

VERIFICATION REPORT

51 MW WIND POWER PROJECT AT CHITRADURGA



Document Prepared By Bureau Veritas Certification Holding SAS

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Summary:

Bureau Veritas Certification has made the 2nd periodic verification of 51 MW Wind Energy Project at Chitradurga, owned by M/s NSL Renewable Power Private Limited, which is located in Bhimasamudra site in Chitradurga district in the state of Karnataka, India with VCS project ID 706 on the basis of Voluntary Carbon Standard (VCS) Version 3 Program, as well as criteria given to provide for consistent project operations, monitoring and reporting. UNFCCC criteria refer to Article 12 of the Kyoto Protocol, as well as the host country criteria.

The verification scope is defined as a periodic independent review and ex post determination by the Designated Operational Entity of the monitored reductions in GHG emissions during defined verification period, and consisted of the following three phases: i) desk review of the project design and the baseline and monitoring plan; ii) follow-up on-site visit and interviews with project stakeholders; iii) resolution of outstanding issues and the issuance of the final verification report and opinion. The overall verification, from Contract Review to Verification Report & Opinion, was conducted using Bureau Veritas Certification internal procedures.

The first output of the verification process is a list of Clarification Requests, Corrective Actions Requests, Forward Actions Requests (CLs, CARs and FARs).

In summary, Bureau Veritas Certification confirms that the Project is implemented as planned and described in the VCS-PD. Deviations from the monitoring plan are sufficiently justified. Installed equipment being essential for generating emission reduction runs reliably and is calibrated appropriately. The monitoring system is in place and the Project is ready to reduce GHG emission. The GHG emission reduction is calculated without material misstatements.

Our opinion relates to the Project's GHG emissions and the resulting GHG emission reductions viz. Voluntary Carbon Units (VCUs) reported are based on the valid project baseline, monitoring plan and associated documents. Based on the evidence and information that are considered necessary to guarantee that GHG emission reductions are appropriately calculated, Bureau Veritas Certification confirms following statement:

Reporting period	Baseline Emissions, (BE _y) (tCO ₂ e)	Project Emissions, (PE _y) (tCO ₂ e)	Leakages, (L _y) (tCO ₂ e)	Emission Reductions, (ER _y) (tCO ₂ e)
01/07/2010 – 31/12/2010	43682	0	0	43,682.00
01/01/2011 – 31/12/2011	104963	0	0	104,963.00
01/01/2012 – 30/09/2012	80206	0	0	80,206.00
Total				228,851.00

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Abbreviations

CDM	Clean Development Mechanism
CEA	Central Electricity Authority
CL	Clarification Request
CO ₂	Carbon Dioxide
DOE	Designated Operational Entity
JMR	Joint Meter Reading
KPTCL	Karnataka Power Transmission Corporation Limited
PDD	Project Design Document
M&P	Modalities and Procedure
MP	Monitoring Plan
MW	Mega Watt
MWh	Mega Watt Hour
NCES	Non Conventional Energy Sources
OM/BM	Operating Margin/Built Margin
O&M	Operation and Maintenance
PPA	Power Purchase Agreement
PP	Project Participant
WTG	Wind Turbine Generators
VCS	Verified Carbon Standard
VER	Verified Emission Reduction
VVM	Validation and Verification Manual

1 INTRODUCTION

1.1 Objective

NSL Renewable Power Private Limited has commissioned Bureau Veritas Certification to verify the emission reductions (VER) for 2nd periodic VCS verification of the Verified Carbon Standard project (VCS) of “51 MW Wind Power Project at Chitradurga” (hereafter referred to as “the Project”), which is located in Chitradurga district in the state of Karnataka, India for the period from 01/07/2010 – 30/09/2012.

Bureau Veritas Certification as the validation/verification body of the Project has been accredited as a DOE by UNFCCC and also meets the competence requirements as set out in ISO 14065:2007.

The Verification is the independent review and ex-post determination by the verification body of the monitored reductions in GHG emissions during defined verification period.

The Certification is the written assurance by a Certification Entity that, during a specific period in time, a project activity achieved the emission reductions as verified. According to the VVM, the Certification Entity is defined as an entity which has been accredited as a DOE by the CDM Executive Board for the particular scope into which the project falls or has been accredited as an approved Certification Entity by the VCS Steering Committee. Bureau Veritas Certification is an accredited DOE for the particular scope into which the Project falls.

The objective of verification is to verify and certify the Verified Carbon Units (VCUs) generated by the Project from 01/07/2010 – 30/09/2012.

VCS Version 3 Program and UNFCCC criteria refer to Article 12 of the Kyoto Protocol, the CDM rules and modalities and the subsequent decisions by the CDM Executive Board, as well as the host country criteria.

1.2 Scope and Criteria

The verification scope is defined as an independent and objective review of the VCS Project Description (VCS-PD), the Project’s baseline study and Monitoring Report (MR) and other relevant documents. The information in these documents is reviewed against VCS Version 3 requirements, UNFCCC rules and associated interpretations.

The verification is not meant to provide any consulting towards the client. However, stated requests for forward actions and/or corrective actions may provide input for improvement of the Project monitoring towards reductions in the GHG emissions.

1.3 Level of assurance

The verification report is based on the VCS-PD, the VCS Monitoring Report (MR) and supporting evidences made available to the verifier and information collected through performing interviews and during the on-site assessment. The verification conclusion is assured the level of assurance of the Project is high.

1.4 Summary Description of the Project

The Project is owned by NSL Renewable Power Private Limited (hereafter referred to as “the Project Participant”) and is located in Bhimasamudra site in Chikkandavadi and Kallavangathihalli village of Chitradurga district in the state of Karnataka, India. The total capacity of project activity is 50.4 MW which comprises of installation of 28 numbers of ReGen Powertech make 1500kW Wind Turbine Generators and 4 numbers of Suzlon make 2100 kW Wind Turbine Generators. The entire power generated by the project activity is exported to the southern regional grid of India.

The Project has been registered under VCS standard 2007.1 with project ID 706 under approved CDM methodology ACM 0002, Version 11 “Consolidated methodology for grid-connected electricity generation from renewable sources”. The Project Start Date is 06/06/2008, when the first WTG with HTSC No HK 3 of the Project activity was commissioned and started electricity generation. The 2nd monitoring period for the Project under the VCS is from 01/07/2010 to 30/09/2012.

Project Title	51 MW Wind Power Project at Chitradurga
VCS Project ID	706
Monitoring period	01/07/2010 to 30/09/2012
Project Participants	NSL Renewable Power Private Limited
Methodologies used	ACM 0002 version 11
Location of the project	Chitradurga District in Karnataka State
Geo Coordinates	As provided in Section 1.5 of VCS PD and section 1.7 of the monitoring report
VCS Link	https://vcsprojectdatabase2.apx.com/myModule/interactive.asp?tc=1&Tab=VCUs&a=1&i=706

2 VALIDATION PROCESS, FINDINGS AND CONCLUSION

2.1 Validation Process

This is the second periodic verification for the registered VCS project activity with project ID 706. Hence this section is not applicable.

2.2 Validation Findings

2.2.1 Gap Validation

Not applicable

2.2.2 Methodology Deviations

Not applicable

2.2.3 Project Description Deviations

Not applicable

2.2.4 New Project Activity Instances

Not applicable

2.3 Validation Conclusion

Not applicable

3 VERIFICATION PROCESS

3.1 Method and Criteria

The overall verification, from Contract Review to Verification Report & Opinion, was conducted using Bureau Veritas Certification internal procedures.

The Project was verified against the requirements set in VCS Standard Version 3.2 effective as on 01/02/2012 (Ref/14/) and the Clean Development Mechanism Validation and Verification Manual Version 01.2 (Ref/11/).

3.2 Document Review

The verification of the project documentation provided by the project participant is based upon both quantitative and qualitative information on emission reductions. Quantitative information comprises the reported numbers in the monitoring report (MR), version 03 dated 29/01/2013 (Ref/3/) and VCS-PD version 05 dated 31/05/2010 (Ref/1/) submitted to the Bureau Veritas Certification. Qualitative information comprises information on internal management controls, calculation procedures, procedures for transfer of data, frequency of emissions reports, and review and internal audit of calculations.

In addition to the monitoring documentation provided by the project participants, Bureau Veritas Certification reviewed:

- a) The VCS-PD of the Project, the monitoring plan and the corresponding validation report (Ref/1/)
- b) The applied monitoring methodology (Ref/12/)
- c) Other information and references relevant to the project activity's resulting emission reductions

3.3 Interviews

On 10/01/2013, Bureau Veritas Certification performed an on-site visit and interviews with project stakeholders to confirm selected information and to resolve issues identified in the document review.

During the on-site visit, representatives of NSL Renewable Power Private Limited and O & M contractor were also interviewed. (see "References" for details).

3.4 Site Inspections

Please refer to section 4.3 below.

3.5 Resolution of Any Material Discrepancy

The objective of this phase of the verification is to raise the requests for corrective actions and clarification and any other outstanding issues that needed to be clarified for Bureau Veritas Certification positive conclusion on the GHG emission reduction calculation.

Findings established during the verification can either be seen as a non-fulfillment of criteria ensuring the proper implementation of a project or where a risk to deliver high quality emission reductions is identified.

Corrective Action Requests (CARs) are issued, where:

- a) Non-conformities with the monitoring plan or methodology are found in monitoring and reporting, or if the evidence provided to prove conformity is insufficient;
- b) Mistakes have been made in applying assumptions, data or calculations of emission reductions which will impair the estimate of emission reductions;
- c) Issues identified in a FAR during validation or previous verification to be verified during verification have not been resolved by the project participants.

Forward Action Requests (FARs) are issued, for actions if the monitoring and reporting require attention and/or adjustment for the next verification period.

The verification team may also use the term Clarification Requests (CLs), if information is insufficient or not clear enough to determine whether the applicable VCS requirements have been met.

To guarantee the transparency of the verification process, the issues raised are documented in more details below.

4 VERIFICATION FINDINGS

4.1 Project Implementation Status

It has been observed by the verification team that the project involves the installation of 28 numbers of 1500 kW WTGs of ReGen make and 4 numbers of 2100 kW WTGs of Suzlon make in Chikkandavadi and Kallavangathihalli Village of Chitradurga district in the state of Karnataka, India. All the 32 WTG's are leading to a cumulative capacity of the project as 50.4 MW, which is same as described in the registered VCS PD¹. The entire power generated by the project activity is exported to the southern regional grid of India with a firm energy purchase agreement with the Karnataka Power Transmission Corporation Limited (KPTCL) (Ref/10/).

The electricity exported and imported from the grid is recorded through metering points installed at group controller station. There are 4 controller station points viz., NSLC III, NSLC IV, NSLC V and NSLC IV used to measure the net electricity supplied to the grid by all the 32 WTGs. All the

¹ The project activity was initially envisaged for 51 MW, involving installation of 34 numbers of 1500 kW ReGen Powertech WTGs for which project participant has released the purchase orders to ReGen Powertech on December 2007. However, ReGen Powertech has supplied only 28 numbers of 1500 kW WTGs (by 12/09/2009) and intimated the project participant that supply of remaining 6 WTGs would be delayed and would be supplied only after June 2010. Hence project participant had decided to replace the remaining 6 numbers of 1.5 MW ReGen Powertech WTGs with 4 numbers of Suzlon make 2.1 MW WTGs.

The verification team confirmed the same by reviewing the initial purchase order for the project activity with Regen (Ref/13/), the letter from the Regen regarding the delay in supply of the WTGs (Ref/13/) and the purchase order to Suzlon (Ref/13/). This change in capacity of the project activity happened before the conclusion of VCS validation opinion and hence it is addressed in the VCS validation report. Hence the verification team concluded that there is no change in capacity of the project capacity from the stated capacity in the registered VCS PD and validation report. Since the title "51 MW Wind Energy Project at Chitradurga" has been used since the beginning of the VCS validation, the PP does not wish to change the title of the project activity. This description has been provided in this report in order to explain the reason for inconsistency in the installed capacity of the project capacity (50.4 MW) and the capacity mentioned in the title of the project (51 MW).

WTGs are not provided with metering location and hence each controller points measure electricity supplied by more than one WTG.

Apart from the readings taken at group controller points, the electricity export readings are also taken at the grid interconnection point or 66 kV substation namely NSLC I and NSLC II. Based on the two readings taken at group controller points and substation, state electricity utility prepares a monthly statement namely Form B of electricity supplied through each WTG after accounting for the transmission loss and import of electricity. The transmission loss has been calculated by the KPTCL personal based on electricity export readings measured at the group controller points and at the 66 kV substation and the same is provided along with the Form B.

All the WTGs are owned by NSL Renewable Private Limited. Hence, the verification team confirms that the project activity has been implemented as per the description provided in the registered VCS PD (Ref/1/). The equipments necessary for GHG emission reductions are in place and have not been changed/replaced, since commissioning of the project activity.

CL 1 was raised by the verification team to clarify the status of the project activity under CDM since the project participant has stated that the project activity is also developed under CDM and also demonstrate that double counting was not involved. The project participant has responded that the project activity has been withdrawn from the CDM cycle. The same was verified from the CDM pipeline and verification team further verified that the project activity has not applied for any other GHG benefits. Hence the verification team confirms that there is no double counting involved in the project activity and CL 1 was closed.

4.2 Accuracy of GHG Emission Reduction or Removal Calculations

Monitoring has been carried out in accordance with the monitoring plan contained in the VCS-PD (Ref/1/). The parameters, required by the monitoring plan and the way the verification team has verified the information flow (from data generation, aggregation, to recording, calculation and reporting for these parameters including the values) in the VCS-MR (Ref/3/) are described below:

Parameters monitored ex-post:

- 1) Total electricity produced by the project activity, including the electricity supplied to the grid and the electricity supplied to internal loads (TEG_y):**

The verification team noted that all the WTGs in the project activity are connected through two feeders to the sub-station which is dedicated to the project activity. There is a main and check meter of accuracy class 0.2s located in each of the two feeders at the receiving sub-station (NSCL I and NSCL II). At the time of site visit, the verification team noted that the sub-station meter, NSLC I, measure and record the total electricity exported by all the WTGs connected to

group controller points, NSCL III and NSCL IV. Similarly, the sub-station meter, NSLC II, measure and record the total electricity exported by all the WTGs connected to group controller points, NSCL V and NSCL VI in the wind farm. The joint meter reading is taken here by representatives of the State Electricity Utility and Project Participant on a monthly basis. The purpose of this recording at substation is to deduce the transmission line losses in the electricity exports by the individual wind turbines in the wind farm. The verification team noted that this determination is, in accordance with the conditions stipulated in the PPA signed between them and the Project Participant.

2) Quantity of net electricity supplied to the grid as a result of implementation of the VCS project activity in year y (EG_y):

At the time of site visit, the verification team noted that there are 4 group controller stations (metering points) at the project site (NSLC III, NSLC IV, NSLC V and NSLC VI), to which the project activity wind turbines are connected to. Each of the above 4 group controller stations consists of an individual main and check meter of accuracy class 0.2s. The electricity exported and imported by the Wind Turbine Generator of the project activity at each of these metering points is recorded monthly by representatives of the State Electricity Utility and Project Participant (Ref/6/).

Based on the monthly electricity export recorded at group controller station meter and at the sub-station meter (TEGy), the State Electricity Utility determines the transmission line loss, in accordance with the conditions stipulated in the PPA signed between them and the Project Participant. Based on this, the state utility issues line loss calculation sheets, for the particular month.

The Joint Meter Reading Statements (known as Form B) is then submitted by the State Utility to the PP which indicates the electricity export, electricity import, transmission line losses and the net electricity exported value at individual grid controller station.

The emission reduction calculations are based on the net electricity exported values at group controller stations, as indicated in the Form B. This determination is in line with the provision stated in the registered monitoring plan. Based on this Form B, the Project Participant raises an invoice to the State Electricity Utility, subsequent to which, the payments are released.

The electricity generation value in the Form B issued by KPTCL/BESCOM has been compared with the invoices raised by the project participant against KPTCL/BESCOM² and a conservative value (among the value mentioned in Form B and in Invoice) is considered for calculation of emission reduction. In this regard, the verification team has raised CL 4 and successfully closed the same after satisfactory response from the PP.

CAR 1 was raised by the verification team since the registered VCS PD has provided the monitoring of 2 parameters but the monitoring report provided by the project participant has stated only one parameter. In response to CAR 1 the project participant has provided both the parameters EG_y and TEG_y in the revised monitoring report. The same was verified by the verification team and found to be in line with VCS PD and hence based on satisfactory response and correction CAR 1 was closed.

The verification team noted that the capacity loads (number of WTGs connected) at each metering points, has varied during the current monitoring period. In this regard, the verification team raised CL 3 to provide the details on the capacity loads at various points. In response, the project participant has provided the capacity load at metering points NSLC I, II, III, IV, V and VI for the current monitoring period in section 3.3 of the revised monitoring report and provided diagrams appropriately. The verification team noted that KPTCL has done load sharing at all the group controller points and as a result there was change in feeders (and hence change in metering location at sub-station) for NSLC V from NSLC I to NSLC II, which happened on 30th September 2011. The verification team noted that this change is not under the control of project participant. Hence based on satisfactory response, CL 3 was closed.

Parameters determined ex-ante:

1) *Emission factor of the grid, $EF_{CO_2,grid,y}$*

The emission factor of the crediting period of the Project has been determined, ex-ante in the registered VCS-PD (Ref/1/). The emission factor of 0.9451 tCO₂e/MWh used for emission reduction calculations for the current monitoring period has been verified against the registered VCS PD and found to be consistent.

Calibration

² The verification team noted that there is minor difference in the net electricity values mentioned in Form B statements and the invoices. This difference is due to the fact that for invoicing the PP considers 115 % of import, which is in accordance with the provisions of PPA.

During the site visit, the verification team noted that the meters located at the group controller points (used to measure the actual electricity supplied to the grid) are of 0.2s accuracy class and the 66 kV substation meter are of 0.2s accuracy class and both are under the control of the state electricity utility. Thus the verification team confirms that the accuracy class of the monitoring equipments is the same as mentioned in the registered VCS-PD. All the energy meters have been calibrated and details of calibration of all the energy meters for the entire monitoring period has been included under section 5 of the MR (Ref/3/). The verification team has verified the records of calibration (Ref/8/&/9/) of all the energy meters for the entire monitoring period and found them to be appropriate. From reviewing each of the calibration certificates, the verification team was able to confirm that test results for all the energy meters are satisfactory, that the meters have operated within the permissible error limit and as per the stated frequency in the registered VCS PD.

The PP has not provided serial numbers of all the meters in the monitoring report. In this, the verification team raised CL 6. In response, the project participant has provided the serial number of all the meters in section 5 of the revised monitoring report. The same was verified by the verification team with the calibration certificates and found to be appropriate and satisfactory and hence CL 6 was closed.

4.3 Quality of Evidence to Determine GHG Emission Reductions or Removals

As per the monitoring plan, the following complete data set was required for the specified monitoring period to calculate the GHG emission reductions resulting from the project activity.

1) *Monthly generation statement for the electricity supplied to the grid issued by Karnataka Power Transmission Corporation Limited :*

The electricity exported and imported by the project activity to the grid is measured and recorded by a main and check meter connected at each of the 4 metering points (Group controller stations) viz., NSLC III, IV, V and VI and sub-station meters (NSLC I and II). This is verified from the joint meter reading statements – Form B (Ref/6/) which includes the export, import readings from both, the main and check meter at the respective metering points and transmission losses for the readings recorded at group controller stations. The JMR is signed by the representatives of the Project Participant and the State Electricity Utility viz; KPTCL / BESCOM on a monthly basis.

All the above procedures/parameters are in line with the provisions described in the approved VCS PD.

All records like joint meter reading statements (Form B), invoices, meter calibration reports, etc. related to the project activity operations have been submitted to the verification team. The verification team noted that these records are well maintained at the office of the Project Participant both in electronic and hard forms. The data was found to be recorded diligently.

The project participant has submitted a spreadsheet for the CER calculation Excel Spreadsheet (Ref/5/), which mentions monthly statement readings for each metering points, for the current monitoring period, separately for each billing month from 01/07/2010 to 30/09/2012. The verification team has checked the readings in each monthly statement (Ref/6/) and confirms that the readings are correctly taken in the CER calculation sheet.

During the current monitoring period, meters at NSLC 1 and 2 have been replaced. In this regard, CL 5 was raised to explain the reason for such replacements and to clarify whether the errors, if applicable, in the replaced meters, have been taken into account in the calculation of ER. In response, the PP has responded that there was an order issued by KPTCL order dated 07/06/2011 for converting all non-ABT meters to ABT meters at substation metering points. Further to this order, the meters at NSCL I and II were replaced on 13/02/2012. Hence JMR was recorded from 01/02/2012 [end date of last JMR reading] till 13/02/2012 [date of replacement of old meters]. The JMR from 13/02/2012 was recorded with newly installed energy meters. Hence there were 2 separate JMR's: one for period from 01/02/2012 to 13/02/2012 and another one from 13/02/2012 to 29/02/2012. Since the meters were replaced as the result of ensuring better accuracy, the verification concluded that there are no data uncertainties in the recorded data being used in the calculation of the emission reduction and based on the satisfactory response CL 5 was closed.

The verification team confirms that complete data set for all the above mentioned monitored parameters is available for the current monitoring period; hence any theoretical assumption or request for deviation was not required for the current monitoring period.

Cross check of information in monitoring report [Para 208(b), VVM 1.2]:

As per the monitoring plan, the measurement results of net electricity supplied to the grid has been cross-checked with the invoices raised by the PP on BESCOM (Ref/7/). The monthly statement issued by BESCOM also reflects the net amount payable by BESCOM to PP against the net electricity supplied by the project activity to the grid. Thus the verification team was able to confirm the net electricity supplied by the project activity to the grid.

The project participant has revised the emission reduction calculation in accordance with the registered VCS PD in response to CL 7 raised by the verification team. The same was verified by the verification team and found to be satisfactory and CL 7 was closed.

4.4 Management and Operational System

The data reporting procedure between the Project and the grid company has been identified and assessed during the on-site visit. In order to ensure the completeness of the records of the meters, the PP had taken the effective actions including the installation, adjustment, calibration and continual monitoring for the meters.

The PP has operated the project activity as per VCS-PD (Ref/1/). The verification team noted during the site visit that the Operation and maintenance set-up has been implemented as per the description provided in the registered VCS PD (Ref/1/), From interview with the O & M personnel at the site, the verification team observed that all the personnel have been trained and quality control procedures are in place. Further, the verification team noted that the reading records of all meters are based on continuous measurement and are jointly recorded by the PP and the grid company, each month. The grid company issues monthly statements to confirm the net electricity supplied to the grid.

Organisation chart provided in the monitoring report was not matching the registered VCS PD hence verification team raised CAR 2 in this regard. The project participant has revised the organisation chart with respect to the registered VCS PD and the same was found to be satisfactory and hence CAR 2 was closed.

5 VERIFICATION CONCLUSION

Bureau Veritas Certification has performed the 2nd periodic verification of 51 MW Wind Power Project at Chitradurga, VCS project ID 706, owned by NSL Renewable Power Private Limited, which is located in Chitradurga District in the state of Karnataka, India and applying the methodology ACM 0002 Version 11.

The verification was performed based on the requirements set by VCS Standard Version 3.2 effective as on 01/02/2012, UNFCCC criteria for the CDM and relevant guidance provided by CMP and the CDM Executive Board.

The verification consisted of the following three phases: i) desk review of the project design and the baseline and monitoring plan; ii) follow-up interviews with project stakeholders and onsite visit; iii) resolution of outstanding issues and the issuance of the final verification report and opinion.

The management of NSL Renewable Power Private Limited is responsible for the preparation of the GHG emissions data and the reported GHG emission reductions of the project on the basis set out within the project Monitoring Plan in the registered VCS-PD. The development and maintenance of records and reporting procedures in accordance with that plan, including the calculation and determination of GHG emission reductions from the Project, is the responsibility of the management of the Project.

Bureau Veritas Certification has verified the project Monitoring Report, version 03 dated 29/01/2013 for the reporting period as indicated below. Bureau Veritas Certification confirms that the Project is implemented as described in the validated and registered project design documents. Installed equipments being essential for generating emission reductions, run reliably and are calibrated appropriately. The monitoring system is in place and the Project is generating GHG emission reductions. The Project also conforms to the verification criteria for projects and their GHG emission reductions or removals set out in the VCS rules.

Bureau Veritas Certification can confirm that the GHG emission reductions are calculated without material misstatements. Our opinion relates to the projects' GHG emission and resulting GHG emission reductions reported and related to the validated and registered project baseline, monitoring plan and its associated documents. Based on the evidence and information that are considered necessary to guarantee that GHG emission reductions are appropriately calculated, Bureau Veritas Certification confirms the following statement:

Reporting period: From [01/07/2010] to [30/09/2012]

Verified GHG emission reductions or removals in the above reporting period:

GHG Emission Reductions or Removals	tCO ₂ e
Baseline Emissions	228,851
Project Emissions	0
Leakage	0
Net GHG emission reductions or removals	228,851

6 REFERENCES

Category 1 documents:

Documents provided by the project participant that related directly to the GHG components of the project.

/1/	Registered VCS PD, Version 05, dated 31/05/2010
/2/	VCS - MR version 01 dated 10/12/2012
/3/	VCS – MR version 03 dated 29/01/2013
/4/	Commissioning certificated of all the WTGs of the project activity
/5/	Emission reduction calculation spreadsheet
/6/	Monthly generation statement for the electricity supplied to the grid issued by KPTCL for the current monitoring period
/7/	Invoices raised by project participant against KPTCL for the sale of electricity for the current monitoring period
/8/	Calibration records for all the main and check meters at the 4 metering points of the project activity, for the current monitoring period
/9/	Calibration records for the substation meters of KPTCL, for the current monitoring period
/10/	Energy purchase agreement between the project participant and KPTCL

Category 2 Documents:

Background documents related to the design and/or methodologies employed in the design or other reference documents.

/11/	CDM Validation and Verification Manual (Version 1.2)
/12/	Approved Baseline & Monitoring Methodology: ACM 0002, version 11
/13/	Purchase orders raised for the project activity and the communication from the technology supplier on delay in WEG supply
/14/	VCS Standard Version 3.2
/15/	Payment receipt from BESCOM for the invoice raised by the project participant

Persons interviewed:

List persons interviewed during the validation or persons that contributed with other information that are not included in the documents listed above.

/1/	N. Sivatham Pillai – Senior Manager
/2/	M. Venkat – Manger Lansor
/3/	P. Chandra Shekar – Manager
/4/	K. Raja Sekhar Reddy – Engineer
/5/	T. Anandamurthy – Sub-Station Supervisor
/6/	P. Bamshankara – Operator
/7/	S. Thippeswamy -Technician
/8/	R. Sivasankari – Consultant, Emergent Ventures
/9/	R. Muthu Kumar – Senior Consultant, Emergent Ventures

7 CURRICULA VITAE OF THE DOE'S VERIFICATION TEAM MEMBERS

Mr. Srinivasan Selvaraj - Team Leader:

Bureau Veritas Certification, Lead Verifier – Climate Change

He has Bachelors in Chemical Engineering and masters in Environmental Management and has over 7 years of experience in the field of Environment and Energy services. He is an accredited energy auditor from Bureau of Energy efficiency from Ministry of Power. He has successfully completed the IRCA approved Lead Auditor course for ISO 14001. He has been in the validation and verification of CDM/VCS/Gold standard projects since June 2008.

Ms. Dwarakaa Elangovan – Team Member**Bureau Veritas Certification, Verifier – Climate Change**

She holds Bachelors of Technology degree in Energy and Environmental Engineering and has done Diploma in Finance from Centre for Financial Management. She has 4 years in the field of Climate change services. Worked on CDM/VCS projects in renewable energy projects, waste heat recovery and green building as a consultant.

Mr. V. Senthil Kumar – Team Member**Bureau Veritas Certification, Verifier – Climate Change**

He is a Environmental Engineer with over 5 years of experience in the fields of Consultancy related to Training and Implementation of Management Systems (ISO : 9000, 14000 & 18000) for various organizations. For the last 4 years, he was involved in offering Climate Change and Sustainability Advisory services to different types of Clean Development Mechanism Projects. He has also experience in offering project management services to various renewable energy projects. Has undergone training related to Clean Development Mechanism and is currently involved in validation and verification of CDM project activities.

Sanjay Patankar, Bureau Veritas Certification, Internal Technical Reviewer

Educational qualifications: B.E. (Mech.) M.E. (Mech.)

He has over 20 years of experience in engineering manufacturing industry covering various functions like enterprise management, product design, engineering, tool & die design, improvements in the production shop, quality assurance & control and systems planning and implementation, including ISO 9001 based quality management systems. Working for the last 2 years in Bureau Veritas Certification (India) Pvt. Ltd. as Lead Auditor for ISO 9001, 14001 and OHSAS 18001 standards/specifications. Has undergone training related to Clean Development Mechanism and is currently involved in validation and verification of CDM project activities.

APPENDIX A VERIFICATION PROTOCOL

Table 1 Verification requirements based on the Voluntary Carbon Standard 2007.1

CHECKLIST QUESTION	COMMENTS	Draft Concl	Final Concl
1 Project implementation in accordance with the registered project document			
a Are all physical features of the proposed VCS project proposed in the registered PD in place?	As per the registered VCS PD “51 MW Wind Power Project at Chitradurga” the project activity involves the installation of 19 nos of 1.5 MW of ReGen Powertech make and 4 nos of 2.1 MW of Suzlon make in the Chitradurga district of Karnataka State. The project activity supplies the generated electricity to the Southern grid through BESCOM/KPTCL. The project participant has stated that this VCS project is also developed under CDM, thus project participant to clarify the status of the project activity and to demonstrate that there is no double counting involved	~~CL-1~~	OK
b Have the project participants operated the proposed VCS project as per the registered PD?	Yes, the verification team found that the project participant has operated the proposed VCS project activity as per the registered VCS PD. It is observed that some of the WTGs in the project activity are implemented under Generation Based Incentives (GBI) scheme, wherein the WTGs are eligible for higher tariff per unit of electricity fed into the grid. Please refer to para 6 of EB 48, Annex 67. Please clarify why the additionality is not required to be re-established in view of this change in the implementation of the project activity and change in the value of the key parameter i.e., tariff.	~~CL-2~~	OK
c Was an on-site visit conducted?	Yes, an onsite visit was conducted by one member of the verification team on 10/01/2013 in the Chitradurga district of Karnataka state.	OK	OK

CHECKLIST QUESTION	COMMENTS	Draft Concl	Final Concl
d If not, justify the rationale of the decision.	Not applicable as the onsite visit was conducted by one member of the verification team.	OK	OK
e Does the implementation or operation of VCS project conform with the description contained in the registered PD?	Yes, the project participant has implemented and operated the project activity in line with the description in the registered VCS PD. The project activity involves the installation of 19 Nos of 1.5 MW ReGen Powertech make and 4 Nos of 2.1 MW Suzlon make in Bhimasamudra in Chitradurga District of Karnataka state. The project activity has released the purchase order for 51 MW to ReGen Powertech Private limited (Technology supplier) for installation of 34 Nos of 1.5 MW WTGs on Dec 2007. But the technology supplier has only supplied 19 WTGs of 1.5 MW and on 12/09/2009 it was communicated that the remaining 6 WTGs would be supplied after June 2010. Hence the project participant has decided to install 4 Nos of 2.1 MW Suzlon make. Hence the project participant has installed only 50.4 MW out of 51 MW that was envisaged during investment decision for the proposed project activity. The WTGs are connected to the bulk metering points NSLC III, NSLC IV, NSLC V and NSLC IV at Hirekandavadi has been connected to NSLC I and NSLC II at 66 kV substation at KN Halli. The bulk meters NSLC III, NSLC IV and NSLC V were connected to NSLC I till 30/09/2011. After 30/09/2011 NSLC III and NSLC IV were connected to NSLC I and NSLC V and NSLC VI were connected to NSLC II. This change was done for load sharing by KPTCL/BESCOM and the project participant has no control on the same. Hence the change has been accepted by the verification team.	~~CL-3~~	OK

CHECKLIST QUESTION	COMMENTS	Draft Concl	Final Concl
	The verification team found the following discrepancies in monitoring locations: 1. But project participant to clarify on the capacity load of WTGs connected at each monitoring locations NSLC I, II, III, IV, V and IV 2. Project participant has not provided any documentary evidence for the monitoring location change of NSLC V from NSLC I to NSLC II		

CHECKLIST QUESTION	COMMENTS	Draft Concl	Final Concl
f If not, which are the potential impacts due to these changes?	The project activity has installed only 50.4 MW which is less than the initially conceptualized 51 MW. The same has been transparently explained in section 1.1 of the monitoring report.	OK	OK
2 Compliance of the monitoring plan with the monitoring methodology			
a Is the validated monitoring plan in accordance with the approved methodology applied by the proposed VCS project?	The registered VCS PD requires the monitoring of actual power generated by the project activity which is measured by the main and check meters installed at grid controller at Hirekandavadi and also the main and check meters installed at grid substation Hirekandavadi. Net electricity exported to the grid is measured at 33/66 kV substation at KN Hali. The joint meter is taken on monthly basis by KPTCL/BESCOM at both the location. Monthly share certificate would be issued by KPTCL/BESCOM based on the prorated calculation of actual generation of WTGs and the net total electricity supplied by wind farm. As per the applied methodology, ACM 0002, version 11, monitoring shall consist of metering the electricity supplied to the grid by the project activity. Hence monitoring plan in registered VCS PD is in accordance with the approved methodology.	OK	OK
b Are there any monitoring aspects of the project that are not specified in the methodology (e.g. additional monitoring parameters, monitoring frequency and calibration frequency)?	No, the project participant has implemented and operated the project activity inline with the registered VCS PD and the monitoring methodology.	OK	OK
3 Compliance of monitoring with the monitoring plan			
a Have the monitoring plan and the applied methodology been properly implemented and followed by the project participants?	As per the monitoring report version 01 the project participant has implemented the requirements specified in the registered PD and the methodology correctly. During the site visit of the verification team, it was observed that the	CAR 1	OK

CHECKLIST QUESTION	COMMENTS	Draft Concl	Final Concl
	metering system includes main and check meter at the WTGs metering yard and also main and check meters at the sub station. The net electricity supplied by the plant is calculated on prorata basis and the same is provided as Form B by KPTCL/BESCOM. This is in line with the requirements stated in the registered VCS PD. Verification team found that there are 2 parameters provided in the registered VCS PD, but project participant has provided the description of single parameter in section 3.2 of the VCS monitoring report verion 01. Project participant to clarify the same.		

CHECKLIST QUESTION	COMMENTS	Draft Concl	Final Concl
b Have all parameters stated in the monitoring plan, the applied methodology been sufficiently monitored and updated as applicable, including:			
i Project emission parameters?	The project emissions are considered NIL as per the approved methodology ACM 0002 version 11	OK	OK
ii Baseline emission parameters?	Yes, however some errors were identified in the emission reduction sheet. It is mentioned that the net electricity value mentioned in JMR would be cross checked with values mentioned in the Invoice. However, the verification team noted that the values in invoice are consistently lower than the values mentioned in the JMR. Hence the PP is requested to clarify the reason for such variation and why the conservative values have not been used in the ER calculation, when conducting such cross checking.	~~CL-4~~	OK
iii Leakage parameters?	There is no leakage emissions attributed from the project activity as per the methodology ACM 0002 version 11	OK	OK
iv Management and operational system: the responsibilities and authorities for monitoring and reporting are in accordance with the responsibilities and authorities stated in the monitoring plan?	The verification team identified the following discrepancies in the monitoring report: 1. The organisation chart provided in the monitoring report version 01 doesn't match with the organisation chart provided in the registered VCS PD	~~CAR-2~~	OK
c Are equipment controlled and calibrated in accordance with the monitoring plan?	Yes, the verification team found that the project participant has controlled and calibrated the equipments in accordance with the monitoring plan provided in the registered monitoring plan. The same was confirmed from the site visit on 10/01/2013. However during the current verification period, the verification team observed that the calibration frequency has been more than stated in the registered VCS PD During the current verification, meters at NSLC 1 and 2 have been replaced. Please explain the reason for such replacements and clarify whether the errors, if applicable, in the replaced meters, is taken into account in the calculation of ER.	~~CL-5~~	OK
d Are monitoring results consistently recorded as per approved frequency?	The electricity generated by the project activity is measured continuously and recorded on monthly basis. The monthly electricity	OK	OK

CHECKLIST QUESTION	COMMENTS	Draft Concl	Final Concl
	supplied to the grid by the project activity is recorded in the form B certificate issued by KPTCL/BESCOM. This is as per the approved revised monitoring plan which requires monthly recording of the electricity supplied to the grid.		

CHECKLIST QUESTION	COMMENTS	Draft Concl	Final Concl
e Have quality assurance and quality control procedures been applied in accordance with the monitoring plan?	As per the registered monitoring plan, all the meters are tested for accuracy annually. It was observed that during the current verification there was no delay in calibration frequency and the calibration reports was verified. The verification team found that the Serial number of checkmeter has not been provided in section 5 of monitoring report version 01 and serial number of main meter provided for NSLC IV and NSLC V are not matching with the calibration certificates provided. Please clarify	~~CL-6~~	OK
4 Assessment of data and calculation of greenhouse gas emission reductions			
a Is a complete set of data for the specified monitoring period available? (If no, i.e., only partial data are available because activity levels or non-activity parameters have not been monitored in accordance with the registered monitoring plan, the validator shall make the most conservative assumption theoretically possible in finalizing the verification report).	Yes, the project participant has provided the complete set of data pertaining for the monitoring period.	OK	OK
b Has information provided in the monitoring report been cross-checked with other sources such as plant log books, inventories, purchase records, laboratory analysis?	Not applicable	OK	OK
c Have calculations of baseline emissions, proposed project emissions and leakage, as appropriate, been carried out in accordance with the formulae and methods described in the monitoring plan and the applied methodology document?	Yes, the calculation of baseline and project emissions has been carried out in accordance with the formulae and methods in the monitoring plan and the applied methodology document. In the registered VCS PD, the formula given to determine ER is as follows: $EG_y = EG_{ex} - EG_{im} - \text{Transmission loss.}$ However for the current monitoring period, the PP has not applied the above formula to determine ER. Please clarify.	~~CL-7~~	OK

CHECKLIST QUESTION	COMMENTS	Draft Concl	Final Concl
			OK
d Have any assumptions used in emission calculations been justified?	No, assumptions was made in the emission reduction calculations, hence not applicable	OK	OK
e Have appropriate emission factors, IPCC default values and other reference values been correctly applied?	The value of emission factor used to calculate the amount of emission reduction is 0.9451 tCO ₂ /MWh inline with the registered PD. No other default or reference values are used during the current monitoring period	OK	OK

Table 2 Resolution of Corrective Action / Forward Action / Clarification Requests.

Draft report clarifications and corrective action requests by verification team	Reference to checklist question in Periodic Verification Checklist	Summary of project owner response	Verification team conclusion
CL 1 The project participant has stated that this VCS project is also developed under CDM, thus project participant to clarify the status of the CDM project activity and also demonstrate that there is no double counting involved for the current monitoring period.	1a ovenfor	The project has been withdrawn from being developed as the CDM project. The PP is not claiming benefits under other GHG emission reduction schemes. Hence there is no double counting involved for the current monitoring period.	Verification team noted that the project participant has not applied for any other GHG benefits and also from CDM. The same was verified from the CDM pipeline and found satisfactory. Hence verification team confirms that there is no double counting involved for the project activity for the current monitoring period and CL 1 is closed.
CL 2 It is observed that some of the WTGs in the project activity are implemented under Generation Based Incentives (GBI) scheme, wherein the WTGs are eligible for higher tariff per unit of electricity fed into the grid. Please refer to para 6 of EB 48, Annex 67. Please clarify why the additionality is not required to be re-established in view of this change in the implementation of the project activity and change in the value of the key parameter i.e., tariff.	1b ovenfor	As per rule 5 of Income tax rule 80% accelerated depreciation is applicable for Wind Energy Generators. Besides this, MNRE has implemented GBI scheme on 17/12/2009 to promote wind energy projects in India. As per MNRE notification dated 17/12/2009 GBI and accelerated depreciation is mutually exclusive. 30.90MW of total project capacity, is claiming GBI in actual. This 30.90MW is not eligible for 80% depreciation. Having said this, change from 80% depreciation to GBI will not have impact on the additionality of the project. Hence the additionality is not required to be re-	Verification team noted that the project participant can either claim accelerated depreciation or GBI incentive from MNRE. The project participant has proved additionality based on accelerated depreciation during registration of the project activity with VCS board. During implementation a part of WTGs were claiming only GBI and not accelerated depreciation. However this change doesn't impact the IRR of the project activity. Hence based on the satisfactory response CL 2 is closed.

Draft report clarifications and corrective action requests by verification team	Reference to checklist question in Periodic Verification Checklist	Summary of project owner response	Verification team conclusion
		established.	
CL 3 The verification team found the following discrepancies in monitoring locations: 1. The project participant to clarify the capacity load of WTGs connected at each monitoring locations NSLC I, II, III, IV, V and IV 2. Project participant has not provided any documentary evidence for the change of bulk metering locations for NSLC V from NSLC I to NSLC II 3. The village names of WTG location provided in monitoring report version 01 is inconsistent with the commissioning certificates.	1e above	1. The capacity load of WTGs connected at each monitoring locations NSLC I, II, III, IV, V, VI are included in section 3.3 of the revised monitoring report, version 2. 2. The documentary evidence is not applicable for the change of bulk metering locations for NSLC V from NSLC I to NSLC II due to the following reason: The capacity load of only 19.5 MW is connected to substation meter NSLC I till Sep 2009 as PP had commissioned only 19.5 MW till Sep 2009. PP had commissioned the remaining capacity load of 30.9 MW in the year 2010 and 2011 only and hence there is need for one more metering point (feeder) NSLC II and it had come up later. The capacity load of the project activity had been shared among the substation meters NSLC I and II with capacity load of 25.5 MW and 24.9 MW respectively, at a later stage once after PP had commissioned all	1. Verification team found that the project participant has provided the capacity load for each monitoring location NSLC I, II, III, IV, V, VI in section 3.3 of the revised monitoring report. The same was in accordance with site scenario and hence found satisfactory. 2. KPTCL is the sole authority for sharing of the loads for each feeder in the project activity. As all the WTGs of the project activity has been commissioned by September 2011 thus the WTGs connected to group controller point NSLC V has been shifted from feeders, NSLC I to feeders, NSLC II. The transfer is not under the control of the project participant thus verification team accepts the same. 3. The verification team found that the project participant has revised the village names of the location of WTGs in revised monitoring report in line with commissioning certificates. Further, verification team noted that the village names in registered VCS-PD and in MR for 1st verification are also not consistent with the village names in the commissioning certificate. However, it was observed that at the time of conclusion of VCS validation and 1st verification, all the WTGs in the project

Draft report clarifications and corrective action requests by verification team	Reference to checklist question in Periodic Verification Checklist	Summary of project owner response	Verification team conclusion
		WTGs. This change has been done by the KPTCL based on the requirement and allocations; hence documentary evidence is not available for this change. 3. The village names has been revised in the revised MR.	activity was not commissioned and hence the names of villages could not be provided correctly. This change in name of the villages is now corrected in the MR for the current monitoring period, consistent with the actual commissioning certificates. Based on the satisfactory closure of the above points CL 3 is closed.
CAR 1 Verification team found that there are 2 parameters, EG_y and TEG_y, provided in the registered VCS PD, but project participant has provided the description of only one parameter, EG_y in section 3.2 of the VCS monitoring report verion 01. Project participant to clarify how the actual monitoring plan of the project activity have adhered to the monitoring plan provided in the regitered VCS PD.	3a ovenfor	The parameter TEG_y is included in section 3.2 of the revised monitoring report, version 2. Also the actual monitoring plan of the project activity is adhere to the monitoring plan provided in the registered VCS PD and the details of the same is described in section 3.3 of the revised monitoring report, version 2.	The project participant has provided description for both the parameter EG_y and TEG_y in section 3.2 of the revised monitoring report in line with the registered VCS PD. The verification team noted that the measurement methods, QA/QC procedures for both the parameters have been adequately explained in this section. The verification team reviewed the same and found them to be satisfactory and hence CAR 1 is closed.
CL 4 It is mentioned that the net electricity value mentioned in JMR would be cross checked with values mentioned in the Invoice. However, the verification team noted that the values in invoice are consistently lower than the values mentioned in the JMR. Hence the PP is requested to clarify the	3bii above	The net electricity generation values at NSLC I,II, III, IV, V, VI as per Form B certificate and as per invoices are provided in the revised Emission reduction calculation spreadsheet. The difference in value is due to the deduction of 115% of import values	Project participant has revised the emission reduction sheet to provide the values of the net electricity exported from both form B and invoice. The conservative of both the values has been used for the emission reduction calculation. The same was verified by the verification team and found

Draft report clarifications and corrective action requests by verification team	Reference to checklist question in Periodic Verification Checklist	Summary of project owner response	Verification team conclusion
reason for such variation and why the conservative values have not been used in the ER calculation, when conducting such cross checking.		from the import values provided in form B values. The electricity supplied to the grid by the plant is calculated as the lowest value of either the net energy generation at NSLC I, II, III, IV, V, VI as per the invoices raised by PP to grid or net energy generation at NSLC I, II, III, IV, V, VI as per the Form B certificate. Hence the conservative values have been considered for emission reduction calculation.	that the emission reduction obtained is conservative. Hence CL 4 is closed.
CAR 2 The verification team identified the following discrepancies in the monitoring report: 1. The organisation chart provided in the monitoring report version 01 doesn't match with the organisation chart provided in the registered VCS PD	3biv above	The organizational chart is corrected in line with the registered VCS PD in section 3.3 of the revised monitoring report, version 2.	Verification team found that the project participant has revised the organization chart in section 3.3 of the revised monitoring report in line with the registered VCS PD. The same was found to be satisfactory and hence CAR 2 is closed.
CL 5 During the current verification, meters at NSLC 1 and 2 have been replaced. Please explain the reason for such replacements and clarify whether the errors, if applicable, in the replaced meters, is taken into account in the calculation of ER.	3c above	KPTCL has passed a circular to WTG supplier for replacement of non ABT meters by ABT meters on 07/06/2011. Hence the non ABT meters at NSLC I and II have been replaced to ABT meters on 13/02/2012 adhering to the	Project participant has provided the documentary evidence for changing of non ABT meters by ABT meters from KPTCL for ensuring better accuracy. Hence verification team confirms that the meters at substation NSLC I and II were not replacement due to

Draft report clarifications and corrective action requests by verification team	Reference to checklist question in Periodic Verification Checklist	Summary of project owner response	Verification team conclusion
		requirement. There is no error observed in the replacement meters. The copy of the circular is attached along with the response for verification.	error readings. The verification team noted that the substation meters are under the jurisdiction of KPTCL and the project participant has no control over the replacement meters. The verification team found that meter change further improves the accuracy of the readings and hence CL 5 is closed.
CL 6 The verification team found that the Serial number of check meter has not been provided in section 5 of monitoring report version 01 and serial number of main meter provided for NSLC IV and NSLC V are not matching with the calibration certificates provided. Please clarify	3e above	The Serial number of check meter is included in section 5 of the revised monitoring report, version 2. The serial number of main meters for NSLC IV, NSLC V is corrected in section 5 of the revised monitoring report, version 2.	Project participant has provided the serial number of the both main and check meters in section 5 of the revised monitoring report. The serial number of main meter for NSLC IV and V has been revised in line with actual site scenario and calibration certificates has been provided in section 5 of the revised monitoring report. Based on the satisfactory response and correction CL 6 is closed.
CL 7 In the registered VCS PD, the formula for determining Emission Reductions due to the project activity is mentioned as follows: $EGy = EG_{ex} - EG_{im} - \text{Transmission loss.}$ However for the current monitoring period, the PP	4c above	The ER for the current monitoring period is calculated in line with the formula provided in the registered VCS PD in the revised emission reduction calculation sheet and revised monitoring report, version 2.	The project participant has revised the emission reduction calculation in line with the formula used in the VCS PD in the revised emission reduction sheet. The same was verified by the verification team and was found to be satisfactory. Hence CL 7 is closed.

Draft report clarifications and corrective action requests by verification team	Reference to checklist question in Periodic Verification Checklist	Summary of project owner response	Verification team conclusion
has not applied the above formula to determine ER. Please clarify.			
FAR 1 The next verifying agency is requested to verify the status of CDM validation and take due consideration in order to avoid double counting of emission reduction for the next monitoring period.		-	To be verified in subsequent verifications.