

Kepezkaya Hydroelectric Power Plant, Turkey

VALIDATION REPORT SOCIALCARBON Standard - Point Zero -



Document Prepared By TÜV Rheinland Energie und Umwelt GmbH

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Project Information

Indicators	Hydro indicators version 4.1, Modified for Kepezkaya HPP
Project Name	Kepezkaya Hydroelectric Power Plant (Kepezkaya HPP)
Year - Point of Project	2012 - Point Zero
Monitoring period (SOCIALCARBON)	01 October 2010 to 31 August 2012
Corresponding Monitoring Report (Carbon Accounting Standard)	01 October 2010 to 31 August 2012 (VCS Version 3.2)
Location	Karaman, Turkey

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1 Introduction

1.1 Scope and Criteria

This report represents the initial (Point Zero) SOCIALCARBON validation of the project Kepezkaya Hydroelectric Power Plant, Turkey. The Social Carbon validation was commissioned by the project owner Selen Elektrik Üretim A.Ş. and TÜV Rheinland Energie und Umwelt GmbH has been contracted as an independent validation/verification body to validate the project against the Social Carbon standard in order to demonstrate the social and environmental benefits of the project in relation to its surroundings.

SOCIALCARBON is a holistic assessment of the impact of a project on its surroundings and takes into consideration (voluntary) actions taken by the project owner to maximize positive side-effects and mitigate against adverse ones. The criteria assessed are categorized into six groups: social, human, natural, biodiversity, financial and carbon. The guidelines "SOCIALCARBON – Indicators for Hydroelectric Power Plants, v4.1" have been applied to evaluate the score of the index for each category. The auditing process is limited to the information described in or required by the indicator (as specified in the SOCIALCARBON standard) to avoid the scope of validation to become "virtually unlimited".

The project has been assessed against the SOCIALCARBON standard version 4.2 and the guidelines presented in the document "SOCIALCARBON - Introduction to criteria and procedures for certification". To ensure compliance with the SOCIALCARBON standard TÜV Rheinland Energie und Umwelt GmbH evaluated if:

- The report contains all information required by the template and guidance for elaborating SOCIALCARBON reports;
- The information disclosure in each indicator is relevant and true;
- The score is in accordance with the described scenario for the indicators published in the document "Indicators for the Hydroelectric Power Plants Version 4.1" with underlying Standard Indicators.

The report assesses the criteria against the conditions present during the period of 1st October 2010 and 31st August 2012, which coincides with the monitoring period for the first VCS verification of this project.

1.2 Project Description

The run-of-river Kepezkaya hydroelectric power plant (HEPP) project is located in the Eastern Mediterranean Region of Turkey. A 80 m long concrete weir (with geographic coordinates 36° 57'52.52"N 32°58'09.12"E) dams the Göksu river and a 3,610 m long conveyance tunnel with diameter of 4 m and average flow of 40 m³/s channels the water to a head pond, the two penstocks and finally the powerhouse (with geographic coordinates 36° 57'10.97"N 33°0'29.91"E). Two vertical Francis turbines (2x14.0 MWe) are utilized for electricity generation, providing a total installed capacity of 28.00 MWe. The project has been developed by Selen Elektrik Üretim A.Ş. (one of the AES-IC İÇTAŞ Enerji Üretim ve Ticaret A.Ş. affiliates).

Upstream of Kepezkaya HPP a large-scale irrigation project is conducted by General Directorate of State Hydraulic Works (DSİ) which will include the construction of three dams (namely Bağbaşı, Afşar and Bozkır dams) and one conveyance tunnel (i.e. Mavi tunnel). The project has been estimated to yield an average annual electricity generation of 107,587 MWh/year over the first carbon crediting period, taking into consideration the impact of the upstream large-scale irrigation project. Based on the combined emission factor of the Turkish national electricity grid, annual average emission reduction of 61,443 tCO₂/a has been determined.

At the time of the on-site visit the Kepezkaya HEPP was completed and operational. It started supplying electricity to the Turkish national grid on 1 October 2010 via a 33 kV transmission line.

No EIA regulatory procedures had to be observed because the project was exempt from the regulations. The EIA exempt certificate has been provided to TÜV Rheinland Energie und Umwelt GmbH. However, an EIA project identifier file has been submitted to the environmental directorate as part of the standard procedure. The fact that the project owner holds all necessary approvals suggests that the project is fully in line with legal requirements.

Kepezkaya HPP is located approximately 50 km from Karaman, the next biggest town. Three villages are located in proximity of the power plant: Bucakkışla, Bostanözü and Çukurköy.

2 Methodology

The methodology for the validation of the SCR included the collection of all relevant information to confirm statements made in the SCR through a combination of a document review, an on-site assessment and interviews with the relevant stakeholders.

The SC methodology requires validating the information related to socioeconomic aspects based on the matrix evaluation grid of the indicator documentation. Therefore, the collated information was used to assess the 30 project parameters against the indicator definitions and checked against the index scores assigned by the carbon consultant. The validation team's findings either confirmed the initial score or illustrated any inconsistencies in which case the score was revised. The best possible match of the actual on-site situation with the least deviation from the reference scenario shall represent the awarded score. Where a direct match could not be identified, information was not available or insufficient or the indicator was not applicable this is mentioned explicitly.

Upon receipt of the draft SCR a list of CAR/CL was forwarded to the responsible party derived from the desk review of the draft SCR and available supplementary information. Additionally the (interview)-records drafted during the on-site assessment were considered during the validation. Where documentation was still insufficient the document request was included in the CAR/CL and eventually by providing all requested documentation, TÜV Rheinland Energie und Umwelt GmbH was able to validate the assertions made in the draft SCR.

2.1 Document Review

Table 1 outlines the documentation reviewed during the validation process.

Table 1: List of reviewed documents

No	Document	Comment
1	SOCIALCARBON Standard, v4.2	Standard document from June 2011
2	SOCIALCARBON – Indicators for Hydroelectric Power Plants, v4.1	From June 2011
3	SOCIALCARBON – Introduction to criteria and procedures for certification	Overview document about SOCIALCARBON and certification procedures
4	SOCIALCARBON – Additional information for auditors of SOCIALCARBON Reports, v2.2	FAQs for auditing SOCIALCARBON reports
5	UNFCCC ACM0002	Official reference, "Consolidated methodology for grid-connected electricity generation from renewable sources", v.13, EB67
6	UNFCCC calculation tool for	Official reference, "Tool to calculate the emission factor

No	Document	Comment
	emission factor	for an electricity system". V.02.2.1, EB 63 Annex 19
7	SOCIALCARBON Report (SCR) for Kepezkaya HEPP v1.0	First draft SOCIALCARBON report
8	SOCIALCARBON Report (SCR) for Kepezkaya HEPP v2.0	Final SOCIALCARBON report
9	VCS Project Description for Kepezkaya HEPP v2.0	VCS PD registered, Version 2.0
10	VCS Validation Report for Kepezkaya HEPP	Final validation report by TÜV Rheinland from 11.09.2012
11	VCS Monitoring Report for Kepezkaya HEPP v2.00	Final monitoring report
12	Kepezkaya SocialCarbon Data	Excel spreadsheet of indicator scores
13	Change of SOCIALCARBON indicators for Kepezkaya HPP	Email request by the carbon consultant for a change in the set of indicators
14	Approval of adapted SOCIALCARBON indicators	Email by Ecologica Institute accepting the adapted set of indicators for Kepezkaya HPP
15	Explanation: Benefits indicator	Interpretation by Ecologica Institute of the indicator "Benefits" (Skype conversation)
16	Visit of auditors for "Environmental Risk Management"	Log book entries from 19 Sep 2012 and 21 Sep 2012
18	Kepezkaya HPP site photo	Photos of the sites of Kepezkaya HPP before construction
19	Sustainability Report for AES People	Internal sustainability report by the mother company AES, outlining the focus areas of their sustainability principles and summary of performance in these areas
20	The AES Values - From Words to Action	Outlines AES' Code of Conduct.
21	AES Edison Award for Innovation & Operational Excellence	Press release of performance of AES
22	AES Sustainability Newsletter	Company internal sustainability newsletter, informing and engaging employees.
23	Environmental Management System (AESIC-HSE-200)	The Environmental Management System (EMS) is for identifying, controlling and monitoring facility's activities, which have potential environmental impacts. QM for EMS applicable to employees & contractors of hydro power plants in Turkey.
24	Safety Management System (AESIC-HSE-100)	Describes the Safety Management System (The Plan) of AES-IC. The Plan has been developed in accordance with Turkish Legislation and AES Global Safety Standard "AES-STD-6.0". It details the Safety Management System elements in operation within the AES-IC, Turkey.
25	Certificates - Employees	Documentation of staff's qualifications such as driving license, English, first aid, Scada, PLC.
26	Employment data (2010-2012)	Employment data for 2010, 2011, 2012 incl. overview of training certificates.
27	Participants list – on-site visit	List of interviewed persons during the on-site visit 13-15 Sep 2012

2.2 On-site Inspection and Interviews

An on-site inspection was conducted with the purpose to interview relevant stakeholders, review documents and assess the situation in order to validate the statements determining the indicator scores. The site visit took place from 13/09/2012 – 15/09/2012 and included visits to offices of relevant governmental institutions as well as the project site itself.

Table 2: Audit plan for the SOCIALCARBON validation visit incl. interviewees:

Time	Organization	Agenda/Topic/Objectives	Interviewed persons
Audit 13 Sep 2012			
09:30	Hotel in Konya	Transfer to DSI	N/A
10:00	General Directorate of State Hydraulic Works (DSI)	Water resources, irrigation project as social program, environmental permits, erosion and sedimentation	Mr. Ahmet Yalın, Operations and Maintenance Branch Manager
11:00		Transfer to Karaman	
12:30	Lunch		
14:00	Forest Authority (FA)	Expropriation process, recovery of degraded areas, erosion and sedimentation, environmental impacts and legislation	Mr. İsmail Çelik, Karaman Forest Authority
15:30	Special Provincial Authority (SPA)	Water rights & resources, acceptance by villagers, irrigation project as social program	Mr. Mustafa Eren, Special Provincial Authority - Directorate of Agricultural Services
16:30		Transfer to hotel	
18:00	Hotel in Karaman	Clarifications on SCR	Dr. Aslı Özçelik, Ekobil Environmental Services and Consulting Ltd.
Audit 14 Sep 2012			
09:00	Hotel in Karaman	Transfer to MoEUP	
09:30	Ministry of Environment and Urban Planning (MoEUP)	Environmental compliance, water resources, erosion and sedimentation, biodiversity	Mr. Mümtaz Yaşar İcat, Department of EIA Services and Environmental Permits Department of Environmental Management and Monitoring
10:30		Transfer to Kepezkaya HPP	N/A
11:30	Plant, office	Audit related to responsibilities and general performance, general document check (incl VCS Ver)	Mr. Koray Keskin, Plant Operations Coordinator of Kepezkaya HPP
13:00	Lunch		
13:30	Plant, office	Expropriation process, acceptance by villagers, social benefits and demands, environmental impacts, social irrigation program, communication	Mr. Ali Güven (Muhtar of Bucakkışla) Mr. Ahmet Erdoğan (Muhtar of Bostanözü) Mr. Mustafa Soykan (Muhtar of Çukurköy)
16:00	Plant, power house	Benefits to employees, health and safety, capacity building programs	Mr. Orkun Çetinkaya, Shift Leader, Selen Elektrik Üretim A.Ş. Mr. İsmail Çetinkaya, Technician, Selen Elektrik Üretim A.Ş.
17:00	Weir, gate/spillway, backup generator, reservoir	Inspection of relevant attributes according to monitoring plan (VCS Ver)	Mr. Koray Keskin, Plant Operations Coordinator of Kepezkaya HPP
19:00		Transfer to Karaman	

Audit 15 Sep 2012			
09:00	Hotel in Karaman	Transfer to Damlapinar HPP	
11:00	Plant, office	Environmental regulations, sustainability principles, environment (risk) management, benefits to employees	Mr. Koray Keskin, Plant Operations Coordinator of Kepezkaya HPP
13:00	Lunch		
13:30	Plant, office, power house, weir, reservoir	Damlapinar HPP (VCS Ver & SC Val)	
17:00		Transfer to Konya	

3 Validation Result

3.1 Evaluation of Consistency and Completeness of Indicators

As a first step of the validation of the Social Carbon Report (SCR) the completeness and consistency of the initial SCR with the standard indicators of the applicable document "Approved Indicators for Hydroelectric Power Plants Version 4.1, June 2011" has been evaluated (see table 3). If indicators have been excluded or are inconsistent with the above mentioned document, the reason has to be clearly stated in the SCR and the approval from Ecologica Institute provided.

Table 3: Comparison of the "Approved Indicators for Hydroelectric Power Plants (Version 4.1)" with the indicators included in the submitted SCR

Indicator	Included in the SCR [Yes / No]	If not, state justification from project proponent
Social Resource: The working networks, the social duties, social relations, relationships of trust, affiliations, and associations.		
Population Displacement	YES	-
Communication with Stakeholders	YES	-
Acceptance	YES	-
Social Demands	YES	-
Social Programs	YES	-
Social Benefits	YES	-
Human Resource: The skills, knowledge, capacities for work and good health that people have. Taken together, these become fundamental for the successful pursuit of different strategies.		
Capacity Building Initiatives	YES	-
Health & Safety	YES	-
Benefits	YES	-
Transfer of New Technology	NO	The kind of technology used in the project (two vertical axis Francis type turbines) is not new and the contribution of the project will be limited to the training of the staff and some added experience to the project operators.
Involvement of Employees in the Project	YES	-
Financial Resource: The basic capital in the form of cash, credit/debt and other economic goods which are available or potential.		
Economic Performance	YES	-
Market	YES	-
Sale of Credits	YES	-
Natural Resource: The stock of natural resources (soil, water, air, etc.) and environmental services (soil protection, maintenance of hydrological cycles, pollution sinks, pest control, pollination, among others), from which resources for livelihoods are derived.		
Sustainability Principles	YES	-
Environmental Management	YES	-
Environmental Legislation	YES	-
Legal Procedures	YES	-

Indicator	Included in the SCR [Yes / No]	If not, state justification from project proponent
Environmental Impacts	YES	-
Environmental Risk Management	YES	-
Reservoir and Marginal Areas Management	YES	
Erosion, landslides, silting and floods	YES	-
Water Resources	YES	-
Biodiversity Resource: the combination of species, ecosystems and genes which form the biological diversity. Relevant aspects of this component are: the integrity of natural communities, the way people use and interact with biodiversity, the degree of conservation, pressures and threats imposed on native species and the existence of high priority areas for conservation		
APP and Legal Reserve	NO	There are no APP and Legal Reserve areas within the project area or around it as documented in the 3 rd party Project Presentation Document presented to the Ministry of Environment to obtain the EIA permit.
Recovery of Degraded Areas	YES	-
Biodiversity Conservation	YES	-
Ichthyofauna	YES	-
Carbon Resource: The type of carbon project developed, encompassing the methodologies utilized and project performance.		
Additionality	YES	-
Emissions Reductions Calculations & Monitoring	YES	-
Validation & Verification	YES	-
Project Performance	YES	-

3.2 Assessment of Indicators

3.2.1 Social Resource

3.2.1.1 Population displacement

Statement in SCR

Initial version:

The project didn't cause any displacement of the population. Most of the project land was acquired from the Forest authority, and a small amount of land was acquired from the private owners, via the expropriation process, and these people are compensated. The site of the powerhouse was a privately owned land and it used to be a fruit garden previously but the landowners are compensated and they are able to pursue their life.

Revised version:

The project didn't cause people to leave their houses. Most of the project land was acquired from the Forest authority, and a small amount of land was acquired from the private owners, via the expropriation process, and these people are compensated. The site of the powerhouse was a privately owned land and it used to be a fruit garden previously but the landowners are compensated and they are able to pursue their life, and kept their economic activities elsewhere within the boundaries of their village. The expropriation process went with strong dialogue with local people and the interviewed villagers admitted that they were happy with the compensation money.

Validation Opinion to the statement of TÜV Rheinland

The interviews with the village heads confirmed that a small number of inhabitants had their land expropriated and have been compensated. Most of the affected persons were happy with the compensation; a small minority were not satisfied initially but ultimately decided to accept the compensation. As per Turkish regulations the expropriation process involved government agencies who facilitated the procedure.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Initial Index: 6	There is no need to displace families or other activities.	No targets assigned.	As (agricultural) activities from some villagers were displaced, this score is not justified.
Revised Index: 5	Participatory Relocation Program, including negotiations with different actors (owners, public agencies, and civil society organizations).		Based on the information received the chosen index is considered as correct.

3.2.1.2 Communication with Stakeholders

Statement in SCR

The project owner is open to dialogue with stakeholders. They communicate regularly with the village

heads, and the district governorship and welcome the visitors. A security post controls access to the power plant. This is to make sure that the visitors are met at the entrance and necessary precautions for their safety are taken. In addition to this the mobile numbers of the technical staff is made available to the village heads and to the local authorities. In summary they have an unstructured but warm relation with the stakeholders.

Validation Opinion to the statement of TÜV Rheinland

Interviews with the three village heads, Forest Authority (FA) and the Ministry for the Environment and Urban Planning (MoEUP) confirmed that the frequent, if informal, communication has been taking place throughout the project planning and operations, and continues to take place. The project owner is very open to dialogue, welcomes visitors and reacts swiftly to requests.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 3	During the planning and operation stages, the entrepreneur has communication with local stakeholders.	The project owner plans to establish a systematic information forum within the coming years, where the communication of information will be more systematical.	Based on the information received the chosen index is considered as correct.

3.2.1.3 Acceptance

Statement in SCR

The project is not very close to the settlements, but the government officials and the villager from the nearest settlement mentioned that the community was happy with the project and was supporting the project.

Validation Opinion to the statement of TÜV Rheinland

Interviews with the three village heads as well as a representative of the Special Provincial Authority (SPA) confirmed that the project is perceived positively and as beneficial for the villagers.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 6	Strong support from local stakeholders and insignificant opposition.	No targets assigned.	Based on the information received the chosen index is considered as correct.

3.2.1.4 Social Demands

Statement in SCR

The social demands reach the chief technician via the village or district heads or the members of the city council. In general the village heads request earth movers, the project coordinator and the chief technicians evaluates these requests and answers these needs within their limits. The project owner is also considering demands from the DSI and other government authorities. As an example they are

helping the authorities to design the local part of an irrigation project that will take its waters from a point within the project boundaries.

Validation Opinion to the statement of TÜV Rheinland

During the on-site assessment the validation team learnt, that the village heads are welcomed at the plant and that none of their requests (earth movers, building material, irrigation) have been denied. The irrigation project has been developed in cooperation with DSI and SPA. The project owner has signed a commitment to undertake the planning and design for the irrigation project, which is intended to be completed by start of the growing season 2013.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 4	The entrepreneur takes actions that surpass compulsory activities.	The PO is developing a policy that will cover the rules and other criteria to address voluntary social actions. Within one year the project owner is going to prepare an internal document that will outline the standard operating procedures to respond the social demands.	Based on the information received the chosen index is considered as correct.

3.2.1.5 Social Programs

Statement in SCR

The project management has very good relations with the local inhabitants, but they have not considered such programs until now.

Validation Opinion to the statement of TÜV Rheinland

During the on-site visit, the carbon consultant explained that the project owner is planning to provide training to local people in agricultural practices, e.g. in growing artichokes (which have a high market value) or medicinal herbs. These plans have been informally proposed to village heads but these activities are still in planning stage and no official documentation exists yet.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 2	Actions are in planning stage with high uncertainty, that benefits can be delivered.	The PO is going to be identifying such activities together with the local stakeholders. They will assess the situation taking into account socio economical characteristics of the area.	Based on the information received the chosen index is considered as correct.

3.2.1.6 Social Benefits

Statement in SCR

The project owner provided irrigation waters to the nearest village via a pipe from their water surge tank. This helped villagers to improve the quality and quantity of their agricultural products and thus increased their income. In addition to that the project has improved some of the village access roads.

Validation Opinion to the statement of TÜV Rheinland

The project provides a number of social benefits, such as local employment (> 50% of employees are from Karaman or surrounding towns), a more reliable source of electricity (through the installation of a TEIAS substation initially financed by the PO), irrigation for agriculture in one village (village head confirmed that the irrigated area has tripled and the olive harvest has increased by 80%) and improvement of a road (between the powerhouse and the weir).

Currently the number of stakeholders receiving such benefits is limited, but as the irrigation project will be extended to the other two villages this number is expected to grow.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 4	Project delivers benefits in more than one of the major areas to a limited number of local stakeholders.	The project owner will identify the social needs together with the stakeholders and local authorities and will determine actions that will benefit more people.	Based on the information received the chosen index is considered as correct.

3.2.2 Human Resource

3.2.2.1 Capacity Building Initiatives

Statement in SCR

The employees are qualified for the job and they are receiving regular trainings to keep them not only up to date, but help them improve their abilities in their career life. The entire operations team has already attended more than one training session.

Validation Opinion to the statement of TÜV Rheinland

The PO is interested in recruiting local people to ensure long-term employment. All employees recruited at work at Kepezkaya HPP are required to prove that they have undergone the necessary education (mechanical/electrical technicians). The chief technician as well as all four shift leaders had to demonstrate relevant experience in addition. All employees receive training according to their needs (SCADA, PLC, external technical courses, English courses). HSE seminars are obligatory for everyone.

Interviews with employees at the plant confirmed that they undergo regular trainings according to their needs.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 6	Operations and Maintenance: Employees of the project have experience and have participated in more than one training or course in intervals of one year or less.	No target assigned but it will be monitored that the project owner will be continuing in house and external trainings to maintain the high qualification level of their employee.	Based on the information received the chosen index is considered as correct.

3.2.2.2 Health and Safety

Statement in SCR

The project owner has its own construction and operational HSE management system in place. They have global, regional and local goals, objectives and targets, which are tracked on quarterly and annual basis by key performance indicators. Related reports and procedures are made available to the validating DOE.

Validation Opinion to the statement of TÜV Rheinland

As a subsidiary of an international company with headquarters in the USA, Selen Elektrik Üretim A.Ş. has implemented a formal HSE Management System. According to the PO monthly HSE trainings are held at the power plant (waste storage, driving safety, etc.).

All incidents have to be recorded in the company's electronic system. During the on-site visit the validation team could confirm that no accident has taken place in 2012.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 5	Existence of an	No Target Assigned.	Based on the

	Occupational Health and Safety Management System or satisfactory safety program.	The situation will be well-maintained.	information received the chosen index is considered as correct.
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3.2.2.3 Benefits

Statement in SCR

All project employees are provided with lunch money and free transportation to their houses. The Selen Elektrik personnel are also provided with an annual bonus payment that is dependent on their performances. In addition to this they are offered a language course. Therefore, they benefit in education and other category. However, the bonus and language training is only available to the Selen personnel. Taking into account the outsourced personnel, we can conclude that all employees benefit in two of the areas.

Validation Opinion to the statement of TÜV Rheinland

During the onsite visit it was confirmed that all employees receive a free transfer from their homes to work and that lunch money is paid on a monthly basis in addition to their salaries.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 4	Benefits are offered to all employees involved in the project in two of the areas.	The project owner will measure employee satisfaction.	Based on the information received the chosen index is considered as correct.

3.2.2.4 Involvement of the Employees in the Carbon Project

Statement in SCR

The management is aware of the carbon project but the employees at the project site have no idea about the climate change and carbon project related concepts.

Validation Opinion to the statement of TÜV Rheinland

The on-site visit confirmed that the plant manager is very much involved in the carbon project, but that the other employees are not aware of it.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 2	Only management and employees directly involved in the carbon project are aware.	The project management will include an in-house training addressing climate change and the contribution of renewable energy projects to tackle the climate change issue.	Based on the information received the chosen index is considered as correct.

3.2.3 Financial Resource

3.2.3.1 Economic Performance

Statement in SCR

The project produced half of the amount of electricity that was suggested for the first year, which is acceptable as the first year is in general spent in setting up the operations. But in the second and third year the project seemed to produce the amount of electricity just as was predicted in the feasibility report, and for the third year is a little higher than expected. So it can be concluded that the project had a good performance.

Validation Opinion to the statement of TÜV Rheinland

Electricity production in the first year fell short of the expected amount, but surpassed expectations in year 2 & 3. The actual overall performance throughout the monitoring period came to 101% of the expected amount.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Initial Index: 5	A Good Performance. Goals and expectations established with shareholders have been accomplished and in some cases surpassed.	Maximum care will be taken for the maintenance of the project components with the goal to improve its efficiency.	The overall result of 101% of the anticipated electricity production is more in line with the definition in index 4.
Revised Index: 4	Adequate Performance. Goals and expectations established with shareholders have been accomplished.		Based on the information received the chosen index is considered as correct.

3.2.3.2 Market

Statement in SCR

The carbon asset of the project is developed considering the CDM rules and the project is validated to the Verified Carbon Standard and can only reach to the voluntary markets.

Validation Opinion to the statement of TÜV Rheinland

The validation team can confirm that the project has been developed and verified under the VCS standard. It is therefore eligible for the voluntary markets.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 3	Project activities are eligible for the voluntary market.	The project owner is hoping to have an opportunity to bring the project into compliance market. However, this	Based on the information received the chosen index is considered as correct.

		depends mainly on the change of the status of Turkey.	
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3.2.3.3 Sale of Credits

Statement in SCR

The project owner started to probe potential buyers by the help of their carbon finance consultant.

Validation Opinion to the statement of TÜV Rheinland

Ekobil confirmed that they are acting as an agent for the PO. Negotiations have started and marketing documents under preparation.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 2	Carbon credits are being negotiated, with little uncertainty regarding its commercialization.	The project owner is targeting to differentiate the project activity from the similar projects in the market and therefore to increase the value of the VCUs.	Based on the information received the chosen index is considered as correct.

3.2.4 Natural Resource

3.2.4.1 Sustainability Principle

Statement in SCR

The sustainability concept and principles are appreciated and practiced as environmental protection, improved working environments, in-house trainings and improving the quality of life in the vicinity of the project area. These are applied as common sense and as part of the company culture. The mother company has recently distributed their first sustainability report to all its employees. The values of the mother company AES is also incorporated to the project site. AES outlines the concept as “sustainable business”, however the details of the concept is difficult to observe in their on-site practices so there is a need to improve the concept with topics included in their internal trainings.

Validation Opinion to the statement of TÜV Rheinland

The mother company AES includes sustainability principles in their overall values and sets clear goals. During the on-site visit the validation team had the feeling that sustainability values (with regards to e.g. staff & employment, HSE) were incorporated in the day-to-day practice of the company despite the lack of documents and formal systems.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Initial Index: 3	Incorporation of sustainability in the values, strategy and principles of the project owner.	The project owner will discuss sustainability concepts in their in house training sessions at the Kepezkaya Project site and will set local sustainability goals and monitor achievement towards these goals.	The carbon consultant and the validation team came to the conclusion, that despite the lack of formal documentation the situation on-site justifies a higher score.
Revised Index: 4	Clear sustainability goals and objectives inserted in the values, strategy or principles of the project owner, but difficulties exist in applying them in practice.		Based on the information received the chosen index is considered as correct.

3.2.4.2 Environmental Management

Statement in SCR

The project is implementing an environmental management system based on the best practice approach.

Validation Opinion to the statement of TÜV Rheinland

During the on-site visit the validation team could confirm that an electronic environmental reporting system via the AES intranet is in place. The team learned that this process is required by AES global and standardized for all AES power plants. Mr. Alp Burak Turgut is the responsible environmental manager for this process and regularly requests information from the plant manager about e.g. amount of solid waste, fuel use, waste water quality etc.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 4	Environmental management and reporting system exists, but with some gaps.	After implementation of the EMS the PO intends to obtain formal certification of the system.	Based on the information received the chosen index is considered as correct.

3.2.4.3 Environmental Legislation

Statement in SCR

The project complies with the Turkish environmental regulations and rules. All the environmental permits and licenses are valid and up to date. In addition to this they have already integrated a systematic control of the legal and regulatory responsibilities in to their environmental management system.

Validation Opinion to the statement of TÜV Rheinland

During the on-site visit the validation team learned that the PO has been granted the permission to use the land after submitting a project description plan and a reclamation plan. The FA conducts annual reports to check that the project runs in accordance with the initial project plans. The PO has committed himself to develop annual monitoring reports to show that they continue complying with the environmental regulations and thereby anticipating whether any new/additional rules and regulations need to be observed.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 6	In addition to the items in Index 5, the entrepreneur has systematic control of the licensing process.	No target assigned.	Based on the information received the chosen index is considered as correct.

3.2.4.4 Legal Procedures

Statement in SCR

In the past one year there were no such complaints nor there were any judicial actions related to the project.

Validation Opinion to the statement of TÜV Rheinland

The Forest Authority confirmed that Kepezkaya HPP conforms to the originally submitted plans and no complaints from villagers have been filed.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 6	The project did not suffer from public civil or judicial action or receive any warnings	No targets assigned.	Based on the information received the chosen index is

	due to potential risk or effective damage to human health or the environment.		considered as correct.
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3.2.4.5 Environmental Impacts

Statement in SCR

The project has submitted a project description file to the Karaman Province General Directorate of MoEUP. The file is studied and the project received an EIA exemption certificate.

Validation Opinion to the statement of TÜV Rheinland

The preliminary EIA confirmed that “the implementation of the project is expected to have only a minor impact on the surrounding environment and regional ecology” (as quoted in the SCR). In an interview the Forest Authority confirms that they perceives Kepezkaya HPP project as an environmentally sensible project.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 5	Studies show insignificant environmental impact.	No targets assigned.	Based on the information received the chosen index is considered as correct.

3.2.4.6 Environmental Risk Management

Statement in SCR

The company culture of the project owner has the sincere perception of the environmental risk management concept. The project has its environmental risk management plans. Yet, there were no environmental risk or emergency situations during the specified validation period

Validation Opinion to the statement of TÜV Rheinland

AES conducts periodic audits of environmental risks in their project sites. The first audit of Kepezkaya HPP was scheduled for 19 -21 September, 2012 and documentation has been received to confirm that it took place.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 6	Periodic internal and external audits of environmental risks and technical reports regarding environmental management are conducted.	No target assigned.	Based on the information received the chosen index is considered as correct.

3.2.4.7 Reservoir and marginal areas management

Statement in SCR

The project owner is satisfactorily protecting the reservoir area and its access roads. However they are looking at ways of improving their management plan to consider multiple uses of the reservoir if ever technically possible.

Validation Opinion to the statement of TÜV Rheinland

During the on-site visit it was confirmed that satisfactory protection measures are in place. Physical barriers prevent invasion and inadequate use of the areas and regular checks by staff pose an additional action to ensure compliance.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 5	Satisfactory plan, but it only contemplates monitoring, safety and control activities.	The project owner is going to improve their marginal area management plan to ensure the support of local wildlife.	Based on the information received the chosen index is considered as correct.

3.2.4.8 Erosion, landslides, silting and floods

Statement in SCR

The project is located within an area where the rocks and formations are not stable and are prone to landslides and mass flows. The area surrounding the reservoir is steep but planted by trees, except some minor parts that are slightly prone to erosion, but the project owner is planning to plant, trees, bushes and shrubs to hold the soil in place. However, there is no major erosion or siltation problem along the reservoir nor is there a major change in the sedimentation level at the downstream areas.

Validation Opinion to the statement of TÜV Rheinland

The Forest Authority (FA) confirmed that they check for erosion as part of their annual site visit and that no problems have been identified at Kepezkaya. MoEUP stated that slope stability is no issue for the Kepezkaya reservoir. Nevertheless, the PO is undertaking re-plantation measures to secure the area around the project site and the excavation areas.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 4	Operations cause minimal or none on-going sedimentation or erosion problems in Reservoir or downstream areas.	Programs to avoid erosion will be developed in cooperation with local inhabitants, FA and DSI.	Based on the information received the chosen index is considered as correct.

3.2.4.9 Water Resources

Statement in SCR

The project has no negative impact on the water quality and quantity. In fact the project owners are doing their best to share the resource with the local inhabitants by helping them with irrigation plans and providing water for irrigation from their surge tank via a small pipe. The weir is not facing immediate erosion related problems, however, occasionally, in heavy and sudden rainfall cases, it is reported by downstream inhabitants that the water was flowing cloudy or very muddy. This is a situation attributable to the natural behavior of the river and would have happened with or without the presence of the project. As this is something seasonal, and in a way this is a good thing to support the downstream delta's sediment regime.

Validation Opinion to the statement of TÜV Rheinland

In the interview with DSI it was stated that DSI is monitoring the water flow through on-site visits on a monthly basis (to measure the velocity and calculate the water flow) as well as through hourly remote monitoring. If the water flow drops below a critical point, DSI immediately contacts the PO and the setting of the weir is adjusted to allow sufficient water flow. The PO responds quickly to such requests. DSI does not monitor water quality unless a complaint has been filed, which has not been the case for Kepezkaya. The preliminary EIA (as quoted in the SCR) states "The project is not expected to have a material effect on water quality".

The sedimentation described in the SCR seems to be a natural occurrence and not a result of the carbon project.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 4	Operations either enhance or cause minimal deterioration to the reservoir or downstream water quality.	The PO will introduce a monitoring system of the water quality upstream and downstream. A communication document about the preventive actions will be drafted and provided to local stakeholders.	Based on the information received the chosen index is considered as correct.

3.2.5 Biodiversity Resource

3.2.5.1 Recovery of Degraded Areas

Statement in SCR

The project has relatively small footprint compared to power plants with similar capacity. However, there were some areas that were disturbed to construct the canal or other project structures. These areas are being reclaimed and the project management is working to improve the project landscape. In addition to this the project owner is trying to improve the surrounding areas to improve the slope stability and avoid landslides.

Validation Opinion to the statement of TÜV Rheinland

In the interviews with DSI and village heads during the on-site visit it was confirmed that replanting measures are underway in the affected areas.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 4	Voluntary recovery of degraded areas but only in areas of project ownership.	The project owner is planning to implement a tree and or bush planting campaign together with the local inhabitants of the area, thus improving areas that are outside the project borders.	Based on the information received the chosen index is considered as correct.

3.2.5.2 Biodiversity Conservation

Statement in SCR

The project owner is safeguarding the project boundaries and watching for illegal hunters and fishers. This way they are supporting the local wildlife.

Validation Opinion to the statement of TÜV Rheinland

During the on-site visit the validation team could confirm that the reservoir area is fenced off and that overview cameras are installed to observe the area. According to the plant manager staff also pays attention to poachers and illegal fishers and expulse them from the area. The FA checks the state of the forests (e.g. for pests) and obvious signs of wildlife as part of their annual site visit. No problems have been identified at Kepezkaya.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 3	Limited to legal obligation.	The project owner is seeking reasonable ways to support local wildlife in coordination with the forestry department and DSI.	Based on the information received the chosen index is considered as correct.

3.2.5.3 Ichthyofauna

Statement in SCR

Initial version:

The project is supporting the fish life by preventing illegal fishing in the project area. They have an active fish ladder at the body of the weir.

Revised version:

The project is supporting the fish life by preventing illegal fishing in the project area. They have an active fish ladder at the body of the weir. But the state of the fish population or whether the fish ladder is working effectively is not being monitored.

Validation Opinion to the statement of TÜV Rheinland

This indicator is assessing the impact of the carbon project on the ichthyofauna. The PO is taking initial steps in the conservation of aquatic life, by providing protection from illegal fishing and building the fish ladder. However, this does not replace the need for monitoring which in this case shows some significant gaps.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Initial Index: 5	The project is implementing a program for preventive actions.	The project owner is going to cooperate with local fisherman and/or local universities to monitor and/or research the state of the fish population in the river.	Due to the lack in efficient monitoring, the score of 5 is not justified.
Revised Index: 2	Inefficiency in monitoring.		Based on the information received the chosen index is considered as correct.

3.2.6 Carbon Resource

3.2.6.1 Additionality

Statement in SCR

The project is validated to the VCS version 2007 standard and implementing CDM Approved tools to demonstrate additionality. The project is under VCS version 3.2 Verification.

Validation Opinion to the statement of TÜV Rheinland

The validation team can confirm that the project has been verified according to the VCS version 3.2 standard and is therefore considered additional.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 6	The project is considered additional according to criteria stated in the ACM0002 version 13 methodology approved by the CDM Executive Board. The project is developed to the rules of the VCS version 3.2.	The project is targeting to comply with the VCS rules and will be monitored and verified to be in compliance with CDM approved emission reduction methodology.	Based on the information received the chosen index is considered as correct.

3.2.6.2 Emissions Reductions Calculations

Statement in SCR

The projects emission reductions are calculated and monitored based on CDM approved Methodology "ACM0002 version 13: Grid-connected electricity generation from renewable sources"

Validation Opinion to the statement of TÜV Rheinland

The validation team can confirm that the emission reductions calculations have been made in accordance with the CDM approved ACM0002 v.13 methodology.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 6	The project has a methodology to calculate emissions reductions and a monitoring plan based on a methodology approved by the CDM Executive Board.	The project owner is targeting to keep complying with the VCS and CDM rules.	Based on the information received the chosen index is considered as correct.

3.2.6.3 Validation and Verification

Statement in SCR

The project is validated by an UNFCCC accredited DOE, and another UNFCCC accredited DOE is assigned for the verification of the project.

Validation Opinion to the statement of TÜV Rheinland

The validation is being carried out by TÜV Rheinland Energie und Umwelt GmbH (under the UNFCCC accreditation of TÜV Rheinland China Ltd. As DOE).

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 6	Validation and Verification are conducted by a Designated Operational Entity according to UNFCCC specifications.	The project owner is targeting to keep complying with the VCS and CDM rules.	Based on the information received the chosen index is considered as correct.

3.2.6.4 Project Performance

Statement in SCR

The project had relatively lower performance in 2010, producing about half the expected VERs (48%), for 2011 103% of the expected emission reductions was produced and for 2012 the performance improved to more than 100% (to 118%). Comparing the overall performance of the period this report covers the project was able to produce about 101% of the targeted emission reductions, thus just achieving the targets.

Validation Opinion to the statement of TÜV Rheinland

The validation team can confirm that the actual emission reductions meet the expected emission reductions.

Index setting by project owner	Wording by definition	Perspective	Validation Opinion
Index: 6	Excellent: More than 95% of carbon credits predicted for the period were effectively generated.	No target assigned.	Based on the information received the chosen index is considered as correct.

4 Validation Statement

Selen Elektrik Üretim A. Ş.

Çetin Emeç, Bulvari 65. Sk.

No 4 Balgat, ANKARA

Turkey

17 October 2012

RE: Social Carbon Validation of Kepezkaya Hydro Electricity Power Plant, Turkey

Selen Elektrik Üretim A. Ş with registered office at Çetin Emeç, Bulvari 65. Sk. No 4 Balgat, ANKARA, Turkey, has engaged TÜV Rheinland Energie und Umwelt GmbH to review and validate the SCR and all assertions related to the GHG project under SOCIALCARBON Standard respectively. The assertions made in the SCR Version 2, submitted 12 October 2012, indicate a Social Carbon performance as follows:

Resource	Average Score	General Performance
Social	4.00	Satisfactory
Human	4.25	Satisfactory
Financial	3.00	Satisfactory
Natural	4.88	Sustainable
Biodiversity	3.00	Satisfactory
Carbon	6.00	Sustainable
Overall Assessment	4.19	Satisfactory

We have conducted the validation of the SOCIALCARBON assertion in accordance with the requirements of the SOCIALCARBON program requirements. The project information validated includes the SOCIALCARBON Report (SCR) delivered to TÜV Rheinland Energie und Umwelt GmbH and all relevant information and evidence acquired during the validation process as stated in the validation report "Social Carbon Validation of Kepezkaya HPP – Point Zero" as of 17/10/2012.

We have come to the conclusion that based on our review and all available documentation the assertions are made in accordance with the requirements of the Social Carbon program, are material correct and fairly represents the socioeconomic parameters without material discrepancies.

Cologne, 17 October 2012



Andrea Nüsse

5 Annex: List of Corrective Action Requests (CAR) and Clarification (CL)

CAR	CL	List of Requests for Corrective Action (CAR) and Clarification (CL)			
		Observation (CAR/CL)	Reference	Summary of project owner response	Validation team conclusion
1		Maximum operation water level and surface area of reservoir are not identical with PDD.	Section 2.2, p9	Checked and found out that only the maximum operation level was wrong, and it is corrected.	OK. CAR CLOSED
2		Columns for BE and PE exchanged.	Section 2.2, p11	Corrected	OK. CAR CLOSED
3		Please translate the institutions of the actors involved into English.	Section 3.4, p15/16	Translated/Updated	OK. CAR CLOSED
	1	Approval from Ecologica Institute for excluding two indicators not available	Section 3.1, p12	We have sent them the e-mails on 31st of August didn't receive any further feedback. I assume this may be due to a staff change in their part. But also take into consideration that we are using the same set of indicators that were accepted in case of similar other hydro projects such as Koyulhisar, and we do not expect any objection from the SCS. Please find attached the corresponding documents.	Email confirmation has been received from Ecologica Institute. OK. CL CLOSED
4		Population Displacement Indicator: A small number of villagers had their land expropriated and therefore activities have been displaced. On this basis the indicator score of 6 is not justified.	Section 4.1, p17	ScoreRevised - Explanation elaborated	OK. CAR CLOSED
	2	Population Displacement Indicator: Please clarify whether the fruit garden at the powerhouse was at Kepezkaya or at Damlapinar.	Section 4.1, p17	There was a fruit garden in the place of regulator please find attached pictures showing before and after the power house	OK. CL CLOSED
5		Benefits Indicator: The methodology lists 4 main areas: Education, Health, Retirement Assistance, Other. According to the methodology outsourced employees will have to be taken into account when evaluating this indicator. The outsourced employees working at Selen Elektrik receive, as all Selen Elektrik	Section 4.2, p20	We have asked for a clarification of the topic and on a skype conversation Raissa Petri Costa have clarified that each "other" benefit such as lunch money, bonus, free ride to home, should be counted saperately. Please find attached the particular skype correspondence. Accordingly we believe the score to be correct.	Confirmation from Raissa Petri Costa viewed. Index score of 4 remains. OK. CAR CLOSED

CAR	CL	List of Requests for Corrective Action (CAR) and Clarification (CL)			
		Observation (CAR/CL)	Reference	Summary of project owner response	Validation team conclusion
		employees, lunch money and free transfer to their homes as extra benefits. Both benefits belong to one main are ("Other"). Therefore the score of 4 is not justified.			
6		Economic Performance Indicator: Electricity production in the first year fell short of the expected amount, but surpassed expectations in year 2 & 3. The actual overall performance came to 101% of the expected amount. This seems to be more in line with the definition in index 4 "Goals have been accomplished".	Section 4.3, p21	Score revised - Explanation corrected	OK. CAR CLOSED
	3	Sustainability Principles Indicator: There is an inconsistency in the description. It is stated that "the sustainability concept [...] is practiced as [...] inhouse-trainings [...]". In the future target it is then mentioned that "The PO will discuss sustainability concepts in their in-house training sessions...".	Section 4.4, p22	The project owners mother company is providing other in house trainings to improve the quality of business and their workers, and we consider this as a contribution to the sustainability of this industry, however the concepts of sustainability needs to be discussed more and learnt and appreciated in their in-house sessions. To make the situation more explicit we have elaborated the explanation and since the sustainability report was able to reach the last month of the period under inspection we re-assessed the score to be 1 mark up.	Explanation for change of score accepted. OK. CL CLOSED
7		Environmental Risk Mgt Indicator: Please provide documentation confirming that the audit has taken place (e.g. photos).	Section 4.4, p23	Please find attached the document that shows the audit date	OK. CAR CLOSED
8		Erosion Indicator: In the comments the erosion problems around the canal are mentioned, but this does not apply to Kepezkaya. Please check all the statements in this indicator and amend if necessary.	Section 4.4, p24	This was a typing error it is now corrected and the report version 2.0 is updated.	OK. CAR CLOSED

CAR	CL	List of Requests for Corrective Action (CAR) and Clarification (CL)			
		Observation (CAR/CL)	Reference	Summary of project owner response	Validation team conclusion
9		Inconsistency regarding an increase in sedimentation. The indicator Erosion states "there is no major change in the sedimentation level downstream". The indicator Water Resources states "there is increased sedimentation".	Section 4.4, p24/25	The increase in stream is due to occasional and seasonal rainfall. The explanation of the present situation is updated to reflect this.	OK. CAR CLOSED
10		Ichthyofauna Indicator: No evidence for any monitoring procedures, research activities or management actions have been found. The project has a fish ladder which is normal procedure for projects such as this one. However, due to the lack of monitoring no statement can be made about adverse impacts through the project, neither can the need for corrective actions or even the effect of preventive actions be identified. The indicator score of 5 is not justified.	Section 4.5, p25/26	The fish is able to pass through the weir via the passage or from beneath the gates , so this reduces their impact. As the size of reservoir is small it is not possible to consider re-stocking actions, and best way to support fish is to prevent illegal hunting and this is what they are doing. So we think our judgement to be just.	This indicator is assessing the impact of the carbon project on the ichthyofauna. The PO is taking initial steps in the conservation of aquatic life, by providing protection from illegal fishing and building the fish ladder. However, this does not replace the need for monitoring which in this case shows some significant gaps. In discussion with the carbon consultant the score has been revised to "2". CAR CLOSED
	4	Project Performance Indicator: We agree with the overall assignment of the score 6, but request clarification for the numbers used in the explanation. Please also see the extra excel spreadsheet for our calculations.	Section 4.6, p27	Updated the text to reflect your numbers we agree with your numbers.	OK. CAR CLOSED
11		The monitoring period is stated incorrectly (as 24. Aug 2010 - 31. Jul 2012) in the heading of Table 6.	Section 5.1, p29	The heading is updated	OK. CAR CLOSED