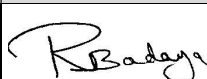

VALIDATION REPORT

Boylam Enerji Yatırım Üretim ve Ticaret A.Ş.

Saros Wind Power Plant

IN

Turkey

Organizational Unit:	Re Carbon Ltd. Carbon Department		
Project Title:	Saros Wind Power Plant		
Project Number:	Client:	Current Version:	PDD
664	Boylam Enerji Yatırım Üretim ve Ticaret A.Ş.	05	
Date of First Issue:	Date of Current Version:	Version Number:	Number of Pages:
13/08/2021	27/12/2021	02	108
Summary:			
Host Country: Turkey			
Project is Reviewed Against:			
<input checked="" type="checkbox"/> Kyoto Protocol <input checked="" type="checkbox"/> UNFCCC CDM rules and regulations and associated documents <input checked="" type="checkbox"/> Gold Standard rules and regulations <input type="checkbox"/> Other (Please Specify)			
Methodology: ACM0002		Version: 20	
Average Annual Emission Reduction Estimate: 313,081 tCO ₂ e			
Project Size: <input checked="" type="checkbox"/> Large Scale <input type="checkbox"/> Small Scale <input type="checkbox"/> Micro Scale			
Type of Crediting Period:	Crediting Period Start Date:		
<input checked="" type="checkbox"/> Renewable <input type="checkbox"/> Fixed	17/10/2020		
Project Participants:	Boylam Enerji Yatırım Üretim ve Ticaret A.Ş.		
Validation Stages:			
<input checked="" type="checkbox"/> Desk Review <input checked="" type="checkbox"/> Site Visit (Remote audit) <input checked="" type="checkbox"/> Follow-up Interviews <input type="checkbox"/> Global Stakeholder Consultation <input checked="" type="checkbox"/> Resolution of Outstanding Issues			
<p>Validation Findings: During the validation 33 Corrective Action Requests, 12 Clarification Requests were raised, all of which were closed out before the issuance of this validation report. No Forward Action Requests were raised during the validation.</p> <p>In summary, it is Re Carbon Ltd.'s opinion that the project activity "Saros Wind Power Plant" in Turkey, as described in the PDD, version 05 dated 27/12/2021, meets all relevant UNFCCC requirements for the CDM, GS and all relevant host Party criteria and correctly applies the baseline and monitoring methodology ACM0002, version 20. Hence, Re Carbon Ltd. requests the registration of the proposed project activity as a GS project activity.</p>			
Validation Team Leader:	Sandeep Kanda	Indexing Terms:	
Validation Team Members:	Seza Danişoğlu	<input checked="" type="checkbox"/> No distribution without permission of the client or responsible organizational unit <input type="checkbox"/> Limited Distribution <input type="checkbox"/> Unrestricted Distribution	
Approved By (Technical Reviewer):	Name:	Signature:	
	Rohit Badaya		

Abbreviations

BM	: Build Margin
CAR	: Corrective Action Request
CDM	: Clean Development Mechanism
CER	: Certified Emission Reduction(s)
CL	: Clarification request
CM	: Combined Margin
CO₂	: Carbon dioxide
CO₂e	: Carbon dioxide equivalent
DNA	: Designated National Authority
DOE	: Designated Operational Entity
DR	: Document Review
EF	: Emission Factor
EIA	: Environmental Impact Assessment
ER	: Emission Reductions
ERPA	: Emission Reduction Purchase Agreement
FAR	: Forward Action Request
FSR	: Feasibility Study Report
GHG	: Greenhouse gas(es)
GS	: Gold Standard
GWP	: Global Warming Potential
I	: Interview
IPCC	: Intergovernmental Panel on Climate Change
IRR	: Internal Rate of Return
kWh	: Kilo Watt Hour
LoA	: Letter of approval
MoV	: Means of Validation
MW	: Mega Watt
MWh	: Mega Watt Hour
NCV	: Net Calorific Value
NGO	: Non-governmental Organisation
ODA	: Official Development Assistance
OM	: Operating Margin
PDD	: Project Design Document
PP	: Project Participant(s)
tCO₂e	: Tonnes of CO ₂ equivalents
UNFCCC	: United Nations Framework Convention on Climate Change



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1. EXECUTIVE SUMMARY – VALIDATION OPINION

Re Carbon Ltd. has performed the validation of the “Saros Wind Power Plant” in “Turkey” between 06/07/2021 and 27/12/2021. The validation was performed on the basis of UNFCCC criteria for the Clean Development Mechanism (CDM), Gold Standard (GS) and Host Party criteria, as well as criteria given to provide for consistent project operations, monitoring and reporting.

As a result of validation, Re Carbon Ltd. concludes the following:

- The review of the project design documentation and the subsequent follow-up interviews have provided Re Carbon Ltd. with sufficient evidence to determine the fulfillment of all stated criteria. In our opinion, the project meets all relevant UNFCCC requirements for the CDM and Gold Standard. Therefore, Re Carbon Ltd. will recommend the project for registration by the Gold Standard.

- The review of the project design documentation and the subsequent follow-up interviews have not provided Re Carbon Ltd. with sufficient evidence to determine the fulfillment of all stated criteria. Therefore, Re Carbon Ltd. will not recommend the project for registration by the Gold Standard and will inform the project participants and the Gold Standard on this decision.

2. INTRODUCTION

2.1. Objective

Re Carbon Ltd. has been appointed by “Boylam Enerji Yatırım Üretim ve Ticaret A.Ş.” to perform the validation of the “Saros Wind Power Plant” in Turkey with the service agreement dated 18/12/2020. The objective of this validation activity is to have an independent third party for the assessment of the project design, and to ensure a thorough assessment of the proposed project activity against the applicable CDM and GS requirements. In particular;

- the project's baseline is assessed against “ACM0002: Grid-connected electricity generation from renewable sources - Version 20.0”
- the project’s monitoring plan is assessed against “ACM0002: Grid-connected electricity generation from renewable sources - Version 20.0”
- the project’s additionality justification is assessed against “Tool for the demonstration and assessment of additionality - Version 07”
- the projects compliance with the requirements of Article 12 of the Kyoto Protocol, the CDM Modalities and Procedures as agreed in the Marrakech Accords under decision 3/CMP.1, the annexes to this decision, subsequent decisions and guidance made by COP/MOP & CDM Executive Board and other relevant rules, including the Host Country legislation and sustainability criteria
- CDM Validation and Verification Standard for project activities version 3.0
- CDM Project Standard for project activities version 3.0
- CDM Project Cycle Procedure for project activities version 3.0
- Gold Standard for Global Goals version 1.2

Validation is a requirement for all GS projects and is seen as necessary to provide assurance to stakeholders of the quality of the project and its intended generation of certified emission reductions (CERs).

2.2. Scope

The scope of the validation is the independent and objective review of the Project Design Document (PDD). The PDD is reviewed against the relevant criteria (see 2.1) and decisions by the CDM Executive Board, including the approved baseline and monitoring methodology. The validation was based on the guidance given in the CDM Validation and Verification Standard version 3.0, CDM Project Standard for project activities, version 3.0 and CDM Project Cycle Procedure for project activities, version 3.0 and Gold Standard for Global Goals version 1.2.

The validation team has employed a risk-based approach to assess the completeness and accuracy of the claims and conservativeness of the assumptions in the PDD. The main focus of the validation team is to identify the significant risks for the project implementation and the generation of CERs. The validation is not meant to provide any consulting towards the project

participants. However, stated requests for clarifications and/or corrective actions may have provided input for improvement of the project design.

The only purpose of the validation is its usage during the registration process as part of the GS project cycle. Therefore, Re Carbon Ltd. can't be held liable by any party for decisions made or not made based on the validation opinion, which will go beyond that purpose.

2.3. GHG Project Description

Boylam Enerji Yatırım Üretim ve Ticaret A.Ş. has invested into a greenfield renewable energy project called Saros wind power plant (Saros WPP). The project involves installation and commissioning of 137.997 MW wind power plant. The Project is located in Çanakkale province of Turkey, consisting of 27 wind turbines with a rated power of 5.111MW each. The project supplies electric power to the Turkish National grid. The annual net electricity production of the project is expected to be 483,000 MWh per year.

The project start date is 05/07/2019 corresponding to the turbine Agreement. The renewable crediting period of the project starts on 17/10/2020 corresponding to the project commissioning when the project started delivering electricity to the grid. The average annual emission reductions of the proposed project for the five-year renewable crediting period are estimated to be 313,081 tonnes of CO₂e (tCO₂e). The emission reduction calculations were validated by the DOE via a detailed review of the baseline calculation Excel sheets.

2.4. Parties Involved

Boylam Enerji Yatırım Üretim ve Ticaret A.Ş. is the project participant and host country is Turkey.

3. METHODOLOGY

The validation of proposed GS project activity includes the following phases:

- Assessment whether the project design of the proposed GS project activity meets the relevant CDM and GS requirements, via a desk review of the PDD between 06/07/2021 and 27/12/2021.
- Assessment whether the applied methodology ACM0002, version 20.0, has been applied correctly, including the baseline selection and monitoring plan.
- Assessment of the additionality argument of the project activity against the rules and guidance given in Tool for the demonstration and assessment of additionality – Ver. 07.
- An online remote visit was conducted on 06/07/2021 to assess the implementation process of the project activity and to confirm stakeholders’ comments.
- Assessment of data and calculation of greenhouse gas emission reductions.
- Issuance of the validation report
- Independent technical review (ITR)
- Approval of the validation report and request of registration

The Validation Protocol is used for the assessment of each requirement during the execution of validation activities and is given in Annex-1 of this validation report.

The Validation Protocol consists of five tables:

- Table 1 Gold Standard (GS) Toolkit requirements
- Table 2 GS Passport requirements
- Table 3 GS Local Stakeholder Consultation (LSC) requirements
- Table 4 (Project Design Document (PDD) and CDM validation requirements) and
- Table 5 (Resolution of Corrective Action, Forward Action and Clarification Requests)

The usage description of Table-1 in Validation Protocol is explained in Table 3-1 below:

Table 3-1: Explanation about Table-1 in Validation Protocol

Question	Reference	MoV*	Findings, comments, references and document sources	Draft & Final Conclusion
The requirements related with GS Toolkit	Gives reference to the legislation or documents where the relevant requirement is found	Explains how conformance with question is investigated. Examples of means of validation are Document Review (DR), Interview (I) and Not Applicable (NA)	Is used to elaborate and discuss the question and/or conformance to the question by giving related references and document sources based on which the finding is issued or evidence is checked	Either acceptable based on the evidence provided (OK), non-compliance with the requirement (CAR), further clarification (CL) due to insufficient, unclear or not transparent information, forward action request (FAR) that needs to be solved during the first verification

The usage description of Table-2 in Validation Protocol is explained in Table 3-2 below:

Table 3-2: Explanation about Table-2 in Validation Protocol

Question	Reference	MoV*	Findings, comments, references and document sources	Draft & Final Conclusion
The requirements related with GS Passport	Gives reference to the legislation or documents where the relevant requirement is found	Explains how conformance with question is investigated. Examples of means of validation are Document Review (DR), Interview (I) and Not Applicable (NA)	Is used to elaborate and discuss the question and/or conformance to the question by giving related references and document sources based on which the finding is issued or evidence is checked	Either acceptable based on the evidence provided (OK), non-compliance with the requirement (CAR), further clarification (CL) due to insufficient, unclear or not transparent information, forward action request (FAR) that needs to be solved during the first verification

The usage description of Table-3 in Validation Protocol is explained in Table 3-3 below:

Table 3-3: Explanation about Table-3 in Validation Protocol

Question	Reference	MoV*	Findings, comments, references and document sources	Draft & Final Conclusion
The requirements related with GS Local Stakeholder Consultation (LSC)	Gives reference to the legislation or documents where the relevant requirement is found	Explains how conformance with question is investigated. Examples of means of validation are Document Review (DR), Interview (I) and Not Applicable (NA)	Is used to elaborate and discuss the question and/or conformance to the question by giving related references and document sources based on which the finding is issued or evidence is checked	Either acceptable based on the evidence provided (OK), non-compliance with the requirement (CAR), further clarification (CL) due to insufficient, unclear or not transparent information, forward action request (FAR) that needs to be solved during the first verification

The usage description of Table-4 in Validation Protocol is explained in Table 3-4 below:

Table 3-4: Explanation about Table-4 in Validation Protocol

Question	Reference	MoV*	Findings, comments, references and document sources	Draft & Final Conclusion
The requirements related with the PDD and validation	Gives reference to the legislation or documents where the relevant requirement is found	Explains how conformance with question is investigated. Examples of means of validation are Document Review (DR), Interview (I) and Not Applicable (NA)	Is used to elaborate and discuss the question and/or conformance to the question by giving related references and document sources based on which the finding is issued or evidence is checked	Either acceptable based on the evidence provided (OK), non-compliance with the requirement (CAR), further clarification (CL) due to insufficient, unclear or not transparent information, forward action request (FAR) that needs to be solved during the first verification

The usage description of Table-5 in Validation Protocol is explained in Table 3-5 below:

Table 3-5: Explanation about Table-5 in Validation Protocol

Draft Report Clarifications, Forward Action and Corrective Action Requests by Validation Team	Ref. to Questions in Table-1, Table-2, Table-3 and Table-4	Summary of Project Participants' Response	Validation Team Conclusion
The all CL, FAR and CARs determined during the draft validation report should be listed here	Gives reference to the checklist questions in Table-1 of Validation Protocol	Is used to summarize the responses by project participants regarding the non-conformities	Is used to summarize the responses by validation team and their conclusions

The Validation Protocol is fulfilled by the validation team in line with the descriptions above and all the CARs, CLs and FARs are listed in a transparent and clear manner.

3.1. Validation Team and ITR Selection

The appointment process of the validation team takes into account the technical area(s), sectoral scope(s), and relevant host country experience required amongst team members for the accurate and thorough assessment of the project design. The relevant GS validation and previous ITR experiences are also assessed during the selection of the team members and Independent Technical Reviewer (ITR), respectively. The validation team and ITR are assigned to this validation activity on 23/10/2020 taking all the above factors into consideration and as a result of the contract review process.

The validation team members and ITR are given in Table 3-3 below:

Table 3-6: Validation team and ITR details

Name	Role	Host Country Experience	Scope Coverage	Technical Expertise	Financial Expertise	Involvement*
Sandeep KANDA	Team Leader	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	DR, R, SV
Seza DANIŞOĞLU	Financial Expert	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	DR, R
Rohit BADAYA	ITR	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ITR

* Explanations for the abbreviations used for involvement types are as follows:

- A : Administrative
- DR : Desk Review
- SV : Online Site Visit
- R : Reporting
- ITR : Independent Technical Review

3.2. Desk Review of PDD and Additional Documents

The basis for the validation activity is the PDD version 01, dated 25/06/2021 which was submitted to the validation team on 06/07/2021. This PDD was revised several times due to

the raised CARs and CLs, version 05 dated 27/12/2021 being the final version. The PDD was assessed against;

- The methodology “ACM0002: Grid-connected electricity generation from renewable sources - Version 20.0” and the associated tools,
- the Host Country criteria
- CDM Validation and Verification Standard for project activities, version 3.0
- CDM Project Standard for project activities, version 3.0
- CDM Project Cycle Procedure for project activities, version 3.0
- and other relevant documents, rules and regulations listed in section 2.1 of this report
- Gold Standard for Global Goals version 1.2

A list of all the documents that were reviewed can be found in Section 6 of this validation report.

3.3. Site Visits

As a part of the validation activities online (remote) site visit was performed to the project activity site, details of which can be seen in the Table 3-7 below:

Table 3-7: Online site visit details

Date	06-07-2021	
Location	Online (remote)	
Participant	Company Name	Role in the Organization / Role in the Site Visit
Muhammed YEŞİLKAYA	BORUSAN ENBW	Operating Technician
Resul YALÇIN	BORUSAN ENBW	General Service
Nazime ÇAĞLAYAN	BORUSAN ENBW	General Service
Kerem ASLAN	Life Energy Ltd.	Consultant
Mehmet AKIŞIK	Kocalar Village	Muhtar (Headman)
Cevher AKIŞIK	Kocalar Village	Resident-Male
Ramazan TÜRKER	Kocalar Village	Resident-Male
Mehmet ŞAHİN	Kocalar Village	Resident-Male
Points Verified	Source of Information	
To confirm rightness of project description, as per GS PDD and Passport including project components and location	Document review and remote audit and interviews with the local stakeholders from Kocalar Village	
To check the project development and operation	Document review and remote audit	
To interview with the local stakeholders about the project and its impacts	Remote audit and interviews with the local stakeholders from Kocalar Village	

3.4. Reporting of Findings via the Validation Protocol

During the validation period, a Validation Protocol which is attached in Annex 1 to this validation report was used to submit the findings to the project participants.

In line with the CDM Validation and Verification Standard, the team reports the non-conformities in the forms of Corrective Action Requests (CARs), Clarification Requests (CLs) and Forward Action Requests (FARs). When and for which type of non-conformities CARs, CLs and FARs are raised are explained below:

- The Validation team raises a **CAR** if one of the following occurs:
 - The project participants have made mistakes that will influence the ability of the project activity to achieve real, measurable additional emission reductions
 - The CDM and/or GS requirements have not been met
 - There is a risk that emission reductions cannot be monitored or calculated.
- The Validation team raises a **CL** if information is insufficient or not clear or not transparent enough to determine whether the applicable CDM and/or GS requirements have been met.
- The Validation team raises a **FAR** during validation to highlight issues related to project implementation that require review during the first verification of the project activity.

According to these principles total of 33 CARs and 12 CLs were raised all of which are listed in the Validation Protocol.

3.5. Follow-Up Interviews

During the validation period follow-up interviews were realized by the validation team to further analyze the correctness and accurateness of the information provided. A list of persons interviewed is given in Section 5 of this Validation Report.

3.6. Resolution of Outstanding Issues

All the issues raised as CLs and CARs during this validation activity, were resolved, during the written and oral communications between the Project Participant(s) and Re Carbon Ltd. validation team members. For the resolution of these non-conformities, the project participants modified the project design, rectified the PDD or provided adequate additional explanations or evidence that satisfy the concerns of the validation team members.

Concerns raised in the desk review, the on-site audit assessments and the follow up interviews and the responses provided for the raised concerns are documented in Annex 1 (Validation Protocol) to guarantee the transparency of the validation process.

The validation timeframe is given in detail in Table 3-8 below:

Table 3-8: Validation Timeframe

Action	Timeline	
	From	To
Desk Review	06/07/2021	04/10/2021
Remote Visit	06/07/2021	06/07/2021
Issuance of the Validation Protocol version 01	-	13/08/2021
Review of PPs Initial and subsequent set of Responses	03/10/2021	08/12/2021
Closing of all the CARs and CLs	-	08/12/2021
Issuance of the validation report version 01	-	08/12/2021
ITR Process	14/12/2021	27/12/2021
Submission of the final validation report to the PP	-	27/12/2021

Information or clarifications provided as a response to a CAR, CL or FAR could also lead to a new request. This can also be seen transparently in the Validation Protocol provided in Annex 1 of this Validation Report.

3.7. Internal Quality Control

As a final step of validation, the final documentation including the validation report and annexes have to undergo an internal quality control by the Re Carbon Ltd.. This quality control is also referred to as Independent Technical Review process.

The Independent Technical Review is performed by another Team Leader who hasn't involved in the validation activities of this project activity. When the Team Leader finalizes the Validation Report, the report is sent to Independent Technical Reviewer, at this stage not only the report but all the supporting documents like emission factor calculations, additionality justifications, relevant excel sheets etc. are reviewed.

Further CLs and CARs can be raised by the Independent Technical Reviewer during this review, to cover all the points that may need further clarification.

After all the CLs and CARs are closed, the validation report is reviewed and approved by the Team Leader, ITR and the Certification Manager, and the request of registration is submitted to the Gold Standard Organization along with the relevant documents.

4. VALIDATION FINDINGS

4.1. Participation Requirements

The project participant and project developer is Boylam Enerji Yatırım Üretim ve Ticaret A.Ş..

Turkey is the host country. Turkey ratified the Kyoto Protocol on 5th February of 2009 and put in effect on 13th May 2009. Turkish National Focal Point to the UNFCCC is the Ministry of Environment and Forestry.

Through document review and interview through remote visit, Re Carbon Ltd. confirmed that the project participants as listed in PDD are correct. It is also confirmed that no entities other than those authorized as project participant are included in the relevant sections of the PDD.

4.2. Project Design

The Project Design Document (PDD) complies with the guidance given in the “Gold Standard for the Global Goals Key Project Information & Project Design Document (PDD)”, Version 1.2 issued by Gold Standard on 14/10/2020.

4.3. Project Description

The project consists of installation of 137.997 MW wind power project by the PP, Boylam Enerji Yatırım Üretim ve Ticaret A.Ş. in Çanakkale Province of Turkey. The project activity has 27 wind turbines of 5.111 MW capacity each. The project is expected to generate 483,000 MWh of electricity and feed into the Turkish national grid, thereby displacing equivalent fossil fuel-based grid electricity. The operational lifetime based on the generation license is 49 years, however, the technical lifetime is determined through “Tool to determine the remaining lifetime of equipment” indicated as 25 years.

Through the remote online visit (due to pandemic restrictions) and desk review of submitted documents, the project capacity, location and generation is confirmed from the license of the project issued by Energy Market Regulatory Authority (EMRA) on 18/10/2012. The project was completely installed at the time of remote audit interview conducted on 06/07/2021 and commissioning date has been checked from EPDK website as 17/10/2020. The same has been appropriately taken in the PDD as the start date of crediting period. The project is in compliance with the Turkish regulations. Boylam Enerji Yatırım Üretim ve Ticaret A.Ş. is the generation license owner of the project activity.

The project contributes directly in achieving ‘SDG#7: Affordable and clean energy’ in addition to ‘SDG#13: Climate Action’, being a renewable electricity generation project and displacing fossil fuel-based grid electricity, thereby reducing CO₂ emissions. Apart from the SDGs mentioned above, the project also indirectly contributes to ‘SDG#8: Decent work and economic growth’ leading to employment generation as evidenced from the social security records and ‘SDG#6: Clean water and Sanitation’ by avoiding wastewater from thermal power plants.

The grid connected wind power project is not gender sensitive project and does not adversely impact women or men. The project does not involve and is not complicit in any form of discrimination based on gender, race, religion, sexual orientation or any other basis.

Through document review and interview conducted remotely, Re Carbon Ltd. Confirms that the description provided of the project is accurate, complete, and provides an understanding of the nature of the project.

4.4. Project Boundary

The project supplies electricity to the Turkish grid, which has been validated based on the electricity generation license. All the units of the project activity as well as the power plants connected to the grid are included in the project boundary in line with the requirements of the baseline methodology applied, ACM0002: Grid-connected electricity generation from renewable sources, Version 20.0. This includes the project site and all power plants connected physically to the Turkish national grid. There are no off-grid power plants in Turkish grid.

4.5. Determination of the Baseline Scenario

As per ACM0002, version 20.0, if the project activity is the installation of a Greenfield power plant, the baseline scenario is electricity delivered to the grid by the project activity would have otherwise been generated by the operation of grid-connected power plants and by the addition of new generation sources, as reflected in the combined margin (CM) calculations described in the “Tool to calculate the emission factor for an electricity system.”

As the methodology directly states the baseline scenario, there is no need to carry out other analyses.

The project supplies electricity generated from wind turbines to the national grid. Thus, the PDD correctly identifies baseline scenario comprised of electricity generation from grid-connected power plants in Turkey. The Combined Margin calculations as described in the Tool to calculate emission factor of an electricity system has been applied in the PDD.

Based on the interviews and desk review by cross-checking the information with similar relevant projects, also based on the validation team’s local and sectoral knowledge, it is confirmed that the selected baseline scenario is the prevailing practice in the host country and in line with the host country regulations.

All the assumptions and data used by the PPs are listed in the PDD, including references and sources, all the references and documents used are relevant for establishing the baseline scenario and correctly quoted in the PDD. The identified baseline scenarios reasonably represented what would occur in the absence of the proposed project activity.

4.6. Application of the Selected Baseline and Monitoring Methodology or Standardized Baseline

Re Carbon Ltd. has assessed the relevant information contained in the PDD, remote audit and evidence obtained against the application criteria listed in the methodology. The applicability of this methodology is justified as below:

- The proposed project activity (Saros WPP) is a greenfield, renewable (wind power) electricity generation project, connected to the Turkish national grid,
- The project activity is the installation of wind power plant
- The project does not involve capacity addition, a retrofit of (an) existing plant(s) or a replacement of (an) existing plant(s)
- Project activity does not involve switching from fossil fuels to renewable energy sources at the site of project activity
- The project does not involve combined heat and power generation activity
- The geographic and system boundaries for the Turkish national electricity grid can be clearly identified and information on the characteristics of the grid is available.

According to ACM0002 V20, the latest approved tools shall be referenced in PDD like, “Tool to calculate the emission factor for an electricity system” (Version 7) and “Tool for the demonstration and assessment of additionality” (Version 07.0.0), which are the latest versions of the tools valid at the starting time and the above tools are applied to the PDD.

Re Carbon Ltd. confirms that the selected baseline and monitoring methodology is applicable to the project activity and applies the latest version valid at the time of submitting the project activity for registration.

4.7. Additionality

The additionality of the project has been demonstrated using the “Tool for the Demonstration and Assessment of Additionality”, version 7.0.

In accordance with additionality tool, identification of alternatives, compliance with national regulations, investment analysis and common practice analysis have been checked by the validation team through document review and remote interview. Re Carbon Ltd. confirms that all data, rationales, assumptions and justifications presented in the PDD and documentation provided by PPs to support the demonstration of additionality are reliable and credible.

Further, detailed round of various discussions between the validation team and PP are documented under CARs 10-16 have been carried out to correctly apply the tool in the PDD and justify the additionality of the project. These CARs focused on correct version of the tool, costs applied in the IRR calculations, benchmark and common practice analysis.

4.7.1. Prior CDM consideration

The prior consideration of carbon revenues by the project has been evidenced from the submission of the project documents to Gold Standard on 19/1/2020 within one year of the project start date as 05/07/2019 and the subsequent documentation carried out by the project.

4.7.2. Project alternatives

The PP identifies following alternatives to the proposed project:

Alternative 1: Implementing the project but not undertaken as a GS VER project activity;

Alternative 2: Other realistic and credible alternative scenario(s)/ power plants to the proposed GS VER project activity scenario that deliver electricity with comparable quality, properties and application areas; and

Alternative 3: Continuation of the current situation.

The list of these alternatives is considered to be complete, viable and realistic and comply with all applicable legislation.

The statistics of Electricity Market Regulatory Authority (EMRA) / Enerji Piyasası Düzenleme Kurumu (EPDK) have been checked to validate the same.

All the alternatives are in compliance with the national laws and regulations:

Electricity Market Law; Law on Utilisation of Renewable Energy Resources for the Purpose of Generating Electrical Energy; Forest Law; Environment Law; and Regulation on Environmental Impact Assessment.

The validation team validated the existing policies in energy sector, in particular, E- policies, like the Renewable Energy Law was considered, which promote lesser emission-intensive technologies. The same has been listed in the PDD, and in line with the requirements of para 81(b) of the VVS, projects implemented before adoption of COP has not been considered in determining the baseline scenario. The same is transparently reported in the PDD.

Re Carbon Ltd. confirms that in the PDD, the identified alternatives are appropriate, credible and complete.

4.7.3. Investment analysis

Project IRR is calculated for the financial analysis.

Choice of approach

For the investment analysis, the Benchmark Analysis (Option III of Step 2 of Tool for the Demonstration and Assessment of Additionality) is selected in project PDD. The same is accepted since simple cost analysis (Option I) and investment comparison analysis (Option II) are not appropriate in line with the Tool for the Demonstration and Assessment of Additionality. The project accrues financial benefits with the sale of electricity to the grid and the alternative baseline scenario of the proposed project is the continuation of the supply of electricity by the grid rather than a comparable investment project.

Hence Re Carbon Ltd. Confirms that the adoption of Benchmark analysis (Option III) is appropriate.

Benchmark selection

As a benchmark, in line with the requirements of “Tool for the demonstration and assessment of additionality”, the lending rate for medium term investment published by the Ministry of Development as “Main Economic Indicators” on a monthly basis has been selected as the benchmark. The lending rate for the medium-term investment by the Turkish Development Bank as 14.5% for the September 2018 is considered as the benchmark. This is also comparable to the World Bank document “Private Sector Renewable Energy and Energy Efficiency Project: The Republic of Turkey”, wherein a 15% internal rate of return (IRR), is cited.

The validation team reviewed the Turkish Development Bank publication, World Bank report and also reviewed other registered projects in the region to confirm the choice of benchmark as appropriate.

Input parameters

PP has calculated project IRR for a 25-year period, which is conservative. All the input parameters used in the financial analysis are taken from approved and trustworthy documents and all references are shown to the validation team.

Re Carbon Ltd. compared the input parameters for the financial analysis included in the PDD and IRR spreadsheet with the parameters stated in the reference documents listed in below table and was able to confirm that the values applied are consistent with the values stated in the references. IRR input documents were valid at time of investment decision.

Table 4-1 includes the inputs for IRR analysis and validation proofs:

Table 4-1: IRR inputs

Parameter	Unit	Value	Reference Document
Installed Capacity	MW	138	Electricity Generation License
Annual electricity generation	GWh	483	Electricity Generation License, Energy yield assessment report
Electricity sales tariff	USD cent / kWh	7.3	Renewable Energy Law
Operation period	Year	25	-
Depreciation	-	Calculated for 10 years, depreciating 10% every year	Clause 45.1.7 of Depreciation of Assets according to the Presidency of Revenue Administration
Capital Investment	Million USD	208.201	Turbine agreement, Electromagnetic equipment and assembly agreement, construction agreement

The expenses comprising of Maintenance, security, System usage fee, Insurance and forest rental are checked from their respective documents. Further, inflation rates have been applied on these variables.

Installed capacity and annual electricity generation license values are taken from the electricity generation license and confirmed further with the energy yield assessment report, which were valid at the time of investment decision.

The inputs considered for the IRR calculations have all been verified, as follows:

Input	Reference
<u>INVESTMENT COSTS</u>	
Wind Turbine Systems	Agreement with GE Wind Energy GmbH dated 05.07.2019 (Investment Decision Date) (Corresponds to Turbine Cost in page ix in Figure ES1 of NREL report given below, which is 67.9%)
Construction	Agreement with "GÜRIŞ İNŞAAT" dated 14.06.2019 (Corresponds to

	total of 'Site Access and Staging' and 'Foundation' Costs given in page ix in Figure ES1 of NREL report given below, which is 7.0% in total)
Electrical Infrastructure	9.9% of Total Cost - Assumption: 2017 Cost of Wind Energy Review, NREL, dated September 2018, page ix in Figure ES1, share of Electrical Infrastructure (Total Cost is calculated by dividing Turbine Cost to 0.679, share of Turbine)
Engineering and Development	2.3% of Total Cost - Assumption: 2017 Cost of Wind Energy Review, NREL, dated September 2018, page ix in Figure ES1, share of Engineering and Development Cost (Total Cost is calculated by dividing Turbine Cost to 0.679, share of Turbine)
Other Costs (Assembly and Installation and Construction Finance)	6.8% of Total Cost - Assumption: 2017 Cost of Wind Energy Review, NREL, dated September 2018, page ix in Figure ES1, share of 'Assembly and Installation' and 'Construction Finance Costs' (Total Cost is calculated by dividing Turbine Cost to 0.679, share of Turbine)
Contingency	6.0% of Total Cost - Assumption: 2017 Cost of Wind Energy Review, NREL, dated September 2018, page ix in Figure ES1, share of Contingency Costs (Total Cost is calculated by dividing Turbine Cost to 0.679, share of Turbine)
Capex Cost (USD/kW)	Lower than the Lowest of Capex Range given in NREL Report, which is 1,552 USD/kW, page 33, Table 22
	https://www.nrel.gov/docs/fy18osti/72167.pdf
<u>TECHNICAL</u>	
Turbine Type	Agreement with "GE Wind Energy GmbH" dated 05.07.2019
Turbine Installed Power	Agreement with "GE Wind Energy GmbH" dated 05.07.2019
Turbine Number	Agreement with "GE Wind Energy GmbH" dated 05.07.2019
Total Installed Power (MWe)	Generation License
Operation Life (years)	Tool to determine the remaining lifetime of equipment (page 4) https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-10-v1.pdf
Annual Energy Generation Amount (kWh)	Generation License https://www.epdk.gov.tr/Detay/DownloadDocument?id=FLI6KOxdaT8

	≡
Transmission Loss (ISKK)	The average of the last three years values was taken into account.
Annual Energy Generation Amount to be Sold (kWh)	Electricity to be sold
FINANCIALS	
Electricity Sale Price between 2020-2030 (USD)	Feed-in-tariff (73 USD/MWh) for the first 10 years of the operation https://www.epdk.gov.tr/Detay/DownloadDocument?id=J00aAUcBJRM=
Electricity Sale Price after 2030 Q3 (USD)	Average Spot Price for Electricity Sale for 2018 http://epdk.gov.tr/Detay/DownloadDocument?id=X/fUh6+7kaM=
Turbine System Agreement Date (Investment Decision Date)	Turbine System Agreement Date with "GE Wind Energy GmbH"
Power Plant Operation Start Date	Commissioning Date - 17.10.2020 https://www.epdk.gov.tr/Detay/DownloadDocument?id=FLI6KOxdaT8=
USD/TL	USD Forex Selling on Investment Decision Date (05.07.2019) https://www.tcmb.gov.tr/kurlar/kurlar_tr.html
EUR/USD	EUR/USD Cross Rate on Investment Decision Date (05.07.2019) https://www.tcmb.gov.tr/kurlar/kurlar_tr.html
EUR/TL	EUR Forex Selling on Investment Decision Date (05.07.2019) https://www.tcmb.gov.tr/kurlar/kurlar_tr.html
Depreciation Duration (yrs)	https://www.mevzuatsorgula.com/Ozelge/ruzgar-tribunlerinde-uretilen-elektrigin-ulusal-elektrik-sebekesine-aktarilmasinda-kullanilan-baglanti-kablolarinin-amortisman-orani-hk/97ac86dab3f6ab51b061f18184b5916e
Corporate Tax Rate	https://www.pkfistanbul.com/kurumlar-vergisi-orani/

Calculation and conclusion

Project IRR has been calculated as 7.04% in the absence of carbon revenue.

It is appropriate to carry out the IRR analysis for 25 years as it covers the crediting period.

The calculations were verified and found to be correct by Re Carbon. The assumptions used in the calculations were deemed to be correct by Re Carbon.

Sensitivity analysis

Sensitivity analysis has been carried out for Investment Cost ($\pm 10\%$), O&M Costs ($\pm 10\%$), and electricity income ($\pm 10\%$). All the variables not included in sensitivity analysis, which constitute less than 20% do not have material impact on the analysis. Reasonable variations of the above stated parameters were checked as in Table 4-2 below:

Table 4-2: IRR inputs

Fluctuating Indicators	Fluctuations	
	-10%	+10%
Investment Cost	8.69%	5.65%
O&M Costs	7.67%	6.32%
Electricity income	5.34%	8.67%

Investment Costs

The validation team validated the IRR calculations to confirm that the IRR would cross the benchmark only when the investment costs are cut significantly more than 10%. With majority of the CAPEX being electromechanical costs, such a reduction is deemed not plausible because of its effect on project's technical capacity, provisioned electricity generation and sales revenue. It is further cross-checked with NREL report citing a value of lowest capex range at 1.552 million USD/MW. Furthermore, a recent publication by IRENA too indicates on-shore wind power cost for 2019 as 1.491 million USD/MW. With this extensive database, the 1.509 Million USD/MW taken by the PP is considered to be reasonable and hence accepted.

Annual operation costs

The validation team validated the IRR calculations to confirm that the IRR would not cross the benchmark even when the maintenance, security & other and insurance costs are nullified. The average operation costs taken by the PP coming to around 0.011 USD/kWh could also be validated and found plausible. The total O&M costs derived from actual O&M costs of similar make of wind turbines in other projects. It is further cross-checked with other projects in the Turkey region and a recent publication by IRENA too, wherein for WPP projects, the average O&M costs are reported as 0.017 USD/kWh and for OECD countries averages of USD 0.02 to USD 0.03/kWh appear to be the norm. Hence, the same is accepted by the validation team.

Electricity income

The validation team validated the IRR calculations to confirm that the IRR would cross the benchmark only when the income through electricity is increased by significantly more than 10%. The income through electricity is a function of electricity generation and the tariff.

With the Renewable Energy Law, 2005, 5.5 €cent/kWh of tariff rate for purchase guarantee has been established. By January 10th, 2011, the same was revised to 7.3 \$cent/kWh which is 5.65 €cent/kWh which underlines a tariff increase of 2.7%. the validation team notes that in a period of past 6 years, tariff has increased by just 2.7%. Thus, it is an unrealistic forecast to expect a significant increase of the feed-in-tariff at least for the period of IRR calculations.

The annual electricity generation is confirmed further with the license and energy yield assessment report by Tuv Sud, dated 04/11/2019. This corresponds to a plant load factor (PLF) / capacity factor of 39.95%. In order to increase the electricity sales, the electricity production and the annual operating hours of the project must be increased significantly. However, it is unrealistic to provision a constant additional increase of annual electricity production due to the wind dependent technology of the project. As the sensitive wind measurements takes place prior to the development of the project which the installed capacity and turbine selection depends on, the feasible turbines are not designated for an additional operating potential. Further, since the project doesn't have a storage component, the project's energy generation potential is fully dependent on the prevailing wind sustainability and speed of the source.

Therefore, it is not probable to envision a continuous substantial increase for the electricity production that is served to the grid, in order to enhance the equity IRR upwards.

Outcome of Step 2: The proposed project activity is unlikely to be the most financially/economically attractive as indicated in the 'Tool for Demonstration and Assessment of Additionality' (Version 07.0.0), as per Step 2c Para 10 b. The additionality of the project activity has been assessed in above section through investment analysis and it is concluded that a financially more viable alternative to the project activity would have led to higher emissions.

It is seen that project is not the most attractive option. Therefore, the project is considered as additional to the baseline scenario.

In conclusion, Re Carbon was able to confirm that this project activity is financially unattractive even after considering the possible fluctuation of the main parameters, and the above analysis is appropriate and in line with paragraph 96-102 of Validation and Verification Standard for project activities, version 02.

4.7.4. Barrier analysis

Not applied.

4.7.5. Common practice analysis

The Methodological tool "Common Practice", Version 03.1 EB84, Annex 7 has been applied.

For the common practice analysis, the geographical boundary is selected as the Turkish Electricity Grid to be in line with the methodology.

Following steps were followed in line with the tool:

Step 1: Calculate applicable output range as +/-50% of the design output or capacity of the proposed project activity.

Since the planned capacity of project is 138 MW, the total capacity of power plants, which were included in the analysis were between 69 MW – 207 MW.

Step 2: In the applicable geographical area, identify all plants that deliver the same output or capacity, within the applicable output range calculated in Step 1, as the proposed project activity and have started commercial operation before the start date of the project. Note their number Nall. Registered CDM project activities and projects activities undergoing validation shall not be included in this step.

All power plants that have same capacity, within the applicable range has been listed in a separately submitted spreadsheet. The list of the power plants has been taken from Energy Market Regulatory Authority (EMRA). Properties of the power plants are also indicated in this excel sheet. There are 9 wind power projects connected to the Turkish Grid having capacity in the range of 45 – 135 MW. Of these projects, after excluding the VER projects, the list has only 1 project. The common practice sheet has been re-worked by the validation team and also compared with other registered project and found to be correct.

Nall = 1

Step 3: Within plants identified in Step 3, identify those that apply technologies different that the technology applied in the proposed project activity. Note their number Ndiff.

Since all remaining projects are hydro power plants plus one geothermal power plant and the project activity is a wind power plant.

Ndiff = 0

Step 4: Calculate factor $F=1-Ndiff/Nall$ representing the share of plants using technology similar to the technology used in the proposed project activity in all plants that deliver the same output or capacity as the proposed project activity

$F= 1- 0/1 = 1$

$Nall - Ndiff = 1 - 0 = 1$

According to the Methodological tool on Common Practice, if the factor F is greater than 0.2 and $Nall-Ndiff$ is greater than 3, then the proposed project is a “common practice”.

For the proposed project, F is 1, however $Nall - Ndiff$ is lower than 3, therefore, the proposed project is not common practice within the region.

Re Carbon could validate the conclusion of the PP that the Saros WPP is not a common practice in Turkey.

In summary, it is clearly demonstrated that the project is not a likely baseline scenario and the emission reductions are additional to what would have happened in absence of the project activity.

4.8. Monitoring

According to ACM0002, the parameter to be monitored is “net electricity supplied by the proposed project to the grid in year y, EGfacility,y”. Data is continuously measured and recorded at least monthly.

As per the monitoring plan, the net electricity generation is based on calculation of measured value of electricity export and import and recorded via meters sealed by TEIAS for billing purposes. Therefore, no new additional protocol will be needed for monitoring emission

reduction. Plant manager will be responsible for the electricity generated, gathering all relevant data and keeping the records. Generation data will be used to prepare monitoring reports.

There are two meters. One is the main meter and the other is back-up meter of the main meter for cross-checking. Both meters are jointly inspected and sealed in order to be protected from interference by any of the parties. Installation of meter and data monitoring will be carried out according to the regulations by TEIAS. Data from metering devices will be recorded by TEIAS monthly (through remote reading).

All data will be kept for at least two years after the crediting period for QA/QC purposes. The calibration and maintenance of the meters will be carried out in line with the Bylaws on Metering and Metering Devices. Accordingly, the meters are calibrated and sealed by TEIAS before the commissioning of the power plant. The meters will be calibrated by TEIAS when there is an inconsistency between two devices.

Re Carbon Ltd. can confirm that the list of parameters that need to be monitored ex post is complete and consistent with ACM0002 and that the monitoring plan is in compliance with the applied monitoring methodology.

By document review and interview with project owner, it is confirmed by the validation team that the monitoring plan can be properly implemented, and all monitoring arrangements are feasible within the project design, and the means of implementation of the monitoring plan, including data management and quality assurance and quality control procedures, are sufficient to ensure that the ERs to be achieved by the project activity can be properly reported and verified.

4.9. Calculation of Emission Factor and Emission Reductions

The emission reduction calculation estimations have been done in the PDD as per the latest approved version of the methodology ACM0002, Version 20. The baseline emissions are calculated based on the emission coefficient multiplied by the expected net electricity generation, which amounts to 483 GWh per annum.

For calculation of the emission factor of Turkish Grid, the latest official emission factor of Turkey published by the Ministry of Energy and Natural Resources has been referred. The document refers to calculation of the grid emission factor based on the “Tool to Calculate the Emission Factor for an Electricity System, version 6”. Although, the latest version of the grid emission factor tool is version 7.0, however the change in the version related to isolated grid does not make any impact in this particular case and it being the latest official publication has therefore been accepted by the DOE.

Option A: A combined margin (CM), consisting of the combination of operating margin (OM) and build margin (BM) is calculated according to the procedures prescribed in the ‘Tool to calculate the emission factor for an electricity system’. The steps of the tool are implemented as below:

Step 1: Turkish national grid is identified as the relevant electric power system

Step 2: Only grid power plants are included in the calculation (there are no off-grid power plants in Turkey).

Step 3: Efgid, OM, γ is calculated as the generation-weighted average CO₂ emissions per unit net electricity generation (tCO₂/MWh) of all the generating plants serving the system, excluding low-cost/must-run power plants. As electricity generation from solar and low-cost biomass facilities is insignificant and there are no nuclear plants in Turkey, the only low cost /must run plants considered are hydroelectric, wind and geothermal facilities.

Under this option, the ex-ante approach is selected.

Step 4: Efgid, OM, γ has been calculated as 0.7258 tCO₂/MWh.

Step 5: Option1 is chosen to calculate the build margin emission factor. The BM is calculated as 0.4153 tCO₂/MWh.

Step 6: The combined margin emissions factor has been calculated using the default values of 0.75 and 0.25 for OM and BM respectively. The CM is calculated as 0.6482 tCO₂/MWh.

There are no project or leakage emissions associated with wind power projects. Thus, the emission reductions correspond to the baseline emissions. The project is expected to result in an average emission reduction of 313,081 tCO₂/year during the first renewable crediting period.

4.10. Environmental Impacts

The wind projects in Turkey are assessed for their environmental impacts by the Ministry of Environment and Urbanization. Based on the project documents submitted by the PP, the project has received exemption from Environmental Impact Assessment vide notification dated 18/03/2019.

4.11. Local Stakeholder Comments

In line with the GS requirements, the local stakeholder consultation was held on 29/05/2018, which was validated based on documentary evidence provided to the validation team. Further, the stakeholder feedback round was conducted wherein no comments have been received.

The comments of the local stakeholders were more of information seeking nature, which have been compiled and assessed appropriately by the PP. All the queries raised during the consultation process were satisfactorily answered. The conduct of local stakeholder consultation is found adequate. No changes were needed in the project design based on the comments received from the stakeholders.

4.12. Global Stakeholder Consultation

4.12.1. Description of how the PDD is made publicly available

Not applicable.

4.12.2. Compilation of comments received

Not applicable.

4.12.3. Explanation of how comments are taken into account

Not applicable.

4.12.4. Summary on comments by parties, stakeholders and NGOs

Not applicable.

4.13. Sampling Plan

Not applicable.

4.14. Sustainable Development

The project participants have carried out an analysis of the social, economic and environmental impacts following the GS4GG Safeguarding Principles and Requirements. All the safeguarding principles are stated, and all the relevant assessment questions included pertaining to the safeguarding principles. No mitigation measures are required for any of the Safeguarding Principles. However, for the safeguarding principle 9.4 pertaining to other pollutants, the noise level and the waste oil disposal will be monitored. Further, based on GS review comments, for the safeguarding principle 9.1 landscape modification and soil and principle 9.10 - high conservation value areas and critical habitats related to bird mortality too have been added as monitoring parameters.

Since the project is a wind power project, it is validated based on interviews held remotely, document reviews and expertise of the validation team that based on the non-relevance of the assessment questions, no mitigation measures have been adopted, which are deemed appropriate. Employment opportunities have emerged with the coming of the project activity, and the employees are trained about health and safety issues too. The same has been validated during the remote discussions with the relevant local stakeholders. These findings are also in line with the findings of the local stakeholder consultations and have been correctly presented in the PDD. The social security records of the PP site employees have also been provided to VVB. Besides that, there hadn't been any complaint by the interviewed employees during the remote online visit, either.

Therefore, through document review and interview held remotely, Re Carbon Ltd. confirms that the safeguarding principles assessment has been appropriately conducted for the project activity.

5. LIST OF PERSONS INTERVIEWED

The list of people who were interviewed during the validation period is given in the Table 5-1 below:

Table 5-1: List of persons interviewed

Reference Number	Means of Interview ¹	Full Name	Title	Organization
I01	SV	Mehmet AKIŞIK	Muhtar (Headman)	Kocalar Village
I02	SV	Cevher AKIŞIK	Resident-Male	Kocalar Village
I03	SV	Muhammed YEŞİLKAYA	Operating Technician	BORUSAN ENBW
I04	SV	Resul YALÇIN	General Service	BORUSAN ENBW
I05	SV	Nazime ÇAĞLAYAN	General Service	BORUSAN ENBW
I06	SV	Kerem ASLAN	Consultant	Life Energy Ltd.
I07	SV	Ramazan TÜRKER	Resident-Male	Kocalar Village
I08	SV	Mehmet ŞAHİN	Resident-Male	Kocalar Village

The local stakeholders stated in the Table 5-1 above were interviewed about the following issues and there hadn't been any complaint by the interviewed local stakeholders during the online site visit:

- Noise due to the project activity
- Sufficiency of local employment
- Waste management practices implemented by PP

It was also concluded that the grievance mechanism is in place and this was also confirmed by the interviewed local stakeholders during the online site visit.

¹ SV: Online site visit; T: Telephone; E: E-mail

6. LIST OF DOCUMENTS REVIEWED

The list of the documents which were reviewed during the validation period is given in the Table 6-1 below:

Table 6-1: List of documents reviewed

Document Number	Document Name	Version	Date (dd/mm/yyyy)
D01	PDD	01	25/06/2021
D02	PDD	02	14/09/2021
D03	PDD	03	02/12/2021
D04	ER Calculation Spreadsheet	01	25/06/2021
D05	ER Calculation Spreadsheet	02	02/12/2021
D06	Common Practice Analysis	01	25/06/2021
D07	IRR Calculations	01	25/06/2021
D08	Validation Service Agreement	-	18/12/2020
D09	CDM Validation and Verification Standard for Project Activities	2.0	29/11/2018
D10	CDM Project Standard for Project Activities	2.0	29/11/2018
D11	CDM Project Cycle Procedure for Project Activities	2.0	29/11/2018
D12	Gold Standard for Global Goals	1.1	-
D13	ACM0002: Grid-Connected Electricity Generation from Renewable Sources	20	28/09/2019
D14	Tool to Calculate the Emission Factor for an Electricity System	07	31/08/2018
D15	Generation Licence	-	18/10/2012
D16	EIA report	-	201/12/2018
D17	License amendment application (coordinates change)	-	20/06/2019
D18	EIA Decision	-	18/03/2019
D19	GE-5332 EIA DG Saros WPP Project Turbine Change	-	21/05/2019
D20	Saros WPP Constrcution Works Agreement	-	14/06/2019
D21	Turbine Agreement with GE	-	05/07/2019
D22	Connection Agreement	-	09/09/2019
D23	Electrical Balance of Plant (EBOP) Agreement	-	20/09/2019
D24	Energy Yield Assessment Report	-	04/11/2019
D25	Agreement with carbon consulting company	-	10/01/2020
D26	Annex-3 Technical Specifications & Projects	-	-
D27	Annex-4 Work Program	-	-
D28	SarosRES_GE_NTP (Notice to proceed)	-	26/07/2019

Document Number	Document Name	Version	Date (dd/mm/yyyy)
D29	Annex 02 Scope of Work	-	-
D30	Annex 03 Work Schedule	-	-
D31	Annex 04 WTG Specifications	-	-
D32	Saros WEPP Supply and Installation Agreement_04072019 Rev20_Exec Vers Signed	-	-
D33	Bird Monitoring Reports	-	-
D34	Decision of General Directorate of Nature Con. and National Parks	-	11/03/2019
D35	SAROS RES İDK GÖRÜŞÜ (002)	-	14/11/2018
D36	Ecosystem Assessment Report (Final EIA)	-	20/12/2018
D37	Floristic Assessment Report Final EIA)	-	20/12/2018
D38	Saros RES _Kesin İzin (Land use)	-	25/08/2016
D39	Number of Employees (SARO RES Personnel List; Securitas; Kerem Efe Tur; Euroserv; Boylam Enerji), SGK records	-	-
D40	Flora and Fauna reports	-	30/09/2019
D41	Saros Ornithology Spring Report_r2	-	14/08/2019
D42	Saros WF_Bat Activity Report_Spring 2019 (002)_FINAL 07102019	-	16/07/2019
D43	Public Participation Meeting documents	-	04/05/2018; 18/05/2018; 29/05/2018
D44	Saros Wind Farm Project: Environmental and Social Action Plan	-	11/2019
D45	Saros Wind Farm Project: Stakeholder Engagement Plan	-	11/2019
D46	Saros Wind Farm Project: Non-Technical Summary	-	11/2019
D47	Environmental and Social Impact Assessment (ESIA) Report	-	11/2019
D48	Meter Test Reports	-	08/04/2019 12/11/2019; 19/03/2020
D49	GS4GG Preliminary Review_GS7801_Final_10062020	-	-
D50	Grievance mechanism	-	-
D51	501-ER-T-ODA-Declaration-Saros WPP (003)	-	14/04/2020
D52	Stakeholder feedback round communication	-	-
D53	PDD	04	21/12/2021
D54	PDD	05	27/12/2021

7. VALIDATION TEAM AND ITR COMPETENCE

Sandeep KANDA holds a degree in Mechanical Engineering, Masters in Energy systems engineering from Indian Institute of Technology – Bombay and Post Graduate Diploma in Industrial Safety & Environmental Management from National Institute of Industrial Engineering in India. He has more than ten years of work experience with auditing and consultancy firms, seven years thereof with Designated Operational Entities under the CDM. He is experienced working on diversified areas of energy and environmental management, including policies, Clean Development Mechanism (CDM), Corporate Sustainability Reporting (CSR) Audits, energy audits, utility audits and product development. As CDM auditor and technical reviewer for TÜV Süd, he has audited more than 30 CDM projects as technical reviewer; 40 projects as lead auditor and 7 PoAs in various capacities; covering a broad range of sectoral scopes, such as Energy industries (renewable - / non-renewable sources), Energy distribution, Energy demand, Manufacturing industries, Chemical industries, Transport, Metal production, Waste handling & disposal and Agriculture. He has been working as a contracted team leader, technical reviewer, TA 1.1 and renewable energy expert in the context of Re Carbon.

Seza DANISOGLU holds a B.Sc. degree in Management from Middle East Technical University in Ankara, Turkey. She also has M.Sc. in Business Statistics and Ph.D. in Finance degrees from Texas Tech University in Lubbock, Texas, USA. She is employed as an assistant professor of finance at the Middle East Technical University. She conducts academic research in the areas of investments and banking, teaches courses in Financial Management, Financial Derivatives and Microeconomics and is also employed as a visiting professor by the Texas Tech University during summer semesters. She has been working as a contracted financial expert in the context of Re Carbon.

Rohit Badaya holds Masters degree (M. Tech) in Nanotechnology and Bachelors degree (B.Tech) in Pulp and Paper Engineering from Indian Institute of Technology Roorkee (IITRoorkee). He is also a Certified Energy Auditor from the Bureau of Energy Efficiency, Ministry of Power, Govt. of India. He has more than 13 years of work experience in the area of Climate Change (CDM, GS, VCS). He has worked in various DOE/VVBs in past including 'TUV Nord', 'PJRCS Inc' and 'KBS Certification Services Private Limited'. During his work experience, he has worked in the capacity of Team Leader, Validator/Verifier, Technical Expert, Technical Reviewer, Manager (Technical & Certification) and Quality Manager. He has worked as a Technical Expert for the Technical Areas—TA 1.1 (Thermal energy generation from fossil fuels and biomass including thermal electricity from solar), TA 1.2 (Energy generation from renewable energy sources), TA 2.1 (Energy Distribution), TA 3.1 (Energy Demand), TA 13.1 (Waste Handling and Disposal), TA 13.2 (Manure) for the CDM/GS/VCS projects. He has worked on more than 200 projects as Team Leader/Validator/Verifier/Technical Expert/Technical Reviewer. He is well versed with the various local regulations related to the CDM/GS/VCS projects located in the countries of Africa, Asia and Turkey. He has been working as a contracted team leader, technical expert and technical reviewer in the context of Re Carbon.

7.1. Appointment Certificates

Re Carbon Gözetim Denetim ve Belgelendirme Ltd. Şti. Prof. Dr. Aziz Sancar Cad. 27/3 TR / 06690 Çankaya-Ankara Tel: 0390-312-287 5122 Fax: 0390-312-287 3373	Certificate of Appointment	
	Carbon Division	

This Certificate of Appointment is given to **Mr. Sandeep KANDA** as a confirmation of compliance with internal qualification requirements as follows:

Clean Development Mechanism				
Validator	Verifier	Team leader	Technical reviewer	Technical Expert
08-02-2021	08-02-2021	08-02-2021	08-02-2021	08-02-2021

Verified Carbon Standard, Gold Standard, World Commission on Dams, Social Carbon				
Validator	Verifier	Team leader	Technical reviewer	Technical Expert
08-02-2021	08-02-2021	08-02-2021	08-02-2021	08-02-2021

Speciality	Regional (Country) expertise	Financial expertise	Technical area
N/A	India, Vietnam, Nepal and Turkey	N/A	1.1, 1.2, 2.1, 3.1, 4.1, 8.1, 8.2, 13.1, 13.2 & 15.1

Within the scope and in strict accordance to the appointment indicated above, the bearer can:


1. Participate in the assessments conducted by Re Carbon Ltd.
2. Take the roles within and outside of the assessment team
3. Bring specific expertise to the assessments

This Certificate of Appointment is valid unless there are changes in the related requirements for the qualification and appointment and/or the personnel's work agreement is terminated and there is no defined validity period for this Certificate.

However, The Certificate may be updated, suspended or cancelled at any time, as a result of the performance assessments and/or other reasons as defined above.

APPOINTMENT IS GRANTED BY			
Mr. Anil SÖYLER	Certification Manager	08-02-2021	
Name	Position	Date	Signature



Re Carbon Cozetim Denetim ve Belgelendirme Ltd. Şti. Bag'ın Plaza Muhsin Yazıcıoğlu Cad. 43/11 TR 06520 Beştepe-Ankara Tel.: 0312-312-267 5122 Fax: 0312-312-267 3373	Certificate of Appointment	
	Carbon Division	

This Certificate of Appointment is given to **Ms. Seza DANIŞOĞLU** as a confirmation of compliance with internal qualification requirements as follows

Clean Development Mechanism				
Validator	Verifier	Team leader	Technical reviewer	Technical Expert
N/A	N/A	N/A	N/A	05-05-2017

Verified Carbon Standard, Gold Standard, World Commission on Dams, Social Carbon				
Validator	Verifier	Team leader	Technical reviewer	Technical Expert
N/A	N/A	N/A	N/A	05-05-2017

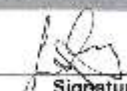
Specialty	Regional expertise	Financial expertise	Technical area
Finance	Worldwide	05-05-2017	N/A

Within the scope and in strict accordance to the appointment indicated above, the bearer can:

1. Participate in the assessments conducted by Re Carbon Ltd.
2. Take the roles within and outside of the assessment team
3. Bring specific expertise to the assessments

This Certificate of Appointment is valid unless there are changes in the related requirements for the qualification and appointment and/or the personnel's work agreement is terminated and there is no defined validity period for this Certificate.

However, The Certificate may be updated, suspended or cancelled at any time, as a result of the performance assessments and/or other reasons as defined above.

APPOINTMENT IS GRANTED BY			
Mr. Anıl SÖYLER	Certification Manager	05-05-2017	
Name	Position	Date	Signature



Re Carbon Özselim Denetim ve Belgelendirme Ltd. Şti. Prof. Dr. Aziz Sancar Cad. 27/15 TR / 06630 Çankaya-Ankara Tel.: 0090-312-267 5122 Fax: 0090-312-267 5373	Certificate of Appointment	
	Carbon Division	Page: 1/1

This Certificate of Appointment is given to **Mr. Rohit BADAYA** as a confirmation of compliance with internal qualification requirements as follows:

Clean Development Mechanism				
Validator	Verifier	Team leader	Technical reviewer	Technical Expert
25-10-2021	25-10-2021	25-10-2021	25-10-2021	25-10-2021

Verified Carbon Standard, Gold Standard, World Commission on Dams, Social Carbon				
Validator	Verifier	Team leader	Technical reviewer	Technical Expert
25-10-2021	25-10-2021	25-10-2021	25-10-2021	25-10-2021

Speciality	Regional (Country) expertise	Financial expertise	Technical area
N/A	India and Turkey	N/A	1.1, 1.2, 2.1, 3.1, 13.1 & 13.2

Within the scope and in strict accordance to the appointment indicated above, the bearer can:

1. Participate in the assessments conducted by Re Carbon Ltd.
2. Take the roles within and outside of the assessment team
3. Bring specific expertise to the assessments

This Certificate of Appointment is valid unless there are changes in the related requirements for the qualification and appointment and/or the personnel's work agreement is terminated and there is no defined validity period for this Certificate.

However, the Certificate may be updated, suspended or cancelled at any time, as a result of the performance assessments and/or other reasons as defined above.

APPOINTMENT IS GRANTED BY			
Mr. Anil SOYLER	Certification Manager	25-10-2021	
Name	Position	Date	Signature

RE-CARBON-001-01



8. VALIDATION OPINION

Re Carbon Ltd. has performed the validation of the “Saros Wind Power Plant” in “Turkey” between 06/07/2021 and 27/12/2021. The validation was performed on the basis of UNFCCC criteria for the CDM, GS and Host Party criteria, as well as criteria given to provide for consistent project operations, monitoring and reporting.

The validation has been performed by a validation team consisting of Sandeep Kanda as team leader, Seza Danişoğlu as financial expert and Rohit Badaya as ITR”, and the project activity was checked against the applicable rules and regulations of CDM including CDM Validation and Verification Standard version 3.0, CDM Project Standard for project activities, version 3.0, and CDM Project Cycle Procedure for project activities, version 3.0, and Gold Standard for Global Goals version 1.2.

Re Carbon Ltd. hereby confirms that the proposed project activity “Saros Wind Power Plant” in Turkey, has applied all relevant EB-guidance as the selected baseline and monitoring methodologies and the associated methodological tools have been applied correctly. Total emission reductions from the project are estimated to be on the average 313,081 tCO₂e per year over the selected 05 year crediting period. The emission reduction forecast has been checked and it is deemed likely that the stated amount is achieved given that the underlying assumptions do not change.

As a result, the validation team assigned by the Re Carbon Ltd. concludes that the proposed Project Activity “Saros Wind Power Plant” in Turkey, as described in the PDD (version number 05, dated 27/12/2021)

- meets all relevant Host Country criteria;
- meets all relevant requirements of the GS, UNFCCC for CDM project activities [including Article 12 of the Kyoto Protocol, the Modalities and Procedures for CDM (Marrakesh Accords) and the subsequent decisions and guidance by the COP/MOP and the CDM Executive Board];
- applies correctly the baseline and monitoring methodology ACM0002, Version 20;
- its additionality is sufficiently justified in the PDD;
- is likely to achieve estimated emission reductions;

Therefore, Re Carbon Ltd. requests the registration of the proposed project activity as a GS project activity.



Sandeep KANDA
Team Leader
27/12/2021



Rohit BADAYA
ITR
27/12/2021



Esin TUNALI
Certification Manager
27/12/2021

ANNEX 1: VALIDATION PROTOCOL

Table 1 – Gold Standard and CDM Validation Requirements

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
Cover Page-Key Project Information					
1. Has the following information been indicated in the cover page of the PDD?	GS-PDD-FORM Ver. 1.2	DR	Yes, the information is indicated correctly.	Ok	Ok
1.1. GS ID of the project activity	GS-PDD-FORM Ver. 1.2	DR	GS 7801 as also indicated in the preliminary review form from GS	Ok	Ok
1.2. Title of the project activity	GS-PDD-FORM Ver. 1.2	DR	Saros Wind Power Plant, as also indicated in the preliminary review form from GS	Ok	Ok
1.3. Time of first submission date	GS-PDD-FORM Ver. 1.2	DR	19/01/2020	Ok	Ok
1.4. Date of design certification	GS-PDD-FORM Ver. 1.2	DR	The date of design certification is to be kept blank for now.	CAR-1	Ok
1.5. Version number of the PDD	GS-PDD-FORM Ver. 1.2	DR	Version 01 indicated for the first submission	Ok	Ok
1.6. Completion date of version	GS-PDD-FORM Ver. 1.2	DR	25/06/2021 indicated for the first submission	Ok	Ok
1.7. Project developer	GS-PDD-FORM Ver. 1.2	DR	Boylam Enerji Yatırım Üretim ve Ticaret A.Ş. The same is also stated in the energy licence issued by EMRA on 18/10/2012	Ok	Ok
1.8. Project representative	GS-PDD-FORM Ver. 1.2	DR	Life İklim ve Enerji Ltd. Şti.	Ok	Ok
1.9. Project participants and any communities involved	GS-PDD-FORM Ver. 1.2	DR	Not applicable	Ok	Ok
1.10. Host country (ies)	GS-PDD-FORM	DR	Turkey	Ok	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
	Ver. 1.2				
1.11. Activity requirements applied	GS-PDD-FORM Ver. 1.2	DR	Renewable energy activities	Ok	Ok
1.12. Scale of the project activity	GS-PDD-FORM Ver. 1.2	DR	Large scale	Ok	Ok
1.13. Other requirements applied	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
1.14. Methodology (ies) applied and version number	GS-PDD-FORM Ver. 1.2	DR	ACM0002, version 20.0	Ok	Ok
1.15. Product requirements applied	GS-PDD-FORM Ver. 1.2	DR	GHG Emissions Reduction & Sequestration	Ok	Ok
1.16. Project cycle	GS-PDD-FORM Ver. 1.2	DR	Retroactive	Ok	Ok
2. Has the estimated sustainable development contributions of the project activity been provided in the relevant tabular format?	GS-PDD-FORM Ver. 1.2	DR	The estimate of SDG contributions has been indicated in the tabular format. However, please clarify the linkage to SDG 6.	CL-1	Ok
A. Description of Project					
A.1. Purpose and general description of project					
A.1.1. Is the scenario existing prior to the implementation of the project activity including, where applicable, the type of facility where the project activity will take place or replace, described in the PDD?	GS-PDD-FORM Ver. 1.2	DR	Yes, it is indicated that the Saros wind power project (WPP) will supply electricity to the grid thereby displacing its constituent fuel sources, mainly fossil fuels.	Ok	Ok
A.1.2. Is the baseline scenario described as	GS-PDD-	DR	Yes	Ok	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
identified in section B4 of the PDD?	FORM Ver. 1.2				
A.1.3. Has the PPs provided an estimation of annual average and total GHG emission reductions for the chosen crediting period?	GS-PDD-FORM Ver. 1.2	DR	a) An estimation of annual average and total GHG emission reductions for the chosen crediting period has not been provided. b) The annual average emission reduction numbers are stated differently in table 1 and section A.1.	CAR-2	Ok
A.1.4. Is the purpose of the project activity described including how it contributes to the sustainable development of the Host Party?	GS-PDD-FORM Ver. 1.2 EB 101 Report Annex 1 §36c	DR	Yes, the project contribution towards sustainable development of Turkey has been indicated.	Ok	Ok
A.1.1. Eligibility of the project under Gold Standard					
A.1.1.1. Is it described how the project meets the eligibility criteria as per section 3.1.1 of GS4GG Principles & Requirements documents and the relevant activity requirements document?	GS-PDD-FORM Ver. 1.2	DR	Yes, it is described how the project meets the eligibility criteria as per section 3.1.1 of GS4GG Principles & Requirements documents	Ok	Ok
A.1.2. Legal ownership of products generated by the project and legal rights to alter use of resources required to service the project					
A.1.2.1. Is it justified that the project owner has full and uncontested legal ownership of the products that are generated under Gold Standard	GS-PDD-FORM Ver. 1.2	DR	Boylam Enerji Yatırım Üretim ve Ticaret A.Ş. is the legal owner of the project as also confirmed through the energy licence issued by EMRA on 18/10/2012	Ok	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
Certification and has legal rights concerning changes in use of resources required to service the Project for e.g water rights, where applicable?					
A.2. Location of the project activity					
A.2.1. Is the location of the project activity clearly identified including:	GS-PDD-FORM Ver. 1.2	DR	a) Please provide further details of the project location apart from stating the province. b) Please provide evidence to corroborate that the area of project location is not a high conservation value (HCV) area.	CAR-3	Ok
A.2.1.1. Host Party(ies)?	GS-PDD-FORM Ver. 1.2	DR	Turkey	Ok	Ok
A.2.1.2. Region/State/Province etc.	GS-PDD-FORM Ver. 1.2	DR	Çanakkale Province	Ok	Ok
A.2.1.3. City/Town/Community etc.	GS-PDD-FORM Ver. 1.2	DR	Refer CAR above	CAR-3	Ok
A.2.1.4. Street name and number	GS-PDD-FORM Ver. 1.2	DR	Refer CAR above	CAR-3	Ok
A.2.1.5. A map	GS-PDD-FORM Ver. 1.2	DR	Please provide a more clearer map of the project.	CAR-4	Ok
A.2.1.6. Details of physical location, including information allowing the unique identification of the project	GS-PDD-FORM Ver. 1.2	DR	The geographic coordinates are provided. However, please clarify the change in the number of turbines as indicated in the licence and the location too. Further, submit the	CL-2	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
activity (e.g. geographic coordinates).			documentary evidence to confirm the coordinates.		
A.3. Technologies and/or measures					
A.3.1. Does PDD include the accurate and complete description of the proposed project activity and provide an understanding of the proposed GS project activity?	EB 101 Report Annex 1 §35	DR	Please clarify about the capacity of the turbine indicated as 5.111 MWe/5.111 MWm, whereas the technical specifications of the selected GE model turbines has rated power of 4.8 – 5.5 MW.	CL-3	Ok
A.3.2. Is the proposed GS project activity in existing facilities or utilizing existing equipment?	EB 101 Report Annex 2 §51	DR	No existing equipment are being used in the project activity. New wind turbines are to be installed.	Ok	Ok
A.3.3. Does the proposed GS project activity involve the alteration of an existing installation or process?	EB 101 Report Annex 2 §51	DR	No	Ok	Ok
A.3.4. If the proposed GS project activity is the alteration of an existing installation or process, does the project description clearly state the differences resulting from the project activity compared to the pre-project situation?	EB 101 Report Annex 2 §51	DR	N/A	Ok	Ok
A.3.5. Have the technologies and measures to be employed and/or implemented by the project activity been described including a list of facilities, systems and equipment that will be installed and/or modified by the project activity?	GS-PDD-FORM Ver. 1.2	DR	The timelines of the project and implementation plan of 27 wind turbines shall be included, apart from the technical details of the turbines.	CAR-5	Ok
A.3.6. Has the PP provided a list of facilities, systems and equipment in operation under the existing scenario prior to the implementation of the project activity?	GS-PDD-FORM Ver. 1.2	DR	The existing grid mix for 2019 has been presented.	Ok	Ok
A.3.7. Has the PP provided a list of facilities, systems and equipment in the baseline scenario, as established in section B.4 of the PDD?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
A.3.8. Does the description clearly explain how the same types and levels of services provided by the project activity would have been provided in the baseline scenario?	GS-PDD-FORM Ver. 1.2 EB 101 Report Annex 1 §60	DR	The project provides renewable electricity to the grid mix.	Ok	Ok
A.3.9. Has the PPs included information about the age and average lifetime of the equipment based on manufacturer’s specifications and industry standards, and existing and forecast installed capacities, load factors and efficiencies, under section A.3 of the PDD?	GS-PDD-FORM Ver. 1.2 EB 101 Report Annex 1 §36e-iv	DR	a) Technical life time of Saros WPP is determined by using the “Tool to determine the remaining lifetime of equipment (v.1)” referring to the default value as 25 years for onshore wind turbines. b) Please correct the presentation of the plant load factor. Also, provide the energy assesment report and the Annex 22 WEPP agreement.	CAR-6	Ok
A.3.10. Is the information provided as to how the project contributes positively to three SDGs?	GS-PDD-FORM Ver. 1.2	DR	It is indicated that the project contributes to SDG 6, 7, 8 and 13. Please clarify further as to how the project contributes to SDG 6.	CAR-7	Ok
A.3.11. Has the energy and mass flows and balances of the systems and equipment included in the project activity, been given?	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
A.3.12. Has the types and levels of services (normally in terms of mass or energy flows) provided by the systems and equipment that are being modified and/or installed under the project activity and their relation, if any, to other manufacturing/production equipment and systems outside the project boundary, been given?	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
A.3.13. Has the PPs described the technology to be employed by the project activity to enable the	EB 101 Report	DR	Yes	Ok	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
identification of the following:	Annex 1 §36				
A.3.13.1. Project's title	EB 101 Report Annex 1 §36a	DR	Yes	Ok	Ok
A.3.13.2. Project's sectoral scope	EB 101 Report Annex 1 §36b	DR	Yes	Ok	Ok
A.3.13.3. Know-how to be used are transferred to the host Party(ies)	EB 101 Report Annex 1 §36e	DR	Yes	Ok	Ok
A.4. Scale of the project					
A.4.1. Has the scale of the project defined (micro scale, small scale or others)?	GS-PDD-FORM Ver. 1.2	DR	It is indicated as a large-scale project	Ok	Ok
A.4.2. Is the justification for the scale of the project provided referring to relevant activity requirement?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
A.5. Funding source of project					
A.5.1. Is the source of public and private funding sources for the project provided?	GS-PDD-FORM Ver. 1.2	DR	Please indicate the source of public and private funding sources for the project.	CAR-8	Ok
A.5.2. If the project activity receives public funding, has the PP provided information on	GS-PDD-FORM	DR	Refer CAR above	CAR-8	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
Parties providing the public funding?	Ver. 1.2				
A.5.3. If the project activity receives public funding, has the PP attached in Appendix 2 of the PDD an affirmation obtained from Parties included in Appendix 1 that such funding does not result in a diversion of Official Development Assistance (ODA), is separate from, and is not counted towards the financial obligations of those Parties?	GS-PDD-FORM Ver. 1.2 EB 101 Report Annex 1 §38	DR	Please submit the ODA declaration letter.	CL-4	Ok
B. Application of Approved Gold Standard Methodology (ies) and/or Demonstration of SDG Contributions					
B.1. Reference of approved methodology(ies)					
B.1.1. Are the references including the number, title, and the version of the selected methodology(ies) given in the PDD?	GS-PDD-FORM Ver. 1.2	DR	Yes, the latest available methodology ACM0002 and the associated tools have been referred for the project. The version of the selected methodology (ver. 20) is the most recent.	Ok	Ok
B.1.2. Are the references including the number, title, and the version of any tools and other methodologies to which the selected methodology(ies) refer given in the PDD?	GS-PDD-FORM Ver. 1.2 EB 101 Report Annex 1 §54	DR	Yes	Ok	Ok
B.2. Applicability of methodology(ies)					
B.2.1. Has the PPs justified the choice of the selected methodology(ies), if applicable, by showing that the project activity meets each applicability condition of the	GS-PDD-FORM Ver. 1.2 EB 101	DR	The justification for the project meeting the applicability conditions of the methodology have not been indicated.	CAR-9	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
methodology(ies)?	Report Annex 1 §54 EB 101 Report Annex 2 §67				
B.2.2. Does the project activity meet each of the applicability conditions of the tools or other methodology components referred to in the applied methodology?	EB 101 Report Annex 2 §67	DR	Refer CAR above	CAR-9	Ok
B.2.3. Has the PPs explained the documentation that has been used and provided the references to applicability of methodology?	GS-PDD-FORM Ver. 1.2	DR	Refer CAR above	CAR-9	Ok
ACM 0002					
B.2.4. Is the type of proposed project activity defined?	ACM 0002 Version 20.0	DR	Refer CAR above	CAR-9	Ok
B.2.5. If the proposed project activity is a hydro power plant project, does one of the following conditions conform to the proposed project activity?	ACM 0002 Version 20.0	DR	Refer CAR above	CAR-9	Ok
B.2.5.1. Is the proposed project activity implemented in an existing single or multiple reservoirs, with no change in the volume of any of the reservoirs?	ACM 0002 Version 20.0	DR	Refer CAR above	CAR-9	Ok
B.2.5.2. Is the project activity implemented in an existing single or multiple reservoirs, where the volume of the reservoir(s) is increased and the power density calculated using equation (3), is greater than 4 W/m ² ?	ACM 0002 Version 20.0	DR	Refer CAR above	CAR-9	Ok
B.2.5.3. Is the project activity results in	ACM 0002	DR	Refer CAR above	CAR-9	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
new single or multiple reservoirs and the power density calculated using equation (3), is greater than 4 W/m ² ?	Version 20.0				
B.2.5.4. If the project activity is an integrated hydro power project, has the PPs demonstrated that water flow from upstream power plants/units spill directly to the downstream reservoir and that collectively constitute to the generation capacity of the integrated hydro power project?	ACM 0002 Version 20.0	DR	Refer CAR above	CAR-9	Ok
B.2.5.5. If the project activity is an integrated hydro power project, has the PPs provided an analysis of the water balance covering the water fed to power units, with all possible combinations of reservoirs and without the construction of reservoirs?	ACM 0002 Version 20.0	DR	Refer CAR above	CAR-9	Ok
B.2.6. If the project activity is an integrated hydro power project involving multiple reservoirs, where the power density for any of the reservoirs calculated using equation (3) is lower than or equal to 4 W/m ² , do all the following conditions conform the project activity?	ACM 0002 Version 20.0	DR	Refer CAR above	CAR-9	Ok
B.2.6.1. The power density calculated using the total installed capacity of the integrated project, as per equation (4), is greater than 4 W/m ² ;	ACM 0002 Version 20.0	DR	Refer CAR above	CAR-9	Ok
B.2.6.2. Water flow between reservoirs is not used by any other hydropower unit	ACM 0002	DR	Refer CAR above	CAR-9	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
which is not a part of the project activity;	Version 20.0				
B.2.6.3. Installed capacity of the power plant(s) with power density lower than or equal to 4 W/m ² shall be:	ACM 0002 Version 20.0	DR	Refer CAR above	CAR-9	Ok
B.2.6.3.1. Lower than or equal to 15 MW; and	ACM 0002 Version 20.0	DR	Refer CAR above	CAR-9	Ok
B.2.6.3.2. Less than 10 per cent of the total installed capacity of integrated hydro power project.	ACM 0002 Version 20.0	DR	Refer CAR above	CAR-9	Ok
B.3. Project boundary					
B.3.1. Has the PP described the emission sources and GHGs included in the project boundary for the purpose of calculating project emissions and baseline emissions, in the tabular format?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.3.2. Has the PP presented a flow diagram of the project boundary, physically delineating the project activity, based on the description provided in section A.3 of the PDD?	GS-PDD-FORM Ver. 1.2	DR	Yes. The project boundary includes project power plant and all power plants connected to the grid.	Ok	Ok
B.3.3. Has the PP included in the flow diagram the equipment, systems and flows of mass and energy described in section A.3 of the PDD, and indicated in the diagram the emission sources and GHGs included in the project boundary and the data and parameters to be monitored?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.3.4. Does the selected methodology allow the PPs to choose whether a source or gas is to be	EB 101 Report	DR	Yes	Ok	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
included in the project boundary?	Annex 1 §58				
B.3.5. If the selected methodology allows the project participants to choose whether a source or gas is to be included in the project boundary, do the project participants explain and justify their choices?	EB 101 Report Annex 1 §58	DR	Yes	Ok	Ok
B.3.6. Have all sources and GHGs necessary for the calculation of emissions been included within the project boundary?	EB 101 Report Annex 2 §69	DR	Yes	Ok	Ok
B.3.7. Does the PDD correctly describe the project boundary and the physical delineation of the proposed project activity?	EB 101 Report Annex 1 §57	DR	Yes	Ok	Ok
B.3.8. Has the selected methodology been correctly applied with respect to project boundary?	EB 101 Report Annex 2 §63a	DR	Yes	Ok	Ok
ACM 0002					
B.3.9. Is the spatial extent of the project boundary identified correctly?	ACM 0002 Version 20.0	DR	Yes	Ok	Ok
B.3.10. Are the greenhouse gases and emission sources included in or excluded from the project boundary given in the tabular form as per the guidance given in Table-2 of ACM 0002?	ACM 0002 Version 20.0	DR	Yes	Ok	Ok
B.4. Establishment and description of the baseline scenario					
B.4.1. Does the approved methodology that is selected by the proposed GS project prescribe	EB 101 Report	DR	As per ACM0002, version 20.0, if the project activity is the installation of a Greenfield power plant, the baseline	Ok	

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
<ul style="list-style-type: none"> the baseline scenario and hence no further analysis is required? 	Annex 2 §94 EB 101 Report Annex 1 §59		scenario is electricity delivered to the grid by the project activity would have otherwise been generated by the operation of grid-connected power plants and by the addition of new generation sources, as reflected in the combined margin (CM) calculations described in the “Tool to calculate the emission factor for an electricity system.		
B.4.2. Does the PDD identify the baseline for the proposed GS project, defined as the scenario that reasonably represents the anthropogenic emissions by sources of GHGs that would occur in the absence of the proposed GS project?	EB 101 Report Annex 2 §75 EB 101 Report Annex 1 §61	DR	While describing baseline, please clarify whether the provided electricity generation in the country corresponds to the latest data.	CL-5	Ok
B.4.3. If the methodology requires use of the tools to identify the baseline scenario, have all those been applied?	EB 101 Report Annex 2 §77	DR	Yes	Ok	Ok
B.4.4. Are there relevant national and/or sectoral policies to identify the baseline scenario?	EB 101 Report Annex 2 §81 EB 101 Report Annex 1 §64	DR	N/A	Ok	Ok
B.4.5. If there are relevant national and/or sectoral policies to identify the baseline scenario, have those been considered correctly in the PDD?	EB 101 Report Annex 2 §83d	DR	N/A	Ok	Ok
B.4.6. Are there relevant circumstances to identify the baseline scenario?	EB 101 Report Annex 2 §81	DR	N/A	Ok	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.4.7. Does the methodology require several alternative scenarios to be considered in the identification of the most reasonable baseline scenario?	EB 101 Report Annex 2 §78	DR	N/A	Ok	Ok
B.4.8. If the methodology requires several alternative scenarios to be considered in the identification of the most reasonable baseline scenario, are all credible scenarios that are in the PDD and are supplementary to those required by the methodology reasonable in the context of the proposed GS project?	EB 101 Report Annex 2 §78	DR	N/A	Ok	Ok
B.4.9. If the proposed project activity includes several different facilities, technologies, outputs or services, do the alternative scenarios for each of them be identified separately?	EB70 Report Annex 8	DR	N/A	Ok	Ok
B.4.10. If the alternative scenarios for each of them be identified separately, are the realistic combinations of these be considered as possible alternative scenarios to the proposed project activity?	EB70 Report Annex 8	DR	N/A	Ok	Ok
B.4.11. Does the list of alternative scenarios given in the PDD include the following?	EB 101 Report Annex 2 §93	DR	N/A	Ok	Ok
B.4.11.1.The project activity is undertaken without being registered as a GS project	EB 101 Report Annex 2 §93a	DR	N/A	Ok	Ok
B.4.11.2.All plausible alternatives	EB 101 Report Annex 2	DR	N/A	Ok	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
	§93b				
B.4.11.3. Comply with all applicable and enforced legislation	EB 101 Report Annex 2 §93c	DR	N/A	Ok	Ok
B.4.12. Has the PP explained how the baseline scenario is established in accordance with the selected methodology(ies)?	GS-PDD-FORM Ver. 1.2 EB 101 Report Annex 1 §59	DR	N/A	Ok	Ok
B.4.13. Where the procedure in the selected methodology(ies) involves several steps, has the PPs described how each step is applied and transparently documented the outcome of each step?	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.4.14. Has the PP provided and explained all data used to establish the baseline scenario (variables, parameters, data sources, etc.)?	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.4.15. Is the identified baseline scenario reasonably supported by correct and verifiable references, assumptions, calculations and rationales?	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.4.16. Has a transparent description of the baseline scenario been provided including the technology(ies) that would be employed and/or the activities that would take place in the absence of the project activity?	GS-PDD-FORM Ver. 1.2 EB 101 Report Annex 2 §80	DR	N/A	Ok	Ok
B.4.17. Has the selected methodology been correctly applied with respect to baseline	EB 101	DR	N/A	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
identification?	Report Annex 2 §63b				
ACM 0002					
B.4.18. If the project activity involves the installation of a greenfield power plant, is the baseline scenario identified appropriately in accordance with the ACM 0002?	ACM 0002 Version 20.0	DR	Yes	Ok	Ok
B.4.19. If the project activity involves capacity addition to existing grid-connected renewable power plant/unit, is the baseline scenario identified appropriately in accordance with the ACM0002?	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.4.20. If the proposed project activity is a capacity addition, retrofit, rehabilitation or replacement, have the existing plant/unit started commercial operation prior to the start of a minimum historical reference period of five years, used for the calculation of baseline emissions and defined in the baseline emission section, and no capacity expansion, retrofit or rehabilitation of the plant has been undertaken between the start of this minimum historical reference period and the implementation of the project activity?	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.4.21. If the project activity is the retrofit or replacement of existing grid-connected renewable power plant/unit, is the point of time at which the generation facility would likely be replaced or retrofitted (DATE _{Baseline Retrofit}) defined?	ACM 0002 Version 20.0	DR	N/A	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.4.22. If the project activity is the retrofit or replacement of existing grid-connected renewable power plant/unit, is the baseline scenario identified following the step-wise procedure in accordance with the ACM0002?	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.4.23. Are the realistic and credible alternative baseline scenarios for power generation appropriately identified following the Step 1 of the “Combined tool to identify the baseline scenario and demonstrate additionality”?	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.4.24. Is “the proposed project activity undertaken without being registered as a CDM project activity” listed as one of the alternatives?	EB70 Report Annex 8 EB 101 Report Annex 2 §93a ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.4.25. Has “other realistic and credible alternative scenario(s) to the proposed CDM project activity scenario that deliver outputs services or services with comparable quality, properties and application areas” been listed as an alternative?	EB70 Report Annex 8 EB 101 Report Annex 2 §93b ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.4.26. Has “continuation of the current situation (no project activity or other alternatives undertaken” been listed as an alternative?	EB70 Report Annex 8 ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.4.27. If the barrier analysis is used, is the Step 2 of the latest applicable version of “Combined	ACM 0002 Version 20.0	DR	N/A	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
tool to identify the baseline scenario and demonstrate “additionality” applied appropriately?					
B.4.28. If more than one alternative is remaining after Step 2 and if the remaining alternatives include scenarios P1 and P3, is the Investment Comparison as per step 3 of the “Combined tool to identify the baseline scenario and demonstrate “additionality” applied appropriately?	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.4.29. If more than one alternative is remaining after Step 2 and if the remaining alternatives include scenarios P1 and P2, is the Benchmark Analysis as per step 2b of the “Tool for the demonstration and assessment of additionality” applied appropriately?	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.5. Demonstration of additionality					
B.5.1. Has it been clearly stated in the PDD which analysis method(s) has been chosen for additionality assessment? •	GS-PDD-FORM Ver. 1.2 EB70 Report Annex 8	DR	The additionality is demonstrated using the “Tool for the Demonstration and Assessment of Additionality”, version 7.0.	Ok	Ok
B.5.1. Prior consideration of CDM					
B.5.1.1. In case of retroactive projects and all projects undergoing Design Changes to include new technologies/measures, has the prior consideration been demonstrated by submission timeline?	GS-PDD-FORM Ver. 1.2	DR	The section 5.1 and 5.2 presenting the prior consideration and ongoing financial need (OFN) respectively is missing.	CAR-10	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.5.1.2. In case of retroactive projects, has the time of first submission is within one year of the project start date?	GS-PDD-FORM Ver. 1.2	DR	As the project is indicated as retroactive, please clarify that the time of first submission is within one year of the project start date.	CL-6	Ok
B.5.1.3. In case of projects undergoing design changes, has the request for design change approval is within one year design change start date?	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.5.1.4. Is the start date of the proposed project activity prior to the date of publication of the PDD for the global stakeholder consultation?	EB 101 Report Annex 1 §31	DR	N/A	Ok	Ok
B.5.1.5. If the start date of a proposed CDM project activity, is prior to the date of publication of the PDD for the global stakeholder consultation, have the PPs demonstrated that the CDM benefits were considered necessary in the decision to undertake the project as a proposed CDM project activity?	EB 101 Report Annex 1 §31	DR	N/A	Ok	Ok
B.5.1.6. If the project was not published and the starting date is on or after 2nd August 2008, have there been list of prior consideration notifications from the UNFCCC website and communication between the project proponent, the Secretariat and the host Party DNA regarding the commencement of a new project activity?	EB 101 Report Annex 1 §32 EB 101 Report Annex 2 §41	DR	N/A	Ok	Ok
B.5.1.7. For the project activities with a starting date before 2nd August 2008 and prior to the date of publication of the PDD for global stakeholder consultation, did PPs have an	EB 101 Report Annex 1 §33a EB 101	DR	N/A	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
awareness of the CDM prior to the project activity start date, and that the benefits of the CDM were a decisive factor in the decision to proceed with the project?	Report Annex 2 §42a				
B.5.1.8. For the project activities with a starting date before 2nd August 2008 and prior to the date of publication of the PDD for global stakeholder consultation, was there enough evidence presented to prove that PPs were taking continuing and real actions to secure CDM status for the project in parallel with its implementation?	EB 101 Report Annex 1 §33b EB 101 Report Annex 2 §42b	DR	N/A	Ok	Ok
B.5.1.9. In case of significant gap in the project development history, can a clear conclusion on prior CDM consideration be made?	EB 101 Report Annex 2 §44	DR	N/A	Ok	Ok
Sub-Step 1a: Definition of alternatives	EB70 Report Annex 8	DR		Ok	Ok
Sub-Step 1b: Consistency with mandatory laws and regulations	EB70 Report Annex 8	DR		Ok	Ok
B.5.1.10. Has the analysis of compliance of the defined alternatives with the mandatory laws and regulations carried out appropriately?	EB70 Report Annex 8	DR	Yes	Ok	Ok
Step 2: Investment analysis	EB70 Report Annex 8	DR		Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.5.1.11.Are the input values used in all investment analysis valid, consistent and applicable at the time of the investment decision taken by the PP?	EB105 Report Annex 6 EB 101 Report Annex 2 §96	DR	Yes, the input values used in all calculations are valid, consistent, and applicable at the time of the investment decision.	Ok	Ok
B.5.1.12.Are all the listed input values been consistently applied in all calculations?	EB105 Report Annex 6	DR	Yes, all the listed input values are applied consistently.	Ok	Ok
B.5.1.13.Do the PPs rely on values from Feasibility Study Report (FSR) that are approved by national authorities for proposed project activities?	EB 101 Report Annex 2 §101	DR	Yes, the input values are referenced to the FSR that has been approved by the national authorities.	Ok	Ok
B.5.1.14.If PPs rely on FSR,		DR		Ok	Ok
B.5.1.14.1. Is it possible to conclude that in the period of time between the finalization of the FSR and the investment decision input values would not have materially changed?	EB 101 Report Annex 2 §101a	DR	Yes, it is possible to conclude that the input values that are based on the FSR are still valid at the time of the investment decision.	Ok	Ok
B.5.1.14.2. Are the values used in the PDD and associated annexes fully consistent with the FSR?	EB 101 Report Annex 2 §101b §101c	DR	Yes, the PDD values are consistent with the FSR.	Ok	Ok
B.5.1.15.Is the plant load factor defined ex-ante in the PDD appropriately?	EB48 Report Annex 11	DR	Yes	Ok	Ok
Sub-step 2a: Determine appropriate analysis method	EB70 Report Annex 8	DR		Ok	Ok
B.5.1.16.Has the PDD described the selection process of investment analysis method (simple cost, investment comparison and benchmark analysis) for the proposed project	EB70 Report Annex 8	DR	Yes, the project owners select the benchmark analysis for determining the financial value of the project (page 20 of the PDD).	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
activity?					
B.5.1.17. Is the choice of the investment analysis method appropriate to the proposed project activity?	EB70 Report Annex 8 EB105 Report Annex 6	DR	Yes, the benchmark analysis is the appropriate method to use for analyzing this project. The other two methods (simple cost and investment comparison) are not appropriate since there are revenues to be earned and the project owner does not provide other investment alternatives as a basis for comparison.	Ok	Ok
Sub-step 2b: Option I-Simple cost analysis	EB70 Report Annex 8	DR		Ok	Ok
B.5.1.18. Have all costs associated with the project activity and the alternatives identified in Step 1 been documented?	EB70 Report Annex 8	DR	N/A	Ok	Ok
B.5.1.19. Has it been demonstrated and supported by valid evidence that at least one of the alternatives defined in Step 1 is less costly than the proposed project activity?	EB70 Report Annex 8	DR	N/A	Ok	Ok
Sub-step 2b: Option II-Apply investment comparison analysis	EB70 Report Annex 8	DR		Ok	Ok
B.5.1.20. Has the PPs identified a financial indicator (such as IRR, NPV, cost benefit ratio, or unit cost of service (e.g., levelized cost of electricity production in \$/kWh or levelized cost of delivered heat in \$/G)) which is most suitable for the project type and decision-making context regarding the investment comparison analysis?	EB70 Report Annex 8	DR	N/A	Ok	Ok
Sub-step 2b: Option III. Apply benchmark analysis	EB70 Report Annex 8	DR		Ok	Ok
B.5.1.21. Has the PPs identified a financial indicator (such as IRR) which is most suitable for the project type and decision-making context including the alternatives for the	EB70 Report Annex 8 EB105 Report	DR	Partially. There are contradictory statements in the PDD regarding the choice of the project's financial indicator: Page 20 of the PDD: "...While applying the Benchmark	CAR-11	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
benchmark analysis?	Annex 6 EB 101 Report Annex 2 §99a		<p>Analysis, Option III, the project IRR is selected as the financial indicator for the demonstration of the additionality of the project as permitted in the additionality tool..."</p> <p>Page 21 of the PDD: "...The lending rate for the medium term investment as estimated by the Turkish Development Bank is 14.5% for the July 2019.2 Thus, 14.5% is taken as the benchmark value for Project IRR (after tax to be conservative)..."</p> <p>Page 21 of the PDD: "...In order to reach 14.50 % equity IRR benchmark, electricity price should increase more than 10.00% from assumed price..."</p> <p>Page 23 of the PDD, Table 5: "...Equity IRR Before Tax (for 25 years) ..."</p> <p>As a result of these contradictory statements, it is not clear whether the project owners use a Project IRR or an Equity IRR as the financial indicator.</p>		
B.5.1.22.Has a pre-tax benchmark been applied?	EB105 Report Annex 6	DR	No, based on the IRR calculations, the PPs apply a post-tax benchmark.	Ok	Ok
B.5.1.23.If post tax benchmark is applied, has actual interest payable been taken into account in the calculation of income tax?	EB105 Report Annex 6	DR	No. There is no information about the financing method for the project. Therefore, it is not clear whether the PPs use any borrowing and whether there are any interest expenses to be paid.	CAR-12	Ok
If the project participant has applied investment	EB70 Report	DR		Ok	Ok

² Please see [the related link](#)

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
comparison or benchmark analysis	Annex 8				
B.5.1.24.If the benchmark is based on parameters that are standard in the market, is the cost of equity determined appropriately? Guideline either by:	EB105 Report Annex 6	DR	Project owners use the Ministry of Development’s medium-term lending rate (14.5%) as the benchmark. However, since no information is available regarding the financing of the project, it is not possible to determine whether this is an appropriate benchmark.	CAR	Ok
B.5.1.25. selecting the values provided in the latest applicable version of Appendix of Investment Analysis Tool? or	EB105 Report Annex 6	DR	Refer CAR above	CAR	Ok
B.5.1.26. by calculating the cost of equity using Capital Asset Pricing Model (CAPM)?	EB105 Report Annex 6	DR	N/A	Ok	Ok
B.5.1.27.If the benchmark based on parameters that are standard in the market, has the cost of debt been calculated as the cost of financing in the capital markets (e.g. commercial lending rates and guarantees required for the country and the type of project activity concerned), based on documented evidence from financial institutions with regard to the cost of debt financing of comparable projects?	EB105 Report Annex 6 EB70 Report Annex 8	DR	Project owners use the Ministry of Development’s medium-term lending rate (14.5%) as the benchmark, and they document the source by referring to the relevant web page where the rate is published.	Ok	Ok
B.5.1.28.Has the discount rates and benchmarks been derived and supported appropriately?	EB70 Report Annex 8	DR	Yes, the project owners derive the benchmark according to “Tool 27: Investment Analysis, Version 08.0” as indicated on page 20 of the PDD.	Ok	Ok
If the company’s internal benchmark has been used for the expected return on equity: (Only applicable to benchmark analysis)	EB105 Report Annex 6				
B.5.1.29.Has it been demonstrated that there is only one possible project developer?	EB105 Report Annex 6	DR	N/A	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.5.1.30.Has it been demonstrated that same benchmark values are used for similar projects with similar risks, developed by the same company or, if the company is brand new, would have been used for similar projects in the same sector in the country/region?	EB105 Report Annex 6	DR	N/A	Ok	Ok
B.5.1.31.If the company's expected return on equity is used as a benchmark, does the percentage of debt financing and equity financing reflect the long-term debt/equity finance structure of the legal entity owning the assets of the project activity?	EB105 Report Annex 6	DR	N/A	Ok	Ok
B.5.1.32.If the company's expected return on equity is used as a benchmark, has the cost of debt been based on the weighted average cost of debt financing of the legal entity owning the project activity?	EB105 Report Annex 6	DR	N/A	Ok	Ok
B.5.1.33.In case of loans, is the weighted average cost of outstanding long-term debt used as a benchmark?	EB105 Report Annex 6	DR	N/A	Ok	Ok
B.5.1.34.In case of bonds, is the weighted average yield of the bonds used as a benchmark?	EB105 Report Annex 6	DR	N/A	Ok	Ok
B.5.1.35.In case of bonds, are the key parameters of the bond including the time of maturity, yield, registration issuance in the financial system and set-up in the market documented?	EB105 Report Annex 6	DR	N/A	Ok	Ok
B.5.1.36.In case of debt financing from a parent	EB105	DR	N/A	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
company, is the transfer of capital to the legal entity documented?	Report Annex 6				
B.5.1.37. In case of loans from a financial institution, is the contract of lending between the financial institution and the legal entity owning the assets of the project activity, or, in absence of the contract, a letter from the bank stating its intention to award the loan and the key terms for the loan documented and supported by the appropriate evidence?	EB105 Report Annex 6	DR	N/A	Ok	Ok
Sub-step 2c: Calculation and comparison of financial indicators (Only applicable to investment comparison and benchmark analysis)	EB70 Report Annex 8	DR		Ok	Ok
B.5.1.38. Has the period of assessment including IRR and equity IRR calculations been chosen appropriately?	EB105 Report Annex 6	DR	A 25-year horizon has been selected to evaluate the project. The project owners justify the investment horizon on page 22 of the PDD.	Ok	Ok
B.5.1.39. Have the PPs justified the period of assessment in the context of the underlying project activity?	EB105 Report Annex 6	DR	Yes. The project owners justify the investment horizon on page 22 of the PDD.	Ok	Ok
B.5.1.40. In case IRR assessment period doesn't cover the technical lifetime of the project, does the cash flow in the final year include a fair value of the project activity assets at the end of the assessment period?	EB105 Report Annex 6	DR	Yes, the final year's cash flows include a fair value for the project activity assets.	Ok	Ok
B.5.1.41. Has the fair value of the project activity assets been calculated in accordance with local accounting regulations where available, or international best practice?	EB105 Report Annex 6	DR	Yes, the PPs assume 5% of the initial value of the project assets as the fair value of these assets at the end of the project's life. They state that scrapping the project assets after 25 years may be too costly to justify but still assume a 5% fair value to be on the conservative side with their IRR calculations.	Ok	Ok
B.5.1.42. Do the fair value calculations include both the book value of the asset and the	EB105 Report	DR	Yes, the PPs assume 5% of the initial value of the project assets as the fair value of these assets at the end of the	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
reasonable expectation of the potential profit or loss on the realization of the assets?	Annex 6		project's life.		
B.5.1.43. Have all relevant costs been included for the calculation of IRR or other relevant financial indicator?	EB70 Report Annex 8 EB105 Report Annex 6	DR	Yes, all relevant costs have been included in the IRR calculations. However, as stated earlier, since there is no information about the financing method for the project, it is not clear whether interest expenses and principal repayments should be included in the cash flows or not.	CAR-14	Ok
B.5.1.44. In case of project IRR, has the cost of financing expenditures (i.e. loan repayments and interest) been included?	EB105 Report Annex 6	DR	a) Since there is no information about the financing method for the project, it is not clear whether interest expenses and principal repayments should be included in the cash flows or not. b) It is not clear whether the PPs use a Project IRR or an Equity IRR for evaluating the project.	CAR-15	Ok
B.5.1.45. Has the depreciation, and other non-cash items related to the project activity, (those deducted in estimating gross profits on which tax is calculated) been added back to net profits in the calculation of the financial indicator (e.g. IRR, NPV)?	EB105 Report Annex 6	DR	Yes, depreciation and other non-cash items have been added back to the cash flows in the IRR calculations.	Ok	Ok
B.5.1.46. In case of using post-tax benchmark, has taxes been included as an expense in the IRR/NPV calculation?	EB105 Report Annex 6	DR	Yes, taxes have been included as an expense in the IRR calculations.	Ok	Ok
B.5.1.47. In case any risk premiums are applied in determination of the benchmark, are the same risks associated with the project type or activity, too?	EB 101 Report Annex 2 §100b EB70 Report Annex 8	DR	N/A	Ok	Ok
B.5.1.48. In the equity IRR, has the cost of debt (loan, bond etc.) been considered as the net cash outflow?	EB105 Report Annex 6	DR	N/A	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.5.1.49. In cases where an investment analysis is carried out in nominal terms and the available IRR benchmarks are in real terms, have PPs converted the real term values of benchmarks to nominal values by adding the inflation rate?	EB105 Report Annex 6	DR	N/A	Ok	Ok
B.5.1.50. Has it been demonstrated that proposed project activity isn't economically or financially feasible without the revenue from CDM?	EB70 Report Annex 8 EB 101 Report Annex 2 §96b	DR	Yes. The current set of calculations demonstrate that the proposed project activity is not economically or financially feasible before the inclusion of the revenue from Carbon.	Ok	Ok
ACM0002					
B.5.1.51. If the proposed project is integrated hydro power project, has the following been considered for the purpose of investment analysis?	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.5.1.51.1. Investment associated with the CDM project activity, i.e. construction of a new reservoir and new power plants/units and	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.5.1.51.2. Revenue due to net electricity generation ($EG_{p,j,y}$) as determined using equation (10) in ACM 0002	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
Sub-step 2d: Sensitivity analysis (Only applicable to investment comparison and benchmark analysis)	EB70 Report Annex 8	DR		Ok	Ok
B.5.1.52. Has a sensitivity analysis showing whether the conclusion regarding the financial/economic attractiveness is robust to	EB70 Report Annex 8 EB105	DR	Yes. A sensitivity analysis in which the key input amounts are varied in several scenarios in order to demonstrate the robustness of the initial calculations has been conducted.	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
reasonable variations in the critical assumptions, been included in the PDD?	Report Annex 6				
B.5.1.53.Has the range of variations selected been justified in the context of the project?	EB105 Report Annex 6	DR	The sensitivity analysis for several variables within a band of $\pm 10\%$ has been provided. The applicability of these scenarios is discussed on pages 21 through 23 of the PDD.	Ok	Ok
Step-3: Barrier analysis	EB70 Report Annex 8	DR		Ok	Ok
B.5.1.54.Have the PPs used and referred the “Guidelines for Objective Demonstration and Assessment of Barriers”?	EB50 Report Annex 13	DR	Not applied	Ok	Ok
Sub-step 3a: Identify barriers that would prevent the implementation of the proposed CDM project activity		DR	Not applied	Ok	Ok
B.5.1.55.Has the PPs established realistic and credible barriers that would prevent the implementation of the proposed CDM project activity?	EB70 Report Annex 8	DR	Not applied	Ok	Ok
Sub-step 3b: Show that the identified barriers would not prevent the implementation of at least one of the alternatives (except the proposed project activity)	EB70 Report Annex 8	DR	Not applied	Ok	Ok
B.5.1.56.Has the identified barriers that would prevent the implementation of the proposed project activity, but not the implementation of at least one of the alternatives in particular the identified baseline scenario, been supported by the clear and valid evidence?	EB70 Report Annex 8 EB 101 Report Annex 2 §103 EB50 Report Annex 13	DR	Not applied	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.5.1.57. Is it demonstrated and supported by proper evidence how the CDM alleviates each of the identified barriers to a level that the project is not prevented anymore from occurring by any of the barriers?	EB50 Report Annex 13 EB70 Report Annex 8	DR	Not applied	Ok	Ok
Investment, technological and other barriers		DR		Ok	Ok
B.5.1.58. In case of investment barriers, is it demonstrated in the PDD that the financing of the project was assured only due to the benefit of the CDM?	EB50 Report Annex 13	DR	N/A	Ok	Ok
B.5.1.59. Can any of the indicated barriers be eliminated by additional financial investments into the proposed project activity?	EB50 Report Annex 13	DR	N/A	Ok	Ok
B.5.1.60. While demonstrating barriers related to the lack of access to capital, technologies and skilled labour, do the PPs provide information on the nature of the companies and entities involved in the financing and implementation of the project?	EB50 Report Annex 13	DR	N/A	Ok	Ok
Barriers due to prevailing practice		DR	N/A	Ok	Ok
B.5.1.61. In case PPs claim that project activity is “first-of-its-kind” have those claims been substantiated and supported by proper evidence?	EB70 Report Annex 8 EB84 Report Annex 6 §12	DR	N/A	Ok	Ok
Step-4: Common practice analysis		DR		Ok	Ok
B.5.1.62. If the project is not “first-of-its-kind”, have PPs applied the common practice analysis appropriately?	EB70 Report Annex 8 EB101	DR	Common practice analysis has been undertaken referring to the latest ver. 3.1. of the tool. However, please provide the evidence or source of the data set considered for	CAR-16	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
	Report Annex 2 §108 EB84 Report Annex 7		common practice analysis.		
B.5.1.63. Is the selection of the assessment region explained and justified completely and correctly?	EB101 Report Annex 2 §108a EB84 Report Annex 7 §9	DR	Yes	Ok	Ok
<p>Sub-step 4a: The proposed CDM project activity(ies) applies measure(s) that are listed below (<u>Questions from B.5.69 to B.5.81 are applicable</u>)</p> <ul style="list-style-type: none"> Fuel and feedstock switch Switch of technology with or without change of energy source (including energy efficiency improvement as well as use of renewable energies); Methane destruction Methane formation avoidance 	EB70 Report Annex 8 EB84 Report Annex 7 §10	DR		Ok	Ok
B.5.1.64. Have all projects within an applicable output range (+/-50%) been included into the common practice analysis?	EB84 Report Annex 7 §13	DR	The applicable output range taken is 69MW - 207 MW. The same is deemed acceptable considering Project capacity of 138 MW.	Ok	Ok
B.5.1.65. Have the similar projects (both CDM and non-CDM) been identified?	EB84 Report Annex 7 §14	DR	Yes	Ok	Ok
B.5.1.66. If the similar projects have been identified, are the following conditions fulfilled?	EB84 Report Annex 7 §14	DR	Yes	Ok	Ok
B.5.1.66.1. Are the projects located in the applicable geographical area?	EB84 Report Annex 7 §14	DR	Turkey is considered as the applicable geographical area.	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.5.1.66.2. Are the projects applied the same measure as the proposed project activity?	EB84 Report Annex 7 §14	DR	Renewable energy projects are considered	Ok	Ok
B.5.1.66.3. Do the projects use the same energy source/fuel and feedstock as the proposed project activity, if a technology switch measure is implemented by the proposed project activity?	EB84 Report Annex 7 §14	DR	Wind power projects are considered	Ok	Ok
B.5.1.66.4. Do the plants in which the projects have been implemented produce goods or services with comparable quality, properties and applications areas (e.g. clinker) as the proposed project plant?	EB84 Report Annex 7 §14	DR	N/A	Ok	Ok
B.5.1.66.5. Are the capacity or output of the projects within the applicable capacity or output range calculated in Question B.5.69?	EB84 Report Annex 7 §14	DR	Yes	Ok	Ok
B.5.1.66.6. Do the projects start commercial operation before the PDD published for global stakeholder consultation or before the start date of proposed project activity, whichever is earlier for the proposed project activity?	EB84 Report Annex 7 §14	DR	Refer to CAR above	CAR-16	Ok
B.5.1.67. Within the projects identified in Question B.5.1.71, have the following project activities been identified?	EB84 Report Annex 7 §15	DR	Refer to CAR above	CAR-16	Ok

*DR= Document Review, I= Interview, SV= Site Visit

Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.5.1.67.1. Non registered CDM project activities	EB84 Report Annex 7 §15	DR	Refer to CAR above	CAR-16	Ok
B.5.1.67.2. Project activities not submitted for registration	EB84 Report Annex 7 §15	DR	Refer to CAR above	CAR-16	Ok
B.5.1.67.3. Project activities not undergoing validation	EB84 Report Annex 7 §15	DR	Refer to CAR above	CAR-16	Ok
B.5.1.68. Within similar projects identified in Question B.5.1.70, have the projects applying technologies that are different to the technology applied in the proposed project activity been identified?	EB84 Report Annex 7 §16 EB70 Report Annex 8 EB101 Report Annex 2 §108c	DR	Refer to CAR above	CAR-16	Ok
B.5.1.69. Has the factor (F=1-Ndiff / Nall) been calculated correctly?	EB84 Report Annex 7 §17	DR	Refer to CAR above	CAR-16	Ok
B.5.1.70. Based on an analysis provided in the PDD, is it possible to conclude that the proposed project activity is not common practice?	EB84 Report Annex 7 §18	DR	Refer to CAR above	CAR-16	Ok
Sub-step 4b: The proposed CDM project activity(ies) doesn't apply any of the measures that are listed in Sub-step 4a above (Questions B.5.1.76 and B.5.1.77 are applicable):		DR		Ok	Ok
B.5.1.71. Has the PPs provided an analysis of any other activities that are operational and that are similar to the proposed project activity in the PDD?	EB70 Report Annex 8 EB101 Report Annex 2 §109b	DR	N/A	Ok	Ok
B.5.1.72. If similar activities have been	EB70 Report	DR	N/A	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
identified, has it been demonstrated that there are essential distinctions between them and proposed project activity, which demonstrate the necessity of the CDM benefits?	Annex 8 EB101 Report Annex 2 §109c				
In all cases to check additionality at the final stage					
B.5.1.73.Has the selected methodology been correctly applied with respect to additionality?	EB101 Report Annex 2 §63d	DR	Refer to CAR above	CAR	Ok
B.5.1.74.As a result, has the PPs demonstrated that the project activity is additional in accordance with the selected methodology(ies) and tool(s)?	GS-PDD- FORM Ver. 1.2 EB101 Report Annex 2 §88	DR	Refer to CAR above	CAR	Ok
B.6. Sustainable Development Goals (SDG) outcomes					
B.6.1. Has the PPs specified the relevant SDG target for each of three SDGs addressed by the project?	GS-PDD- FORM Ver. 1.2	DR	The table presented in the section is not as per the PDD template and also the reference to the project contribution to SDG 6 is unclear.	CAR-17	Ok
B.6.1. Explanation of methodological choices/approaches for estimating the SDG outcome					
B.6.1.1. Has the PPs explained how the methods or methodological steps in the	GS-PDD- FORM	DR	The section B.6.1 as per the PDD template has not been provided. Please explain the methods or methodological	CAR-18	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
selected methodology(ies), for calculating baseline and project outcomes are applied?	Ver. 1.2		steps in the selected methodology for calculating baseline and project outcomes.		
B.6.1.1.1. Baseline	GS-PDD-FORM Ver. 1.2	DR	Refer to CAR above	CAR-18	Ok
B.6.1.1.2. Project	GS-PDD-FORM Ver. 1.2	DR	Refer to CAR above	CAR-18	Ok
B.6.1.1.3. Leakage	GS-PDD-FORM Ver. 1.2	DR	Refer to CAR above	CAR-18	Ok
B.6.1.1.4. Net benefit	GS-PDD-FORM Ver. 1.2	DR	Refer to CAR above	CAR-18	Ok
B.6.1.2. Has the PPs clearly stated which equations will be used in calculating net benefit?	GS-PDD-FORM Ver. 1.2	DR	Refer to CAR above	CAR-18	Ok
B.6.1.3. Has the PPs explained and justified all relevant methodological choices including the following?	GS-PDD-FORM Ver. 1.2 EB101 Report Annex 1 §72	DR	Refer to CAR above	CAR-18	Ok
B.6.1.3.1. Where the methodology(ies) include different scenarios or cases, indicate and justify which scenario or case applies to the project activity	GS-PDD-FORM Ver. 1.2 EB101 Report Annex 1 §72	DR	Refer to CAR above	CAR-18	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.6.1.3.2. Where the methodology(ies) provide different options to choose from , indicate and justify which option is chosen for the project activity	GS-PDD-FORM Ver. 1.2 EB101 Report Annex 1 §72	DR	Refer to CAR above	CAR-18	Ok
B.6.1.3.3. Where the methodology(ies) allow different default values, indicate and justify which of the default values have been chosen for the project activity.	GS-PDD-FORM Ver. 1.2	DR	Refer to CAR above	CAR-18	Ok
B.6.2. Data and parameters fixed ex ante					
B.6.2.1. Have the PPs included a compilation of information on the data and parameters that are not monitored during the crediting period but are determined before the registration and remain fixed throughout the crediting period under section B.6.3 of the PDD?	GS-PDD-FORM Ver. 1.2	DR	The grid emission factor has been fixed ex-ante and the combine margin emission factor is indicated. Also, the electricity generation and wastewater discharged by thermal power plants is included from 2018/2019. However, please clarify the use of recent vintage data being used.	CAR-19	Ok
B.6.2.2. Are the data that are calculated with the equations provided in the selected methodology(ies) or default values specified in the methodology(ies) included in the compilation?	GS-PDD-FORM Ver. 1.2	DR	The grid emission factor is referred to publication of Turkish Ministry of Energy and Natural Resources.	Ok	Ok
B.6.2.3. Are the following information regarding the data and parameters specified correctly?	GS-PDD-FORM Ver. 1.2	DR	Please clarify the reference to SDG 7 for the gross electricity generation.	CL-7	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.6.2.3.1. Relevant SDG indicator	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.6.2.3.2. Data/parameter	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.6.2.3.3. Data/parameter unit	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.6.2.3.4. Description of the data/parameter	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.6.2.3.5. Source of data	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.6.2.3.6. Values applied to data/parameter	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.6.2.4. Where applied values have been measured, are the following included in the PDD?	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.6.2.4.1. The equipment used	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.6.2.4.2. The standards used	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.6.2.4.3. Responsible person/entity having undertaken the	GS-PDD-FORM	DR	N/A	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
measurement	Ver. 1.2				
B.6.2.4.4. The date of measurement(s)	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.6.2.4.5. The frequency of measurement(s)	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.6.2.4.6. The measurement results	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.6.2.5. Has the purpose of data been chosen as one of the following for each data/parameter?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.6.2.5.1. Calculation of baseline;	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.6.2.5.2. Calculation of project;	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.6.2.5.3. Calculation of leakage.	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.6.3. Ex ante estimation of SDG impact					
B.6.3.1. Do the steps taken and equations applied to calculate following comply with the requirements of the selected baseline and monitoring methodology including applicable tool(s)?	EB101 Report Annex 1 §71 EB101 Report	DR	Yes	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
	Annex 2 §110				
B.6.3.1.1. project outcome	EB101 Report Annex 1 §71 EB101 Report Annex 2 §110	DR	No project emissions from the project activity.	Ok	Ok
B.6.3.1.2. baseline outcome	EB101 Report Annex 1 §71 EB101 Report Annex 2 §110	DR	The baseline emissions from the project, as presented in an excel sheet submitted for validation.	Ok	Ok
B.6.3.1.3. leakage	EB101 Report Annex 1 §71 EB101 Report Annex 2 §110	DR	No leakage from project activity.	Ok	Ok
B.6.3.1.4. Net outcomes	EB101 Report Annex 1 §71 EB101 Report Annex 2 §110	DR	Yes	Ok	Ok
B.6.3.2. Where the methodology allows for selection between options for equations or	EB101 Report	DR	N/A	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
parameters, has adequate justification been provided in the PDD?	Annex 2 §111				
B.6.3.3. Has the PPs used the values contained in the tables in section B.6.2 of the PDD for data and parameters available before registration?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.6.3.4. Has the PPs used the estimates contained in the table in section B.6 of the PDD for the data/parameters not available before registration and monitored during the crediting period?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.6.3.5. If any of these estimates has been determined by a sampling approach, has the PP provided a description of the sampling efforts undertaken in accordance with the “Standard for sampling and surveys for CDM project activities and programme of activities”?	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.6.3.6. Has the PPs provided a sample calculation for each equation used?	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.6.3.7. Have the PPs provided a sample calculation for each equation used, substituting the values used in the equations?	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.6.3.8. Is it explained and clearly stated how the procedures in the approved methodology or standardized baseline(s) to calculate emissions like project emissions, baseline emissions and leakages are applied by the PPs?	EB101 Report Annex 2 §112	DR	Yes	Ok	Ok
B.6.3.9. Has the selected methodology or standardized baseline(s) been correctly and	EB101	DR	Yes	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
transparently applied with respect to algorithms and/or formulae used to determine emission reductions?	Report Annex 2 §63c				
ACM 0002					
B.6.3.10. Are baseline emissions calculated using equation (11) given in the methodology?	ACM 0002 Version 20.0	DR	Yes	Ok	Ok
B.6.3.11. Is the quantity of net electricity generation that is produced and fed into the grid as a result of the implementation of the project activity in year y ($EG_{p,y}$) calculated using equations (12), (13), (14), (15) or (16) given in the methodology depending on the project type and relevant requirements?	ACM 0002 Version 20.0	DR	Yes	Ok	Ok
B.6.3.12. When the methodology offers options for approaches in calculations, is it documented in the PDD which option is applied?	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.6.3.13. In the case of retrofits or replacements, has the point in time when the existing equipment would need to be replaced/retrofitted in the absence of the project chosen in a conservative manner?	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.6.3.14. In the case of capacity additions, retrofits, rehabilitations or replacements (except for wind, solar, wave or tidal power capacity addition projects)	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.6.3.14.1. Is it ensured that the existing plant started commercial operation prior to the start of a	ACM 0002 Version 20.0	DR	N/A	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
minimum historical reference period of five years, used for the calculation of baseline emissions?					
B.6.3.14.2. Is it defined in the baseline emission section that no capacity addition, retrofit or rehabilitation of the plant has been undertaken between the start of this minimum historical reference period and the implementation of the project activity?	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.6.3.15. Are the project emissions calculated properly using equations (1), (2), (3), (4), (5), (6), (7), (8), (9) or (10) given in the methodology depending on the project type and the power density value?	ACM 0002 Version 20.0	DR	N/A	Ok	Ok
B.6.3.16. Where project emissions are taken as "0", has the PP made proper justification?	ACM 0002 Version 20.0	DR	Yes	Ok	Ok
B.6.3.17. Are the emission reductions calculated using equation (17) given in the methodology?	ACM 0002 Version 20.0	DR	Yes	Ok	Ok
B.6.4. Summary of the ex-ante estimates of each SDG impact					
B.6.4.1. Have the PPs summarized the results of the ex-ante calculation of emission reductions for all years of the crediting period, using the tabular format?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.7. Monitoring Plan					
B.7.1. Data and parameters to be monitored					

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.7.1.1. In the data/parameter tabular formats for monitoring, has the name of each relevant SDG indicator been included?	GS-PDD-FORM Ver. 1.2	DR	Yes, the tables for SDG 7, 8 and 13 are included.	Ok	Ok
B.7.1.2. In the data/parameter tabular formats for monitoring, has the name of each data/parameter been included?	GS-PDD-FORM Ver. 1.2	DR	Yes, the name of the data/parameters are included.	Ok	Ok
B.7.1.3. Has the unit of each data/parameter been included?	GS-PDD-FORM Ver. 1.2	DR	For the tables of SDG 8 please include the units as 'numbers' in the unit row.	CAR-20	Ok
B.7.1.4. Has the description of each data/parameter been included?	GS-PDD-FORM Ver. 1.2	DR	The description in the table for ERy for all the other non-GHG emissions is to be corrected as currently it only indicates 'CO emission reductions achieved per year'.	CAR-21	Ok
B.7.1.5. Has the source of each data/parameter been included?	GS-PDD-FORM Ver. 1.2	DR	<p>a) The description in the table for ERy for all the other non-GHG emissions is to be corrected as currently it indicates 'As per Monitoring Plan sheet of registered CM Excel. During the verification, the results shall be obtained from the Actual ER excel file.'</p> <p>b) Unlike for CO2 wherein the combined margin grid emission factor is fixed ex-ante, the factors for determining the other non-GHG emissions is not provided.</p> <p>c) The ex-ante factor for avoidance of wastewater too is not presented.</p>	CAR-22	Ok
B.7.1.6. Where several sources of data/parameters are used, is the choice of data/parameter sources explained and justified?	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.7.1.7. Has the applied value of each data/parameter been included?	GS-PDD-FORM	DR	Yes	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
	Ver. 1.2				
B.7.1.8. Has the measurement methods and procedures been included?	GS-PDD-FORM Ver. 1.2	DR	a) In the context of net electricity supplied to the grid, please clarify the reference to apportioning procedures and to section 7.2 corresponding to sampling. b) The relevance and context of apportioning in section 7.3 too needs to be clarified and corrected.	CAR-23	Ok
B.7.1.9. Has the PPs included which measurement equipment is used for monitoring?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.7.1.10. Have the PPs included description of calibration procedures for the monitoring equipment including the following?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.7.1.10.1. Frequency of the calibration	GS-PDD-FORM Ver. 1.2 EB101 Report Annex 1 §81c ACM 0002 Version 20	DR	The calibration frequency of electricity meters is cited as 10 years as per Article 9 of the 'Regulation of Metering and Testing of Metering Systems' by Ministry of Trade and Industry.	Ok	Ok
B.7.1.10.2. Accuracy of the calibration	EB101 Report Annex 1 §81b	DR	Yes	Ok	Ok
B.7.1.10.3. Uncertainty of the calibration	EB101 Report Annex 1	DR	Yes	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
	§81b				
B.7.1.10.4. Calibrating agency/person	EB101 Report Annex 1 §81c	DR	Yes	Ok	Ok
B.7.1.10.5. The relevant national/international standards	EB101 Report Annex 1 §81c	DR	Yes	Ok	Ok
B.7.1.11. Has the accuracy level of the measurement method included?	EB101 Report Annex 1 §81b	DR	Although the specifications of the electricity meters are presented the accuracy level of the same is not explicitly indicated.	CAR-24	Ok
B.7.1.12. Has the responsible person/entity for the measurements included?	GS-PDD-FORM Ver. 1.2	DR	Please indicate for each parameter the responsible person/entity for the measurements.	CAR-25	Ok
B.7.1.13. Has the interval for the measurements included?	GS-PDD-FORM Ver. 1.2	DR	n/a	Ok	Ok
B.7.1.14. Has the monitoring frequency for each data/parameter been included?	GS-PDD-FORM Ver. 1.2	DR	The monitoring frequency for the safeguarding principles is to be clarified and corrected.	CAR-26	Ok
B.7.1.15. Has the QA/QC procedures of each data/parameter been included?	GS-PDD-FORM Ver. 1.2 EB101 Report Annex 1 §81a ACM 0002	DR	Yes	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
	Version 20.0				
B.7.1.16.Has the purpose of data/parameter been chosen as one of the following for each data/parameter?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.7.1.16.1. Calculation of baseline outcome;	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
B.7.1.16.2. Calculation of project outcome;	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.7.1.16.3. Calculation of leakage.	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
B.7.1.17.Have the PPs developed and described the monitoring plan for the proposed project activity in accordance with the selected methodology(ies) and all other applicable rules and requirements?	EB101 Report Annex 1 §78 EB101 Report Annex 2 §117	DR	Yes	Ok	Ok
B.7.1.18.Does the monitoring plan include all data, parameters and related information required by the selected methodology(ies)?	EB101 Report Annex 2 §118a-ii ACM 0002 Version 20.0	DR	Yes	Ok	Ok
B.7.1.19.Are the monitoring arrangements described in the monitoring plan feasible within the project design?	EB101 Report Annex 2 §118b	DR	Yes	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.7.2. Sampling plan					
B.7.2.1. Are the data and parameters monitored in section B.7.1 of the PDD determined by a sampling approach?	GS-PDD-FORM Ver. 1.2 EB101 Report Annex 2 §29e EB86 Report Annex 4	DR	Not applicable	Ok	Ok
B.7.2.2. If the data and parameters monitored in section B.7.1 of the PDD are to be determined by a sampling approach, has the PP provided a description of the sampling plan in accordance with the recommended outline for a sampling plan in the latest applicable version of “Standard for Sampling and Surveys for CDM Project Activities and Programme of Activities”?	GS-PDD-FORM Ver. 1.2 EB105 Report Annex 1 §29 §30 §31 §32 §33	DR	Not applicable	Ok	Ok
B.7.2.3. If the sampling approach is used by the PPs, does the sampling plan present a reasonable approach for obtaining unbiased, reliable estimates of the variables?	EB86 Report Annex 4 §40a	DR	Not applicable	Ok	Ok
B.7.2.4. If the sampling approach is used by the PPs, are the elements of objectives and reliability requirements complete?	EB86 Report Annex 4 §40a-i	DR	Not applicable	Ok	Ok
B.7.2.5. If the sampling approach is used by the PPs, do the requirements specified agree with those stated in the appropriate standards?	EB86 Report Annex 4 §40a-i	DR	Not applicable	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.7.2.6. If the sampling approach is used by the PPs, is the population in the sampling plan clearly defined?	EB86 Report Annex 4 §40b	DR	Not applicable	Ok	Ok
B.7.2.7. If the sampling approach is used by the PPs, is the proposed sampling approach clear?	EB86 Report Annex 4 §40c	DR	Not applicable	Ok	Ok
B.7.2.8. If the sampling approach is used by the PPs, does the sampling approach comply with the description of the population?	EB86 Report Annex 4 §40c-ii	DR	Not applicable	Ok	Ok
B.7.2.9. If the sampling approach is used by the PPs, is the proposed sample size adequate to achieve the minimum confidence/precision requirements?	EB86 Report Annex 4 §40d	DR	Not applicable	Ok	Ok
B.7.2.10.If the sampling approach is used by the PPs, is the ex-ante estimate of the population variance needed for the calculation of the sample size adequately justified?	EB86 Report Annex 4 §40d	DR	Not applicable	Ok	Ok
B.7.2.11.If the sampling approach is used by the PPs, is the sample representative of the population?	EB86 Report Annex 4 §40e	DR	Not applicable	Ok	Ok
B.7.2.12.If the sampling approach is used by the PPs, is it identified how the sampling frame would be kept?	EB86 Report Annex 4 §40e-ii	DR	Not applicable	Ok	Ok
B.7.2.13.If the sampling approach is used by the PPs, are the methods of data collection clear and unambiguous?	EB86 Report Annex 4 §40f-i	DR	Not applicable	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
B.7.2.14.If the sampling approach is used by the PPs, are the procedures for the data measurements defined appropriately and clearly?	EB86 Report Annex 4 §40g	DR	Not applicable	Ok	Ok
B.7.2.15.If the sampling approach is used by the PPs, do the procedures for measurements adequately provide for minimizing non-sampling errors?	EB86 Report Annex 4 §40g	DR	Not applicable	Ok	Ok
B.7.2.16.If the sampling approach is used by the PPs, is the quality control and assurance strategy adequate?	EB86 Report Annex 4 §40g-i	DR	Not applicable	Ok	Ok
B.7.2.17.If the sampling approach is used by the PPs, are the proposed skill sets, qualifications and experience of the personnel to be engaged to conduct sampling adequate?	EB86 Report Annex 4 §40h-i	DR	Not applicable	Ok	Ok
B.7.3. Other elements of monitoring plan					
B.7.3.1. Has the operational and management structure been given in the monitoring plan to monitor emission reductions and any leakage generated by the project activity?	GS-PDD-FORM Ver. 1.2 EB101 Report Annex 1 §82a	DR	<ul style="list-style-type: none"> a) Please clarify the reference to Vestas whereas earlier GE turbines are indicated. b) The reference to the power purchase agreement, trivector meters, state utility, joint meter reading, apportioning procedures, annual calibration of meters among others indicated in section B.7.3. 	CAR-27	Ok
B.7.3.2. Has the PP clearly indicated the responsibilities and institutional arrangements for data collection and archiving?	GS-PDD-FORM Ver. 1.2 EB101 Report Annex 1	DR	Please clearly indicate the responsibilities and institutional arrangements for data collection and archiving.	CAR-28	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
	§82c				
C. Duration and crediting period					
C.1. Duration of project					
C.1.1. Start date of project					
C.1.1.1. Has the start date of the project, in the format of DD/MM/YYYY been stated under section C.1.1 of the PDD?	GS-PDD-FORM Ver. 1.2 EB101 Report Annex 1 §85	DR	a) 14/06/2019 is the indicated date which corresponds to the date of Construction Agreement. Please submit the stated construction agreement. b) Please clarify the date 05/07/2019 stated in the GS preliminary review document.	CL-8	Ok
C.1.1.2. Has the PP described how this date has been determined?	GS-PDD-FORM Ver. 1.2 EB101 Report Annex 1 §85	DR	Refer CL above	CL-8	Ok
C.1.1.3. Has the PP provided evidence to support this date?	GS-PDD-FORM Ver. 1.2 EB101 Report Annex 1 §85	DR	Refer CL above	CL-8	Ok
C.1.2. Expected operational lifetime of project					
C.1.2.1. Is the expected operational lifetime of the project activity stated in years and months under section C.1.2 of the PDD?	GS-PDD-FORM Ver. 1.2	DR	Expected lifetime indicated as 25 years	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
	EB101 Report Annex 1 §86				
C.2. Crediting period of project					
C.2.1. Start date of crediting period					
C.2.1.1. Is the start date of the crediting period of the project activity given in DD/MM/YYYY format?	GS-PDD-FORM Ver. 1.2	DR	Start date of crediting period has been determined as 17/10/2020. Please clarify the basis of arriving at this date and also submit the corresponding documentary evidence.	CL-9	Ok
C.2.1.2. Have the PPs determined only one start date for the crediting period, even in cases of phased implementation of the proposed project activity?	EB101 Report Annex 1 §89	DR	Refer CL above	CL-9	Ok
C.2.1.3. Has the PPs used any qualifications to the start date, such as “expected”?	EB101 Report Annex 1 §90	DR	Refer CL above	CL-9	Ok
C.2.2. Total length of crediting period					
C.2.2.1. Is the length of the crediting period of the proposed project activity stated in years and months under section C.2.3 of the PDD?	GS-PDD-FORM Ver. 1.2	DR	5 years. (Twice renewable)	Ok	Ok
D. Summary of Safeguarding Principles and Gender Sensitive Assessment					
D.1. Safeguarding principles that will be monitored					
D.1.1. Has the safeguarding principles that will be monitored been summarized including the mitigation measures added to the monitoring	GS-PDD-FORM	DR	a) The section D.1 shall include Principle 6.1 on labour rights for the training of workers.	CAR-29	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
plan? Have the PPs carried out an analysis of the social, economic and environmental impacts following the GS4GG Safeguarding Principles and Requirements?	Ver. 1.2		b) Saros Bay is one of the environmental protection areas in Turkey in line with the announcement by Ministry of Environment and Urbanization. Although it is stated by the PP representatives during the online site visit that the project hasn't been located in that area, the relevant environmental reports, permits and declaration by PP shall be provided.		
D.1.2. Are all the safeguarding principles stated?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
D.1.3. Are all the relevant assessment questions included pertaining to the safeguarding principles?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
D.1.4. Is the relevance of the principle cited correctly (Yes/potentially/no)?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
D.1.5. Is proper justification for the safeguarding principle indicated?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
D.2. Assessment that project complies with 'gender sensitive' requirements					
D.2.1. Has the evidence been provided that the project concept and design cover the overall societal context from a gender perspective?	GS-PDD-FORM Ver. 1.2	DR	Please provide the evidence that the project concept and design cover the overall societal context from a gender perspective.	CL-10	Ok
D.2.2. Does the project reflect the key issues and requirements of Gender Sensitive design and implementation as outlined in the Gender Policy?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
D.2.3. Has it been explained how the project align	GS-PDD-	DR	Yes	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
with existing country policies, strategies and best practices?	FORM Ver. 1.2				
D.2.4. Has an expert been involved for the Gender Safeguarding Principles & Requirements, where required?	GS-PDD-FORM Ver. 1.2	DR	N/A	Ok	Ok
D.2.5. Has it been explained how the project address the questions raised in the Gold Standard Safeguarding Principles & Requirements document?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
D.2.6. Does the project apply the Gold Standard Stakeholder Consultation & Engagement Procedure, Requirements & Guidelines?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
E. Summary of Local Stakeholder Consultation					
E.1. Summary of stakeholder mitigation measures					
E.1.1. Has the PP described the process by which comments from stakeholders have been invited for the project?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
E.1.2. Has the PP conducted the stakeholder consultation in accordance with GS4GG Stakeholder Procedure Requirements and Guidelines?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
E.1.3. Has the PP demonstrated how due steps/actions were taken to appropriately engage stakeholders and solicit comment?	EB101 Report Annex 1 §94	DR	Yes	Ok	Ok
E.1.4. Has the PP invited comment from stakeholders in an open and transparent	EB101	DR	Yes	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
manner, in a way that facilitates comments to be received from local stakeholders and allows for a reasonable time for comments to be submitted?	Report Annex 1 §99 EB101 Report Annex 2 §132				
E.1.5. Has the PPs described the proposed project in a manner that allows the stakeholders to understand the project activity, taking into account confidentiality provisions of the applicable CDM M&Ps and requirements?	EB101 Report Annex 1 §101	DR	Yes	Ok	Ok
E.1.6. Has the PP identified the stakeholders that have made comments?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
E.1.7. Has the PP provided a summary of the stakeholder comments in a complete and clear manner?	EB101 Report Annex 1 §105 EB101 Report Annex 2 §132f	DR	Yes	Ok	Ok
E.1.8. Has the PPs provided information demonstrating that all comments received have been considered?	EB101 Report Annex 1 §107	DR	Please submit the documentary evidence for the stakeholder consultations.	CL-11	Ok
E.1.9. Is the process on how the PPs taken into account of all comments received described in the PDD?	EB101 Report Annex 1 §107 EB101	DR	Refer CL above	CL-11	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
	Report Annex 2 §132g				
E.2. Final continuous input / grievance mechanism					
E.2.1. Has the relevant methods and all details of chosen methods been provided in the related tabular format?	GS-PDD-FORM Ver. 1.2	DR	It is indicated that 'Continuous Input Process Book was provided to Muhtar of village'. Please clarify the corresponding village and provide evidence for the presence of the grievance book.	CL-12	Ok
E.2.2. Has the following been provided as the mandatory methods as part of the final continuous input / grievance mechanism	GS-PDD-FORM Ver. 1.2	DR	Refer to CL above	CL-12	Ok
E.2.2.1. Continuous input / grievance expression process book	GS-PDD-FORM Ver. 1.2	DR	Refer to CL above	CL-12	Ok
E.2.2.2. GS contact	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
F. Other Requirements					
F.1. Forward action requests (FARs) identified during preliminary GS review and/or LSC review					
F.1.1. Are there any FARs from the preliminary GS review and/or LSC review stages?	EB101 Report Annex 2 §36	DR	<p>Please clarify how the following points from the preliminary review have been addressed:</p> <ul style="list-style-type: none"> a) CAR#1: For BM calculation, please determine AEGtotal value excluding the VER project activities and Identify Set20% value excluding the VER project activities as per Tool 07 under B.4.1 of PDD since stated as "all plants In operation by 2018". b) CAR#2: Please discuss AEGset5 units and list down of 1 MW as per Tool 07 under BM calculations. c) CAR#3: Under Table 15: <ul style="list-style-type: none"> • The sample group's total generation Is not determined 20% which Is 48,030 GWh. Please clarify. • Please clarify why there are no "renewables" under energy source since there are listed under Table 16. d) CAR#4: Please state equation numbers as per Tool 07 under OM/BM/CM calculations - not In numerical order. e) CAR#5: Table 19 under Common Practice Includes 2 projects whereas 22 Is stated. Please list down all assessed projects. f) FAR#1: The live SFR shall be used to close gaps in the consultation process by inviting stakeholders from all GS categories to view the project documentation and comment/feedback on the design, the stakeholders shall be provided with an opportunity to comment on 	CAR-30	Ok

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Question	Reference	Means of Validation*	Findings, Comments, References and Document Sources	Draft Opinion	Final Opinion
			the project and PD shall provide further explanation of how comments received during consultation were taken into account, as the VVB needs to validate the same.		

Question	Reference	Means of validation*	Findings, comments, references and document sources	Draft opinion	Final opinion
Appendix-1 Safeguarding principles assessment					
1. Has the safeguarding principles assessment been completed for each principle using the relevant tabular format?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
2. Has the justification of relevance for the related safeguarding principles assessment been provided?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
3. If the respond is yes for the justification of relevance, has all relevant requirements from the GS4GG Safeguarding Principles and Requirements document been included in the tabular format?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
4. If the respond is no or potentially for the justification of relevance, has this been justified clearly and adequately?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
Appendix-2 Contact information of project participants					

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Question	Reference	Means of validation*	Findings, comments, references and document sources	Draft opinion	Final opinion
1. Is the contact information of PPs provided in Appendix 2?	GS-PDD-FORM Ver. 1.2	DR	Yes	Ok	Ok
Appendix 3- LUF additional information					
1. In case of land use and forest projects, has the additional information been provided in Appendix-3?	GS-PDD-FORM Ver. 1.2	DR	Not applicable	Ok	Ok
Appendix-4 Summary of approved design changes					
1. If applicable, is the summary of the approved design changes been provided?	GS-PDD-FORM Ver. 1.2	DR	Not applicable	Ok	Ok

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Table 2 – Resolution of Corrective Action, Forward Action and Clarification Requests

Draft Report Clarifications, Forward Action and Corrective Action Requests by Validation Team	Ref. to Checklist Questions in Table-1	Summary of Project Participants' Response	Validation Team Conclusion
<p>CAR-1 The date of design certification is to be kept blank for now.</p>	<p>1.4</p>	<p><u>Response to 1st protocol</u> Related section has been revised on the page 2.</p>	<p>Review-1: Ok Closed (The section has been edited).</p>
<p>CAR-2 a) An estimation of annual average and total GHG emission reductions for the chosen crediting period has not been provided. b) The annual average emission reduction numbers are stated differently in table 1 and section A.1.</p>	<p>A.1.3</p>	<p><u>Response to 1st protocol</u> a) Estimation of annual average and total GHG has been provided in the section A.1. b) Value in the section A.1. has been revised according to table 1 value.</p>	<p>Review-1: Ok Closed (The section has been corrected).</p>
<p>CAR-3 a) Please provide further details of the project location apart from stating the province. b) Please provide evidence to corroborate that the area of project location is not a high conservation value (HCV) area.</p>	<p>A.2.1</p>	<p><u>Response to 1st protocol</u> a) Further details have been provided in the section A.2. b) See the Ecosystem Assessment Report, page 218 and 219 that is about the remarks of related council (referred to Annex-17 and Annex-18). Related information have been indicated in the section A.2.</p>	<p>Review-1: Ok Closed (The section has been edited. Through the Ecosystem Assessment Report, it is confirmed that the project is in accordance with the Conservation of Cultural and Natural Assets).</p>
<p>CAR-4 Please provide a more clearer map of the project.</p>	<p>A.2.1.5</p>	<p><u>Response to 1st protocol</u> Has been provided in the section A.2 and previous map has been changed with clearer map.</p>	<p>Review-1: Ok Closed (The section has been edited).</p>
<p>CAR-5 The timelines of the project and implementation plan of 27 wind turbines shall be included, apart from the technical details of the turbines.</p>	<p>A.3.5</p>	<p><u>Response to 1st protocol</u> Milestones of the project has provided under the section of B.5. Table has been revised according to correction request.</p>	<p>Review-1: Ok Closed (The section has been edited).</p>

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Draft Report Clarifications, Forward Action and Corrective Action Requests by Validation Team	Ref. to Checklist Questions in Table-1	Summary of Project Participants' Response	Validation Team Conclusion
<p>CAR-6</p> <p>Technical life time of Saros WPP is determined by using the “Tool to determine the remaining lifetime of equipment (v.1)” referring to the default value as 25 years for onshore wind turbines.</p> <p>Please correct the presentation of the plant load factor. Also, provide the energy assesment report and the Annex 22 WEPP agreement.</p>	A.3.9	<p><u>Response to 1st protocol</u></p> <p>Technical life time of wind turbines is 25 years for onshore wind turbines according to stated tool. Also, correction request is not clear please clarify it. Stated sentence is the same sentence in the PDD.</p> <p>Plant load factor calculation has been revised under the section A.3. Providing annex 22 is not possible due to privacy. Energy assessment report have already provided and has been shared again for the power curves and energy yield. P-value (80%) has been already used in compliance with the licence.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited).</p>
<p>CAR-7</p> <p>It is indicated that the project contributes to SDG 6, 7, 8 and 13. Please clarify further as to how the project contributes to SDG 6.</p>	A.3.10	<p><u>Response to 1st protocol</u></p> <p>SDG 6 contributions have been clarified in the section B.6.1 and section B.6.3 too.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited).</p>
<p>CAR-8</p> <p>Please indicate the source of public and private funding sources for the project.</p>	A.5.1	<p><u>Response to 1st protocol</u></p> <p>Section A.5. has been revised according to correction request.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited).</p>
<p>CAR-9</p> <p>The justifications for the project meeting the applicability conditions of the methodology have not been indicated.</p>	B.2.1	<p><u>Response to 1st protocol</u></p> <p>Justifications have been provided under the section B.2.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited).</p>
<p>CAR-10</p> <p>The section 5.1 and 5.2 presenting the prior consideration and ongoing financial need (OFN) respectively is missing.</p>	B.5.1.1	<p><u>Response to 1st protocol</u></p> <p>Sections have been added and clarified under the B.5 section as B.5.1 and B.5.2.</p>	<p>Review-1:</p> <p>Ok Closed (The sections have been added).</p>
<p>CAR-11</p> <p>There are contradictory statements in the PDD</p>	B.5.1.21	<p><u>Response to 1st protocol</u></p> <p>Aforementioned contradictory statements in the PDD have been revised</p>	<p>Review-1:</p> <p>Ok Closed (The section has been</p>

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Draft Report Clarifications, Forward Action and Corrective Action Requests by Validation Team	Ref. to Checklist Questions in Table-1	Summary of Project Participants' Response	Validation Team Conclusion
<p>regarding the choice of the project's financial indicator:</p> <p>Page 20 of the PDD: "...While applying the Benchmark Analysis, Option III, the project IRR is selected as the financial indicator for the demonstration of the additionality of the project as permitted in the additionality tool..."</p> <p>Page 21 of the PDD: "...The lending rate for the medium term investment as estimated by the Turkish Development Bank is 14.5% for the July 2019.3 Thus, 14.5% is taken as the benchmark value for Project IRR (after tax to be conservative)..."</p> <p>Page 21 of the PDD: "...In order to reach 14.50 % equity IRR benchmark, electricity price should increase more than 10.00% from assumed price..."</p> <p>Page 23 of the PDD, Table 5: "...Equity IRR Before Tax (for 25 years) ..."</p> <p>As a result of these contradictory statements, it is not clear whether the project owners use a</p>		<p>according to correction request.</p>	<p>edited).</p>

³ Please see [the related link](#)

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Draft Report Clarifications, Forward Action and Corrective Action Requests by Validation Team	Ref. to Checklist Questions in Table-1	Summary of Project Participants' Response	Validation Team Conclusion
Project IRR or an Equity IRR as the financial indicator.			
<p>CAR-12</p> <p>There is no information about the financing method for the project. Therefore, it is not clear whether the PPs use any borrowing and whether there are any interest expenses to be paid.</p>	B.5.1.23	<p><u>Response to 1st protocol</u></p> <p>Financing method is selected as project IRR in the IRR excel and PDD. As can be seen in paragraph 9 of the relevant guideline. Financing expenditures will not be included in the project IRR. So, project financing expenditures are not considered.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited with indication of project IRR).</p>
<p>CAR-13</p> <p>Project owners use the Ministry of Development's medium-term lending rate (14.5%) as the benchmark. However, since no information is available regarding the financing of the project, it is not possible to determine whether this is an appropriate benchmark.</p>	B.5.1.24	<p><u>Response to 1st protocol</u></p> <p>Project IRR method has been used as the financing of the project and determine appropriate benchmark.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited with indication of project IRR).</p>
<p>CAR-14</p> <p>Although all relevant costs have been included in the IRR calculations. However, as stated earlier, since there is no information about the financing method for the project, it is not clear whether interest expenses and principal repayments should be included in the cash flows or not.</p>	B.5.1.43	<p><u>Response to 1st protocol</u></p> <p>Project IRR method has been used for the financing analysis. Thus, interest expenses and principal repayments are <u>not</u> considered as costs for the project IRR calculations, according to paragraph 10 - (rationale) of relevant guideline.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited with indication of project IRR).</p>
<p>CAR-15</p> <p>c) Since there is no information about the financing method for the project, it is not clear whether interest expenses and</p>	B.5.1.44	<p><u>Response to 1st protocol</u></p> <p>c-d) Both corrective action requests have been elucidated with the CAR-11,CAR-12,CAR-13,CAR-14 responses and revised PDD.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited with indication of project IRR).</p>

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Draft Report Clarifications, Forward Action and Corrective Action Requests by Validation Team	Ref. to Checklist Questions in Table-1	Summary of Project Participants' Response	Validation Team Conclusion
<p>principal repayments should be included in the cash flows or not.</p> <p>d) It is not clear whether the PPs use a Project IRR or an Equity IRR for evaluating the project.</p>			
<p>CAR-16</p> <p>Common practice analysis has been undertaken referring to the latest ver. 3.1. of the tool. However, please provide the evidence or source of the data set considered for common practice analysis.</p>	B.5.1.62	<p><u>Response to 1st protocol</u></p> <p>Source of data set and references have been provided and in the Common Practice excel spreadsheet.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited with indication of source and the same has been submitted too).</p>
<p>CAR-17</p> <p>The table presented in the section is not as per the PDD template and also the reference to the project contribution to SDG 6 is unclear.</p>	B.6.1	<p><u>Response to 1st protocol</u></p> <p>Please indicate the section. SDG 6 sections have been revised in the PDD.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited).</p>
<p>CAR-18</p> <p>The section B.6.1 as per the PDD template has not been provided. Please explain the methods or methodological steps in the selected methodology for calculating baseline and project outcomes.</p>	B.6.1.1	<p><u>Response to 1st protocol</u></p> <p>B.6.1 section has been provided and clarified.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited).</p>
<p>CAR-19</p> <p>The grid emission factor has been fixed ex-ante and the combine margin emission factor is indicated. Also, the electricity generation and wastewater discharged by thermal power plants is included from 2018/2019. However, please</p>	B.6.2.1	<p><u>Response to 1st protocol</u></p> <p>It has already stated in the related section as, "(publication of TURKSTAT data for the year of 2018, which is the most recent available data, was used)". Therefore, recent data has been used according to commissioning date of the project.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited).</p>

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Draft Report Clarifications, Forward Action and Corrective Action Requests by Validation Team	Ref. to Checklist Questions in Table-1	Summary of Project Participants' Response	Validation Team Conclusion
clarify the use of recent vintage data being used.			
<p>CAR-20</p> <p>For the tables of SDG 8 please include the units as 'numbers' in the unit row.</p>	B.7.1.3	<p><u>Response to 1st protocol</u></p> <p>Related section has been revised according to correction request in the table 1.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited).</p>
<p>CAR-21</p> <p>The description in the table for ERY for all the other non-GHG emissions is to be corrected as currently it only indicates 'CO emission reductions achieved per year'.</p>	B.7.1.4	<p><u>Response to 1st protocol</u></p> <p>Other non-GHG emissions have been provided in the ERY table.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited).</p>
<p>CAR-22</p> <p>a) The description in the table for ERY for all the other non-GHG emissions is to be corrected as currently it indicates 'As per Monitoring Plan sheet of registered CM Excel. During the verification, the results shall be obtained from the Actual ER excel file.'</p> <p>b) Unlike for CO2 wherein the combined margin grid emission factor is fixed ex-ante, the factors for determining the other non-GHG emissions is not provided.</p> <p>c) The ex-ante factor for avoidance of wastewater too is not presented.</p>	B.7.1.5	<p><u>Response to 1st protocol</u></p> <p>a) Description in the table ERY has been revised according to other non-GHG emissions.</p> <p>b) Fixed ex-ante CM grid emission factors for non-GHG emissions have been provided in the section B.6.2.</p> <p>c) Fixed ex-ante factor for avoidance of wastewater has been provided in the section B.6.2.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited).</p>
<p>CAR-23</p> <p>a) In the context of net electricity supplied to the grid, please clarify the reference to</p>	B.7.1.8	<p><u>Response to 1st protocol</u></p> <p>a) Section B.7.2 have been revised. There is no sampling plan is required for wind projects.</p>	<p>Review-1:</p> <p>Ok Closed (The section has been edited).</p>

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Draft Report Clarifications, Forward Action and Corrective Action Requests by Validation Team	Ref. to Checklist Questions in Table-1	Summary of Project Participants' Response	Validation Team Conclusion
<p>apportioning procedures and to section 7.2 corresponding to sampling.</p> <p>b) The relevance and context of apportioning in section 7.3 too needs to be clarified and corrected.</p>		<p>b) Related section has been totally revised under the section B.7.3. to clarify more clear.</p>	
<p>CAR-24</p> <p>Although the specifications of the electricity meters are presented the accuracy level of the same is not explicitly indicated.</p>	<p>B.7.1.11</p>	<p><u>Response to 1st protocol</u></p> <p>Accuracy levels of electricity meters have been indicated in the “EG facility, y” parameter under the B.7.1. section.</p>	<p>Review-1: Ok Closed (The section has been edited).</p>
<p>CAR-25</p> <p>Please indicate for each parameter the responsible person/entity for the measurements.</p>	<p>B.7.1.12</p>	<p><u>Response to 1st protocol</u></p> <p>Responsible entity for measurements have been indicated in the all parameters under the section B.7.1.</p>	<p>Review-1: Ok Closed (The section has been edited).</p>
<p>CAR-26</p> <p>The monitoring frequency for the safeguarding principles is to be clarified and corrected.</p>	<p>B.7.1.14</p>	<p><u>Response to 1st protocol</u></p> <p>Monitoring frequencies have been clarified in the section D.1.</p>	<p>Review-1: Ok Closed (The section has been edited).</p>
<p>CAR-27</p> <p>c) Please clarify the reference to Vestas whereas earlier GE turbines are indicated.</p> <p>d) The reference to the power purchase agreement, trivector meters, state utility, joint meter reading, apportioning procedures, annual calibration of meters among others indicated in section B.7.3.</p>	<p>B.7.3.1</p>	<p><u>Response to 1st protocol</u></p> <p>c) Reference has been revised according to correction request under the section B.7.3.</p> <p>d) There is no ‘power purchase agreement’ in Turkey since there is an incentive mechanism with a purchase guarantee for the electricity produced by renewable energy plants in Turkey which is called YEKDEM. YEKDEM stands for “Renewable Energy Resources Support Mechanism”. Generally; It supports many energy production facilities, of which we can multiply examples such as wind, solar, geothermal, biomass energies, wave current and tidal energy. The aim here is to increase the number of domestic and national energy</p>	<p>Review-1: Ok Closed (The section has been edited).</p>

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Draft Report Clarifications, Forward Action and Corrective Action Requests by Validation Team	Ref. to Checklist Questions in Table-1	Summary of Project Participants' Response	Validation Team Conclusion
		<p>resources and production facilities and to reduce dependence on foreign countries as much as possible. As you could check via the link given below, Saros WPP is already on YEKDEM's list and its produced electricity is being purchased with the guarantee of YEKDEM. (https://www.epdk.gov.tr/Detay/DownloadDocument?id=FLI6KOxdaT8=) (Cell E495)</p> <p>For trivector meters, description has been provided in the 'Metering Arrangements and Procedures' under the section B.7.3.</p> <p>For annual calibration meters, footnote has been provided.</p>	
<p>CAR-28 Please clearly indicate the responsibilities and institutional arrangements for data collection and archiving.</p>	<p>B.7.3.2</p>	<p><u>Response to 1st protocol</u> Correction request has been provided under the section B.7.3.</p>	<p>Review-1: Ok Closed (The section has been edited).</p>
<p>CAR-29 a) The section D.1 shall include Principle 6.1 on labour rights for the training of workers. b) Saros Bay is one of the environmental protection areas in Turkey in line with the announcement by Ministry of Environment and Urbanization. Although it is stated by the PP representatives during the online site visit that the project hasn't been located in that area, the relevant environmental reports, permits and declaration by PP shall be provided.</p>	<p>D.1.1</p>	<p><u>Response to 1st protocol</u> a) Principle 6.1 has been provided in the section D.1. b) The location of the Saros has been provided in PDD. It can be seen there are no turbine or corner coordinates regarding the Saros Bay area. Moreover, EIA reports have already provided with annexes, which are including declarations of Ministries to prove the permits for project.</p>	<p>Review-1: Ok Closed (The section has been edited and the supporting documents confirming environmental protection has been submitted).</p>
<p>CAR-30 Please clarify how the following points from the</p>	<p>F.1.1</p>	<p><u>Response to 1st protocol</u> g) h) i) j) k)</p>	<p>Review-1: Ok Closed (The section has been</p>

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Draft Report Clarifications, Forward Action and Corrective Action Requests by Validation Team	Ref. to Checklist Questions in Table-1	Summary of Project Participants' Response	Validation Team Conclusion
<p>preliminary review have been addressed:</p> <p>g) CAR#1: For BM calculation, please determine AEGtotal value excluding the VER project activities and Identify Set20% value excluding the VER project activities as per Tool 07 under B.4.1 of PDD since stated as "all plants In operation by 2018".</p> <p>h) CAR#2: Please discuss AEGset5 units and list down of 1 MW as per Tool 07 under BM calculations.</p> <p>i) CAR#3: Under Table 15:</p> <ul style="list-style-type: none"> • The sample group's total generation is not determined 20% which is 48,030 GWh. Please clarify. • Please clarify why there are no "renewables" under energy source since there are listed under Table 16. <p>j) CAR#4: Please state equation numbers as per Tool 07 under OM/BM/CM calculations - not in numerical order.</p> <p>k) CAR#5: Table 19 under Common Practice includes 2 projects whereas 22 is stated. Please list down all assessed projects.</p> <p>l) FAR#1: The live SFR shall be used to close gaps in the consultation process by inviting stakeholders from all GS categories to view the project documentation and comment/feedback on the design, the</p>		<p>The values of OM, BM and CM have been taken directly from the 2018 Turkish national electricity grid emission factor calculation published by the Republic of Turkey Ministry of Energy and Natural Resources on 04.09.2020. Since the project was commissioned on 17.10.2020, these calculations are applicable for using to calculate CM.</p> <p>Moreover, starting date of the preliminary review is 10.01.2020 and during the preliminary review CM calculation had made according to methodology requirements. After the published and calculated values –by Republic of Turkey Ministry of Energy and Natural Resources- CM calculations have been revised according to published values.</p> <p>l) A stakeholder consultation has been conducted within the Environmental Impact Assessment process. The supporting documents have been provided such as; announcements and meeting minutes and some of feedbacks have been noted on the PDD. Moreover, SFR has been started by project owner for validation procedure. Coming feedbacks will be provided to VVB. It can be accessible the related page via: https://www.boylamenerji.com.tr</p>	<p>edited. Further, the grid emission factor determination is provided by the relevant Turkish ministry).</p>

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<p>stakeholders shall be provided with an opportunity to comment on the project and PD shall provide further explanation of how comments received during consultation were taken into account, as the VVB needs to validate the same.</p>			
<p>CL-1 The estimate of SDG contributions has been indicated in the tabular format. However, please clarify the linkage to SDG 6.</p>	2	<p><u>Response to 1st protocol</u> SDG 6 contributions have been provided in the B.6.3 section.</p>	<p>Review-1: Ok Closed (The section has been edited).</p>
<p>CL-2 a) The geographic coordinates are provided. However, please clarify the change in the number of turbines as indicated in the licence and the location too. b) Please submit the documentary evidence to confirm the coordinates.</p>	A.2.1.6	<p><u>Response to 1st protocol</u> a) Licence had changed two times. First one was for 35 turbines, and other revision was for 27 turbines. Project activity have decreased the area usage with using new turbine models for installing same power. All revised licences have been provided. b) Licence has been provided as proof of coordinates.</p>	<p>Review-1: Ok Closed (The licence has been submitted also confirming the coordinates).</p>
<p>CL-3 Please clarify about the capacity of the turbine indicated as 5.111 MWe/5.111 MWm, whereas the technical specifications of the selected GE model turbines has rated power of 4.8 – 5.5 MW.</p>	A.3.1	<p><u>Response to 1st protocol</u> Specification of the turbines have been revised in the Table 2 which is under the section A.3. GE 5.3-158 model turbines can be used between the 5 MW to 5.5 MW ranges. Due to the limit of contract power, each of these turbines in the project operates with a power of 5,111 MW. Flexible power ratings have been provided in the aforementioned table.</p>	<p>Review-1: Ok Closed (The specifications from GE have been submitted).</p>
<p>CL-4 Please submit the ODA declaration letter.</p>	A.5.3	<p><u>Response to 1st protocol</u> ODA declaration letter has been provided.</p>	<p>Review-1: Ok Closed (The ODA declaration has been submitted).</p>

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<p>CL-5</p> <p>While describing baseline, please clarify whether the provided electricity generation in the country corresponds to the latest data.</p>	<p>B.4.2</p>	<p><u>Response to 1st protocol</u></p> <p>Commissioning date of project is 17.10.2020. In line with this date, 2019 electricity data are latest data. In addition, it can be accessible via link below: https://www.teias.gov.tr/tr-TR/turkiye-elektrik-uretim-iletim-istatistikleri</p>	<p>Review-1:</p> <p>Ok Closed (Clarified).</p>
<p>CL-6</p> <p>As the project is indicated as retroactive, please clarify that the time of first submission is within one year of the project start date.</p>	<p>B.5.1.2</p>	<p><u>Response to 1st protocol</u></p> <p>Turbine agreement date that is 05.07.2019 is project start date. First submission date of the project documents to Gold Standard is 19.01.2020 and first draft PDD has 01.10.2020 date, which can be seen on the final round of the preliminary review.</p>	<p>Review-1:</p> <p>Ok Closed (Clarified).</p>
<p>CL-7</p> <p>Please clarify the reference to SDG 7 for the gross electricity generation.</p>	<p>B.6.2.3</p>	<p><u>Response to 1st protocol</u></p> <p>Reference has been provided under section B.6.2. for SDG 7. Reference can accessible with this link below: https://webapi.teias.gov.tr/file/345a1333-4709-4506-a1b7-24c6332d32d0?download</p>	<p>Review-1:</p> <p>Ok Closed (Clarified).</p>
<p>CL-8</p> <p>a) 14/06/2019 is the indicated date which corresponds to the date of Construction Agreement. Please submit the stated construction agreement.</p> <p>b) Please clarify the date 05/07/2019 stated in the GS preliminary review document.</p>	<p>C.1.1.1</p>	<p><u>Response to 1st protocol</u></p> <p>a) Construction agreement have already provided and will be provided again. It is stated on the page 8 of the agreement.</p> <p>b) Turbine agreement have already provided and will be provided again. Date had stated on the cover page of the agreement.</p>	<p>Review-1:</p> <p>Ok Closed (Clarified and documents submitted).</p>
<p>CL-9</p> <p>Start date of crediting period has been determined as 17/10/2020. Please clarify the basis of arriving at this date and also submit the corresponding documentary evidence.</p>	<p>C.2.1.1</p>	<p><u>Response to 1st protocol</u></p> <p>Start date of crediting period of the project has been selected as commissioning date of the project. Commissioning date of the Saros can be accessible via link below: https://www.epdk.gov.tr/Detay/DownloadDocument?id=FLI6KOxdaT8=Cell N495</p>	<p>Review-1:</p> <p>Ok Closed (Clarified).</p>

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<p>CL-10 Please provide the evidence that the project concept and design cover the overall societal context from a gender perspective.</p>	<p>D.2.1</p>	<p><u>Response to 1st protocol</u> Although the problem of qualified personnel always arises in rural areas, the project workers have been selected from the local people and without gender discrimination. Statement of employment are shared and can be checked from a gender perspective.</p>	<p>Review-1: Ok Closed (Clarified).</p>
<p>CL-11 Please submit the documentary evidence for the stakeholder consultations.</p>	<p>E.1.8</p>	<p><u>Response to 1st protocol</u> A stakeholder consultation has been conducted within the Environmental Impact Assessment process. The supporting documents have been provided such as; announcements and meeting minutes and some of feedbacks have been noted on the PDD. Moreover, SFR has been started by project owner for validation procedure. Coming feedbacks will be provided to VVB. It can be accessible the related page via: https://www.boylamenerji.com.tr</p> <p><u>Response to 2nd protocol</u> There is no comment received during the SFR which last 3 months in line with the 9.1.4 of "Stakeholder consultation and engagement guidelines" and FAR#1. Related screenshots regarding the e-mail sent have been shared.</p> <p>In addition, received comments during the physical stakeholder consultation meeting, announcements, meeting minutes and documents that support the actions taken have been provided in line with the FAR#1.</p>	<p>Review-1: Considering the two months SFR requirements please provide all relevant SFR records including invitations, received comments and taken actions, if any.</p> <p>Review-2: Ok Closed (Clarified).</p>
<p>CL-12 It is indicated that 'Continuous Input Process Book was provided to Muhtar of village'. Please clarify the corresponding village and provide evidence for the presence of the grievance book.</p>	<p>E.2.1</p>	<p><u>Response to 1st protocol</u> The project has a grievance mechanism. Related documents regarding the mechanism have been shared. Anyone affected by project activity or villagers can fill the shared forms and send them to the mukhtar or directly to the power plant authorities. There is also a similar mechanism on the project's website (https://www.boylamenerji.com.tr/SikayetVeOneri) and this</p>	<p>Review-1: Ok Closed (Clarified and documents submitted).</p>

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		mechanism will be active and controllable as long as the project is operational.	
<p>CAR-31</p> <p>Section B.6.4: The title of this Section is “Summary of ex ante estimates of each SDG Impact”, hence the SDG impact for all the SDGs shall be provided in this Section. However, it is observed that SDG impact corresponding to SDG13, SDG7 has only been provided and no information has been provided related to other SDGs (SDG6 and SDG8). Hence the details related to other SDGs (SDG6 and SDG8) shall also be provided in this Section.</p>	ITR	<p><u>Response to ITR</u></p> <p>Summary estimates of SDG 6 and SDG 8 have been provided in section B.6.4.</p>	<p>Review-1:</p> <p>Ok Closed (Clarified and documents submitted).</p>
<p>CAR-32</p> <p>Section B.6.3: Please refer to the Table for SDG 7 (Affordable and Clean Energy) provided under the Section B.6.3 of PDD, where the “project estimate” has been mentioned as zero. However, when the SDG7 is for the “Clean Energy”, so how the “Project Estimate” can be “zero”. Please correct accordingly.</p>	ITR	<p><u>Response to ITR</u></p> <p>Annual estimation for electricity generation is indicated as “Net electricity supplied to the grid” in the $EG_{facility,y}$ monitoring parameter. Hereby, we’ve already been calculated the estimation of net electricity generation for Table SDG 7 in Section B.6.3. Thus, there is no need to add project estimate values in the mentioned section, it is already subtracted as estimated consumption in the baseline estimate column.</p>	<p>Review-1:</p> <p>Ok Closed (Clarified and documents submitted).</p>
<p>CAR-33</p> <p>Section B.7.1: In the parameter table (page-40) for the parameter ($EG_{facility,y}$), it is written as “Therefore, periodic calibration of the meters will be done every 10 years”. However the Section B.7.3 (page-44) mentions as “The main and check meters shall be calibrated on an</p>	ITR	<p><u>Response to ITR</u></p> <p>The paragraph of calibration procedures in Section B.7.3 has been revised elaborately in compliance with $EG_{facility,y}$ monitoring parameter in the Section B.7.1.</p>	<p>Review-1:</p> <p>Ok Closed (Clarified and documents submitted).</p>

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annual base with reference to a portable standard meter". Hence the correct and consistent Calibration frequency shall be provided at all the places in the documents.			

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