



VERIFICATION REPORT FOR “GRID CONNECTED WIND ENERGY PROJECT IN TAMIL NADU”



Document Prepared By Earthood Services Private Limited

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Summary:

Earthood Services Private Limited (hereafter referred to as ESPL) has been contracted by CLP Wind Farms (Theni – Project II) Private Limited to conduct the verification of the project - “Grid Connected Wind Energy Project in Tamil Nadu”, VCS ID 911 with regard to the relevant requirements of VCS programme guidelines and standard (VCS standard version 4.0, & VCS program guide version 04.0). Relevant requirements of the UNFCCC for CDM project activities, as well as criteria for consistent project operations, monitoring and reporting has been applied for verification.

The monitoring period covers under this verification are from 10/09/2018 to 24/06/2020(both days included).

The verification includes confirming the implementation of the monitoring plan of the registered VCS PD and MR (VCS ID 911) and the application of the monitoring methodology as per ACM0002 version 13: “Consolidated baseline methodology for grid-connected electricity generation from renewable sources”.

The project activity involves installation of 49.5 MW wind power project at the G.Usulampatti, Mottanoothu, Kothapatti, Shanmuga Sundara Puram & Marikundu villages of Theni district in state of Tamil Nadu., India and supplying the electricity to the Southern grid (now part of integrated Indian grid). Thus, the project aims to displace electricity produced by fossil fuel power plants harnessing wind energy. The energy produced is supplied to the regional grid. Therefore, the project reduces greenhouse gas emissions and thereby contributes to sustainable development.

A risk-based approach has been followed to perform this verification. In the course of verification, 03 Corrective Action request (CARs), 00 Forward Action request (FARs), and 01 Clarification request (CLs) were raised and successfully closed.

The review of the project design documentation, monitoring report and additional documents related to baseline and monitoring methodology; the subsequent background investigation, follow-up interviews (telephonic) and stakeholders have provided ESPL with sufficient evidence to validate the fulfillment of the stated criteria.

ESPL confirms that the project is implemented in accordance with the registered VCS PD. The monitoring system is in place and the emission reductions are calculated without material misstatements. Our opinion relates to the project's GHG emissions and the resulting GHG emission reductions reported and related to the valid and registered project baseline and monitoring and its associated documents. Based on the information seen and evaluated we confirm that the emission reductions from the project activity "Grid Connected Wind Energy Project in Tamil Nadu" in India during the period 10/09/2018 to 24/06/2020 (including both days) amount to 111,058 tons of CO₂e.

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1 INTRODUCTION

1.1 Objective

Earthood Services Private Limited (ESPL) has been contracted by CLP Wind Farms (Theni – Project II) Private Limited (project proponent), to undertake the verification of the renewable energy project titled “Grid Connected Wind Energy Project in Tamil Nadu” (VCS ID-911). The verifiers have reviewed the GHG data collected to date for the monitoring period from 10/09/2018 to 24/06/2020 (both days included) covered in this verification. The objective of this verification is a thorough and independent assessment of registered project activities against the applicable VCS requirement by the VVB. The verification process shall determine whether the proposed project activity complies with the requirements of latest VCS guidelines, applicability conditions of the selected methodology, relevant host country regulations and guidance issued by the VCS Board.

1.2 Scope and Criteria

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

The Verification is not meant to provide any consulting towards the project participants. However, stated requests for clarification and/or correction actions request may have provided inputs for improvement of the project design.

1.3 Level of Assurance

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

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

The evidence used to achieve a reasonable level of assurance is specified in section 2.3 and 2.4 of this report. Materiality for the project is 5%.

1.4 Summary Description of the Project

The project activity involves electricity generation by wind electric convertors and supplying the generated electricity for group captive consumers. The project being a renewable energy generation activity, it leads to removal of fossil fuel dominated electricity generation. The project activity results in reductions of greenhouse gas (GHG) emissions that are real, measurable, and verifiable and also plays beneficial role in the mitigation of climate change.

The project activity consists of 30 WTGs (1650 kW capacity each), making the total installed capacity to be 49.5 MW at the G.Usulampatti, Mottanoothu, Kothapatti, Shanmuga Sundara Puram & Marikundu villages of Theni district in state of Tamil Nadu.

Location of the project was verified through Google Map (<https://www.google.com/maps>) and found consistent with the data provided in the registered PD /01/.

The first 20 WTGs have been commissioned on 25/06/2010 and remaining 10 WTGs on 02/07/2010. The same was verified against the registered VCS PD/01/ and commissioning certificates/12/. The emission reductions from the project activity during the period 10/09/2018 – 24/06/2020 (including both days) amount to 111,058 tonnes of CO₂e.

The verification team has also verified the latest photographs/19/ of all the equipment's (WTGs and transformers, energy meters) installed at site and SCADA monitoring system submitted by the project proponent. The project activity is undergoing fifth verification and the implementation of project activity was also verified during previous verification/02/ through on-site visit by ESPL team on 17/10/2018. Based on the assessment of the documents, the assessment team is able to confirm that the project activity is fully functional and implemented as described in the registered VCS PD.

2 VERIFICATION PROCESS

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

2.1 Method and Criteria

The verification approach consists two phases.

In the first phase, ESPL completed a strategic review and risk assessment of the project's activities and processes in order to gain a full understanding of:

- Activities associated with all the sources contributing to the project emissions and emission reductions, including leakage if relevant;
- Protocols used to estimate or measure GHG emissions from these sources;

- Collection and handling of data;
- Controls on the collection and handling of data;
- Means of verifying reported data; and
- Compilation of the Monitoring Report.

At the end of this phase, ESPL produced a Verification Checklist which, based on the risk assessment of the parameters and data collection and handling processes for each of those parameters, describes the verification approach and the sampling plan.

In the second phase using the Verification checklist, ESPL verified the implementation of the monitoring plan and the data presented in the VCS MR/04/ for the period in question. This involved telephonic interviews of project proponent representative's and a desk review of the Monitoring Report. This verification report describes the findings of this assessment.

2.2 Document Review

The verification is performed primarily as a document review of the registered VCS PD/01/, previous verification report/02/ and associated documents as stated in details in appendix 1 of this document. The assessment is performed by a verification team using a protocol. The cross checks between information provided in the Monitoring report, VCS PD and information from sources other than those used, if available, the team's sectoral or local expertise and, if necessary, independent background investigations.

2.3 Interviews

During the current verification, on-site inspection has not been performed by the assessment team. However, the representatives of the PP were interviewed telephonically on 20/11/2020 i.e. personnel responsible for monitoring of the project activity, data collection and management, and QA/QC procedure. The details of the people interviewed are mentioned in the table below:

Name	Organization	Topic covered
Mr. Darshak Patil	CLP Wind Farms (Theni - Project II) Private Limited (Site In-charge)	Project implementation, start date as per the VCS requirements. Electricity Generation Records (monthly energy statements/JMRs, Invoices) Reliability & accuracy of readings considered for emission reduction calculations, Calibration procedure

Name	Organization	Topic covered
Mr. Sandip Saha	Deputy Manager, CLP Wind Farms (India) Private (Limited)	Consideration of monitoring period, monitoring methodology, project documentation and emission reduction calculations. Monitoring and measuring system, Collection of measurements Observations of established practices Data Verification of monitoring parameters QA/QC procedures, data management, internal audits to maintain data quality & reliability, maintenance Practices.

2.4 Site Inspections

Due to the current situation with the global COVID-19 pandemic scenario physical site inspection is not done for the current verification. Although domestic travel has resumed in India, it is still not recommended until absolutely necessary and considering health and safety a top priority, physical site visit for verification audit is not conducted. However, to achieve a reasonable level of assurance, the assessment team has followed the alternative means to substantiate the verification criteria as described in the below table:

Assessment Criteria	Means of verification/source documents	Assessment opinion
Description of project activity	Commissioning certificates /12/ PPA signed for the project activity /13/ VCS verification report for previous monitoring period/02/ Telephonic interview with site personnel on 20/11/2020.	The information with reference to project capacity, technology, plant equipment's and commissioning dates as provided in section 1.1 of MR are found consistent with the documents.
Compliance of the project implementation with the registered	- Monthly JMRs issued by state utility /09/. - Geographical co-ordinates of	Monthly JMRs issued by state utility indicate the following information: Identification of the

Assessment Criteria	Means of verification/source documents	Assessment opinion
project design document	project activity verified through Google Map¹ • Photograph of equipment's installed at site and screen shots of SCADA system /19/ • VCS verification report for previous monitoring period/02/. • Telephonic interview with site personnel on 20/11/2020	substation to which the project is connected, Serial numbers of energy meters used for measurement, Capacity of project and name of project participant. Location of project is verified through Google Map and found consistent with registered VCS PD. Photograph of equipment's and screen shots of SCADA system are verified to check the operational status of project activity. Grid connectivity of the project is confirmed through the PPA. All the information's regarding the project implementation as discuss above are further verified through VCS PD and found consistent.
Compliance of the registered monitoring plan with applied methodologies and standardized baselines	• Telephonic interview with site personnel on 20/11/2020. • PPA signed for the project activity /13/ • Monthly JMRs issued by state utility /09/.	The organizational structure, responsibilities and competencies of the personnel confirmed through telephonic interview. Frequency of monitoring of

¹ <https://www.gps-coordinates.net/>

Assessment Criteria	Means of verification/source documents	Assessment opinion
	- Invoices raised by project developer /08/ - ISO Certifications /20/.	parameters listed under approved monitoring plan is verified through JMRs /Invoices. The methods used for measuring, recording, storing, aggregating, and reporting the data on monitored parameters are verified through PPA and telephonic conversations with site personnel. Procedure for data uncertainty, emergency preparedness, roles and responsibility, operational and management structure are mentioned in the MR is confirmed through policy documents/20/ and found satisfactory.
Compliance with the calibration frequency requirements for measuring instruments	- Calibration certificates of meters/07/ - PPA signed for the project activity /13/ - Photograph of energy meters indicating sr. No, accuracy class, make /19/. - Central Electricity Authority (Installation and Operation of Meters) Regulations/16/	Calibration frequency and energy meter specifications (Sr. No, make accuracy class) is verified through calibration certificates and further verified through photographs and found consistent. Responsibility of calibration and maintenance of energy meters is solely under control of TNEB; this is verified through the

Assessment Criteria	Means of verification/source documents	Assessment opinion
		PPA.
Assessment of data and calculation of emission reductions or net removals	- Monthly JMRs issued by state utility /09/. - Invoices raised by project developer /08/ - CEA CO2 Baseline Database for the Indian Power Sector /11/ - Previous VCS verification report /02/.	Monthly values of monitoring parameter used in ER calculation are verified through JMRs and cross verified with the invoices. Methods, formulae and emission factor for calculating baseline emissions have been followed are in accordance with the applied methodology and as described in the approved VCS verification report /02/

It is noteworthy that no sampling plan for verification is applied as 100% data is verified for the current monitoring period. Most of the reference document referred by the assessment team (above table) are either issued /endorsed by state utility (TNEB/ TANGEDCO), an external government agency, hence is deemed authentic.

Based on the above assessment it can be concluded that the assessment team has verified sufficient appropriate audit evidences, to reduce audit risk to an acceptably low level as requisite to achieve reasonable level of assurance for the current verification.

2.5 Resolution of Findings

The objective of this step is to identify, discuss and conclude on the issues related to the monitoring, implementation and operations of the registered project activity that could impair the capacity of the registered project activity to achieve emission reductions or influence the monitoring and reporting of emission reductions. This is done based on the desk review and interaction with site personnel over phone. The verification team prepares and/or updates a verification protocol (internal document) that records the conformities and non-conformities, which may be of following types;

CAR (Corrective Action Request) is raised if one of the following occurs:

Non-compliance with the monitoring plan, the methodology or the standardized baseline are found in monitoring and reporting and has not been sufficiently documented by the project participants, or if the evidence provided to prove conformity is insufficient;

Modifications to the implementation, operation and monitoring of the registered project activity has not been sufficiently documented by the project participants;

Mistakes have been made in applying assumptions, data or calculations of emission reductions that will impact the quantity of emission reductions;

Issues identified in a FAR during validation to be verified during verification or previous verification(s) have not been resolved by the project participants. Clarification request (CL) is raised if information is insufficient or not clear enough to determine whether the applicable CDM requirements have been met. All CARs and CLs raised by the ESPL during verification shall be resolved prior to submitting a request for issuance.

FAR (Forward Action Request) is raised during verification if the monitoring and reporting require attention and/or adjustment for the next verification period. During the current verification there are 2 CARs and 1 CL raised and resolved. All the findings that are raised and communicated to project participant during the verification are included under Appendix 3. The section also includes the response, if provided, by the project participants and an assessment by the verification team if it was closed out or otherwise.

2.5.1 Forward Action Requests

The project activity is undergoing sixth verification in VCS; there were no FARs raised during the validation or previous verification/02/.

2.6 Eligibility for Validation Activities

Not applicable.

3 VALIDATION FINDINGS

Not applicable.

3.1 Participation under Other GHG Programs

The project activity is registered under the VCS only (VCS Project ID 911) and is not registered under any other emissions trading program or any other mechanism that includes GHG allowance trading. PP also confirms that net GHG emission reductions or removals generated during this monitoring period shall not be used for compliance under any such programs or mechanisms. This was confirmed through a declaration/15/ submitted by the PP and hence accepted by the assessment team.

3.2 Methodology Deviations

There is no methodology deviation identified during the current monitoring period.

3.3 Project Description Deviations

Project deviation in the current monitoring period:

During the current monitoring period, project deviation regarding the change in the calibration frequency is identified. The registered PD mentions that the meters will be calibrated and tested once in 3 year, however the calibration frequency is updated as once in 5 years.

The national guidelines issued by the Central Electricity Authority, Ministry of Power, Government of India Notification No. 502/70/CEA/DP&D dated 17/03/2006 which is considered as national standard, mentions that “All interface meters shall be tested at least once in five years.” The PPA signed specifically for this project activity between the state utility and the PP also states in section 4 paragraph (vi) that “All the meters shall be tested for accuracy as per the Central Electricity Authority (Installation and Operation of energy meters) Regulation 2006 by State Utility”.

As per the Section 4 paragraphs (iv) and (v) of the PPA, the meters shall be sealed by the state utility and that any meter seal shall be broken only by the representative of state utility whenever the metering systems is to be inspected, tested, adjusted, repaired or replaced. This confirms that the meters are sealed and in control of the state utility who calibrates/tests the meters. Therefore, it can be confirmed that the calibration frequency of the meters is not in control of the PP, hence the revised calibration frequency of “once in 5 years” is appropriate. Since the calibration of meters is not under control of the project proponent and the updated calibration frequency is in line with the national standard, hence project deviation is justified and accepted.

Project deviation in the previous monitoring period:

The Project proponent has considered project deviation in the previous monitoring period (4th verification) that is also applicable and valid in the current monitoring period. There is a change of accuracy class of energy meters installed project site. In accordance with the registered VCS PD, two identical energy meters – main meter and check meters of 0.5s accuracy class at each WTG's 33 kV outgoing feeder (metering point) were installed. As per Standards on Installation and Operation of Meters (pg no 15 of 20) of the notification dated 17/03/2006 published by Central Electricity Board, Govt. of India², interface meter with 0.5s or better accuracy class needs to be installed if energy meter is connected above 650 volts and up to 33 kV. Thus, during project commissioning state utility has installed energy meters with 0.5s accuracy class as energy meters are connected to grid at 33 kV. However, TNEB (state utility) has decided to upgrade accuracy class of all energy meters from 0.5s to 0.2s. Thus, being a project developer under TNEB jurisdiction, the PP has to replace all interface energy meters at site and same is beyond the control of the PP. It was observed that all main meters and check meters have been replaced with 0.2s. Thus, this project activity is now using energy meters with higher accuracy class to monitor export and import of electricity which is more conservative in nature. This is likely to be a permanent deviation. The assessment team has accepted this deviation for the reasons below:

- There is no loss of accuracy as a result of the alteration in monitoring (the energy meter's accuracy class improving from 0.5s to 0.2s)
- Due to improvement of accuracy class of energy meter, resulting in a more accurate value of the generation.

The assessment team is able to confirm that the deviations identified during the current monitoring period and previous monitoring period (fourth) is appropriately described and justified in section 3.2 of the monitoring report and the project remains in compliance with the VCS rules. Also, the deviation does not have an impact on the applicability of the methodology, additionality or the appropriateness of the baseline scenario.

3.4 Grouped Project

Not applicable. The project activity is not a grouped project

4 VERIFICATION FINDINGS

4.1 Project Implementation Status

² www.aegcl.co.in/Metering_Regulations_Of_CEA_17_03_2006.pdf

The project activity consists of 30 WTGs installed at G. Usulampatti, Mottanoothu, Kothapatti, Shanmuga Sundara Puram & Marikundu villages of Theni district in state of Tamil Nadu. The first 20 WTGs and last 10 WTGs under the project activity was commissioned on 25/06/2010 and 02/07/2010 respectively. The WTGs are Vestas make with an individual capacity of 1.65 MW, summing up to 49.5 MW of total installation capacity.

The project activity is reducing the GHG emissions generated by the current generation energy mix in India's Power Grid, which is dominated by fossil fuel-based grid connected power plants. The power generated through the proposed project activity being supplied to southern grid (now part of Indian grid) through contractual arrangement (PPA). The technical specification of the project activity equipment's has been checked through the photographs of all the equipment's/19/ installed at site and are found to be consistent with the mentioned under section 3.1 of MR. The current status of the project activity is verified through the screen shots of SCADA system/19/, indicating the real-time generation data and hence it is confirmed that the project is fully functioning.

The monitoring plan of registered VCS PD/01/ includes the parameter "Quantity of net electricity generation that is produced and fed into the grid as a result of the implementation of the project activity during the period y" ($EG_{PJ,y}$). This parameter is directly monitored through the dedicated meters (main and check) installed by the state utility (TNEB) at each WTG. All the meters installed at WTGs are of accuracy class 0.2s and in line with the applied methodology, parameter $EG_{PJ,y}$ is measured continuously and recorded monthly.

Monthly values of $EG_{PJ,y}$ obtained directly from the monthly JMRs issued by state utility/09/. The invoicing being done against electricity supplied by the project plant. The measurement results are cross checked with records of invoices and it is in line with applied methodology. Thus, this parameter is considered in emission reduction calculations.

As verified through the calibration certificates/07/ and recent photographs of energy meters/19/ that the project WTGs are connected to eight separate feeders, there is one set of energy meters (main and check meter) installed at each feeder located at substation and are under control of state utility (TNEB), sealed in presence of both the state utility official & representative of PP. Also, the WTGs of other project developers (non-project activity) are also connected to these feeders, hence the electricity supplied to the grid by the individual project developer is calculated by the O&M contractor/DISCOM using apportioning procedure as described under section 4.3 of the monitoring report.

Post apportioning the state utility issues the JMRs/09/ to individual project developer, that indicates the value of electricity exported, imported and net electricity supplied to the grid in particular month.

Joint Meter Reading is being taken jointly by the officials of state utility and project participant's representative on monthly basis and accordingly monthly JMR is being prepared/13/. The monitoring methodology applies consistently the choice of the option selected for monitoring of baseline emissions. The monitoring plan provide procedures for the collection and archiving of all relevant data necessary for estimation or measuring the emission reductions within the project boundary during the crediting period. This is checked through discussion with consultant and the project participant during the telephonic interview.

The VCS MR/04/ has been reviewed to check that the procedure for data uncertainty, emergency preparedness, roles and responsibility, operational and management structure are mention in the MR. The monitoring plan completely describes all measures to be implemented for monitoring all parameters required. The monitoring plan described the positioning of the equipment. Calibration frequency for Energy meters is once in 5 years. Also, CEA Notification/16/ No. 502/70/CEA/DP&D dated 17/03/2006 which is considered as national standard mentions that "All interface meters shall be tested at least once in five years." Hence calibration frequency once in 5 years considered for the project activity is found to be appropriate.

The information relating to the project implementation, provided in the Monitoring Report /04/ is consistent with that stated in the registered PD /01/. The data and variables provided in the monitoring report are the same as stated in the registered PD/01/. Total emission reductions achieved under this monitoring period 10/09/2018 to 24/06/2020 (including both days) is 111,058 tCO₂e.

Assessment team concludes the following:

- a) There are no material discrepancies between project implementation and the project description provided in the registered PD/01/.
- b) The monitoring plan is implemented completely and monitoring system (i.e., process and schedule for obtaining, recording, compiling and analysing the monitored data and parameters) is appropriate.
- c) There are no material discrepancies between the actual monitoring system, and the monitoring plan set out in the project description and the applied methodology/10/.
- d) The GHG emission reductions or removals generated by the project have not included in an emissions trading program or any other mechanism that includes GHG allowance trading/15/.
- e) The project has not received or sought any other form of environmental credit, or has become eligible to do so since validation or previous verification/15/.
- f) The project is registered under VCS only and not seeking registration under CDM.

- g) The project activity is complying with indicators for sustainable development in the interim approval guidelines for Clean Development Mechanism (CDM) projects from India as discussed under section 1.11 of MR.

In view of the information's as verified above the assessment team is able to conclude that the project has been implemented as described in the project description.

4.2 Safeguards

4.2.1 No Net Harm

There is no negative impact to any socio-economic conditions of the region due to the project activity. As per the notifications issued by Ministry of Environment and Forest dated 01/12/2009(ref:<http://moef.nic.in/downloads/rules-and-regulations/3067.pdf>), Environmental Impact Assessment for the wind projects is not required to be done.

This project activity will not involve any negative environmental or socio-economic impacts, as the project activity involves generation of power using wind energy which is a clean source of energy. Hence no mitigation measures are required.

4.2.2 Local Stakeholder Consultation

The project activity undergoing sixth verification and local stakeholder consultation was appropriately conducted prior to validation as a way to inform the design of the project and maximize participation from stakeholders during the validation.

The project proponent has implemented mechanism for ongoing communication with local stakeholders to allow stakeholders to raise concerns about potential negative impacts during implementation and operation of the project activity. The project proponent has placed a grievance register and a grievance box at site office/21/, where the local villagers can register their concerns.

The assessment team has checked the copy of grievance register maintained at site office/21/ and confirmed that no formal complaints were received during the current monitoring period.

4.3 AFOLU-Specific Safeguards

Not applicable to the project activity.

4.4 Accuracy of GHG Emission Reduction and Removal Calculations

The calculation of the emission reductions is found to be correct. The details of the reported and the verified values for all parameters are listed in section 4.5 of this report.

The parameter $EG_{PJ,y}$ is directly sourced from monthly JMRs issued by state utility. The PP has provided the complete set of data for all the monitored parameters in the ER spreadsheet/06/. This data has been verified as described in section 4.5 below. The formulae & method used to calculate the baseline emissions, project emissions and leakage are appropriate and in line with the approved methodology ACM0002 version 13.

The PP has calculated the grid emission factor as per the combined margin approach described in the 'Tool to calculate the emission factor for an electricity system', version 2.2.1. The grid emission factor has been calculated as the weighted average of OM & BM; and has been fixed ex-ante for the entire crediting period.

The OM and BM have been obtained from a publicly available source i.e. "CO₂ Baseline Database for Indian Power sector", version 07/11/ published by Central Electricity Authority, Ministry of Power, and Government of India. The OM has been determined as the average of the previous 3 years values obtained from the CEA database/11/. The value of BM has been identified directly from the CEA database. The combined margin emission factor was arrived at by applying weights of 75% for OM and 25% for BM, as specified in the tool. The OM and BM have been calculated to be 0.9513 tCO₂/MWh and 0.7339 tCO₂/MWh respectively. Applying the weights, the grid emission factor has been calculated to be 0.8970 t CO₂/MWh.

As per ER calculation excel spreadsheet/06/ submitted by the PP, the net emission reductions for the current monitoring period was verified as 111,058 tCO₂e for the current monitoring period.

The assessment team able to confirm that the GHG emission reductions and removals have been quantified correctly in accordance with the project description and applied methodology.

4.5 Quality of Evidence to Determine GHG Emission Reductions and Removals

All the data recorded is in compliance with the registered VCS PD and Monitoring Report. The assessment team has checked the monthly JMRs for electricity generated and supplied by project activity/09/ for the current monitoring period to verify the values of monitoring parameter reported in ER calculation sheet and found to be consistent. Since the monthly credit reports prepared and issued by state utility, they are found to be reliable and authentic.

The CLP Wind Farms (Theni – Project II) Private Limited is responsible for the operations, maintenance and monitoring of the project activity, whose operation and maintenance activities are ISO 9001:2015 (Quality Management System) certified/20/. Hence it is confirmed that the management system of the VCS project is in place; with the responsibilities properly identified. The same was also verified during the telephonic interview of site personnel.

The monitoring of the project activity is found to be in accordance with the monitoring methodology described in ACM0002, Version 13 /10/. The monitoring mechanism is effective and reliable. During the remote audit, personnel involved at various levels of the operation of the project activity have been interviewed(telephonically) to confirm that the plant personnel are conscious of the importance of the monitoring activities. The verification of the plant records and latest photographs are also substantiating consistency in recording and reporting of monitored data.

The screen shots of SCADA system/19/ confirms that the monitoring systems have been installed and are operational. The meters comply with appropriate quality standards applicable for the used technology. The accuracy class of the meters installed for the project activity was verified through the registered VCS PD/01/, MR /04/, and calibration certificates/07/, latest photographs of meters and cross-checked against the PPA/13/ signed for the project activity, found to be consistent.

The supporting records of monthly JMRs /09/ and invoices for the entire monitoring period were checked and found to be sufficient to enable verification of emission reductions.

The following parameter has been verified for current monitoring period:

Parameter:	Quantity of net electricity generation that is produced and fed into the grid as a result of the implementation of the project activity during the period y, $EG_{PJ,y}$ (MWh):	
Means of verification		
	Criteria/Requirements	Assessment/Observation
	Measuring /Reading /Recording frequency	The main meter and check meters, located near the turbine, continuously monitors export, import and net export of energy from each turbine. The readings at the Metering Point are undertaken every month jointly by the representatives of the State Grid/ TNEB and CLP/Vestas representative.
	Is measuring and reporting frequency in accordance with the monitoring plan and monitoring methodology? (Yes / No)	Yes. In line with the approved monitoring plan, this parameter is recorded on monthly basis in the monthly JMRs issued by state utility.
	Monitoring equipment	A set of bidirectional (main and check) energy meters are installed near each

		WTG to account the electricity supplied to the grid.
	Is accuracy of the monitoring equipment as stated in the monitoring plan? If the monitoring plan does not specify the accuracy of the monitoring equipment, does the accuracy of the monitoring equipment comply with local/national standards, or as per the manufacturer's specification?	The energy meters are two-way tri-vector meters of accuracy class 0.2s. Accuracy of the monitoring equipment's is higher than accuracy mentioned in the monitoring plan as outlined in the registered PD.
	Is the accuracy valid for the entire measuring range or do different accuracy levels apply to different measuring ranges?	Yes. The accuracy of monitoring equipment is valid for the entire range. Calibration of energy meters is valid for the current monitoring period.
	Calibration frequency /interval:	Calibration frequency of the meters is once in 5 years /01/.
	Is the calibration interval in line with the monitoring plan and/or methodology? If the monitoring plan does not specify the frequency of calibration, is the selected frequency in accordance with the local/national standards, or as per the manufacturer's specifications?	Yes. The calibration frequency is in line with the monitoring plan as outlined in the registered VCS PD/01/.
	Is the calibration of measuring equipment carried out by an accredited person or institution?	Yes, the calibration is conducted by state utility (TNEB) which is a NABL Accredited entity/07/.
	How were the values in the	Cumulative value of $EG_{PJ,y}$ for entire

	monitoring report verified?	monitoring period is reported in the monitoring report/04/, however monthly values are reported in the ER calculation sheet/06/. The monthly values were verified from the JMRs issued by state utility and found to be consistent. Value of this parameter for the current monitoring period was verified as 123,812.21 MWh.
	If applicable, has the reported data been cross-checked with other available data?	Monthly reported values of $EG_{PJ,y}$ for the current monitoring period were further cross-checked with the monthly invoices raised by the PP /08/ and found to be consistent.
	Does the data management ensure correct transfer of data and reporting of emission reductions and are necessary QA/QC processes in place?	Yes, the adequate QA/QC procedures were implemented by all the stakeholders, namely, the Grid Authority (TNEB), the PP and the Vestas (O&M Contractor). The data transfer process for the said parameter is as follows: The Joint meter reading at all the metering points at DISCOM substation is taken by the representatives of TNEB in the presence of PPs representative officials in the form of JMRs. Based on this monthly recording, the state electricity board issues the 'joint meter reading' (JMR) termed as Statement of Energy every month. The verification team cross-checked all the Energy statements issued by TANGEDCO, invoices raised by Project Participant for corresponding months and confirms that the generated electricity has been sold to the grid and not used for any other purpose throughout the current monitoring period.

	In case project participants have temporarily not monitored the parameter, has either i) a deviation been approved by the CDM EB or ii) has the parameter been estimated as stipulated by Appendix 1 to the CDM Project Standard?	No such issues.
Findings	CL #1, CAR #1, CAR #2 and CAR #3 were raised and resolved.	
Conclusion	The parameter has been monitored appropriately, in accordance with the registered monitoring plan (as per measurement methods and procedures to be applied) and applied methodology. The monitoring results were recorded consistently as per the approved frequency in the monitoring plan.	

Parameters fixed ex ante:

$EF_{grid,OM,y}$; tCO_{2e}/MWh : it is the operating margin emission factor of southern grid fixed at the time of project registration the mentioned value of 0.9513 tCO_{2e}/MWh is consistent with the registered PD/01/ and MR..

$EF_{grid,BM,y}$; tCO_{2e}/MWh : it is build margin emission factor of southern grid fixed at the time of project registration the mentioned value of 0.7339 tCO_{2e}/MWh is consistent with the registered PD/01/ and MR.

$EF_{grid,CM,y}$; tCO_{2e}/MWh : it is the combined margin emission factor of southern grid fixed at the time of project registration the mentioned value of 0.8970 tCO_{2e}/MWh is consistent with the registered PD/01/ and MR.

Calibration of meters:

During the verification assessment of the project activity, accuracy of all the metering have been checked and found appropriate. The installation and working conditions of the meters were checked through calibration certificates, latest photographs and were found to be satisfactory. Details of meters are provided in below table:

HTSC No-	Main Meter			Check meter		
	Sr. No.	Calibration date	Validity	Sr. No.	Calibration date	Validity
T-90	HPL624813	3/02/2017	22/02/2022	HPL624819	22/2/2017	22/02/2022

HTSC No-	Main Meter			Check meter		
	Sr. No.	Calibration date	Validity	Sr. No.	Calibration date	Validity
T-91	HPL624812	25/02/2017	24/02/2022	HPL624817	25/02/2017	24/02/2022
T-92	HPL624814	24/02/2017	23/02/2022	HPL624978	24/02/2017	23/02/2022
T-93	HPL624972	24/02/2017	23/02/2022	HPL624976	24/02/2017	23/02/2022
T-94	HPL624971	24/02/2017	23/02/2022	HPL624975	24/02/2017	23/02/2022
T-95	HPL624973	25/02/2017	24/02/2022	HPL624977	25/02/2017	24/02/2022
T-96	HPL624979	22/02/2017	21/02/2022	HPL624980	22/02/2017	21/02/2022
T-97	HPL624820	22/02/2017	21/02/2022	HPL624974	22/02/2017	21/02/2022
T-98	HPL625141	23/03/2017	22/03/2022	HPL625146	23/03/2017	22/03/2022
T-99	HPL625144	24/03/2017	23/03/2022	HPL625150	23/03/2017	22/03/2022
T-100	GENUS 4322544	29/05/2017	28/05/2022	HPL 3033738	08/12/2017	07/12/2022
T-101	GENUS 4321972	30/05/2017	29/05/2022	HPL 3033737	08/12/2017	07/12/2022
T-102	HPL625145	24/03/2017	23/03/2022	HPL625149	24/03/2017	23/03/2022
T-103	HT2160431	01/03/2016	28/02/2021	HT2160432	01/03/2016	28/02/2022
T-104	GENUS 4321968	30/05/2017	29/05/2022	HPL 3033733	08/12/2017	07/12/2022
T-105	HPL624853	22/03/2017	21/03/2022	HPL624860	22/03/2017	21/03/2022

HTSC No-	Main Meter			Check meter		
	Sr. No.	Calibration date	Validity	Sr. No.	Calibration date	Validity
		017	22			
T-106	HPL624856	22/03/2017	21/03/2022	HPL624859	27/02/2017	26/02/2022
T-107	HPL625142	22/03/2017	21/03/2022	HPL625148	23/03/2017	22/03/2022
T-108	HPL625143	23/03/2017	22/03/2022	HPL625147	23/03/2017	22/03/2022
T-109	HPL624854	27/02/2017	26/02/2022	HPL624855	27/02/2017	26/02/2022
T-113	HPL624811	21/02/2017	20/02/2022	HPL624816	21/02/2017	20/02/2022
T-114	HPL624815	22/02/2017	21/02/2022	HPL624818	21/02/2017	20/02/2022
T-115	HPL625081	23/02/2017	22/02/2022	HPL625089	23/02/2017	22/02/2022
T-116	GENUS 4321967	29/05/2017	28/05/2022	HPL 3033735	08/12/2017	07/12/2022
T-117	HPL624741	25/02/2017	24/02/2022	HPL624747	25/02/2017	24/02/2022
T-118	HPL624857	27/02/2017	26/02/2022	HPL624858	27/02/2017	26/02/2022
T-119	HPL624743	25/02/2017	24/02/2022	HPL624745	25/02/2017	24/02/2022
T-120	HPL624748	27/02/2017	26/02/2022	HPL624750	25/02/2017	24/02/2022
T-121	GENUS 4322548	29/05/2017	28/05/2022	GENUS 4322548	27/02/2017	26/02/2022
T-122	GENUS 4321971	30/05/2017	29/05/2022	HPL 3033748	08/12/2017	07/12/2022

It is evident from the above table that calibration of all the existing meters was valid during the current monitoring period, hence no delay in calibration of meters identified. The CEA Notification No. 502/70/CEA/DP&D dated 17/03/2006 and its amendments Notified on 26/06/2010 No. 502/6/2009/DP&D/D-I /16/ which is considered as national standard, mentions that for voltage of 650 V up to 33 Kv, 0.5s accuracy class or above is recommended. Hence, the accuracy classes of 0.2s for the energy meters installed at the project activity site are found to be appropriate.

The details of monitoring equipment are involved in the project activity and their calibration details/07/ are mentioned under section 4.3 of the VCS MR/04/. The CEA Notification No. 502/70/CEA/DP&D dated 17/03/2006/16/ which is considered as national standard mentions that "All interface meters shall be tested at least once in five years." Hence, the stipulated calibration frequency once in 5 years is appropriate.

In view of the above discussion the assessment team able to confirm that evidence used to determine the GHG reductions and removals are sufficient and appropriate with respect to quality and quantity.

GHG Calculations:

The emission reduction as per the applied methodology equals the baseline emissions (project emissions and leakage emissions for such project activities is considered zero). The formula provided for the calculation of baseline emissions is:

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

Where:

BE_y : Baseline emissions in year y (tCO_{2e}/yr)

$EG_{PJ,y}$: Quantity of net electricity supplied to the grid as a result of the implementation of the CDM project activity in year y (MWh)

$EF_{grid,CM,y}$: CO₂ emission factor of the grid in year y (tCO₂/MWh)

Thus,

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

$$\text{Thus, } BE_y = 123,812.21 \text{ MWh} * 0.8970 \text{ tCO}_2/\text{MWh}$$

$$= 111,058 \text{ tCO}_2 \text{ (rounded down value)}$$

As per the applied methodology, emission reductions are calculated as follows:

$$ER_y = BE_y - PE_y$$

$$ER_y = 111,058 - 0$$

$$ER_y = 111,058 \text{ tCO}_2$$

The verification team confirms that appropriate methods and formulae for calculating baseline emissions have been followed. The assumptions, emission factors and default values that were applied in the calculations are justified. The actual emission reduction achieved during the current monitoring period are 42.73 % lower than the estimated amount of emission reductions as determined in the registered VCS PD, which is due to the low PLF achieved by the project activity during the monitoring period.

It is to be noted that PLF is completely governed by the availability of wind, which is natural phenomenon and same is beyond the control of PP, hence the assessment team has concluded the decrease in emission reduction of the project activity is justified and acceptable. All the data were made available and have monitored as per required monitoring frequency. The means of verification for the values of parameters, used for baseline emission calculation, is described above.

4.6 Non-Permanence Risk Analysis

Not applicable for the project activity.

5 VERIFICATION CONCLUSION

Earthood Services Private Limited (ESPL), contracted by CLP Wind Farms (Theni – Project II) Private Limited, to perform the independent verification of the emission reductions for the VCS project activity “Grid Connected Wind Energy Project in Tamil Nadu” (VCS ID- 911) in India for the monitoring period 10/09/2018 – 24/06/2020 as reported in the Monitoring Report Version 02 dated 25/11/2020. The CLP Wind Farms (Theni – Project II) Private Limited is responsible for the collection of data in accordance with the monitoring plan and the reporting of GHG emissions reductions from the project activity.

It is our responsibility to express an independent verification statement on the reported GHG emission reductions from the project activity. ESPL commenced the verification on the basis of the baseline and monitoring methodology ACM0002 Version 13, the monitoring plan contained in the registered VCS PD Version 03, dated 21/06/2012 and VCS guidelines version 4.0, Monitoring Report Version 02 dated 25/11/2020 as per the process described under Section 2 of this report. ESPL verification approach is based on the understanding of the risks associated with reporting of GHG emission data and the controls in place to mitigate these. ESPL planned and performed the verification by obtaining evidence and other information and explanations that ESPL considered necessary to give reasonable assurance that reported GHG emission reductions are fairly stated.

In our opinion the GHG emissions reductions reported for the project activity for the period 10/09/2018 – 24/06/2020 are fairly stated in the Monitoring Report Version 02 dated 25/11/2020. The GHG emission reductions were calculated correctly on the basis of the approved baseline and monitoring methodology ACM0002, Version 13, and the VCS standard version 4.0.

Verification period: From 10/09/2018 – 24/06/2020 (including both days)

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

Year	Baseline emissions or removals (tCO ₂ e)	Project emissions or removals (tCO ₂ e)	Leakage emissions (tCO ₂ e)	Net GHG emission reductions or removals (tCO ₂ e)
2018 (from 10/09/2018 to 31/12/2018)	5,462	0	0	5,462
2019 (from 01/01/2019 to 31/12/2019)	79,993	0	0	79,993
2020 (from 01/01/2020 to 24/06/2020)	25,603	0	0	25,603
Total	111,058	0	0	111,058

Approved by



Dr. Kaviraj Singh

Managing Director

Earthood Services Privated Limited

Date: 03/12/2020

Place: Gurugram, Haryana

APPENDIX 1:DOCUMENT REFERENCES

S.No	Title of Document	Version	Date
1.	Registered VCS PD	3.0	21/06/2012
2.	VCS Validation Report	3.0	22/06/2012
2.	VCS Verification report fifth monitoring period (from 10/10/2017 to 09/09/2018)	02	26/10/2018
3.	VCS Monitoring Report	01	20/10/2020
4.	VCS Monitoring Report (Final)	02	25/11/2020
5.	ER spread sheet	01	20/10/2020
6.	ER spread sheet (corresponding to the final monitoring report)	02	25/11/2020
7.	Certificates of Calibration for all the meters belongs to project activity	-	-
8.	Invoice issued by PP	For the period 10/09/2018 to 24/06/2020	-
9.	Monthly JMRs issued by the state utility	For the period 10/09/2018 to 24/06/2020	-
10.	“Consolidated baseline methodology for grid-connected electricity generation from renewable sources”, ACM0002,	13.0.0	-
11.	CEA Database	version 07	-
12.	Commissioning certificate for all the WTGs of the project activity issued by state electricity authority	-	Commissioned between 25/06/2010 and 02/07/2010
13.	Power Purchase Agreements signed between Project Proponent and state electricity authority	-	-
14.	VCS webpage for the project, VCS ID 911; https://registry.verra.org/app/projectDetail/VCS/911	-	-
15.	Letter of declaration dated from PP regarding not having created or sought any other form of environmental credit for the same period	-	24/11/2020
16.	Central Electricity Authority (Installation and Operation of Meters) Regulations Notified on 17/03/2006 No. 502/70/CEA/DP&D Amendments Notified on 26/06/2010 No. 502/6/2009/DP&D/D-I	-	-
17.	VCS Standard	Version 4.0	19/09/2019
18.	VCS Program Guide	Version 4.0	19/09/2019
19.	Remote site visit (Con-call with PP representatives) Latest photographs of SCADA system, WTGs, transformers and energy meters installed at site	-	20/11/2020

S.No	Title of Document	Version	Date
20.	- ISO 9001:2015 certification for Scope of Design, Development and Operation of wind power plant - Quality policy implemented at site	-	-
21.	Grievance register/suggestion box placed at site office	-	-

APPENDIX 2: ABBREVIATIONS

Abbreviations	Full texts
ABT	Availability Based Tariff
BEF	Baseline Emission Factor
BM	Build Margin
CAR	Corrective Action Request
CEA	Central Electricity Authority
CERC	Central Electricity Regulatory Commission
CL	Clarification Request
CMS	Central Monitoring System
CMP	Conference of Parties Serving as Meeting of Parties
CO2	Carbon dioxide
DISCOM	Distribution Company
EB	Executive Board
FAR	Forward Action Request
GHG	Green House Gas
ISO	International Standards Organization
JMR	Joint Meter Reading
kW	Kilowatt
kWh	Kilowatt hour
MEDA	Maharashtra Energy Development Agency
MFR	Multi-Function Relay
MR	Monitoring Report
MWh	Megawatt-hour
PD	Project Description
PLF	Plant Load Factor
PP	Project Proponent

Abbreviations	Full texts
QA/QC	Quality Assurance and Quality Control
TNEB	Tamil Nadu Electricity Board
TANGEDCO	Tamil Nadu Generation and Distribution Corporation Limited
UNFCCC	United Nations Framework Convention on Climate Change
VCS	Voluntary Carbon Standard
VCSA	Voluntary Carbon Standard Association
VCS PD	VCS Project Description
VCUs	Voluntary Carbon Units
WEG	Wind Energy Generator
WTG	Wind Turbine Generator

APPENDIX 3: FINDINGS OVERVIEW

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

FAR ID	NA	Section no.	NA	Date :DD/MM/YYYY
Description of FAR				
No FAR from validation or verification				
Project participant response				Date :DD/MM/YYYY
NA				
Documentation provided by project participant				
NA				
DOE assessment				Date: DD/MM/YYYY
NA				

Table 1. CL from this verification

CL ID	02	Section no.	4.1	Date : 20/11/2020
Description of CL				
Please submit the following documents: 1. Commissioning certificates 2. Power Purchase Agreement 3. Monthly JMRs and invoices for the current monitoring period.				
Project participant response				Date : 25/11/2020
Following documents are now submitted along with this submission: 1) Commissioning certificates 2) Power Purchase Agreement 3) Monthly generation statement and respective invoices for the current monitoring period.				
Documentation provided by project participant				
1) Commissioning certificates 2) Power Purchase Agreement 3) Monthly generation statement and respective invoices for the current monitoring period.				

DOE assessment	Date: 28/11/2020
The PP has submitted the requested documents and found to be appropriate, hence accepted. CL #1 is closed.	

Table 2. CAR from this verification

CAR ID	01	Section no.	3.1	Date : 20/11/2020
Description of CAR				
Please submit declaration confirming that the GHG Emission reductions or removals generated by the project activity will not be used for compliance with an emission trading program or to meet binding limits on GHG Emissions.				
Project participant response				Date : 25/11/2020
Declaration has been attached with this submission				
Documentation provided by project participant				
Declaration letter				
DOE assessment				Date: 28/11/2020
Project proponent has submitted the declaration pertaining to confirmation for the GHG Emission reductions or removals generated by the project activity will not be used for compliance with an emission trading program or to meet binding limits on GHG Emissions, found satisfactory, hence accepted. CAR #1 is closed.				

CAR ID	02	Section no.	4.4	Date : 20/11/2020
Description of CAR				
Value of emission reductions achieved during the current monitoring period as reported in the MR is not consistent with the ER calculation sheet. Start date of vintage year 2018 as mentioned under section 5.4 of the MR is not consistent with the ER calculation sheet.				
Project participant response				Date : 25/11/2020
Value of emission reductions achieved during the current monitoring period is not made consistent throughout monitoring period Start date of vintage year 2018 is now updated appropriately				
Documentation provided by project participant				
MR Version 02 ER sheet version 02				
DOE assessment				Date: 28/11/2020
The project proponent has corrected the value of emission reductions achieved during the current monitoring period in the MR and found consistent with the ER calculation sheet. Start date of vintage year 2018 is corrected in section 5.4 of the revised MR, found consistent with the ER calculation sheet. CAR #2 is closed.				

CAR ID	03	Section no.	4.4	Date : 20/11/2020
Description of CAR				
As per the information provided in section 4.3 the MR, calibration of all the meters is not valid in the current monitoring period, since the current monitoring period ends on 24/06/2020, hence please clarify how it is ensured that the meters were working satisfactorily during the current monitoring period. Please submit the calibration certificates of all the meters valid for current monitoring period.				
Project participant response				Date : 25/11/2020

During registration, calibration frequency has been considered once in a three year. However, in actual practice, state utility conducted the accuracy check of all interface meters once in five years. These meters also tested whenever the energy and other quantities recorded by the meter are abnormal or inconsistent with electrically adjacent meters. Details of the calibration is mentioned in section 4 of the PPA which is in line with para 18.1.b of the notification dated 17/03/2006 published by Central Electricity Board, Govt. of India (www.aegcl.co.in/Metering_Regulations_Of_CEA_17_03_2006.pdf). Testing and calibration has been done by state utility which is beyond the control of Project Participant. Thus, deviation has been proposed.

Documentation provided by project participant

Revised Monitoring report
Power Purchase Agreement

DOE assessment

Date: 28/11/2020

During the current monitoring period, calibration frequency of the meters from once in 3 year to once in 5 years and considered this change as project deviation during the current monitoring period. The national guidelines issued by the Central Electricity Authority, Ministry of Power, Government of India Notification No. 502/70/CEA/DP&D dated 17/03/2006 which is considered as national standard, mentions that "All interface meters shall be tested at least once in five years." The PPA signed specifically for this project activity between the state utility and the PP also states in section 4 paragraph (vi) that "All the meters shall be tested for accuracy as per the Central Electricity Authority (Installation and Operation of energy meters) Regulation 2006 by State Utility". Since the calibration of meters is not under control of the project proponent and the updated calibration frequency is in line with the national standard, hence project deviation is justified and accepted.
CAR #3 is closed.

Table 3. FAR from this verification

FAR ID	NA	Section No.	NA	Date :DD/MM/YYYY
Description of FAR				
No FAR rose during the verification.				
Project participant response				Date :DD/MM/YYYY
NA				
Documentation provided by project participant				
NA				
DOE assessment				Date: DD/MM/YYYY
NA				

APPENDIX 4: COMPETENCY STATEMENTS

Competence Statement			
Name	Ravi Kant Soni		
Country	India		
Education	B. Tech. (Mechanical Engineering) M. Tech. (Energy Management)		
Experience	8 Years +		
Field	Energy and Climate Change		
Approved Roles			
Team Leader	YES		
Validator	YES		
Verifier	YES		
Methodology Expert	AMS-I.D., AMS-I.C., ACM0002		
Local expert	YES (India)		
Financial Expert	No		
Technical Reviewer	No		
TA Expert	YES (TA 1.2)		
Reviewed by	Shreya Garg	Date	04/06/2019
Approved by	Anshika Gupta	Date	04/06/2019

Name	Anshika Gupta		
Country	India		
Education	M.Sc. (Climate Science & Policy), TERI University		
Experience	6 Years +		
Field	Climate Change		
Approved Roles			
Team Leader	YES		
Validator	YES		
Verifier	YES		
Methodology Expert	AMS-I.A., AMS-II.G., ACM0002, AMS-III.A.V.		
Local expert	YES (India)		
Financial Expert	NO		
Technical Reviewer	YES		
TA Expert	YES (TA 1.2, TA 3.1)		
Reviewed by	Shreya Garg	Date	12/03/2019
Approved by	Kaviraj Singh	Date	12/03/2019