment and assessed the following aspects of project concerning the comment: • The comment raises a concern that additionality of the project activity may be impacted due to its registration under the South African Renewable Energy Independent Power Producer Procurement Programme (REIPPPP). VVB has assessed the additionality of this project activity (5448) and confirms that the project activity is a first-of-it-

1. CONTEXT The REIPPPP is a competitive tender programme established to attract private sector investment into grid-connected renewable energy generation in South Africa. The programme is playing a critical role in driving the country's transition to cleaner energy. Additional context on the REIPPPP is provided in Box 1. Box 1: Overview of the REIPPPP and key stakeholders The request aims to gain a deeper understanding of the eligibility of projects under the REIPPPP for the generation of carbon credits. Specifically, how environmental integrity is upheld and whether financial structures comply with international carbon market principles. Clarity is being sought on two principal aspects: • The management of carbon-related environmental attributes to avoid double counting, and • The financial structuring of REIPPPP tariffs in relation to the principle of additionality.	right to monetize carbon credits • Alignment with carbon accounting principles (related to GEF) • Financial structuring of REIPPPP tariffs within additionality • If PPA explicitly defines ownership and transferability of the associated environmental rights • Alignment with carbon accounting principles (related to REIPP projects already included in GEF) Clarity regarding potential to generate carbon credits: REIPPPP tariffs are structured for cost recovery and to ensure a reasonable return to investors. However, that does not preclude additionality in carbon market terms. Financial viability and additionality are not binary concepts – additionality is assessed in relation to whether the carbon revenue played a role in project decision-making or was necessary to overcome barriers (financial, technological, regulatory,	kind activity and as per §13 of TOOL 23/B02/ and §4.1.18 of TOOL 01/B02/ the project is considered additional. • The VVB has checked for double counting at the validation stage by reviewing all the relevant registries that could hold RECs from the project. The project activity is not registered under any other emissions trading program or any other mechanism that includes GHG allowance trading. Following registries have been assessed: ➤ https://www.climateactionreserve.org/ ➤ https://registry.goldsstandard.org/projects?q=&page=1 ➤ https://iceland.itmoregistry.net/Public/Project ➤ https://biocarbonregistry.com/en/projects/ ➤ https://projects.globalcarboncouncil.com/pages/submitted_projects ➤ https://registry.verra.org/app/search/VCS/All%20Projects
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2.1. Management of Environmental Attributes and Avoidance of Double Counting It is understood that renewable energy generated through REIPPPP is included in the calculation of South Africa's national grid emission factor (GEF), which in turn is used to estimate the emissions attributable to grid-supplied electricity. The implication is that renewable electricity supplied to the grid contributes to a lower overall GHG intensity, thereby benefiting all grid users. There is therefore a concern that issuing carbon credits for the same environmental benefit, already embedded in a reduced GEF, could constitute a form of double counting. To support a credible carbon market approach, clarity is needed on how the environmental attributes are treated contractually and institutionally. Specifically, the following aspects require investigation: • Whether the Power Purchase Agreement (PPA) explicitly defines the ownership and transferability of the associated environmental rights.	etc.) at the time of investment. Hence, not all REIPPPP projects are equally profitable or de-risked. Many faces unexpected delays (e.g. grid constraints, currency issues, escalating capex, lead times in remote areas) or thin margins. These issues are material to an assessment of additionality. So, in principle these projects can qualify as carbon projects under the voluntary carbon market (as has already been demonstrated with a number of other REIPPPP projects in South Africa already registered under recognized carbon schemes such as Verra VCS or the CDM. The generation and use of carbon offsets for South African domestic purposes – including under the Carbon Tax Act (15 of 2019) and its associated offset regulations – have been explicitly recognized and encouraged by the National Treasury and South African Revenue Services. This project is aligned with this objective and the resultant VCU's (carbon credits) from these projects qualify under the domestic offset scheme, and it is expected that they will	➤ https://cdm.unfccc.int/Projects/projsearch.html ➤ The project is not registered under the international REC Mechanism e.g. I-REC Device Registry and the same is confirmed through the I-REC web site (https://v-1.evident.app/Public/ReportDevices/). The project has provided all information required on double counting and double claiming in section 1.16 and 1.17 of the VCS PD. VVB has confirmed through interviews with representatives of PP that the project is not claiming and does not plan to claim GHG credits under any other GHG program. Further, PP has confirmed that the project activity has not been rejected under any other GHG program. A signed declaration stating the same is provided by PP to the VVB/06/. • VVB has reviewed the grid emission factor calculation demonstrated in Grid Emission factor calculation
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- Whether Eskom, as the purchaser of electricity, acknowledges that the IPP retains the rights to monetise environmental attributes such as carbon credits. - How the programme ensures alignment with carbon accounting principles, given that GHG reductions from REIPPPP projects are already reflected in the national GEF used for greenhouse gas accounting by electricity consumers. 2.2. Alignment of Tariff Structures with the Principle of Additionality The principle of additionality is foundational to the issuance of carbon credits. In the case of REIPPPP, awarded tariffs are designed to ensure financial viability and bankability. The Power Purchase Agreement allows for cost recovery, typically based on the plant's Levelized Cost of Electricity, which includes capital investment, the weighted average cost of capital, capacity factor, and both fixed and variable operating and maintenance costs. Given this, there is a concern that the inclusion of carbon credit revenue could be considered surplus to financial	be used within this framework. They are intended to support domestic decarbonization and net zero targets, and as such directly support South Africa's NDC and industrial transition. Management of carbon related environmental attributes to avoid double counting: In accordance with the VCS Standard (§3.23), project proponents need to demonstrate that there is no double counting, or double selling of any GHG emission reductions. This was confirmed by cross referencing a number of local and international registries, including Renewable Energy Certificates (RECs). Further to this, during the project development process, each project owned provided a signed declaration that no other environmental benefits are sought, and no offtake agreements or GHG benefits have been allocated outside of the listed Verra project. These documents formed part of the independent validation by the VVB during the audit process. No additional contractual obligations or evidence of	sheet/03/. Based on the review, VVB confirms that the EF is calculated as per CDM TOOL 07. All the data sources referenced to determine the EF are found to be relevant, credible and latest. Therefore, VVB confirms that PP has determined the grid emission factor appropriately and sufficiently justified the sources. Based on the review of the PPA between the PP and ESKOM/19/, VVB confirms that PP will sell the renewable energy generated through Scatec project activity only to ESKOM as per terms of agreement outlined in the PPA. Further, VVB based on on-site inspection confirms that there is no other grid present in proximity of project area at the time of validation site visit.
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requirements, thereby potentially undermining additionality. If projects are already financially viable based on tariff revenues structured to cover all costs and provide a reasonable return on investment, the addition of carbon credit income might be perceived as a windfall, rather than a necessity for project feasibility. It would be useful to understand if the programme has conducted any assessments or established guidelines to determine if carbon revenues are essential to the financial case for the project, or whether these are supplementary. 3. CONCLUSION In closing, further insight into how the REIPPPP framework aligns with the requirements for carbon credit generation under international market standards would be appreciated. Specifically, if there are any applicable policy or regulatory provisions that may affect project eligibility, and whether certain bidding windows or project categories are treated differently. Clear guidance on these points will assist in evaluating the role of REIPPPP projects within	any carbon credit being claimed or accounted for by any other third party was found during this review. In addition, during the project development process, each project owned provided a signed declaration that no other offtake agreements or GHG benefits have been allocated outside of the listed Verra project. Environmental attributes already embedded in GEF: Under the VCM, South Africa does not have a published and/or approved national grid emission factor or standardized baseline for the use by project proponents, and each project has to determine the Grid Emission Factor in accordance with the VCS Standard (§3.13) and the applied methodology. In the case of this project, CDM methodology ACM 0002 (v 22.0) was applied, and as per §5.2. The associated tool, CDM TOOL07 (in conjunction with the new Verra tool, VT011) were applied in order to determine the grid emission factor at the time of validation. This process is approved by Verra and takes cognizance of all	
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credible carbon market mechanisms and support efforts to ensure environmental integrity and financial rigour in project development,	components of the national grid, including renewable energy projects. As per the prescribed tools, all non-operational projects, e.g. those seeking registration with Verra, as well as other REIPPP projects not yet commissioned at the time of publishing the PDD are not included in the baseline scenario and hence are excluded from the grid emission factor calculation. However, the effect of all other large scale renewable energy projects already feeding into South Africa's grid at the time of publishing the PDD were taken into account through the Build Margin (BM) calculation. The build margin refers to the group of prospective power plants whose construction and future operation would be affected by the proposed project activity. This was demonstrated to the VVB during the validation and met the requirements. If national utility (Eskom) acknowledges the rights to monetize carbon credits: The specific rights to monetize carbon credits do not directly form part of the VERRA registration process, however project proponents do need	
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to demonstrate ownership of any VCUs. This was responded to in the comment above and were demonstrated to the VVB during the validation through legally binding agreements that the various project proponents had signed. These agreements covered commercial aspects of the project, including responsibilities for various project activities (such as operations, offtake, carbon development etc.).

While the comment suggests a contractual obligation limiting the monetization of the carbon credits to the project proponent, independent legal opinion and review obtained by both project proponents has a differing opinion in this, as the relevant clauses of both the PPA and the Implementation Agreements (IA) are ambiguous regarding the rights to monetize any environmental attributes. The environmental attributes are not clearly defined either in the PPA or IA. Specifically for the Scatec RMI project, the PPA implicitly acknowledges the PP's right to utilize carbon credits under the RMI. Where a contract is ambiguous then one can rely on general

principles of law to interpret the contract, and in this instance reliance can be placed on the general principle of property law that the (carbon) project owner (the IPP) is also owner of the environmental attributes with the right to monetize such environmental attributes. Legal review was conducted in the light of these comments and a letter to the IPP from the IPPO dated 1 July 2025. The review was unable to identify any substantive contractual foundation that differs from the PP's current understanding and interpretation of the contracts and the eligibility to register a project and gain VCUs from the project.

Furthermore, these contractual obligations also made provisions for changes to the operating environment in the future that may arise from changes in ownership, legal disputes, legislation, and contractual amendments. policy changes or changes to the international voluntary carbon market, which the PP acknowledges may change any future claim or eligibility. These documents formed part of the independent

	validation by the VVB during the audit process. In addition to the above, the monetization of carbon credits resultant from a VCS project would fall outside of the registration and issuance process, as this would be a commercial agreement between project proponents and shareholders regarding any revenue sharing. Alignment with carbon accounting principles (related to GEF): Under the VCM, South Africa does not have a published and approved national grid emission factor or standardized baseline, and each project has to determine the Grid Emission Factor in accordance with the VCS Standard (§3.13) and the applied methodology. In the case of this project, CDM methodology ACM 0002 (v 22.0) was applied, and as per §5.2. CDM TOOL07 (in conjunction with the new Verra tool, VT0011) were applied in order to determine the grid emission factor. This process is approved by Verra and takes cognizance of all components of the national grid, including renewable energy projects.	
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As per the prescribed tools, the projects seeking registration with Verra, as well as other REIPPP projects not yet commissioned at the time of publishing the PDD are not included in the baseline scenario and hence are excluded from the grid emission factor calculation. However, the effect of other large scale renewable energy projects already feeding into South Africa's grid at the time of publishing the PDD was taken into account through the Build Margin (BM) calculation. The build margin refers to the group of prospective power plants whose construction and future operation would be affected by the proposed project activity. This was demonstrated to the VVB during the validation and met the requirements.

Financial structuring of REIPPP tariffs within additionality: In accordance with the VCS Standard (§3.14) and the applied methodology (§5.2.3 and the associated Tools that were applied), additionality was evaluated within the framework applicable to the Verra VCS requirements, including CDM TOOL1 v7,

CDM TOOL 24 v3.1 and CDM TOOL 27 v14. All parameters used in the assessment of additionality were valid at the time of investment decision and were verified by the carbon project developer as well as the independent VVB before being submitted to Verra as part of the Registration process.

Even though the REIPPPP is a program implemented by the South African government, it is not a government subsidized program, but rather a price-competitive procurement programme. We acknowledge that REIPPPP tariffs are structured to provide cost recovery. However, the assumption that all awarded projects are fully bankable without carbon revenue is not borne out in practice. Of the projects commented on, only the Redstone CSP project is a REIPPPP project. The other projects were all granted licenses under the Risk Mitigation IPP Programme. Despite this subtle difference, the projects still had to demonstrate additionality in compliance with the Verra rules, irrespective if they were part of the REIPPPP programme or not.

	Additionally, risks such as capex overruns, long development lead times, logistics issues at remote greenfield sites and currency (ZAR) devaluation and volatility impacted financial viability, reinforcing the importance of a carbon revenue stream. As such, the projects meet the criteria for additionality as per VCS rules. If PPA explicitly defines ownership and transferability of the associated environmental rights: In accordance with the VCS Standard (§3.7), project proponents need to demonstrate the legal right to own, control and operate the project activities. This and the proof of right were demonstrated to the VVB during the validation through legally binding agreements between those the various project proponents had signed. These agreements covered commercial aspects of the project, including responsibilities for various project activities (such as operations, offtake, carbon development etc.). While the comment suggests a contractual obligation	
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limiting the ownership and transferability of the carbon credits to the project proponent, independent legal opinion and review obtained by both project proponents has a differing opinion in this, as the relevant clauses of both the PPA and the Implementation Agreements (IA) are ambiguous regarding the ownership. Where a contract is ambiguous then one can rely on general principles of law to interpret the contract, and in this instance reliance can be placed on the general principle of property law that the (carbon) project owner (the IPP) is also owner of the environmental attributes with the right to monetize such environmental attributes. Legal review was conducted in the light of these comments and a letter to the IPP from the IPPO dated 1 July 2025. The review was unable to identify any substantive contractual foundation that differs from the PP current understanding and interpretation of the contracts and the eligibility to register a project and gain VCU's from the project.

Furthermore, these contractual obligations also made provision for changes

to the operating environment in the future that may arise from changes in ownership, legal disputes, legislation, contractual amendments,. policy changes or changes to the international voluntary carbon market, which the PP acknowledges may change any future claim or eligibility. These documents formed part of the independent validation by the VVB during the audit process .

Alignment with carbon accounting principles (related to REIPP projects already included in GEF):

Under the VCM, South Africa does not have a published and approved national grid emission factor or standardized baseline, and each project has to determine the Grid Emission Factor in accordance with the VCS Standard (§3.13) and the applied methodology. In the case of this project, CDM methodology ACM 0002 (v 22.0) was applied, and as per §5.2. CDM TOOL07 (in conjunction with the new Verra tool, VT011) were applied in order to determine the grid emission factor. This process is approved by Verra and takes cognizance of all

	components of the national grid, including renewable energy projects. As per the prescribed tools, the projects seeking registration with Verra, as well as other REIPPP projects not yet commissioned at the time of publishing the PDD are not included in the baseline scenario and hence are excluded from the grid emission factor calculation. However, the effect of other large scale renewable energy projects already feeding into South Africa's grid at the time of publishing the PDD was taken into account through the Build Margin (BM) calculation. The build margin refers to the group of prospective power plants whose construction and future operation would be affected by the proposed project activity. This was demonstrated to the VVB during the validation and met the requirements.	
Comment 4 – Anonymous – submitted 10 June 2025 FORMAL CONCERN REGARDING REGISTRATION OF IPP PROJECTS UNDER THE VERRA VCS PROGRAMME	The response to the comment has been split into the primary issues raised as follows: Carbon credits are subject to contractual provisions (§4)	VVB has reviewed the public comment and assessed the following aspects of project concerning the comment: VVB has reviewed the license issued by IPP/19/to the project

1. We refer to the above-subject matter. 2. It has come to our attention that the following Independent Power Producer (IPPs) Projects have been registered or started the process of registering under the Verra Verified Carbon Standard (VCS) programme: 2.1 Scatec RMI Hybrid Cluster (VCS 5488) 2.2 De Aar Hydra Storage (VCS 5337) 2.3 Oya Hybrid Project (VCS 5312) 2.4 Umoyilanga Hybrid Project (VCS 5272) 2.5 Redstone CSP Project (VCS 5146) 3. These projects are being implemented under the Risk Mitigation Independent Power Producer Procurement Programme (RMIPPPP) and Renewable Energy Independent Power Producer Procurement Programme (REIPPPP), managed by the Department of Electricity and Energy through the IPP Office. 4. We wish to formally inform Verra that, in accordance with the Power Purchase Agreements (PPAs),	• IPP prohibited from registering Environmental Attributes unless prior consent obtained (§5) • Prior authorization required otherwise may be inconsistent with contracts (§6) • Verra to review double counting (including contractual obligations) (§7) • Department request to meet with Verra (§8) Carbon credits are subject to contractual provisions (§4): Independent legal review by the project proponents came to the conclusion that this is a factually incorrect statement because there are no specific contractual provisions relating to carbon credits and/or other claims to environmental attributes under any of the REIPPPP and/or RMI contractual and other documentation to which this comment refers. In addition to the above, the monetization of carbon credits resultant from any	proponent SCATEC KENHARDT 1 (PTY) LTD, SCATEC KENHARDT 2 (PTY) LTD and SCATEC KENHARDT 3 (PTY) LTD. Therefore, the legal ownership of the project activity is confirmed through review of the same. Additionally, VVB has reviewed an agreement/19/ between the SCATEC KENHARDT 1 (PTY) LTD, SCATEC KENHARDT 2 (PTY) LTD and SCATEC KENHARDT 3 (PTY) LTD. in whose name the IPP is issued and Anthesis B.V. ('Anthesis') who are involved in developing the project under VERRA. Based on this agreement, VVB confirms that both parties will have joint ownership of the carbon project when registered. Further, VVB has reviewed the legal opinion obtained by PP/51/and confirms that there is no indication about either exclusive ownership of carbon credits or a requirement to obtain prior consent
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Implementation Agreements (IAs), and associated procurement documents governing these programmes, the ownership and treatment of environmental attributes, including carbon credits and associated claims, are subject to specific contractual provisions. 5. Under these provisions, IPPs are prohibited from registering, monetizing, or otherwise utilizing Environmental Attributes outside of the approved frameworks, unless prior consent has been obtained from the Department. The Department retains the sole discretion to determine the use, or monetization of Environmental Attributes in terms of the relevant environmental policies. 6. Based on our current understanding, unless prior written authorisation has been obtained from the Department, the IPPs do not hold the exclusive rights to register such environmental attributes under voluntary carbon markets, including the VCS. Accordingly, such registrations, if made without the necessary approval, may be inconsistent with the contractual obligations under	VCS project, would fall outside of the registration and issuance process, as this would be a commercial agreement between project proponents and shareholders regarding any revenue sharing. The VVB reviewed current contracts between the PPs regarding carbon credits as part of the validation process. IPP prohibited from registering Environmental Attributes unless prior consent obtained (§5): Independent legal review by the project proponents came to the conclusion that this is a factually incorrect statement because there are no specific contractual provisions relating to carbon credits and/or other claims to environmental attributes under any of the REIPPPP and/or RMI contractual and other documentation to which this comment refers. Given this lack of contractual specificity, it was deemed that: • IPPs are not prohibited from registering, monetizing, or otherwise utilizing Environmental Attributes outside of the approved frameworks,	from REIPPPP or RMI or ESKOM. Therefore, VVB confirms that PP has demonstrated ownership of the project activity and therefore. carbon credits generated through the project activity in line with VCS standard. • The VVB has checked for double counting at the validation stage by reviewing all the relevant registries that could hold RECS from the project. The project activity is not registered under any other emissions trading program or any other mechanism that includes GHG allowance trading. Following registries have been assessed: ➤ https://www.climateactionreserve.org/ ➤ https://registry.goldsstandard.org/projects?q=2page=1 ➤ https://iceland.itmoregistry.net/Public/Project ➤ https://biocarbonregistry.com/en/projects/
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which these projects were awarded and developed. 7. Given the potential implications of double-counting, the Department requests that Verra reviews the registration and claims associated with the listed projects, considering the contractual limitations and rights under the REIPPPP and RMIPPPP.	- the Department does not retain any discretion to determine the use, or monetization of environmental attributes, and - there are no environmental policies that specifically address these issues except for regulations under the Carbon Tax Act which provide for a process in terms of which project proponents (including project proponents of REIPPPP projects) can seek authorization to list carbon credits as carbon offsets on the Carbon Offset Administration System. proponent. Prior authorization required otherwise may be inconsistent with contracts (§6): Independent legal review by the project proponents came to the conclusion that this is a factually incorrect statement because there are no specific contractual provisions relating to carbon credits and/or other claims to environmental attributes under any of the REIPPPP and/or RMI contractual and other documentation to which this comment refers.	➤ https://projects.globalcarboncouncil.com/pages/submitted-projects ➤ https://registry.verra.org/app/search/VCS/All%20Projects ➤ https://cdm.unfccc.int/Projects/projsearch.html • The project is not registered under the international REC Mechanism e.g. I-REC Device Registry and the same is confirmed through the I-REC web site (https://v-1.evident.app/Public/ReportDevices/). • The project has provided all information required on double counting and double claiming in section 1.16 and 1.17 of the VCS PD. VVB has confirmed through interviews with representatives of PP that the project is not claiming and does not plan to claim GHG credits under any other GHG program. Further, PP has confirmed that the project activity
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	Given this lack of contractual specificity: • IPPs do not need prior authorization from the Department to register projects under the VCS, indeed a number of REIPPP projects have been registered and operational for some years, including having transacted VCU into the carbon. Clearly, therefore no prior authorization is required. Verra to review double counting (including contractual obligations) (§7): In accordance with the VCS Standard (§3.23), project proponents need to demonstrate that there is no double counting, or double selling of any GHG emission reductions. This was confirmed by cross referencing a number of local and international registries, including Renewable Energy Certificates (RECs). Further to this, during the project development process, each project owned provided a signed declaration that no other environmental benefits are sought offtake agreements or GHG benefits have been allocated outside of the listed Verra project.	has not been rejected under any other GHG program. A signed declaration stating the same is provided by PP to the VVB
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	These documents formed part of the independent validation by the VVB during the audit process. In addition, during the project development process, each project owned provided a signed declaration that no other offtake agreements or GHG benefits have been allocated outside of the listed Verra project. Department request to meet with Verra (§8): The Project proponent acknowledges that a meeting is requested and no further action is required currently.	
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3.3.2 Risks to Local Stakeholders and the Environment

3.3.2.1 Management Experience

VVB has interviewed representatives of Anthesis and confirms that the management has extensive experience in voluntary carbon market.

VVB has interviewed representatives of PP to confirm that the global power company is experienced in implementing similar project activities, engaging with communities, project management and environmental and social safeguards aligned with the VCS requirements. Members of the project development team have as a collective, in excess of 50 years' experience in the voluntary carbon market. They have been originating, developing and monetizing carbon credits a company for over 2 decades. The Scatec RMI operational project proponent has extensive renewable energy project experience in the South African region and globally, including similar Renewable Power facilities in Brazil, Tunisia, Philippines, Honduras, Malaysia, Romania and Egypt among others. The integrated teams are well-positioned to implement and operate the facility and deliver the associated GHG emission reductions into the local market.

3.3.2.2 Risk Assessment

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Natural and human-induced risks to stakeholders' wellbeing	PP has identified potential risks and described the same in section 2.2.2 of the JPD-MR/01/ along with their mitigation measures documented in the EIA report/13/.
Risks to stakeholder participation	Based on review of the JPD-MR/01/, interviews with representatives of PP and the end users, the validation team confirms that no risks were identified related to stakeholders' participation.
Working conditions	Based on review of the JPD-MR/01/, interviews with representatives of PP and employees of the PP, the validation team confirms that no risks were identified related to working conditions. PP has specified that the project activity will comply with Basic Conditions of Employment Act of South Africa and labour conditions are covered by periodic inspections and compliance to the South African Department of Labour.
Safety of women and girls	Based on onsite interviews with representatives of PP, VVB confirms that no risks were identified related to safety of women and girls. The project proponent has taken all measures to ensure the safety of women and girls by implementing various policies as per South African labour and anti-discrimination laws.
Safety of minority and marginalized groups, including children	Based on review onsite interviews with representatives of PP, VVB confirms that there is safety of minority and marginalized groups, including children in the project as per the South African labour and anti-discrimination laws.
Pollutants (air, noise, discharges to water, generation of waste, release of hazardous materials, and chemical pesticides and fertilizers)	PP has specified that vehicles on the road and continuous maintenance of gravel roads to be generated by the project are classified as a moderate hazard, with a Hazard rating of 3. VVB has reviewed the test report to confirm the same/48/.

3.3.3 Respect for Human Rights and Equity

3.3.3.1 Labor and Work

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Discrimination	Based on review of human resource and labour policies as per Basic Conditions of Employment Act of South Africa /53/, interviews with representatives of PP, VVB confirms that no risks were identified related to discrimination at workplace.
Sexual harassment	Based on review of human resource and labour policies as per Basic Conditions of Employment Act of South Africa /53/, interviews with representatives of PP, VVB confirms that no risks were identified related to discrimination at workplace.
Equal pay for equal work	Based on review of human resource and labour policies as per Basic Conditions of Employment Act of South Africa /53/, interviews with representatives of PP, VVB confirms that no risks were identified related to discrimination at workplace.
Gender equity in labor and work	Based on review of human resource and labour policies as per Basic Conditions of Employment Act of South Africa /53/, interviews with representatives of PP, VVB confirms that no risks were identified related to discrimination at workplace.
Forced labor	Based on review of human resource and labour policies as per Basic Conditions of Employment Act of South Africa /53/, interviews with representatives of PP, VVB confirms that no risks were identified related to discrimination at workplace.
Child labor	Based on review of human resource and labour policies as per Basic Conditions of Employment Act of South Africa /53/, interviews with representatives of PP, VVB confirms that no risks were identified related to discrimination at workplace.
Human trafficking,	Based on review of human resource and labour policies as per Basic Conditions of Employment Act of South Africa /53/, interviews with representatives of PP, VVB confirms that no risks were identified related to discrimination at workplace.

3.3.3.2 Human Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
No risks identified	Based on review of the EIA report/13/ of the project activity, VVB confirms that Negative impacts were considered negligible and mitigated as far as possible.

3.3.3.3 Indigenous Peoples and Cultural Heritage

Risk identified	Evidence gathering activities, evidence checked, and assessment conclusion
Rock slab identified within the project site which is likely to be a grave since no other rocks are present in that vicinity.	The EMPr /23/incorporated mitigation measures that must be put in place prior to construction to exclude sites of significant cultural or historical (heritage) importance with a 5m buffer from the project boundary.

3.3.3.4 Property Rights

Risks identified	Evidence gathering activities, evidence checked, and assessment conclusion
No risks identified	VVB has confirmed through review of the land lease agreement/17/ that the owner has consented to the project activity being constructed and operational on the property. Additionally, VVB has interviewed the local stakeholders to confirm that the project activity does not impact customary rights of Indigenous people and local communities.

3.3.3.5 Benefit Sharing

As stated in Section 2.3.4, the project does not impact on property rights as the land is privately owned and has been secured via a lease agreement; therefore, there is no Benefit Sharing Agreement.

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Process used to design the benefit sharing plan	The project does not impact on property rights and therefore no benefit sharing agreement is required
Summary of the benefit sharing plan	The project does not impact on property rights and therefore no benefit sharing agreement is required
Approval and dissemination of benefit sharing plan	The project does not impact on property rights and therefore no benefit sharing agreement is required
Benefit sharing during the monitoring period	The project does not impact on property rights and therefore no benefit sharing agreement is required

3.3.4 Ecosystem Health

Item	Evidence gathering activities, evidence checked, and assessment conclusion
Impacts on biodiversity and ecosystems	PP has specified that, as per approved EMPr/23/ the risk to indigenous natural vegetation will be mitigated by rehabilitation as soon as construction is complete. A faunal register must be maintained to record avifaunal injuries and fatalities. VVB has reviewed EMPr/23/ and confirms that sufficient mechanism is in place to mitigate the risk.
Soil degradation and soil erosion	PP has specified that, as per the approved EMPr /23/ the risk to soil degradation and soil erosion will be mitigated by stormwater management and erosion control measures are in place, including ongoing monitoring and maintenance. Vehicle movement is restricted to designated routes during construction to minimize soil disturbance. Post-construction rehabilitation includes re-vegetation and the use of erosion control measures such as mats and silt traps.
Water consumption and stress	PP has indicated that, in line with the approved EMPr/23/, the risk of water consumption and stress will be addressed through compliance with the General Authorization for Water Use granted by the Department of Water Affairs, which requires continuous monitoring, reporting, and

management during operational phases. Potential impact on groundwater availability due to use for cleaning solar panels, and groundwater availability as a result of accidental oil spillages and fuel leakages.

3.3.4.1 Rare, Threatened, and Endangered species

Risk identified	Evidence gathering activities, evidence checked, and assessment conclusion
Species and habitat	The project has identified Aloe dichotoma and Aloe claviflora species at the site, which are protected under the Northern Cape Nature Conservation Act. In line with the Environmental Authorization requirements/48/, the developer has obtained the necessary permit and implemented mitigation measures by mapping these species and excluding them from the project boundary.
Areas needed for habitat connectivity	The site falls within the Bushmanland Arid Grassland, a poorly conserved area with sensitive habitats. The EMPr /23/ includes a sensitivity map to ensure habitat connectivity, and these areas have been excluded from project development

3.3.4.2 Introduction of Species

Existing invasive species	Evidence gathering activities, evidence checked, and assessment conclusion
Atriplex lindleyi	- Pre-construction clearance of all exotic vegetation on site should be undertaken to reduce the possibility of further exotic weed invasion. - Design and implement an exotic weed control plan for the site for the duration of the operational phase.
Datura ferox	- Pre-construction clearance of all exotic vegetation on site should be undertaken to reduce the possibility of further exotic weed invasion.

	- Design and implement an exotic weed control plan for the site for the duration of the operational phase.
Prosopis glandulosa	- Pre-construction clearance of all exotic vegetation on site should be undertaken to reduce the possibility of further exotic weed invasion. - Design and implement an exotic weed control plan for the site for the duration of the operational phase.

Evidence gathering activities, evidence checked, and assessment conclusion	
Invasive species	PP has specified that, as per approved EMPr/23/ the risk to indigenous natural vegetation will be mitigated by rehabilitation as soon as construction is complete. Additionally, vehicles used in the development site should be regularly washed to avoid the dispersal of seeds of any exotic or invasive species into the project site.

3.3.4.3 Ecosystem conversion

Risks Identified	Evidence gathering activities and evidence checked
Ecosystem conversion	Since the project activity is a BESS integrated renewable energy controlled by hybrid controller project, this section is not applicable

3.4 Application of Methodology

3.4.1 Title and Reference

Type (methodology, tool or module).	Reference ID, if applicable	Title	Version
Methodology	ACM0002	Grid-connected electricity generation from renewable sources	22.0

Tool	TOOL 01	Tool for the demonstration and assessment of additionality	7.0
Tool	TOOL 07	Tool to calculate the emission factor for an electricity system	7.0
Tool	VT0011	Electricity System Emission Factors	1.0
Tool	TOOL 23	Methodological tool: Additionality of first-of-its-kind project activities	3.0

3.4.2 Applicability

The project activity(s) meets each of the applicability conditions of the methodology(s), tools, and modules applied by the project (where applicable), as described below:

Methodology ID	Applicability condition	Justification of compliance	VVB Assessment
ACM0002	This methodology is applicable to grid-connected renewable energy power generation project activities that: (a) Install a Greenfield power plant; (b) Involve a capacity addition to (an) existing plant(s); (c) Involve a retrofit of (an) existing operating plant(s)/unit(s); (d) Involve a rehabilitation of (an) existing plant(s)/unit(s); or (e) Involve a replacement of (an) existing plant(s)/unit(s); or	a) The project activity involves construction and operation of grid-connected solar power plant integrated with BESS, at a site where no renewable energy power plant was operated prior to the implementation of the project activity and therefore a “green field power project” as per the definition of the methodology and hence complies to the applicability condition (a). Hence the project activity meets the applicability	The project activity involves installation of a greenfield power plant (a) that is connected to the national grid of South Africa. This is confirmed through power purchase agreement signed between PP and ESKOM/B01/. Thus, the applicability criteria is met by the project activity.

Methodology ID	Applicability condition	Justification of compliance	VVB Assessment
	(f) Install a Greenfield power plant together with a grid-connected Greenfield pumped storage power plant. The greenfield power plant may be directly connected to the PSP or connected to the PSP through the grid.	condition of the methodology.	
	In case the project activity involves the integration of a BESS, the methodology is applicable to grid-connected renewable energy power generation project activities that: (a) Integrate BESS with a Greenfield power plant; (b) Integrate a BESS together with implementing a capacity addition to (an) existing solar photovoltaic¹ or wind power plant(s)/unit(s); (c) Integrate a BESS to (an) existing solar photovoltaic or wind power plant(s)/unit(s) without implementing any other changes to the existing plant(s); (d) Integrate a BESS together with implementing a retrofit of (an) existing solar photovoltaic or wind power plant(s)/unit(s); (e) Integrate a BESS together with a Greenfield power plant	This project activity is a grid-connected renewable energy power generation project which includes the integration of a BESS into the greenfield solar power plant. So, the project meets applicability condition (a)	This project activity is a solar PV integrated with the battery energy storage system (BESS) managed by a hybrid power plant controller. This was confirmed through review of the project technology described in JPD-MR/01/, interviews with representatives of PP and on-site inspection.

Methodology ID	Applicability condition	Justification of compliance	VVB Assessment
	that is operating in coordination with a PSP. The BESS is located at site of the greenfield renewable power plant.		
	The methodology is applicable under the following conditions: (a) Hydro power plant/unit with or without reservoir, wind power plant/unit, geothermal power plant/unit, solar power plant/unit, wave power plant/unit or tidal power plant/unit; (b) In the case of capacity additions, retrofits, rehabilitations or replacements (except for wind, solar, wave or tidal power capacity addition projects) the existing plant/unit must have started commercial operation prior to the start of a minimum historical reference period of five years. The reference period is used for the calculation of baseline emissions and defined in the baseline emission section. Furthermore, no capacity expansion, retrofit, or rehabilitation of the plant/unit has been undertaken between the start of this minimum	(a) This project is a hybrid renewable energy plant utilising solar power With BESS (b) This project is not a capacity addition, retrofit, rehabilitation or replacement, but a greenfield plant. (c) BESS is an integral part of the project design and is a requirement of the project approvals and	This project activity is a solar PV integrated with the battery energy storage system (BESS) managed by a hybrid power plant controller. The conditions are not applicable.

Methodology ID	Applicability condition	Justification of compliance	VVB Assessment
	historical reference period and the implementation of the project activity; (c) In case of Greenfield project activities applicable under paragraph 7(a) above, the project participants shall demonstrate that the BESS was an integral part of the design of the renewable energy project activity (e.g., by referring to feasibility studies or investment decision documents); (d) The BESS should be charged with electricity generated from the associated renewable energy power plant(s). Only during exigencies² may the BESS be charged with electricity from the grid or a fossil fuel electricity generator. In such cases, the corresponding GHG emissions shall be accounted for as project emissions following the requirements under section 5.4.4 below. The charging using the grid or using fossil fuel electricity generator should not amount to more than 2 per cent of the electricity generated by the project renewable energy plant during a monitoring period. During the time periods (e.g., week(s),	power purchase agreement. (d) BESS will only be charged from the greenfield renewable energy (solar) plants at each location. No grid power will be used to charge the BESS component. (e) Not applicable to this project as the project does not employ PSP	

Methodology ID	Applicability condition	Justification of compliance	VVB Assessment
	months(s)) when the BESS consumes more than 2 per cent of the electricity for charging, the project participant shall not be entitled to issuance of the certified emission reductions for the concerned periods of the monitoring period. (e) In case the project activity involves PSP, the PSP shall utilize the electricity generated from the renewable energy power plant(s) that is operating in coordination with the PSP during pumping mode.		
	In case of hydro power plants, one of the following conditions shall apply: (a) The project activity is implemented in existing single or multiple reservoirs, with no change in the volume of any of the reservoirs; or (b) The project activity is implemented in existing single or multiple reservoirs, where the volume of the reservoir(s) is increased and the power density, calculated using equation (7), is greater than 4 W/m²; or (c) The project activity results in new single or multiple reservoirs and the power	Not applicable to this project activity as it does not employ hydro power.	This project activity is a solar PV integrated with the battery energy storage system (BESS) managed by a hybrid power plant controller. The conditions are not applicable.

Methodology ID	Applicability condition	Justification of compliance	VVB Assessment
	density, calculated using equation (7), is greater than 4 W/m²; or (d) The project activity is an integrated hydro power project involving multiple reservoirs, where the power density for any of the reservoirs, calculated using equation (7), is lower than or equal to 4 W/m², and all of the following conditions shall apply: (i) The power density calculated using the total installed capacity of the integrated project, as per equation (8), is greater than 4 W/m²; (ii) Water flow between reservoirs is not used by any other hydropower unit which is not a part of the project activity; (iii) Installed capacity of the power plant(s) with power density lower than or equal to 4 W/m² are: a. Lower than or equal to 15 MW; and b. Less than 10 per cent of the total installed capacity of integrated hydro power project.		

Methodology ID	Applicability condition	Justification of compliance	VVB Assessment
	In the case of integrated hydro power projects, project participants shall: (a) Demonstrate that water flow from upstream power plants/units spill directly to the downstream reservoir and that collectively constitute to the generation capacity of the integrated hydro power project; or (b) Provide an analysis of the water balance covering the water fed to power units, with all possible combinations of reservoirs and without the construction of reservoirs. The purpose of water balance is to demonstrate the requirement of specific combination of reservoirs constructed under CDM project activity for the optimization of power output. This demonstration has to be carried out in the specific scenario of water availability in different seasons to optimize the water flow at the inlet of power units. Therefore, this water balance will take into account seasonal flows from river, tributaries (if any), and rainfall for minimum of five years prior to the	Not applicable to this project as the project does not employ hydro power	This project activity is a solar PV integrated with the battery energy storage system (BESS) managed by a hybrid power plant controller. The conditions are not applicable.

Methodology ID	Applicability condition	Justification of compliance	VVB Assessment
	implementation of the CDM project activity.		
	In the case of PSP, the project participants shall demonstrate in the VCS Project Description that the project is not using water which would have been used to generate electricity in the baseline.	Not applicable to this project as the project does not employ PSP	This project activity is a solar PV integrated with the battery energy storage system (BESS) managed by a hybrid power plant controller. The conditions are not applicable.
	The methodology is not applicable to: (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.	(a) Not applicable to this project as the project does not employ any fuel switching. (b) Not applicable to this project as the project does not employ any biomass firing	This project activity is a solar PV integrated with the battery energy storage system (BESS) managed by a hybrid power plant controller. The conditions are not applicable.
	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	Not applicable to this project as the project does not employ any retrofits, rehabilitations,	This project activity is a solar PV integrated with the battery energy storage system (BESS) managed by a hybrid power plant

Methodology ID	Applicability condition	Justification of compliance	VVB Assessment
	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”.	replacements, or capacity additions	controller. The conditions are not applicable.

Methodology ID	Applicability condition	Justification of compliance	VVB Assessment
CDM TOOL 01	The use of the “Tool for the demonstration and assessment of additionality” is not mandatory for project participants when proposing new methodologies. Project participants may propose alternative methods to demonstrate additionality for consideration by the Executive Board. They may also submit revisions to approved methodologies using the additionality tool.	Since the applied methodology is not a new methodology, project proponent has applied this tool for the demonstration additionality in compliance with the tool. Refer to section 3.5 below for the detailed applicability of this tool and additionality assessment. Hence this tool is applicable.	The applicability criteria are met as application of tool is mandatory under the applied methodology.
CDM TOOL 01	Once the additionality tool is included in an approved methodology, its application by project participants using this methodology is mandatory.	In line with the methodology requirement PP has applied this tool for the demonstration of additionality assessment.	The applicability criteria are met as application of tool is mandatory under the applied methodology.

		Hence this tool is applicable.	
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Methodology ID	Applicability condition	Justification of compliance	VVB Assessment
CDM TOOL 07	This tool may be applied to estimate the OM, BM and/or CM when calculating baseline emissions for a project activity that substitutes grid electricity that is where a project activity supplies electricity to a grid or a project activity that results in savings of electricity that would have been provided by the grid (e.g. demand-side energy efficiency projects).	This tool is applied to estimate the OM, BM and/or CM for the project activity	The applicability criteria are met as application of tool is mandatory under the applied methodology.
CDM TOOL 07	Under this tool, the emission factor for the project electricity system can be calculated either for grid power plants only or, as an option, can include off-grid power plants. In the latter case, two sub-options under the step 2 of the tool are available to the project participants, i.e. option IIa and option IIb. If option IIa is chosen, the conditions specified in “Appendix 1: Procedures related to off-grid power generation” should be met. Namely, the total capacity of off-grid power plants (in MW)	The emission factor for the project electricity system is calculated for grid power plants only.	The applicability criteria are met as application of tool is mandatory under the applied methodology.

	should be at least 10 per cent of the total capacity of grid power plants in the electricity system; or the total electricity generation by off-grid power plants (in MWh) should be at least 10 per cent of the total electricity generation by grid power plants in the electricity system; and that factors which negatively affect the reliability and stability of the grid are primarily due to constraints in generation and not to other aspects such as transmission capacity.		
CDM TOOL 07	In case of CDM projects the tool is not applicable if the project electricity system is located partially or totally in an Annex I country.	The project activity is not a CDM project, however the project activity is located in a non-Annex I country and hence the tool is applicable.	The applicability criteria are met as application of tool is mandatory under the applied methodology.
CDM TOOL 07	Under this tool, the value applied to the CO2 emission factor of biofuels is zero.	N/A as the project activity does not involve biofuels.	The applicability criteria are met as application of tool is mandatory under the applied methodology.

Methodology ID	Applicability condition	Justification of compliance	VVB Assessment
TOOL VT 0011	This tool is applied to calculate the CO2 emission factor of an electricity system whose dispatch and generation are affected by a	The tool is applicable as the dispatch and generation is affected by a project activity.	The applicability criteria are met as application of tool is mandatory under the applied methodology.

	project activity. It is globally applicable.		
TOOL VT 0011	All applicability conditions of the most recent version of TOOL07 must be met, except for Applicability Condition 5, which is removed under this revision	As per the table above, all applicability conditions of the most recent version of TOOL07 are met.	The applicability criteria are met as application of tool is mandatory under the applied methodology.
TOOL VT 0011	This tool must be used in conjunction with the most recent version of TOOL07. All the procedures and requirements of TOOL07 must be applied unless this tool indicates otherwise.	The tool has been used in conjunction with CDM TOOL07, as per the applicability conditions above and in section 5.3 the Grid Emission Factor determination.	The applicability criteria are met as application of tool is mandatory under the applied methodology.

Methodology ID	Applicability condition	Justification of compliance	VVB Assessment
CDM TOOL 23	This methodological tool is applicable to project activities that wish to use the "first-of-its kind" approach to demonstrate additionality and that use versions of baseline and monitoring methodologies, or the "Tool for the demonstration and assessment of additionality" or the "Combined tool to identify the baseline scenario and demonstrate additionality", which allow using the "first-of-its-kind"	The project activity applied CDM methodology ACM0002 and Tool 01, which allow using the "first-of-its-kind" approach for demonstrating additionality. Hence this tool is applicable to this project activity.	VVB has assessed the first of its kind documents/41/ and confirms the applicability.

	approach for demonstrating additionality.		
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3.4.3 Project Boundary

The project boundary and identified GHG sources, sinks and reservoirs for the project and baseline scenarios (including leakage if applicable) are appropriately defined in the VCS JPD-MR/01/. The selection and justification for inclusion or exclusion is appropriate and duly supported by the observation during the on-site site visit. In addition to the table, a diagram of the project boundary, showing the physical locations of the various installations as part of the project activity are included in the PD. The choice of GHGs is also appropriate to the context of the project description. There is no GHG source that is omitted.

The relevant GHG sources included in or excluded from the project boundary are shown on the Table below

Source		Gas	Included?	Justification/Explanation
Baseline	CO2 emissions from electricity generation in fossil fuel fired power plants that are displaced due to project activity.	CO ₂	Yes	Main emission source (Grid electricity)
		CH ₄	No	Excluded for simplification. Minor source of emissions. Conservative
		N ₂ O	No	
		Other	No	No other GHG emissions relevant.
Project	Greenfield solar photovoltaic electricity generation project activity	CO ₂	No	No CO ₂ emissions from project activity. Minimal taken as negligible
		CH ₄	No	Excluded. Minimal taken as negligible
		N ₂ O	No	Excluded. Minimal taken as negligible
		Other	No	No other GHG emissions
	Charging of BESS using electricity from the renewable energy plants	CO ₂	No	Not accounted as BESS will only be charged from the renewable energy generation plants on site therefore taken as negligible.
		CH ₄	No	Not accounted as BESS will only be charged from the renewable energy generation plants on site therefore taken as negligible.
		N ₂ O	No	Not accounted as BESS will only be charged from the renewable energy

Source	Gas	Included?	Justification/Explanation
			generation plants on site therefore taken as negligible.
	Other	No	Not accounted as BESS will only be charged from the renewable energy generation plants on site therefore taken as negligible.

3.4.4 Baseline Scenario

According to the § 27 of the methodology, ACM0002 version 22.0/B02/: “If the project activity is the installation of a Greenfield power plant with or without Battery Energy Storage System (BESS), the baseline scenario is electricity delivered to the grid by the project activity that would otherwise have 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 AM TOOL07 ‘Tool to calculate the emission factor for an electricity system (Version 07.0)’.

The South African electricity grid is characterized by high carbon intensity due to its heavy reliance on coal-fired power plants, which accounts for 80% of its energy mix/11/. This high reliance on coal positions South Africa among the top greenhouse gas emitters per capita globally/11/.

According to South Africa’s Integrated Resource Plan (IRP 2019) /11/ coal remains a dominant energy source, projected to account for over 50% of the electricity generation mix through 2030. According to South Africa’s Integrated Resource Plan (IRP 2019)/11/, coal remains a dominant energy source, projected to account for over 50% of the electricity generation mix through 2030. The IRP outlines significant reliance on existing coal-fired power plants, with limited expansion of renewable energy capacity due to financial, regulatory, and infrastructural barriers. Despite government efforts to increase renewable energy through initiatives like the Renewable Energy Independent Power Producer Procurement Programme (REIPPPP)/18/, the expansion pace is slow, and integration challenges persist, resulting in continued reliance on fossil fuel generation. The South African energy sector faces numerous challenges, including delays in project approvals, difficulties in securing financing, and grid connectivity issues. These barriers significantly impact the deployment of renewable energy projects, validating the assumption that the baseline scenario will continue to be dominated by fossil fuel-based power plants, including both existing and new coal and gas-fired units.

Historical data from Eskom, the primary electricity supplier, indicates a stable grid emission factor of approximately 0.932 tCO_{2e}/MWh over the past five years, driven by a heavy reliance on coal-fired plants. This trend is expected to continue in the absence of major interventions like the SCATEC project, further supporting the selection of this baseline scenario. The grid emission factor for this baseline is calculated in accordance with the CDM TOOL07 “Tool to calculate the

emission factor for an electricity system” Version 07.0. Option A under the Simple OM approach was selected along with the default weighting for solar projects in the first crediting period. This results in a combined margin factor for the baseline grid of 0.932 tCO₂e/MWh. The steps taken to calculate the grid emission factor as per AM TOOL 07 are outlined in section 4.1 below. §28 – 34 of ACM0002 do not apply to this project.

Determination of Grid Emission Factor (EF_{grid}, CM, y):

Parameter	Value (tCO ₂ /MWh)	VVB Assessment
Combined margin CO ₂ emission factor for the project electricity system in year y: EF _{grid} , CM, y	0.932	VVB has assessed the Grid emission factor calculation/03/.

The validation team confirms that the baseline scenario opted by the project activity is in accordance with the requirements of the applied methodology/B02/ and is justified and reflect the actual on ground situation.

3.4.5 Additionality

As per the evidence /41/ and the section 3.5.2 of the JPDMR, the project has demonstrated that it is a first-of-its-kind activity and as per §13 of TOOL 23/B02/ and §4.1.18 of TOOL 01/B02/ the project is considered additional.

3.4.6 Quantification of GHG Emission Reductions and Carbon Dioxide Removals

The emission reduction (ER_y) by the project activity during the crediting period is the difference between baseline emissions (BE_y) and project emissions (PE_y). All aspects related to the direct and indirect GHG emissions as relevant to the project activity have been addressed and are presented in a transparent manner, in line with the applied methodology ACM0002, version 22.0/B02/.

The assessment team checked whether the equations and parameters used to calculate GHG emission reductions or net anthropogenic GHG removals are in accordance with applied methodology. The assessment team checked section 5 of the joint PDMR/01/ to confirm whether all formulae used to calculate baseline emissions, project emission and leakage have been applied in line with the underlying methodology.

Baseline emissions

The baseline emissions discussed in section 5.1 of the joint PDMR/01/ mentioned that the emission would have occurred in the absence of the project activity. The emission reduction calculation has been done as per the Large-scale Consolidated Methodology- ACM0002 “Grid connected electricity generation from renewable sources”, Version 22.0/B02/.

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 above baseline levels would have been generated by existing grid-connected power plants and the addition of new grid-connected power plants. The baseline emissions are to be calculated as follows:

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

Equation 1 (ACM0002 Equation 11)

Where:

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

$EG_{PJ,y}$ = Net electricity fed into the grid supplied by the project activity in year y (MWh/yr)

$EF_{grid,CM,y}$ = Combined margin CO₂ emission factor for grid connected power generation in year y calculated using TOOL07 (t CO₂/MWh)

The results obtained are: 8,108,400 t CO₂/ annum, as shown below:

Parameter name	Value	Unit
BE_y	8,108,400	t CO ₂ / yr
$EG_{PJ,y}$	8,700,000	MWh/yr
$EF_{grid,CM,y}$	0.932	t CO ₂ /MWh

The plant's auxiliary electricity consumption is supplied by its connection to South Africa's national grid (Eskom).

$EG_{PJ,y}$ represents the net electricity supplied to the grid, which is measured as the difference between electricity exported to the grid and electricity imported from the grid. The plant does not rely on the on-site diesel generators for electricity generation, it only serves as emergency backup. Since the plant does not rely on the backup diesel generators to meet its auxiliary electricity supply needs, the emissions from such generator are considered negligible as per paragraph 42 of ACM0002. Fossil fuel usage will, however, still be monitored for record-keeping purposes.

The project is a greenfield power plant and therefore $EG_{PJ,y}$ is calculated as follows:

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

Equation 2 (ACM0002 Equation 12)

Where:

$EG_{PJ,y}$ = Net electricity generation fed into the grid as a result of the implementation of . the project activity in year y (MWh/yr)

$EG_{facility,y}$ = Net electricity generation supplied by the project plant to the grid in year y (MWh/yr)

The results obtained are 870, 000 MWh / yr (from technical specifications)

Project emission

As per the approved consolidated Methodology ACM0002, “Grid-connected electricity generation from renewable sources” (Version 22.0) para 40: “For most renewable energy power generation project activities, $PE_y = 0$. However, some project activities may involve project emissions that can be significant. These emissions shall be accounted for as project emissions by using the following equation:

$$PE_y = PE_{FF,y} + PE_{GP,y} + PE_{HP,y} + PE_{BESS,y} + PE_{PSP,y}$$

Where,

PE_y = Project emissions in year y (t CO₂e/yr)

$PE_{FF,y}$ = Project emissions from fossil fuel consumption in year y (tCO₂/yr)

$PE_{GP,y}$ = Project emissions from the operation of dry, flash steam or binary geothermal power plants in year y (tCO₂e/yr)

$PE_{HP,y}$ = Project emissions from water reservoirs of hydro power plants in year y (tCO₂e/yr)

$PE_{BESS,y}$ = Project emissions from charging of a BESS using electricity from the grid or from fossil fuel electricity generators (tCO₂e/yr)

$PE_{PSP,y}$ = Project emissions from utilizing electricity from the grid for pumping operation of PSP in excess to the production of the renewable power plant operating in coordination with the PSP (t CO₂e/yr)

Leakage emissions

As per paragraph 71 of the applied methodology/B02/, there are no emissions related to leakage in this project.

Emission reductions:

As per the paragraph 72 of the methodology ACM0002 “Grid-connected electricity generation from renewable sources” Version 22.0 emission reductions are calculated as follows:

$$ER_y = BE_y - PE_y \text{ (Equation (17))}$$

Where:

ER_y = Emission reductions in year y (t CO₂e/yr)

BE_y = Baseline emissions in year y (t CO₂e/yr)

PE_y = Project emissions in year y (t CO₂e/yr)

3.4.7 Methodology Deviations

There is no methodology deviations applied in the Project.

3.4.8 Monitoring Plan

The monitoring plan of the project activity is in compliance with the monitoring methodology ACM0002: “Grid-connected electricity generation from renewable sources”, version 22.0/B02/. The assessment team, based on the onsite inspection conducted, confirms that the project proponent is monitoring the project activity as per the monitoring plan included in section 6 of the joint PDMR/01/.

Parameters Determined ex-ante

The following parameters are determined ex-ante and mentioned in section 6.1 of the PD:

Parameter	Unit	Value	Assessment
$EF_{grid,OM,y}$	tCO ₂ /MWh	1.099	PP has determined the value using Equation 1, as per TOOL07 “Tool to calculate the emission factor for an electricity system”.
$EF_{grid,BM,y}$	tCO ₂ /MWh	0.764	PP has determined the value using Equation 6, as per

			TOOL07 “Tool to calculate the emission factor for an electricity system”.						
EFgrid,CM,y	tCO2/MWh	0.932	PP has determined the value using Equation 7, as per TOOL07 “Tool to calculate the emission factor for an electricity system”.						
ShareLCMR	%	<table><tr><td>2022</td><td>2023</td><td>2024</td></tr><tr><td>21.3%</td><td>23.1%</td><td>23.6%</td></tr></table>	2022	2023	2024	21.3%	23.1%	23.6%	The values are determined from electricity generation data reported in Eskom’s annual Integrated Report for 2024, and records published on Eskom’s website for each power station.
2022	2023	2024							
21.3%	23.1%	23.6%							
EGLCMR,y	MWh	<table><tr><td>EGLCMRy: 2024</td><td>49,751,000</td></tr><tr><td>EGLCMRy: 2023</td><td>49,691,000</td></tr><tr><td>EGLCMRy: 2022</td><td>48,092,000</td></tr></table>	EGLCMRy: 2024	49,751,000	EGLCMRy: 2023	49,691,000	EGLCMRy: 2022	48,092,000	The values are determined from electricity generation data reported in Eskom’s annual
EGLCMRy: 2024	49,751,000								
EGLCMRy: 2023	49,691,000								
EGLCMRy: 2022	48,092,000								

				Integrated Report for 2024, and records published on Eskom's website for each power station.
totaly	MWh			The values are determined from electricity generation data reported in Eskom's annual Integrated Report for 2024, and records published on Eskom's website for each power station.
		totaly: 2024	210,648GWh / yr	
		totaly: 2023	215,318GWh / yr	
		totaly: 2022	226,226GWh / yr	
Y	year	2024		This is the most recent year for which data is available at the time of validation.
EGm,y	MWh	170,245,818		The values are determined from electricity generation data reported in Eskom's annual Integrated Report for

			2024, and records published on Eskom's website for each power station.
EF _(EL,m,y)	tCO ₂ /MWh	1.06	The values are determined from electricity generation data reported in Eskom's annual Integrated Report for 2024, and records published on Eskom's website for each power station.
FC _(i,m,y)	Tonnes	PI refer section 6.1 of the PD for values applied according to each power plant.	The values are determined from electricity generation data reported in Eskom's annual Integrated Report for 2024, and records published on Eskom's website for each power station.
NCV _(i,y)	GJ/tonne	40.40	The values are

			determined from electricity generation data reported in Eskom's annual Integrated Report for 2024, and records published on Eskom's website for each power station.
[[AEG]] _total	GWh	210,648	The values are determined from electricity generation data reported in Eskom's annual Integrated Report for 2024, and records published on Eskom's website for each power station.
[[AEG]] _(set-5-units)	GWh	1,643	The values are determined from electricity generation data reported in Eskom's annual Integrated Report for 2024, and

			records published on Eskom's website for each power station.
[[SET]]_(≥20%)	Dimensionless	20.29% of AEG_total in 2024.	The values are determined from electricity generation data reported in Eskom's annual Integrated Report for 2024, and records published on Eskom's website for each power station.
[[AEG]]_(set≥20%)	GWh	42,739	The values are determined from electricity generation data reported in Eskom's annual Integrated Report for 2024, and records published on Eskom's website for each power station.
[[SET]]_sample	Dimensionless	20.29% of AEG_total in 2024.	The values are determined

			from electricity generation data reported in Eskom's annual Integrated Report for 2024, and records published on Eskom's website for each power station.
[[AEG]]_(set sample)	GWh	42,739	The weighting of operating margin emissions factor is determined as per Tool07 paragraph 86 (a)
w _{OM} (Weighting of operating margin emissions factor)	%	50%	The value is estimated using para 86 (b) of the CDM tool 07, version 7.0.
w _{BM} (Weighting of build margin emissions factor)	%	50%	The value is estimated using para 86 (b) of the CDM tool 07, version 7.0.
BE _y	tCO ₂ e/yr	1,266,749	The value is estimated using equation 1 of the applied methodology.

Parameters monitored ex-post:

Monitoring of the project activity involves all the parameters necessary for calculation of GHG emission reduction by the proposed project activity. These parameters are mentioned in section 6.2 of the JPD-MR. The parameters which are to be monitored include:

Parameter	Unit	Value	Assessment
EGfacility	MWh/year	870,000	The value is estimated quantity of net electricity generation supplied by renewable energy source feeding into a Battery Energy Storage System (BESS) controlled through an automatic generation Hybrid Plant Controller (the project. All infrastructure is located on a multiple site, and combined the system will provide 150 MW of dispatchable power from 3 renewable energy sources (solar PV) feeding into a Battery Energy Storage System (BESS), managed by a hybrid power controller to

			feed the grid. As per PDD, Electricity meter, (to be confirmed during installation and commissioning), meters will be located at the Switching Station which serves as the grid tie-in point. There will be a meter (with a backup as a check and failsafe. The national utility will also have a meter located in the switching station at their tie in point as a check meter. All these meters are located after the hybrid power controller on either side of the grid tie-in point,
PEy	tCO2/yr	0	For all renewable energy power generation project activities, emissions due to the use of fossil fuels for

			the backup generator can be neglected.
<i>ERy</i>	tCO ₂ /yr	810,840	The value will be calculated ex-post using equation 09 of the applied methodology.

The assessment team confirms that:

- The monitoring plan mentioned in VCS JPD MR/01/ is in compliance with the applied methodology ACM0002 version 22.0/B02/;
- Based on the on-site interview and document review, the assessment team confirms that monitoring arrangements described in the monitoring plan are feasible within the project design;
- Based on the on-site interview and document review, the assessment team confirms that project participant deputed the competent personal to execute the monitoring approach and to follow the monitoring plan.

3.5 Non-Permanence Risk Analysis

The project activity does not require a non-permanence risk analysis. Hence this is not applicable.

4 VERIFICATION FINDINGS

4.1 Project Implementation Status

Implementation Status	Assessment steps, evidence checked, & conclusion:
Project implementation	The project has been implemented as per the project description provided in section 4.1 of the joint PD&MR. There are no material discrepancies between project implementation and the project description provided in the JPDMR/01/.
Monitoring plan	The monitoring plan has been found to be completed and implemented at the location where the project is located. The implemented monitoring system was found suitable with respect to the process and schedule for obtaining, recording, compiling and analyzing the monitored data and parameters. No discrepancies between the actual monitoring system, and the monitoring plan set out in the project description and the applied methodology have been found during the site visit.
AFOLU-specific project implementation	<i>Not Applicable as the project activity is not an AFOLU Project.</i>

Opinion:

The assessment team concludes the following:

- There are no material discrepancies between project implementation and the project description provided in the JPDMR/01/.
- The monitoring plan is implemented completely and the monitoring system (i.e., process and schedule for obtaining, recording, compiling and analyzing the monitored data and parameters) is appropriate.
- There are no material discrepancies between the actual monitoring system and the monitoring plan set out in the joint PD&MR/01/ as per the applied methodology.
- The GHG emission reductions or removals generated by the project have not been included in an emissions trading program or any other mechanism that includes GHG allowance trading.

- The project has not participated in or been rejected under any other GHG programs. Further the project has not received or sought any other form of environmental credit or has become eligible to do during the validation or verification.
- The project is registered under VCS only. Hence the assessment team confirms that there is no double counting associated with project activity being participation of other GHG programs which is also verified from the no-double-counting declaration given by the PP/26/.
- The VVB reviewed the Electricity Regulation Act (2006) , RMIPPPP/REIPPPP rules, and related project agreements. The review confirms that participation by IPPs in these programmes is voluntary, with no legal or regulatory requirement to build or operate Solar PV, BESS, or hybrid PV+BESS projects

Hence it can be concluded based on the review of the project documents and the site visit that project has been implemented as described in the joint VCS joint PD&MR/01/.

4.2 Accuracy of Reduction and Removal Calculations

VVB confirms that appropriate methods and formulae for calculating baseline emissions, project emissions and leakage have been followed, and the assumptions, emission factors and default values that are applied in the calculation have been justified.

Baseline Emission:

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 above baseline levels would have been generated by existing grid-connected power plants and the addition of new grid-connected power plants. The baseline emissions are to be calculated as follows:

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

Equation 3 (ACM0002 Equation 11)

Where:

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

$EG_{PJ,y}$ = Net electricity fed into the grid supplied by the project activity in year y
(MWh/yr)

$EF_{grid,CM,y}$ = Combined margin CO₂ emission factor for grid connected power generation in year y calculated using TOOL07 (t CO₂/MWh)

The results obtained are: 1,266,749 t CO₂/ annum, as shown below:

Parameter name	Value	Unit
BE_y	1,266,749	t CO ₂ / yr
$EG_{PJ,y}$	1,359,173	MWh/yr
$EF_{grid,CM,y}$	0.932	t CO ₂ /MWh

Project Emission:

As per the approved consolidated Methodology ACM0002, “Grid-connected electricity generation from renewable sources” (Version 22.0) para 40: “For most renewable energy power generation project activities, $PE_y = 0$. However, some project activities may involve project emissions that can be significant. These emissions shall be accounted for as project emissions by using the following equation:

$$PE_y = PE_{FF,y} + PE_{GP,y} + PE_{HP,y} + PE_{BESS,y} + PE_{PSP,y}$$

Where,

PE_y = Project emissions in year y (t CO₂e/yr)

$PE_{FF,y}$ = Project emissions from fossil fuel consumption in year y (tCO₂/yr)

$PE_{GP,y}$ = Project emissions from the operation of dry, flash steam or binary geothermal power plants in year y (tCO₂e/yr)

$PE_{HP,y}$ = Project emissions from water reservoirs of hydro power plants in year y (tCO₂e/yr)

$PE_{BESS,y}$ = Project emissions from charging of a BESS using electricity from the grid or from fossil fuel electricity generators (tCO₂e/yr)

$PE_{PSP,y}$ = Project emissions from utilizing electricity from the grid for pumping operation of PSP in excess to the production of the renewable power plant operating in coordination with the PSP (t CO₂e/yr)

As the project activity is the installation of a new grid-connected solar Power plant and does not involve any project emissions from fossil fuel, operation of dry, flash steam or binary geothermal power plants, and from water reservoirs of hydro power plants. Therefore $PE_{FF,y}$, $PE_{GP,y}$, $PE_{HP,y}$, $PE_{BESS,y}$, $PE_{PSP,y}$ are equal to zero and thus, $PE_y = 0$.

Leakage Emission:

As per the applied methodology, no other leakage emissions are considered. The emissions potentially arising due to activities such as power plant construction and upstream emissions from fossil fuel use (e.g.: extraction, processing, transport etc.) are neglected.

4.3 Quality of Evidence to Determine Reductions and Removals

The assessment of each parameter related to calculate the GHG emission reductions is justified in Sections 4.2 above. Via the Onsite inspection and desk review, the assessment team verified the supporting evidence provided by the project proponent as listed in Appendix 3 used to determine the GHG emission reductions.

For each reported data, the evidence is provided and verified as sufficient, and quality is appropriate. Also, the cross-checks have been performed on the reported data with different sources of evidence. The information flows from data generation and aggregation, to recording, calculation and final transposition into the monitoring report has been assessed by VVB in Section 4.1. Moreover, the calibration is verified as stated in Section 4.1 during onsite inspection with evidence to confirm the meters' location, accuracy and calibration frequency are in line with requirement of the monitoring plan.

Therefore, it is concluded that the evidence provided is verified as sufficient and quality is appropriate and thus the evidence can be used to determine the GHG emission reductions and removals for this monitoring period.

Based on the above, the assessment team confirms the sufficiency and appropriateness of the quality of evidence provided by the PP to determine the GHG reductions and further deems them to be acceptable.

5 VALIDATION AND VERIFICATION OPINION

5.1 Validation and Verification Summary

Carbon Check has been contracted by Anthesis BV, the Project Proponent (PP)/50/, to undertake the validation and verification of the VCS Project “Scatec RMI Hybrid Cluster *Project* in South Africa” by Anthesis, VCS ID 5488 for the crediting period 19-November-2023 to 18-November-2033, and monitoring period 19-November-2023 to 30-June-2025 with regard to the relevant requirements of VCS Standard, v4.7 /B01/.

The validation and verification are based on the project description “JPD MR”, version 2.4; dated 3-October-2025 /01/ for this project. Validation and verification approach was based on the requirements as defined under the Kyoto Protocol, as well as those defined by the CDM Executive Board and the VCS Standard, v4.7.

Anthesis and Scatec Kenhardt Solar 1 (RF) Proprietary Limited, Scatec Kenhardt Solar 2 (RF) Proprietary Limited and Scatec Kenhardt Solar 3 (RF) Proprietary Limited are responsible for the preparation of the GHG emissions data and the reported GHG emissions reductions on the basis set out within the project. The calculation and determination of GHG emission reductions from

the project is the responsibility of the Anthesis and Scatec Kenhardt Solar 1 (RF) Proprietary Limited, Scatec Kenhardt Solar 2 (RF) Proprietary Limited and Scatec Kenhardt Solar 3 (RF) Proprietary Limited.

It is Carbon Check responsibility to express an independent GHG validation opinion on the GHG emissions and on the calculation of GHG emission reductions from the project for the crediting period 19-November-2023 to 18-November-2033 was found to be 8,108,400 tCO₂e total and annual average of 810,840 tCO₂e.

Vintage period	Estimated baseline emissions (tCO ₂ e)	Estimated project emissions (tCO ₂ e)	Estimated leakage emissions (tCO ₂ e)	Estimated reduction VCUs (tCO ₂ e)	Estimated removal VCUs (tCO ₂ e)	Estimated total VCUs (tCO ₂ e)
19-November-2023 to 31-December-2023	87,841	0	0	0	0	87,841
01-January-2024 to 31-December-2024	8,10,840	0	0	0	0	8,10,840
01-January-2025 to 31-December-2025	8,10,840	0	0	0	0	8,10,840
01-January-2026 to 31-December-2026	8,10,840	0	0	0	0	8,10,840
01-January-2027 to 31-December-2027	8,10,840	0	0	0	0	8,10,840
01-January-2028 to 31-December-2028	8,10,840	0	0	0	0	8,10,840
01-January-2029 to 31-December-2029	8,10,840	0	0	0	0	8,10,840
01-January-2030 to 31-December-2030	8,10,840	0	0	0	0	8,10,840
01-January-2031 to 31-December-2031	8,10,840	0	0	0	0	8,10,840
01-January-2032 to 31-December-2032	8,10,840	0	0	0	0	8,10,840
01-January-2033 to 18-November-2033	7,22,999	0	0	0	0	7,22,999
Total estimated ERRs during the first or fixed crediting period						81,08,400
Total number of years						10
Average annual ERRs						8,10,840

5.2 Validation Conclusion

In our opinion, the GHG emissions reductions estimated for the project activity for the period 19-November-2023 to 18-November-2033 are fairly stated in the Joint Project Description and Monitoring Report/01/, Version 2.4 dated 3-October-2025. The GHG emission reductions were calculated correctly on the basis of the approved baseline and monitoring methodology ACM0002: Grid-connected electricity generation from renewable sources, version 22.0/B02/ and the VCS standard v4.7 /B01/.

The assessment team confirm that validation of the GHG statement was conducted in accordance with ISO 14064-3: 2019. The validation is based on the Joint PDMR/01/, additional documents related to baseline and monitoring methodology; the subsequent background investigation, follow-up interviews and supporting documents made available to the assessment team by project proponent. The review of the project design and the subsequent follow-up interviews with sufficient evidence to determine the project's fulfilment of all the above stated criteria. No restrictions or uncertainties were identified related to the validation.

Therefore, VVB is able to certify that the project is in full compliance with the VCS Standard Version 4.7/B01/ and recommend registration of the project activity.

Crediting Period: From 19-November-2023 to 18-November-2033

Validated estimated GHG emission reductions and carbon dioxide removals for the project crediting period:

Vintage period	Estimated baseline emissions (tCO ₂ e)	Estimated project emissions (tCO ₂ e)	Estimated leakage emissions (tCO ₂ e)	Estimated reduction VCUs (tCO ₂ e)	Estimated removal VCUs (tCO ₂ e)	Estimated total VCUs (tCO ₂ e)
19-November-2023 to 31-December-2023	87,841	0	0	0	0	87,841
01-January-2024 to 31-December-2024	8,10,840	0	0	0	0	8,10,840
01-January-2025 to 31-December-2025	8,10,840	0	0	0	0	8,10,840
01-January-2026 to 31-December-2026	8,10,840	0	0	0	0	8,10,840
01-January-2027 to 31-December-2027	8,10,840	0	0	0	0	8,10,840
01-January-2028 to 31-December-2028	8,10,840	0	0	0	0	8,10,840
01-January-2029 to 31-December-2029	8,10,840	0	0	0	0	8,10,840
01-January-2030 to 31-December-2030	8,10,840	0	0	0	0	8,10,840
01-January-2031 to 31-December-2031	8,10,840	0	0	0	0	8,10,840
01-January-2032 to 31-December-2032	8,10,840	0	0	0	0	8,10,840

01-January-2033 to 18-November-2033	7,22,999	0	0	0	0	7,22,999
Total estimated ERRs during the first or fixed crediting period						81,08,400
Total number of years						10
Average annual ERRs						8,10,840

5.3 Verification conclusion

The verification has been done with a reasonable level of assurance. In our opinion, the GHG emissions reductions reported for the project activity for the period 19-November-2023 to 30-June-2025 is stated in the Joint Project Description and Monitoring Report, version 2.4 dated 3-October-2025. The GHG emission reductions were calculated correctly on the basis of the approved baseline and monitoring methodology ACM0002: Grid-connected electricity generation from renewable sources, Version 22.0/B02/ and the VCS standard v4.7/B01/. The assessment team confirm that verification of the GHG statement was conducted in accordance with ISO 14064-3: 2019.

Verification Period: From 19-November-2023 to 30-June-2025

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

Vintage period	Baseline emissions (tCO ₂ e)	Project emissions (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Reduction VCU (tCO ₂ e)	Removal VCU (tCO ₂ e)	Total VCUs (tCO ₂ e)
19-Nov-2023 to 31-Dec-2023	76,226	0	0	0	0	76,226
01-Jan-2024 to 31-Dec-2024	7,94,745	0	0	0	0	7,94,745
01-Jan-2025 to 30-JUN-2025	3,95,778	0	0	0	0	3,95,778
Total	12,66,749	0	0	0	0	12,66,749

5.4 Ex-ante vs Ex-post ERR Comparison

Vintage period	Ex-ante estimated reductions/removals	Achieved reductions/removals	Percent difference	Explanation for the difference
19-Nov-2023 to 31-Dec-2023	87,841	76,226	13%	VVB has assessed the DGR (daily generation report)/52/ and confirms the difference is due to phased

				approach during plant start-up and initial troubleshooting
01-Jan-2024 to 31-Dec-2024	8,10,840	7,94,745	2%	VVB has assessed the DGR (daily generation report)/52/ and confirms the difference is due to planned and unplanned Maintenance
01-Jan-2025 to 30-JUN-2025	402,087	3,95,778	1%	VVB has assessed the DGR (daily generation report)/52/ and confirms the difference is due to planned and unplanned Maintenance
Total	13,00,768	12,66,749	3%	

APPENDIX 1: Abbreviations

BE	Baseline Emission
CAR	Corrective Action Request
CDM	Clean Development Mechanism
CDM	Clean Development Mechanism
CL	Clarification Request
CO2	Carbon Dioxide
CO2e	Carbon Dioxide Equivalent
DPR	Detailed project report
DVR	Draft Validation Report
EB	CDM Executive Board
EF	Emission Factor
ER	Emission Reduction
FAR	Forward Action Request
FVR	Final validation Report
GHG	Greenhouse gas(es)
GWh	Giga Watt Hour
IPCC	Intergovernmental Panel on Climate Change
MW	Mega Watt
MWh	Mega Watt Hour
NA	Not Applicable
OSV	On Site Visit
PD	Project Description
PP	Project Proponent
QC/QA	Quality control/Quality assurance
VVB	Validation and Verification Body

APPENDIX 2: REFERENCE DOCUMENTS

Ref	Document
/01/	- VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2.4;Date - 3- October-2025 - VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2.3;Date - 26 August-2025 - VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2.2;Date - 19 August-2025 - VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2.1;Date - 08 August-2025 - VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2.0;Date - 25 July-2025 - VCS PDMR 5488 14APR2025 Scatec RMI Hybrid Cluster_PDMR V1; Date - 14-April-2025
/02/	ER Sheet
/03/	Grid Emission Factor Calculation
/04/	Evidence of project start date
/05/	Project Implementation Schedule
/06/	Declaration of not claiming other credits
/07/	Single Line Diagram and Meter Location Layout
/08/	Evidence of grievance mechanism
/09/	Evidence of local stakeholder consultation
/10/	Local stakeholder Consultation Report
/11/	South Africa's Integrated Resource plan (IRP 2019)
/12/	ESKOM's annual integrated reports (2024)
/13/	EIA Report
/14/	Surface Water, Heritage, & Terrestrial Ecology Impact Assessment Report
/15/	Evidence for Operating Margin Plant Data

/16/	Evidence for Parameters for plant emission factor calculation
/17/	Evidence for Five most Recent Plants supplying the grid
/18/	The Renewable Energy Independent Power Producer Procurement Programme (REIPPPP)
/19/	Legal Agreements and Licenses • Power Purchase Agreement • Agreement of Scatec Project Proponents have an agreement with subsidiaries of the parent company (Scatec ASA) • Management Services and other shared services, including the Global Operations Centre (GOC) • NERSA Generation Licences dated July 2022 • Implementation Agreements (IA) • EPC Agreement • O&M Agreement • Lease Agreement • Servitude Agreement • Landowner Agreement
/20/	Company registration certificates of each of the participating entities
/21/	Declaration for project ownership
/22/	EIA approval letter
/23/	Approved EMPr and SIA
/24/	SANS 474 to check calibration requirements of meters
/25/	Approval of grid connection
/26/	Declaration for Double Counting and Participation under Other GHG Programs
/27/	Technical specifications
/28/	Operational and technical lifespan of the project
/29/	Detailed project report (DPR) and technical Due diligence (TDD)
/30/	Construction Standard for Solar, BESS Power Project
/31/	Evidence for COD

/32/	Running record of 13 gensets
/33/	Plant Generation Data
/34/	QAQC procedures
/35/	Training manual, plan & records
/36/	Operation and maintenance procedures
/37/	Renewable Energy Report
/38/	Calibration certificate of electricity meters (Main + Check)
/39/	Scatec and Anthesis Agreement
/40/	Organizational structures
/41/	Evidence for First of Its Kind_Media Statement Signing Scatec Financial Close
/42/	National Climate Change Response White Paper
/43/	South Africa National GHG Inventory Report.” Accessed Apr. 08, 2025
/44/	Scatec RMIPPP Job Creation Report
/45/	Promethium Guidance Note - SA Grid Emission Factor
/46/	Public Comment
/47/	Scatec RMI Newspaper Article Final
/48/	Kenhardt Environmental Authorization
/49/	Evidence for job creation
/50/	Contract Between Anthesis and VVB
/51/	Legal review and opinion on various contractual agreements.
/52/	Daily Generation Report (DGR)
/53/	Basic Conditions of Employment Act of South Africa

/54/	Electricity Regulation Act, 2006
/55/	Joint Media Statement: Signing Of Risk Mitigation Independent Power Producer Procurement Programme (RMIPPPP) Project Agreements; Dated- 2 June 2022
/56/	Documents: • Legal opinions by Climate Legal (8 August 2025) and • Herbert Smith Freehills Kramer LLP (9 September 2025); • Letters to the IPP Office from Scatec (15 July 2025); • Industry letters from SAWEA (8 August 2025) and SACMA (October 2025); • Letters from other IPPs (various dates in 2025); • SCATEC Letter to IPPOs
/57/	SK Generator Operational Register

Ref	Document
/B01/	VCS Requirements a. VCS Standard (v4.7, dated 16-April-2024) b. VCS Program Guide (v4.4, dated 29-August-2023) c. VCS Validation and Verification Manual version (v3.2, dated 19/10/2016) d. Registration & Issuance Process (v4.6, dated 16-October-2024) e. VCS Program Definitions version (v4.5, dated 16-April-2024) f. VCS PD template version 4.1
/B02/	Applied baseline and monitoring methodology. a. Applied baseline and monitoring methodology, ACM0002 Version 22.0 b. CDM Tool 01: Tool for the demonstration and assessment of additionality, Version 07.0.0 c. CDM Tool 07: Tool to calculate the emission factor for an electricity system, Version 07.0 d. CDM Tool 24: Common practice, Version 3.1 e. CDM Tool 27: Investment analysis, Version 14.0 f. Annex 5 Guidelines on The Assessment of Investment Analysis g. CDM TOOL 32 (Positive lists of technologies v 04.0
/B03/	Website and links: 1. IPCC (http://www.ipcc-nggip.iges.or.jp) 2. http://cdm.unfccc.int 3. http://www.v-c-s.org

APPENDIX 3: Certificate of Competence



Carbon Check (India) Private Limited

Certificate of Competency

Mr. Anubhav Dimri

has been qualified as per CCIPL's internal qualification procedures in accordance with the requirements of CDM AS, A 6.4 AS/ ISO/IEC 14065:2020, ISO/IEC 17029:2019 and other applicable GHG programs:

for the following functions and requirements:

☒ Validator	☒ Verifier	☒ Team Leader	☒ Technical Expert
☒ Technical Reviewer	☐ Validator/Verifier (Trainee)	☐ Gender Expert	☒ Plastic Waste Expert
☒ CCB Expert	☐ Legal Expert	☒ Financial Expert	☒ Environmental, Health and Safety financial matters
☒ SDG Expert	☒ Expert Social aspect	☒ Expert Environmental Aspect	☐ Health Expert
☒ Regional Expert for India, RSA and Spanish Speaking countries		☒ FOEN Approved Technical Expert	☐ FOEN Approved Quality officer

in the following Technical Areas:

☒ TA 1.1	☒ TA 1.2	☐ TA 2.1	☒ TA 3.1	☐ TA 4.1
☐ TA 4. n	☐ TA 5.1	☐ TA 5.2	☐ TA 7.1	☒ TA 8.1
☐ TA 9.1	☐ TA 9.2	☐ TA 10.1	☒ TA 13.1	☒ TA 13.2
☒ TA 14.1	☒ TA 15.1	☒ TA 16.1		

Issue Date

06th February 2025

Expiry Date

31st December 2025



Mr. Vikash Kumar Singh
Director - Compliance

Revision History of the document:

Revision Date	Summary of changes
Jan 2025 ¹	Revised as per latest organogram
Feb 2025	Revised to include FOEN requirements

CCIPL_FM 7.9 Certificate of Competency_V8.0_05022025

¹ Please refer to previous version of FM 7.9 for the revision history



Carbon Check (India) Private Limited

Certificate of Competency

Mr. Pankaj Kumar

has been qualified as per CCIPL's internal qualification procedures in accordance with the requirements of CDM AS, A 6.4 AS/ ISO/IEC 14065:2020, ISO/IEC 17029:2019 and other applicable GHG programs:

for the following functions and requirements:

- | | | | |
|---|---|--|---|
| ☒ Validator | ☒ Verifier | ☒ Team Leader | ☒ Technical Expert |
| ☐ Technical Reviewer | ☐ Validator/Verifier (Trainee) | ☐ Gender Expert | ☐ Plastic Waste Expert |
| ☐ CCB Expert | ☐ Legal Expert | ☐ Financial Expert | ☐ Environmental, Health and Safety financial matters |
| ☐ SDG Expert | ☐ Expert Social aspect | ☐ Expert Environmental Aspect | ☐ Health Expert |
| ☒ Regional Expert for India | | ☒ FOEN Approved Technical Expert | ☐ FOEN Approved Quality officer |

in the following Technical Areas:

- | | | | | |
|----------------------------------|--|----------------------------------|---|----------------------------------|
| ☐ TA 1.1 | ☒ TA 1.2 | ☐ TA 2.1 | ☒ TA 3.1 | ☐ TA 4.1 |
| ☐ TA 4. n | ☐ TA 5.1 | ☐ TA 5.2 | ☐ TA 7.1 | ☐ TA 8.1 |
| ☐ TA 9.1 | ☐ TA 9.2 | ☐ TA 10.1 | ☒ TA 13.1 | ☐ TA 13.2 |
| ☐ TA 14.1 | ☐ TA 15.1 | ☐ TA 16.1 | | |

Issue Date

06th February 2025

Expiry Date

31st December 2025



Mr. Vikash Kumar Singh
Director - Compliance

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CCIPL_FM 7.9 Certificate of Competency_V8.0_05022025

¹ Please refer to previous version of FM 7.9 for the revision history



Carbon Check (India) Private Limited

Certificate of Competency

Mr. S Ranganathan

has been qualified as per CCIPL's internal qualification procedures in accordance with the requirements of CDM AS, A 6.4 AS/ ISO/IEC 14065:2020, ISO/IEC 17029:2019 and other applicable GHG programs:

for the following functions and requirements:

- | | | | |
|---|--|---|---|
| ☒ Validator | ☒ Verifier | ☒ Team Leader | ☒ Technical Expert |
| ☒ Technical Reviewer | ☐ Validator/Verifier (Trainee) | ☐ Gender Expert | ☐ Plastic Waste Expert |
| ☐ CCB Expert | ☐ Legal Expert | ☒ Financial Expert | ☐ Environmental, Health and Safety financial matters |
| ☒ SDG Expert | ☒ Expert Social aspect | ☒ Expert Environmental Aspect | ☐ Health Expert |
| ☒ Regional Expert for India | | ☐ FOEN Approved Technical Expert | ☐ FOEN Approved Quality officer |

in the following Technical Areas:

- | | | | | |
|--|--|----------------------------------|---|---|
| ☒ TA 1.1 | ☒ TA 1.2 | ☐ TA 2.1 | ☒ TA 3.1 | ☐ TA 4.1 |
| ☐ TA 4. n | ☒ TA 5.1 | ☐ TA 5.2 | ☐ TA 7.1 | ☐ TA 8.1 |
| ☐ TA 9.1 | ☐ TA 9.2 | ☐ TA 10.1 | ☒ TA 13.1 | ☒ TA 13.2 |
| ☐ TA 14.1 | ☐ TA 15.1 | ☐ TA 16.1 | | |

Issue Date

06th February 2025

Expiry Date

31st December 2025


Mr. Vikash Kumar Singh
 Director - Compliance

Revision History of the document:

Revision Date	Summary of changes
Jan 2025 ¹	Revised as per latest organogram
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CCIPL_FM 7.9 Certificate of Competency_V8.0_05022025

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APPENDIX 4: FINDINGS LOG

Table 1 Clarifications Required.

CL ID	01	Section no.	1.1/TOC	Date: 09/05/2025
Description of CL				
1. Table of context (TOC) is not in line with PDMR template. PP shall clarify 2. In Section 1.1 of the PD-MR, the Project Proponent (PP) states that the contracted capacity of the project is 150 MW. However, within the same paragraph, it is also mentioned that the dispatchable capacity is 225 MW. The PP shall clarify. Additionally, the same paragraph refers to a combined total installed capacity of approximately 540 MW. The PP is requested to provide the individual capacities of each of the three plants. 3. In section 1.1 of the PDMR. the average and total GHG value are not in line with ER sheet. PP shall clarify. 4. During the OSV VVB observed that the hybrid controller plays a critical role in managing power output. PP shall provide further clarification on this functionality and explain how excess power generation is handled. And further PP shall provide an update on the technology and configuration of the hybrid controller used for power evacuation 5. In section 1.5 of the PD, PP mentioned that “Multiple locations or project activity instances (but not a grouped project)” which is not in line with section 1.1 of the PD. PP shall clarify.				
Project Developer (PD) response				Date: 28/07/2025
PD corrected as per findings				
Documentation provided by PD				
<u>VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster PDMR V2 (Work Draft).docx</u>				
VVB assessment				Date: 06/08/2025
1. VVB has assessed the updater JPDMR and found that PD has now updated Table of context (TOC) in line with PDMR template, version 4.4 – Hence, CL is closed. 2. The VVB has assessed the updated Project Developer's Monitoring Report (PD-MR) and confirms that Section 1.1 has been rephrased to clearly state the individual plant capacities. The report now specifies that each of the three adjacent solar plants has a capacity of 180 MWp, and the Battery Energy Storage System (BESS) has a capacity of 225 MW. – Hence, CL is closed. 3. PD has now explained the role of hybrid controller in the updated JPDMR. Hence, CL is closed. 4. PD has now updated the location in section 1.5 of the JPDMR. Hence, CL is closed. 5. VVB has assessed the updated PD-MR and found that PD has updated section 1.5 in line with section 1.1 of the PD-MR. – Hence, CL is closed.				

CL ID	02	Section no.	1.4.1	Date: 09/05/2025
Description of CL				
In table 2 of the PDMR in section 1.4.1, PP shall clarify the technology used for the project activities.				
Project Developer (PD) response				Date: 28/07/2025
Technology updated in PD				
Documentation provided by PD				
<u>VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2 (Work Draft).docx</u>				
VVB assessment				Date: 07/08/2025
VVB has assessed the updated PD-MR and found that PD has now updated regarding technology in section 1.4.1. – Hence, CL is closed.				

CL ID	03	Section no.	1.12	Date: 09/05/2025
Description of CL				
1. The statement in section 1.12 “The solar portion is spread over 6 clusters located adjacent to one another and forming a combined total installed capacity of an approximately 540 MW peak (DC).” is not in line with section 1.1 of the PDD. PP shall clarify and shall declare the number of clusters on actual.				
Project Developer (PD) response				Date: 28/07/2025
PD clarified				
Documentation provided by PD				
<u>VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2 (Work Draft).docx</u>				
VVB assessment				Date: 07/08/2025
VVB has assessed the updated PD-MR and found that PD has now updated statement declaring the number of clusters with capacities in section 1.12 in line with section 1.1 of the PD-MR – Hence, CL is closed.				

CL ID	04	Section no.	1.14	Date: 09/05/2025
Description of CL				
The location of the project activities in section 1.14 of the PDMR is not in line with section 1.13. PP shall clarify				
Project Developer (PD) response				Date: 28/07/2025
PD Clarified				

Documentation provided by PD	
<u>VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster PDMR V2 (Work Draft).docx</u> https://en.wikipedia.org/wiki/Nama_Karoo	
See red X in Nama Karoo bio	
VVB assessment	Date: 07/08/2025
VVB has assessed the link shared by PD and found that project activities in section 1.14 of the PDMR is not in line with section 1.13. Hence, CL is closed.	

CL ID	05	Section no.	4.0	Date: 09/05/2025
Description of CL				
The section 4 of the PD-MR is not in line with VCS PD-MR Template v4.4. PP shall clarify.				
Project Developer (PD) response				Date: 28/07/2025
PD Clarified				
Documentation provided by PD				
<u>VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster PDMR V2 (Work Draft).docx</u>				
VVB assessment				Date: 07/08/2025
VVB has assessed the updated PD-MR and found PD has now updated the section 4 of the PD-MR in line with VCS PD-MR template, version 4.4. – Hence, CL is closed.				

CL ID	06	Section no.	7.3	Date: 09/05/2025
Description of CL				
In section 7.3 of the PDMR, PP has mentioned that “new grid-connected solar Power plant or BESS integrated with solar”. PP shall clarify.				
Project Developer (PD) response				Date: 28/07/2025
PD Clarified				
Documentation provided by PD				
<u>VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster PDMR V2 (Work Draft).docx</u>				
VVB assessment				Date: 07/08/2025
VVB has assessed the updated PD-MR and found PD has now updated the statement according to existing arrangements in section 7.3 of the PD-MR– Hence, CL is closed.				

CL ID	07	Section no.	Table 4, section 1.18.2	Date: 03/06/2025
Description of CL				
For SDG 8.5, PP has claimed that they have created 234 jobs during optional phase. PP shall clarify the type and nature of job.				
Project Developer (PD) response				Date: 27/07/2025
PD updated and metric amended – source document uploaded in supporting evidence				
Documentation provided by PD				
<u>VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2 (Work Draft).docx</u>				
VVB assessment				Date: 07/08/2025
VVB has assessed the updated PD-MR and found PD has now clarify the number of jobs created during operational phase and in current monitoring period. – Hence, CL is closed.				

CL ID	08	Section no.	5.4	Date: 03/06/2025
Description of CL				
"The value of ERs in the PD-MR is not in line with ER calculation. PD Shall clarify. Further, section is not in line with the template version 4.4"				
Project Developer (PD) response				Date: 27/08/2025
PD Clarified – monitoring period has been adjusted with delays too – now to 30 June 2025				
Documentation provided by PD				
<u>VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2 (Work Draft).docx</u>				
<u>Montioring_Report-Scatec-JUL2025.pdf</u>				
VVB assessment				Date: 07/08/2025
The VVB has assessed the updated PD-MR and confirmed that the Project Developer has revised the ER sheet and accordingly updated Section 5.4 to align with template version 4.4– Hence, CL is closed.				

Table 2 Corrective action Required.

CAR ID	01	Section no.	PD (Editorial Findings)	Date: 28/11/2024
Description of CAR				
a. Appendix 2: Bibliography does not include references for all citations mentioned throughout the report. b. In section 1.12, PP shall provide the transformer details. c. PP shall specify the capacities of the BESS in section 1.12 of PDMR. d. PP shall share the source of “§4.7.4 for meters greater than 10MVA as being every 5 years.” e. PP shall updated section 2.1.5 of the PD as per VCS Registry. f. PP shall update figure 2 of section 3.3 of the PD. g. PP shall provide the evidence for first of its kind.				
Project Developer (PD) response				Date: 28/07/2025
PD updated to conform and address finding				
Documentation provided by PD				
<u>VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2 (Work Draft).docx</u>				
VVB assessment				Date: 07/08/2025
a. VVB has assessed the updated PD-MR and found that Appendix 2 – Bibliography has been updated. Hence, CAR is closed. b. PD has now provided the transformer details in section 1.12 of the PD-MR. - Hence, CAR is closed. c. PD has now provided the BESS details in section 1.12 of the PD-MR. - Hence, CAR is closed. d. PD has now provided the source of “§4.7.4 for meters greater than 10MVA as being every 5 years.”. - Hence, CAR is closed. e. PD has now provided updated section 2.1.5 of the PD-MR in line with the VCS registry. - Hence, CAR is closed. f. PD has now provided updated figure in section 3.3 of the PD-MR. - Hence, CAR is closed. g. PD has now provided the source of first of its kind. - Hence, CAR is closed.				

CAR ID	02	Section no.	1.1	Date: 28/11/2024
Description of CAR				
The Project Proponent (PP) shall elaborate on the statement: 'No additional project activities (Cluster) will be added to the project.' Furthermore, in Section 1.1, the PP mentions 'solar photovoltaic power feeding into a battery energy storage system (BESS) prior to feeding into the national grid at the Rooidam switching station,' but does not provide details regarding the operation of the BESS technology.				
Project Developer (PD) response				Date: 28/07/2025

PD updated to address finding	
Documentation provided by PD	
<i>VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2 (Work Draft).docx</i>	
VVB assessment	Date: 07/08/2025
VVB has assessed the updated PD-MR and PD has now added the details of projects activities with capacities and defined the role of the BESS. - Hence, CAR is closed.	

CAR ID	03	Section no.	1.18.1	Date: 20/12/2024
Description of CAR				
In section 1.18.1 of the PDMR, PP mention that “In alignment over the seven-year crediting period, renewable twice”, the statement is not in line with section 1.10 of the PDMR.				
Project Developer (PD) response				Date: 28/07/2025
PD Corrected to a single 10 year crediting period				
Documentation provided by PD				
<i>VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2 (Work Draft).docx</i>				
VVB assessment				Date: 07/08/2025
VVB has assessed the updated PD and found that PD has now changed the statement “In alignment over the seven-year crediting period, renewable twice” to 10 years fixed no renewable crediting period. – Hence, CAR is closed.				

CAR ID	04	Section no.	1.12	Date: 03/06/2025
Description of CAR				
1. In Section 1.12 of the PD-MR, PP shall provide the utilization of excess power generation and the role of the hybrid controller. Additionally, the PP should update the table with the exact details of the installed equipment. 2. In figure 2 of section 1.1.2 of the PD, hybrid controller is not shown. PP shall update the figure 2				
Project Developer (PD) response				Date: 28/07/2025
PD updated to address use of power generation and added figure				
Documentation provided by PD				
<i>VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2 (Work Draft).docx</i>				

VVB assessment	Date: 07/08/2025
1. VVB has assessed the updated PD-MR and found that PD provided the utilization of excess power generation and the role of the hybrid controller and details of equipment. – Hence, CAR is closed. 2. VVB has assessed the updated PD-MR and found that PD has now changed the figure and provided the updated one with hybrid controller in section 1.12 of the PD-MR. – Hence, CAR is closed.	

CAR ID	05	Section no.	2.1.2	Date: 03/06/2025
Description of CAR				
1. In section 2.1.2 of the PD, PP mentioned that stakeholder consultation meeting was done from 3-August-2015 to April 2025. PP shall mention the current date of LSC meeting and update how many meetings so far has been done. 2. To address stakeholder input, the PP shall explain in Section 2.1.2 of the PD how all feedback received during the consultation was duly considered, in accordance with the requirements of JPDMR Template 4.4				
Project Developer (PD) response				Date: 28/07/2025
PD updated to include this – also additional GSC comments (4 in total) submitted by VERRA – and these have been updated and addressed in PD too – in addition to the above finding				
Documentation provided by PD				
<u>VCS PDMR 5488 25JUL2025 Scatec RMI Hybrid Cluster_PDMR V2 (Work Draft).docx</u>				
VVB assessment				Date: 07/08/2025
1. VVB has assessed the updated PD-MR and found that PD has provided current date of LSC meeting. – Hence, CAR is closed. 2. VVB has assessed the updated PD-MR and found that PD has provided the process of receiving feedback and their mitigation in section 2.1.2 of the PD-MR. – Hence, CAR is closed.				

Table 3 Forwarded action Required.

FAR ID	01	Section no.	3.3.1.5	Date: 22/12/2025
Description of CAR				
The VVB doing verification shall assess and confirm whether any changes occurred to followings: • the Implementation Agreement (IA); • the Power Purchase Agreement (PPA); and/or • applicable national laws, regulations, or government directives that may affect the ownership, registration, or monetisation of environmental attributes, including carbon credits. Further, VVB shall explicitly document the outcome of the assessment in the verification report, including: • confirmation that no such changes have occurred; or				

- where changes have occurred, a clear assessment of their implications for the project's continued eligibility under the VCS Program.