

المجلس العالمي للبصمة الكربونية
GLOBAL CARBON COUNCIL



Project Submission Form

V3.2 - 2020

Project Submission Form

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COVER PAGE- Project Submission Form (PSF)	
BASIC INFORMATION	
Title of the Project Activity	Büget SPP
PSF version number	01
Date of completion of this form	03.06.2022
Project Owner(s) <small>(Shall be consistent with De-registered CDM Type B Projects)</small>	1. Karomad Enerji Üretim A.Ş.
Country where the Project Activity is located	Turkey
GPS coordinates of the project site(s)	Provided in Section A.2.
Eligible GCC Project Type as per the Project Standard <small>(Tick applicable project type)</small>	<input checked="" type="checkbox"/> Type A: <input type="checkbox"/> Type A1 <input checked="" type="checkbox"/> Type A2 <input type="checkbox"/> Type B – De-registered CDM Projects:¹ <input type="checkbox"/> Type B1 <input type="checkbox"/> Type B2

¹ Owners of Type B projects shall fill in the form provided in Appendix 7.

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<p>Minimum compliance requirements</p>	<input checked="" type="checkbox"/> Real and Measurable GHG Reductions <input checked="" type="checkbox"/> National Sustainable Development Criteria (if any) <input checked="" type="checkbox"/> Apply credible baseline and monitoring methodologies <input checked="" type="checkbox"/> Additionality <input checked="" type="checkbox"/> Local Stakeholder Consultation Process <input checked="" type="checkbox"/> Global Stakeholder Consultation Process <input checked="" type="checkbox"/> No GHG Double Counting <input checked="" type="checkbox"/> Contributes to United Nations Sustainable Development Goal 13 (Climate Action)																																	
<p>Choose optional and additional requirements <small>(Tick applicable label categories)</small></p>	<input checked="" type="checkbox"/> Do-no-net-harm Safeguards to address Environmental Impacts <input checked="" type="checkbox"/> Do-no-net-harm Safeguards to address Social Impacts <input checked="" type="checkbox"/> Contributes to United Nations Sustainable Development Goals (in addition to Goal 13)																																	
<p>Applied methodologies <small>(Shall be approved by the GCC or the CDM)</small></p>	<p>AMS-I.D: Grid connected renewable electricity generation – Version 18.0</p>																																	
<p>GHG Sectoral scope(s) linked to the applied methodology(ies)</p>	<p>#1 - Energy (renewable/non-renewable sources)</p>																																	
<p>Applicable Rules and Requirements for Project Owners <small>(Tick applicable Rules and Requirements)</small></p>	<table border="1"> <thead> <tr> <th colspan="2">Rules and Requirements</th> <th>Reference</th> <th>Version</th> </tr> </thead> <tbody> <tr> <td colspan="2"><input checked="" type="checkbox"/> ISO 14064-2</td> <td></td> <td></td> </tr> <tr> <td colspan="2"><input checked="" type="checkbox"/> Applicable host country legal requirements /rules</td> <td></td> <td></td> </tr> <tr> <td rowspan="6"><input checked="" type="checkbox"/> GCC Rules and Requirements²</td> <td><input checked="" type="checkbox"/> Project Standard</td> <td></td> <td>V3.1</td> </tr> <tr> <td><input checked="" type="checkbox"/> Approved GCC Methodology (XXXXX)</td> <td></td> <td>V2.0</td> </tr> <tr> <td><input checked="" type="checkbox"/> Program Definitions</td> <td></td> <td>V3.1</td> </tr> <tr> <td><input checked="" type="checkbox"/> Environment and Social Safeguards Standard</td> <td></td> <td>V2.0</td> </tr> <tr> <td><input checked="" type="checkbox"/> Project Sustainability Standard</td> <td></td> <td>V2.1</td> </tr> <tr> <td><input checked="" type="checkbox"/> Instructions in Project Submission Form (PSF)-template</td> <td></td> <td>V3.2</td> </tr> </tbody> </table>			Rules and Requirements		Reference	Version	<input checked="" type="checkbox"/> ISO 14064-2				<input checked="" type="checkbox"/> Applicable host country legal requirements /rules				<input checked="" type="checkbox"/> GCC Rules and Requirements ²	<input checked="" type="checkbox"/> Project Standard		V3.1	<input checked="" type="checkbox"/> Approved GCC Methodology (XXXXX)		V2.0	<input checked="" type="checkbox"/> Program Definitions		V3.1	<input checked="" type="checkbox"/> Environment and Social Safeguards Standard		V2.0	<input checked="" type="checkbox"/> Project Sustainability Standard		V2.1	<input checked="" type="checkbox"/> Instructions in Project Submission Form (PSF)-template		V3.2
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	<input checked="" type="checkbox"/> Instructions in Project Submission Form (PSF)-template		V3.2																															

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	<input checked="" type="checkbox"/> Clarification No. 01		V1.1	
	<input checked="" type="checkbox"/> CDM Rules ³	<input checked="" type="checkbox"/> Approved CDM Methodology (XXXXX)	AMS-I.D: Grid connected renewable electricity generation	V18.0
		<input checked="" type="checkbox"/> Tool for the demonstration and assessment of additionality	TOOL 01	V07.0
		<input type="checkbox"/> Combined tool to identify the baseline scenario and demonstrate additionality	TOOL 02	
		<input checked="" type="checkbox"/> Tool to calculate the emission factor for an electricity system	TOOL 07	V07.0
		<input type="checkbox"/> Demonstration of additionality of microscale project activities	TOOL 19	
		<input type="checkbox"/> Demonstration of additionality of small-scale project activities	TOOL 21	
		<input type="checkbox"/> Additionality of first-of-its-kind project activities	TOOL 23	
		<input checked="" type="checkbox"/> Common practice	TOOL 24	V3.1
		<input checked="" type="checkbox"/> Investment analysis	TOOL 27	V11.0
		<input type="checkbox"/> Positive lists of technologies	TOOL 32	
<input type="checkbox"/> Guidelines for objective demonstration and assessment of barriers				
Choose Third Party External Project Verification by approved GCC Verifiers⁴	<input checked="" type="checkbox"/> GHG emission reductions (i.e., Approved Carbon Credits (ACCs)) <input checked="" type="checkbox"/> Environmental No-net-harm Label (E⁺) <input checked="" type="checkbox"/> Social No-net-harm Label (S⁺)			

³ CDM Program rules: <https://cdm.unfccc.int/Reference/index.html>


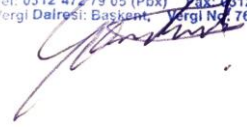
⁴ **Note:** GCC Verifiers under the Individual Track are not eligible to conduct verifications for GCC Project Activities whose owners intend to supply carbon credits (ACCs) for use within CORSIA.

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<p>(Tick applicable verification categories)</p>	<p><input checked="" type="checkbox"/> United Nations Sustainable Development Goals (SDG+)</p> <p><input type="checkbox"/> Bronze SDG Label</p> <p><input type="checkbox"/> Silver SDG Label</p> <p><input checked="" type="checkbox"/> Gold SDG Label</p> <p><input type="checkbox"/> Platinum SDG Label</p> <p><input type="checkbox"/> Diamond SDG Label</p> <p><input checked="" type="checkbox"/> CORSIA requirements (C+)</p> <p><input checked="" type="checkbox"/> Host Country Attestation on Double counting</p>
<p>Declaration to be made by the Project Owner(s)⁵</p> <p>(Tick all applicable statements)</p>	<p>The Project Owner(s) declares that:</p> <p><input checked="" type="checkbox"/> The Project Activity complies with the eligibility of the applicable project type (A1, A2, B1 or B2) as stipulated by the Project Standard.</p> <p><input checked="" type="checkbox"/> The Project Activity shall start operations, and start generating emission reductions, on or after 1 January 2016.</p> <p><input checked="" type="checkbox"/> The Project Activity is eligible to be registered under the GCC program.</p> <p><input checked="" type="checkbox"/> No carbon credits generated by the proposed Project Activity will be claimed as carbon credits in any other GHG program anywhere in the world, either for compliance or voluntary purposes, for the entire 10-year GCC crediting period.</p> <p><input checked="" type="checkbox"/> The proposed Project Activity, if Type A, is NOT registered as a GHG Project Activity in any other GHG program or any other voluntary program anywhere in the world.</p> <p><input checked="" type="checkbox"/> The proposed Project Activity is NOT included as a component Project Activity (CPA) in a registered GHG Programme of Activities (PoA) under any GHG program (such as the CDM or any other voluntary program) anywhere in the world.</p> <p><input checked="" type="checkbox"/> The proposed Project Activity is NOT a CPA that has been excluded from a registered PoA under any GHG program (such as the CDM or any other voluntary program) anywhere in the world.</p> <p>Provide details (if any) below for the boxes ticked above.</p> <p><input checked="" type="checkbox"/> If a GCC project chooses to apply to use ACCs under CORSIA, the Project Owner(s) is required to declare that they are aware that they must obtain and provide to the GCC and its Registry (operated by IHS Markit) a written</p>

⁵ The "Project Owner" means the legal entity or organization that has overall control and responsibility for the Project Activity.

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	<p>attestation from the host country's national focal point (e.g., Ministry of Environment or Civil Aviation Authority) or focal point's designee, as required by CORSIA Emissions Unit Eligibility Criteria, which:</p> <p><input checked="" type="checkbox"/> Confirms the avoidance of double counting as required by CORSIA;</p> <p><input checked="" type="checkbox"/> Shall be made publicly available prior to the use of units from the host country under CORSIA; and</p> <p><input checked="" type="checkbox"/> Places all responsibility on the Project Owner(s) to replace any and all doubly claimed or counted ACCs by the host country, in the GCC registry operated by IHS Markit.</p> <p>Provide details below for the boxes ticked above</p>
	<p>The Project Owner(s) declares that:</p> <p><input checked="" type="checkbox"/> All of the information provided in this document, including any supporting documents submitted to the GCC or its registry operator IHS Markit at any time, is true and correct;</p> <p><input checked="" type="checkbox"/> They understand that a failure by them to provide accurate information or data, or concealing facts and information, can be considered as negligence, fraud or willful misconduct. Therefore, they are aware that they are fully responsible for any liability that arises as a result of such actions.</p> <p>Provide details below for the boxes ticked above</p>
<p>Appendixes 1-7</p>	<p>Details about the Project Activity are provided in Appendixes 1 through 7 to this document.</p>
<p>Name, designation, date and signature of the Project Owner(s)</p>	<p>On behalf of Karomad Enerji Üretim A.Ş.</p> <p> SGY - SİSTEM GELİŞTİRME YÖNETİM Eğitim Danışmanlık Ltd. Şti. Çetin Emec Bulvarı 1328. Sok. No : 15 / 1, 06450 Aşağıöveçler - Çankaya / Ankara Tel: 0312 472 79 05 (Pbx) Fax: 0312 472 79 07 Vergi Dairesi: Başkent, Vergi No: 769 026 5036</p> <p></p> <hr/> <p>03.06.2022 SGY – Sistem Geliştirme Yönetim Eğitim Danışmanlık Ltd. Şti. Göktuğ E. Önel Director</p>

1. PROJECT SUBMISSION FORM

Section A. Description of the Project Activity

A.1. Purpose and general description of the Project Activity

Karomad Enerji Üretim A.Ş. has constructed the Büget SPP located in Büget, Afşin district, Kahramanmaraş province of Turkey. The electricity produced by project activity will result in average emission reduction of 100,841 tons of CO₂e for fixed crediting period. The purpose of the project is to generate clean energy by using the solar power and providing the energy to the Turkish national grid. By implementing the project, investors also aim to reduce dependency to the fossil fuels thereby reducing the sources of environmental pollution.

The project boundary is considered as the National Electricity Grid of Turkey. The spatial extent of the project boundary includes the project's power plants and all power plants connected physically to the electricity system that the power plants are connected to. According to the applicable methodology, baseline scenario has been identified as "the electricity delivered to the grid by the project activity that otherwise would have been generated by the operation of grid-connected power plants and by the addition of new generation sources".

The project is operational since August 2020. The project start date has been taken as 28/08/2020, which is the provisional acceptance date of the power plant. The project complies with the relevant regulations and laws in Turkey. In line with Turkish environmental regulations, an "Environmental Impact Assessment (EIA) not required letter" was approved by the Ministry of Environment and Urbanization in 02/08/2017.

The project activity will generate greenhouse gas (GHG) emission reductions by avoiding CO₂ emission from electricity generation by fossil fuel power plants connected to Turkish National Power Grid. Total installed capacity included by the GCC project is drawn as 7 MWe/10.6 MWm. The annual generated energy is expected to be 17,806 MWh according to the generation license and the project will be able to deliver a reduction in emissions of around 11,542 tCO₂e (tons of carbon dioxide equivalent) per annum.

As it was mentioned above, the project will help Turkey to stimulate and commercialize the use of grid connected renewable energy technologies and markets. Furthermore, the project will demonstrate the viability of grid connected solar power plants which can support improved energy security, improved air quality, alternative sustainable energy futures, improved local livelihoods and sustainable renewable energy industry development.

The specific goals of the project are to:

- reduce greenhouse gas emissions in Turkey compared to the business-as-usual scenario;
- help to stimulate the growth of the solar power industry in Turkey;
- create local employment during the construction and the operation phase of the solar power plant;
- Reduction of import dependency on fossil fuel weighed electricity sector and diversify generation mix through use of local resources.
- help to reduce Turkey's increasing energy deficit;

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The project is expected to contribute 4 SDGs which are SDG 7, 8, 9, and 13.

SDG 7 Energy: The project contributes SDG Target 7.2 “By 2030, increase substantially the share of renewable energy in the global energy mix” by the utilization of solar power as a renewable energy source.

SDG 8 Economic Growth: The project creates direct and indirect employment opportunities during construction and operation phases, so it contributes to SDG Target 8.5 “By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities and equal pay for work of equal value”.

SDG 9 Infrastructure, Industrialization: SDG Target 9.4 requires “By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities”. The project helps the Target 9.4 by implementing a clean, reliable and environmental-friendly infrastructure for clean energy production up-to-date industrialization.

SDG 13 Climate Change: The project produces clean renewable energy by diminishing CO₂ emissions. Therefore, it contributes SDG Target 13.3 “Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning”

A.2. Location of the Project Activity

Address and geodetic coordinates of the physical site of the Project Activity		
Physical address	Latitude	Longitude
Büget District, Kahramanmaraş Province	38°26'23.89"K 38.4399°	36°58'40.05"D 36.9777°

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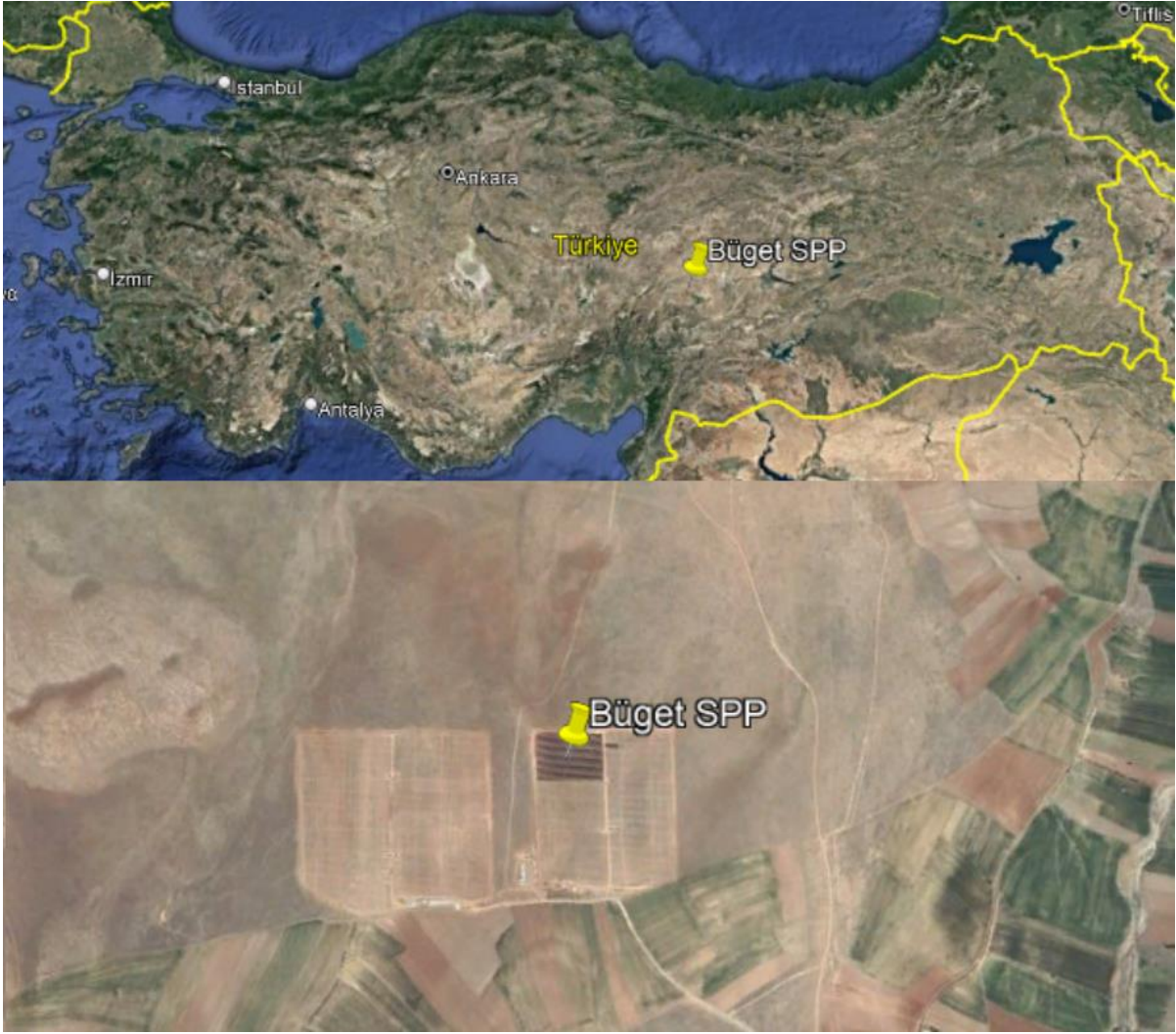


Figure 1. Project location

A.3. Technologies/measures

The technology being employed, converts solar energy into electrical energy. The proposed project uses monocrystalline silicon based solar PV modules. Technical details of each equipment which was used in the plant are given in the table below.

	Brand Of Solar Panel	Type	Panel Power (Wp)	Panel Unit Number	Brand of the Inverter	Power of the Inverter (kWe)	Number of Inverter	Installed Capacity DC (kWp)	Installed Capacity AC (kWe)
Büget SPP	Alfasolar	Monocrystalline	320	33.156	Huawei	185	42	10600	7.000

Table 1. Technical details of Büget SPP

A.4. Project Owner(s)

Location / Country	Project Owner(s)	Where applicable ⁶ , indicate if the host country has provided approval (Yes/No)
Turkey	Karomad Enerji Üretim A.Ş.	No

A.5. Declaration of intended use of Approved Carbon Credits (ACCs) generated by the Project Activity

The Project Activity is expected to generate ACCs for a full 10-year crediting period and supply the credits to offset the following GHG emissions:

Period		Name of the Entities	Purpose and Quantity of ACCs to be supplied
From	To		
28/08/2020	27/08/2030	CORSIA	11,542 tCO ₂ e annually 100,841 tCO ₂ e in the whole period

ACCs from the project activity will be used to create additional revenue stream for the investment and for reducing the project financial risks and thus enabling the sustainability of the project.

Project has been previously registered as I-REC which is a voluntary non-GHG Program and issued certificates for generation between 01/09/2020 and 30/11/2021. Registration to I-REC has been cancelled prior to submission to GCC and project owner will not claim any I-RECs in the future.

Project owner confirms that the ACCs shall not be double counted.

A.6. Additional requirements for CORSIA

Please see Section E and F.

Section B. Application of selected methodology(ies)

B.1. Reference to methodology(ies)

⁶ For example, *Project Coordination Form* is to be filled-in by Project Owners for projects located in Qatar. A written attestation from the host country's national focal point or the focal point's designee, as required by CORSIA (Refer section A.5 of the PSF guidelines).

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The United Nations approved consolidated baseline methodology applicable to this project is AMS-I.D.: Grid connected renewable electricity generation --- Version 18.0⁷

AMS-I.D refers to the following tools:

- “Tool to calculate the emission factor for an electricity system”, Version 7⁸,
- “Tool for the demonstration and assessment of additionality”, Tool 01, Version 07.0⁹,
- “Investment analysis”, Tool 27, Version 11.0¹⁰,
- “Common practice”, Tool 24, Version 03.1¹¹

B.2. Applicability of methodology(ies)

Since the project is below 15 MW installed capacity, small scale methodology AMS I.D. version 18 is used. The applicability criteria are described as follows;

Applicability Criteria	Project Scenario
This methodology is applicable to project activities that: (a) Install a Greenfield plant; (b) Involve a capacity addition in (an) existing plant(s); (c) Involve a retrofit of (an) existing plant(s); (d) Involve a rehabilitation of (an) existing plant(s)/unit(s); or (e) Involve a replacement of (an) existing plant(s).	The project activity is a greenfield, grid connected renewable electricity generation project.
Hydro power plants with reservoirs that satisfy at least one of the following conditions are eligible to apply this methodology: (a) The project activity is implemented in an existing reservoir with no change in the volume of reservoir; (b) The project activity is implemented in an existing reservoir, where the volume of reservoir is increased and the power density of the project activity, as per definitions given in the project emissions section, is greater than 4 W/m ² ; (c) The project activity results in new reservoirs and the power density of the power plant, as per definitions given in the project emissions section, is greater than 4 W/m ² .	The Project activity is not a Hydro Power Project; therefore this eligibility criterion is not applicable to the proposed project activity.

⁷ <https://cdm.unfccc.int/methodologies/DB/W3TINZ7KKWCK7L8WTXFQQOFQQH4SBK>

⁸ <https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-07-v7.0.pdf>

⁹ <https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-01-v7.0.0.pdf>

¹⁰ <https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-27-v11.0.pdf>

¹¹ <https://cdm.unfccc.int/methodologies/PAmethodologies/tools/am-tool-24-v1.pdf>

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<p>If the new unit has both renewable and non-renewable components (e.g. a wind/diesel unit), the eligibility limit of 15 MW for a small-scale CDM project activity applies only to the renewable component. If the new unit co-fires fossil fuel, the capacity of the entire unit shall not exceed the limit of 15 MW.</p>	<p>The project activity has only renewable component, i.e., solar PV generated power with a capacity of less than 15 MWe.</p>
<p>Combined heat and power (co-generation) systems are not eligible under this category.</p>	<p>The project does not involve combined heat and power generation activity.</p>
<p>In the case of project activities that involve the capacity addition of renewable energy generation units at an existing renewable power generation facility, the added capacity of the units added by the project should be lower than 15 MW and should be physically distinct from the existing units.</p>	<p>The project does not involve capacity addition.</p>
<p>In the case of retrofit, rehabilitation or replacement, to qualify as a small-scale project, the total output of the retrofitted, rehabilitated or replacement power plant/unit shall not exceed the limit of 15 MW.</p>	<p>Project activity is not a retrofit or modification of an existing facility.</p>
<p>In the case of landfill gas, waste gas, wastewater treatment and agro-industries projects, recovered methane emissions are eligible under a relevant Type III category. If the recovered methane is used for electricity generation for supply to a grid then the baseline for the electricity component shall be in accordance with procedure prescribed under this methodology. If the recovered methane is used for heat generation or cogeneration other applicable Type-I methodologies such as “AMS-I.C.: Thermal energy production with or without electricity” shall be explored.</p>	<p>Not applicable as the project activity is the installation of solar power plant.</p>
<p>In case biomass is sourced from dedicated plantations, the applicability criteria in the tool “Project emissions from cultivation of biomass” shall apply.</p>	<p>The project is not a biomass project. Hence, this condition is N/A.</p>

Applicability as per “Tool 07: Tool to calculate the emission factor for an electricity system, version 07.0”

<p>Applicability Criteria</p>	<p>Project Scenario</p>
<p>This tool may be applied to estimate the OM, BM and/or CM when calculating baseline emissions for a project activity that substitutes grid electricity that is where a project activity supplies electricity to a grid or a project activity that results in savings of electricity that would have been provided by the grid (e.g. demand-side energy efficiency projects).</p>	<p>The project activity supplies electricity to a grid.</p>

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<p>Under this tool, the emission factor for the project electricity system can be calculated either for grid power plants only or, as an option, can include off-grid power plants. In the latter case, two sub-options under the step 2 of the tool are available to the project participants, i.e. option IIa and option IIb. If option IIa is chosen, the conditions specified in “Appendix 1: Procedures related to off-grid power generation” should be met. Namely, the total capacity of off-grid power plants (in MW) should be at least 10 per cent of the total capacity of grid power plants in the electricity system; or the total electricity generation by off-grid power plants (in MWh) should be at least 10 per cent of the total electricity generation by grid power plants in the electricity system; and that factors which negatively affect the reliability and stability of the grid are primarily due to constraints in generation and not to other aspects such as transmission capacity.</p>	<p>CO₂ emission factor for the displacement of electricity generated by power plants in an electricity system is determined by calculating the “combined margin” emission factor (CM) of the electricity system.</p>
<p>In case of CDM projects the tool is not applicable if the project electricity system is located partially or totally in an Annex I country.</p>	<p>Not applicable as the project electricity system is not located partially or totally in an Annex I country.</p>
<p>Under this tool, the value applied to the CO₂ emission factor of biofuels is zero.</p>	<p>The project does not involve biofuels in any way.</p>

Applicability as per “Tool 01: “Tool for the demonstration and assessment of additionality, version 07.0”

- The additionality tool is included by an approved methodology (AMS.I-D.). Therefore, it is mandatory to use it in this project.

Applicability as per “Tool 27: “Investment analysis, version 11.0”

- This methodological tool is applicable to project activities that apply the methodological tool “Tool for the demonstration and assessment of additionality”. Hence, it is mandatory to use this tool.

Applicability as per “Tool 24: “Common practice, version 03.1”

- This methodological tool is applicable to project activities that apply the “Tool for the demonstration and assessment of additionality”. Hence, it is mandatory to use this tool.

The project also meets Clarification No. 01 criteria as per GCC Rules & Requirements. The project is a single project developed to include only solar PV technology and applying AMS- I.D. Hence, the project complies with the clarifications.

B.3. Project boundary, sources and greenhouse gases (GHGs)

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The project boundary is considered as the National Electricity Grid of Turkey according to applied tool. The spatial extent of the project boundary includes the project power plant and all power plants connected physically to the electricity system that the power plant is connected to.

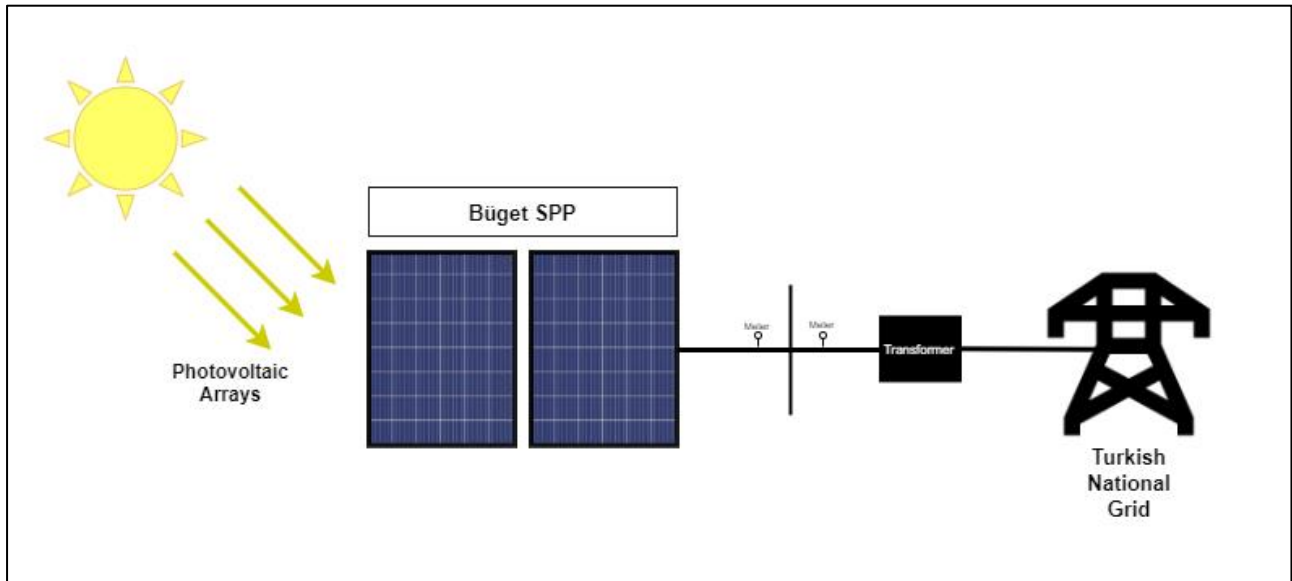


Figure 2. Project boundary of Būget SPP

Solar PV systems use cells to convert sunlight into electricity and electricity generated here is transferred to the grid for consumer without any greenhouse gas emissions.

The project does not involve any other emissions sources not foreseen by the methodologies. The greenhouse gases and emission sources included in or excluded from the project boundary are shown in table below.

The table below provides an overview of the emissions sources included or excluded from the project boundary for determination of baseline and project emissions.

Source		GHG	Included?	Justification/Explanation
Baseline	Electricity Generation	CO ₂	Yes	Main Emission Source
		CH ₄	No	Minor Emission Source. Excluded for simplification
		N ₂ O	No	Minor Emission Source. Excluded for simplification
Project Activity	CO ₂ emissions as a result of project activity	CO ₂	No	Not Applicable.
		CH ₄	No	Not Applicable.
		N ₂ O	No	Not Applicable.

B.4. Establishment and description of the baseline scenario

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This project follows an approved small scale UNFCCC methodology which is AMS.I.D (Version 18). Selected methodology has been applied together with the “Tool for the demonstration and assessment of additionality, version 07.0.0”, “Tool to calculate the emission factor for an electricity system, version 07.0”, “Common practice, version 03.1”, and “Investment analysis, version 11.0”.

According to the guidelines of the methodology baseline scenario has been identified as “the electricity delivered to the grid by the project activity that otherwise would have been generated by the operation of grid connected power plants and by the addition of new generation sources”. Thus, proposed project activity will evacuate power to the National Grid complying with the stated guideline.

Turkish electricity generation is mainly composed of thermal power plants and the share of renewable resources; especially hydroelectric power plants have decreased significantly in recent years whereas share of solar power plants is still extremely low. Since Turkey is an advanced developing country, there is an increasing demand for electricity which is fully expected to continue in the near future.

The trend in Turkey to date and given historically slow development of alternative energy resources is to build an increasing number of thermal power plants in the future to satisfy the annual growth in energy consumption demand. Turkey as an advanced developing nation has looked at dealing with energy security by developing and constructing high-capacity coal and natural gas power plants. The development of thermal power plants has been also encouraged by the large natural resource availability in Turkey, especially the abundance of economically accessible lignite.

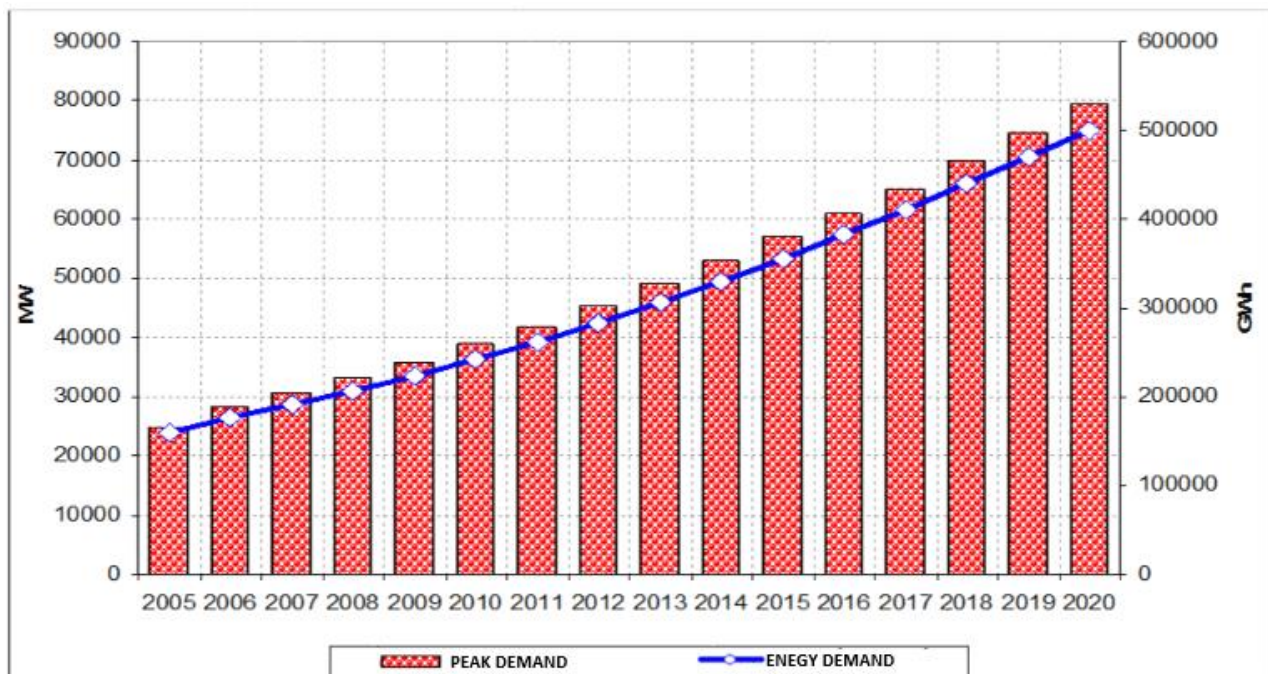


Figure 3. Peak Load and consumption projection for Turkish electricity system between 2005-2020¹²

¹² <http://www.teias.gov.tr/apkuretimplani/veriler.htm>

B.5. Demonstration of additionality

The additionality of a GCC Project shall be demonstrated by applying the following approach, consisting of two components:

- (i) A Legal Requirement Test; and
- (ii) An Additionality Test either based on a Positive List test or a projects-specific additionality test.

The project is not enforced by law. The project passes the legal requirement test since there are no enforced laws, statutes, regulations, court orders, environmental-mitigation agreements, permitting conditions of other legally-binding mandates requiring its implementation. Since voluntary commitments/agreements within a sector or by an entity do not constitute the legal requirement, the project is additional as per paragraph 46 of Project Standard.

The proposed project activity meets the criteria for additionality since:

- Project without carbon revenue is not financially attractive as discussed in investment analysis section below (benchmark and sensitivity analysis).
- Due to increasing demand of electricity, the proposed project activity is not enough for meeting the demand. Thus, new power plants should be constructed which includes mainly thermal power plants.
- The following applicable mandatory laws and regulations have been identified:
 - Electricity Market Law¹³
 - Law on Utilization of Renewable Energy Resources for the Purpose of Generating Electricity Energy¹⁴
 - Energy Efficiency Law¹⁵
 - Environment Law¹⁶
- In accordance with common practice analysis there is no plants similar to the proposed project and built without carbon revenue, the proposed type of project should not be considered as a common practice in Turkey. Hence, project is additional in this aspect.

¹³ http://www.teias.gov.tr/eBulten/makaleler/2009/okulyeni2/elektrik/elektrik_piyasalari_kanunu.pdf

¹⁴ <http://www.mevzuat.gov.tr/MevzuatMetin/1.5.5346.pdf>

¹⁵ <https://www.mevzuat.gov.tr/MevzuatMetin/1.5.5627.pdf>

¹⁶ <https://www.mevzuat.gov.tr/mevzuatmetin/1.5.2872.pdf>

Plausible alternative scenarios

Description Of The Alternatives	Justification
The proposed project activity not being registered as a CDM project activity;	Not an attractive option as demonstrated by the IRR analysis.
If applicable, continuation of the current situation (no project activity or other alternatives undertaken).	Continuation of the current situation is not considered as a realistic alternative due to increasing electricity demand therefore new power plants should be constructed which includes mainly thermal power plants. Implementation of the project is additional to the baseline scenario which is alternative above and therefore reduces the emissions. Hence, this is the baseline scenario and implementation of the proposed project as a CDM project activity would be additional to this scenario.

Investment analysis

The investment analysis has been done in order to make an economic and financial evaluation of the project. No public funding or ODA are available in Turkey for finance of this type of projects. Investment analysis is carried as per the methodological Tool: “Tool for the demonstration and assessment of additionality”, Version 07.0.

Sub-step 2a: Determine appropriate analysis method

There are three options for the determination of analysis method which are:

- Simple Cost Analysis
- Investment Comparison Analysis
- Benchmark Analysis

Since the project generates economic benefits from sales of electricity, the simple cost analysis is not applicable. Also, since the baseline of the project is generation of electricity by the grid, no alternative investment is considered at issue. So, it has been decided to use benchmark analysis for evaluation of the project investment.

Sub-step 2b: Option III. Apply benchmark analysis

While applying the Benchmark Analysis, Option III, the Equity IRR is selected as the financial indicator for the demonstration of the additionality of the project as permitted in the additionality tool.

For benchmark analysis, figure defined by World Bank for similar project types have been used which has been given as 25% in the policy paper “Private Sector Renewable Energy and Energy Efficiency Project in Turkey” published in 2017¹⁷. In order to reach this equity IRR (pre-tax) benchmark, the average electricity tariff would need to be higher than the 13.3 \$/kWh in the absence of carbon revenue and assuming that initial investment figures are realized so that the investment will become reasonable.

Sub-step 2c: Calculation and comparison of financial indicators

Parameters	Unit	Data Value
Installed Capacity	MWe	7
Grid Connected output	MWh	17,806
Capital Investment	Million \$	~ 13,910
O&M Cost	\$ / Year	269,171
Expected Feed-in Tariff	\$ Cents/kWh	13.3 ¹⁸

Table 2. Main financial parameters

Internal Rate of Return (IRR) of the proposed project has been calculated as 11.50% based on the parameters given above without considering the carbon revenue. IRR has been calculated as per the tool as stated in the applied methodology. Electricity tariff has been used as 13.3 ¢/kWh for the first 10 years following the proposed project activity’s commissioning date since project uses government incentives for electricity generation. Annual generation has been taken as 17.806 MWh according to the generation license.

Acceptable IRR values for energy investments in Turkey are expected to yield returns in excess of 25% per annum, given the current economic uncertainty. Even if we include the carbon revenue in the cash flow, equity IRR increases to 11.93% which is still lower than the accepted benchmark rates. Considering the market price risk, it can be concluded the carbon revenue will make the investment more feasible however, it will still be below the benchmark IRR.

¹⁷ <http://documents.worldbank.org/curated/en/799701498842988254/pdf/ICR00004069-06192017.pdf>

¹⁸ <https://www.mevzuat.gov.tr/anasayfa/MevzuatFihristDetayIframe?MevzuatTur=7&MevzuatNo=18907&MevzuatTertip=5>

Sub-step 2d: Sensitivity analysis

Sensitivity analysis had been carried out for three main parameters identified for the project;

- Investment Cost
- Operating Cost
- Electricity Sales Revenue

Parameters	% Fluctuation						
	-15	-10	-5	0	5	10	15
Investment Cost	14,88	13,64	12,52	11,50%	10,55	9,69	8,88
Operating Cost	11,88	11,75	11,62	11,50%	11,37	11,24	11,10
Electricity Income	8,04	9,22	10,37	11,50%	12,59	13,67	14,73

An important parameter affecting equity IRR is investment cost. However, since the agreements have been made and costs are realized as given in financial model, there is no chance to expect a %15 decrease in the investment cost. In addition to that, Turkey has feed in tariff which means fixed electricity price for renewable project, it is unlikely to have a higher electricity price, which is above the market price. Operating costs can also affect the equity IRR however, its impact is not significant and does not cause any significant change in equity IRR and the fluctuation percentage to reach the benchmark is very high and not likely.

The sensitivity analysis confirms that the proposed project activity is unlikely to be economically attractive without the revenues from ACCs as even the maximum IRR result for the best-case scenario (14.88%) is below the benchmark, which is 25%.

Barrier Analysis

As per the methodological Tool: “Tool for the demonstration and assessment of additionality”, Version 07.0, since both the investment and the sensitivity analyses are concluded that the proposed project activity is unlikely to be (the most) financially/economically attractive and ACC revenues are making the proposed project activity more attractive and more viable, Step 4 (Common practice analysis) will be proceeded, in order to finalize the demonstration of the proposed project activity’s additionality.

Common practice analysis

According to the “Tool for the demonstration and assessment of additionality”, Version 07.0.0¹⁹, the common practice shall provide an analysis of any other activities that are similar to the Project Activity. Projects are considered similar if they are in the same country/region and/or rely on a broadly similar technology, are of a similar scale, and take place in a comparable environment with respect to regulatory framework, investment climate, access to technology, access to financing etc.

¹⁹ <https://cdm.unfccc.int/methodologies/PAMethodologies/tools/am-tool-01-v7.0.0.pdf>

Stepwise Approach For Common Practice

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

The design capacity of the proposed project is 7 MW. Therefore, the applicable output range is from 4 MW – 11 MW.

Step 2: Identify similar projects (both CDM and non-CDM) which fulfil all of the following conditions

- (a) The projects are located in the applicable geographical area;
- (b) The projects apply the same measure as the proposed project activity;
- (c) 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;
- (d) The plants in which the projects are implemented produce goods or services with comparable quality, properties and applications areas (e.g. clinker) as the proposed project plant;
- (e) The capacity or output of the projects is within the applicable capacity or output range calculated in Step 1;
- (f) The projects started commercial operation before the project design document (CDM-PDD) is published for global stakeholder consultation or before the start date of proposed project activity, whichever is earlier for the proposed project activity

According to the official report of “Final List on Renewable Energy Plants, 2020”, published by Republic of Turkey Energy Market Regulatory Authority (EPDK)²⁰, there are 6 solar power plant investments whose installed capacities are within the proposed project activity’s applicable capacity range calculated in Step 1.

The list of the plants is given in the Table below:

No.	Name of plant	Capacity (MWe)
1.	Serra GES	5,6
2.	Edikli GES	10
3.	İota M.Firinci GES	9,95
4.	Özgüçlü GES	9,99
5.	Alibey GES	5
6.	Büget GES	10

Step 3: within the projects identified in Step 2, identify those that are neither registered CDM project activities, project activities submitted for registration, nor project activities undergoing validation. Note their number N_{all}.

²⁰ <https://www.epdk.gov.tr/Detay/DownloadDocument?id=eH2tX1W3zso=>

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Within the projects identified in Step 2 above, the projects which are neither registered CDM project activities, project activities submitted for registration, nor project activities undergoing validation are as follows:

No.	Name of plant	Capacity (MWe)
1.	Özgüçlü GES	9,99
2.	Alibey GES	5

Therefore, $N_{all}=2$

Step 4: within similar projects identified in Step 3, identify those that apply technologies that are different to the technology applied in the proposed project activity. Note their number N_{diff} .

All of the projects identified in Step 3 above, have similar technology with Bütet SPP.

Therefore, $N_{diff} = 0$

Step 5: calculate factor $F=1-N_{diff}/N_{all}$ representing the share of similar projects (penetration rate of the measure/technology) using a measure/technology similar to the measure/technology used in the proposed project activity that deliver the same output or capacity as the proposed project activity.

$$F=1 - N_{diff}/N_{all} = 1 - (0/1) = 1 \quad (> 0.2)$$

$$N_{all}-N_{diff}= 2 - 0 = 2 \quad (\leq 3)$$

According to the guidelines on common practice version 03.1, if the factor F is greater than 0.2 and $N_{all}-N_{diff}$ is greater than 3, then the proposed project is a “common practice”.

For the proposed project, $F=1$ (greater than 0.2) and $N_{all}-N_{diff}=2$ which is less than 3, therefore, the proposed project is not common practice within the region. Hence, the proposed project is additional.

B.6. Estimation of emission reductions

B.6.1. Explanation of methodological choices

Turkish Ministry of Energy and Natural Resources published the Turkey’s National Electric Grid Emission Factor²¹ for the year of 2019 and the data in this publication were used for the emission

²¹

<https://enerji.gov.tr//Media/Dizin/EVCED/tr/ÇevreVeİklim/İklimDeğişikliği/TürkiyeUlusalElektrikŞebekesiEmisyonFaktörü/Belgeler/EK-2.pdf>

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factors used in the calculation of the estimated emission reductions. Publication includes calculated Emission Factor values that are Operating Margin (OM), Growth Based Margin (Build Margin-BM) and Combined Margin (CM) Emission Factors, for the relevant year with usage of the methodological tool: “Tool to calculate the emission factor for an electricity system”.

The emission factor has been calculated conservatively as required by the methodology and will remain same over the crediting period.

Baseline emissions

The baseline emissions are to be calculated as follows:

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

Where:

- BE_y = Baseline emissions in year y (t CO₂)
- $EG_{PJ,y}$ = Quantity of net electricity generation that is produced and fed into the grid as a result of the implementation of the CDM project activity in year y (MWh)
- $EF_{grid,y}$ = Combined margin CO₂ emission factor for grid connected power generation in year y calculated using the latest version of the “Tool to calculate the emission factor for an electricity system” (tCO₂/MWh) and according to the Ministry of Energy and Natural Resources document named as Turkey’s National Electricity Network Emission Factor Factsheet (06/10/2021), OM is calculated as 0.7258 tCO₂/MWh whereas BM is 0.4153 tCO₂/MWh) Therefore, CM is calculated as 0.6482 whereas 0.75 and 0.25 weightage factor given to OM and BM, respectively

Considering this project is a solar power plant project, combined margin is calculated as follows:

As given by the Ministry of Energy and Natural Resources, built margin is 0.7258 and operating margin is 0.4153.

$$(0.7258 \times 0.75) + (0.4153 \times 0.25) = 0.6482 \text{ tCO}_2/\text{MWh}$$

Therefore, the baseline emission annually is:

$$BE_y = (17,806) \times (0.6482)$$

$$BE_y = 11,542 \text{ tCO}_2\text{e}$$

Project emissions

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The proposed project activity involves the generation of electricity by development of a solar plant. The generation of electricity does not result in greenhouse gas emissions and therefore is taken as 0 tCO₂/year.

Leakage

No leakage is applicable for Büğet Solar Power Plant under AMS-I.D. methodology.

Emission reductions

As a result, Total Emission Reduction is:

$$ER_y = BE_y = 11,542 \text{ tCO}_2/\text{year}$$

B.6.2 Data and parameters fixed ex ante

Data / Parameter Table 1.

Data / Parameter:	EF_{grid,CM,y}
Methodology reference	AMS-I.D
Data unit	tCO ₂ /MWh
Description	For the combined margin CO ₂ emission factor that were used to calculate estimated emission reductions, publication of Turkish Ministry of Energy and Natural Resources which is indicating Turkey’s National Electricity Grid Emission Factor for the year of 2019 was used.
Measured/calculated/default	Calculated
Data source	Tool 07 Tool to calculate the emission factor for an electricity system Ministry of Energy and Natural Resources, OM & BM values
Value(s) of monitored parameter	0.6482 tCO ₂ /MWh
Measurement/ Monitoring equipment (if applicable)	As per publication of Turkish Ministry of Energy and Natural Resources, which is indicating Turkey’s National Electricity Grid Emission Factor for the year of 2019 was used. The coefficients are taken as 0.25 and 0.75 for BM and OM, respectively according to the methodology.
Measuring/reading/ recording frequency (if applicable)	Once in the crediting period
Calculation method (if applicable)	As given by the Ministry of Energy and Natural Resources, built margin is 0.4153 and operating margin is 0.7258. (0.4153 x 0.25) + (0.7258 x 0.75) = 0.6482 tCO ₂ /MWh

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QA/QC procedures	-
Purpose of data	Calculation of baseline emissions
Additional comments	-

B.6.3. Ex-ante calculation of emission reductions

Baseline emissions

The baseline emissions are to be calculated as follows:

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

Where:

- BE_y = Baseline emissions in year y (t CO₂)
- $EG_{PJ,y}$ = Quantity of net electricity generation that is produced and fed into the grid as a result of the implementation of the CDM project activity in year y (MWh)
- $EF_{grid,y}$ = Combined margin CO₂ emission factor for grid connected power generation in year y calculated using the latest version of the “Tool to calculate the emission factor for an electricity system” (tCO₂/MWh) and according to the Ministry of Energy and Natural Resources document named as Turkey’s National Electricity Network Emission Factor Factsheet (06/10/2021), OM is calculated as 0.7258 tCO₂/MWh whereas BM is 0.4153 tCO₂/MWh. Therefore, CM is calculated as 0.6482 whereas 0.75 and 0.25 weightage factor given to OM and BM, respectively

Considering this project is a solar power plant project, combined margin is calculated as follows:

As given by the Ministry of Energy and Natural Resources, built margin is 0.7258 and operating margin is 0.4153.

$$(0.7258 \times 0.75) + (0.4153 \times 0.25) = 0.6482 \text{ tCO}_2/\text{MWh}$$

Therefore, the baseline emission annually is:

$$BE_y = (17,806) \times (0.6482)$$

$$BE_y = 11,542 \text{ tCO}_2\text{e}$$

Project emissions

Since the project is classified as a renewable energy project, PE_y is 0 for Büğet Solar Power Plant.

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Leakage

LE_y is 0, as it is not considered according to AMS-I.D (page 12) since the project is a solar power generation activity.

Therefore,

$$ER_y = BE_y$$

Emission reductions

As it is stated in ex-ante calculations:

$$ER_y = BE_y = 11,542 \text{ tCO}_2/\text{year}$$

B.6.4. Summary of ex ante estimates of emission reductions

Year	Baseline emissions (t CO ₂ e)	Project emissions (t CO ₂ e)	Leakage (t CO ₂ e)	Emission reductions (t CO ₂ e)
2020* (28.08.2020 - 31.12.2020)	0	0	0	0
2021*	980	0	0	980
2022	11,542	0	0	11,542
2023	11,542	0	0	11,542
2024	11,542	0	0	11,542
2025	11,542	0	0	11,542
2026	11,542	0	0	11,542
2027	11,542	0	0	11,542
2028	11,542	0	0	11,542
2029	11,542	0	0	11,542
01.01.2030 - 27.08.2030	7,526	0	0	7,526
Total	100,841	0	0	100,841
Total number of crediting years	10 Years			
Annual average over the crediting period	11,542	0	0	11,542

*ACCs will not be claimed for the 01/09/2020-30/11/2021 period, for which I-RECs have been issued.

B.7. Monitoring plan

B7.1. Data and parameters to be monitored

Data / Parameter Table 2.

Data / Parameter:	<i>EG_{PJ, facility, y}</i>																							
Methodology reference	AMS-I.D																							
Data unit	MWh																							
Description	Quantity of net electricity generation supplied by the project plant/unit to the grid in year <i>y</i>																							
Measured/calculated /default	Measured																							
Data source	Electricity meter(s)																							
Value(s) of monitored parameter	Estimated annual generation forming the basis for emission reduction Calculation is expected to be 17,806 MWh																							
Measurement/ Monitoring equipment	<table border="1"> <thead> <tr> <th></th> <th>Main Meter</th> <th>Back-up Meter</th> </tr> </thead> <tbody> <tr> <td>Type of meter</td> <td>ITRON / SL761X071</td> <td>ITRON / SL761X071</td> </tr> <tr> <td>Location of meter</td> <td>On site</td> <td>On site</td> </tr> <tr> <td>Accuracy of meter</td> <td>0.5S</td> <td>0.5S</td> </tr> <tr> <td>Serial number of meter</td> <td>84500316</td> <td>84500315</td> </tr> <tr> <td>Calibration frequency</td> <td>10 Years</td> <td>10 Years</td> </tr> <tr> <td>Calibration Status</td> <td>Calibrated</td> <td>Calibrated</td> </tr> </tbody> </table>				Main Meter	Back-up Meter	Type of meter	ITRON / SL761X071	ITRON / SL761X071	Location of meter	On site	On site	Accuracy of meter	0.5S	0.5S	Serial number of meter	84500316	84500315	Calibration frequency	10 Years	10 Years	Calibration Status	Calibrated	Calibrated
	Main Meter	Back-up Meter																						
Type of meter	ITRON / SL761X071	ITRON / SL761X071																						
Location of meter	On site	On site																						
Accuracy of meter	0.5S	0.5S																						
Serial number of meter	84500316	84500315																						
Calibration frequency	10 Years	10 Years																						
Calibration Status	Calibrated	Calibrated																						
Measuring/reading/ recording frequency	Monthly																							
Calculation method (if applicable)	<p>EGy calculation is used by EPIAS (which is one of the TEIAS association) records and which are more conservative than the site records. Generation is recorded via remote reading system. The values are cross-check with the on-site meter records. Generation data is recorded by two metering devices continuously.</p> <p>These records provide the data for the monthly invoicing to TEIAS. Generation is recorded via remote reading system. The quantity of electricity supplied by the project plant/unit to the grid (ISVM) and the quantity of electricity delivered to the project plant/unit from the grid (UECM) are measured. Net generation is calculated via subtracting energy delivered by the project activity to the grid for internal consumption from electricity fed to the grid</p>																							
QA/QC procedures	<p>Calibration of the meters are valid for 10 years based on related regulation. Maintenance and calibration of the metering devices are made by TEIAS. If there is a significant difference between the readings of two devices, maintenance and tests of the metering devices and the associated equipment are done before waiting for the periodical maintenance. The meters should comply with EPDK regulations which define the accuracy class of the meters as 0.2 or 0.5 depending on the capacity of the circuit as given in document in link (https://www.epdk.gov.tr/Detay/Icerik/3-0-0-128/tebligler).</p>																							
Purpose of data	Calculation of Baseline Emissions																							
Additional comments																								

Data / Parameter Table 3.

Data / Parameter:	CO₂ Emissions
Methodology reference	GCC Environment and Social Safeguards Standard, v2.0
Data unit	Tonnes
Description	Reduction of CO ₂ emissions due to implementation of the project activity
Measured/calculated/default	Calculated
Data source	Electricity generated by Büget SPP and OM&BM calculations
Value(s) of monitored parameter	11,542 tonnes of CO ₂ annually
Measurement/Monitoring equipment	Monthly meter reading values
Measuring/reading/recording frequency	Continuous reading, monthly recording
Calculation method (if applicable)	The net electricity supplied by the Project will be continuously measured and recorded by EPIAS; and will be kept by the Project Owner
QA/QC procedures	
Purpose of data	To evaluate the contribution SDG 13 Climate Action / 13.3.2 Number of countries that have communicated the strengthening of institutional, systemic and individual capacity-building to implement adaptation, mitigation and technology transfer, and development actions development
Additional comments	

Data / Parameter Table 4.

Data / Parameter:	Quantitative Employment
Methodology reference	GCC Environment and Social Safeguards Standard, v2.0
Data unit	
Description	Creating new employment opportunities
Measured/calculated/default	Measured
Data source	Employment records
Value(s) of monitored parameter	Project created employment opportunity
Measurement/Monitoring equipment	For number of employments: Social security records of employees will be provided For number of local employments: Statement of employments will be provided
Measuring/reading/recording frequency	Once in each monitoring period
Calculation method (if applicable)	Employment records will be checked

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applicable)	
QA/QC procedures	-
Purpose of data	To assess the contribution to SDG 8 Decent work and economic growth / SDG Target 8.8 by employment and decent work / Indicator 8.8.2
Additional comments	-

Data / Parameter Table 5.

Data / Parameter:	Solid Waste Pollution from E-wastes and Batteries
Methodology reference	GCC Environment and Social Safeguards Standard, v2.0
Data unit	
Description	No solid waste pollution caused due to e-wastes and batteries from the project activity
Measured/calculated/default	Measured
Data source	Records of any incidents of panel damage
Value(s) of monitored parameter	No solid waste pollution due to e-wastes and batteries in the baseline
Measurement/Monitoring equipment	-
Measuring/reading/recording frequency	Annually
Calculation method (if applicable)	Any e-waste and battery wastes will be handled according to the national regulations: Regulation on Waste Management ²² , Regulation on Electrical and Electronic Waste Control ²³ , and Regulation on Battery and Accumulator Wastes ²⁴ .
QA/QC procedures	The panels are under warranty. In any case of problems, the panels are returned to the manufacturer and further handling of the wastes are done by the manufacturer
Purpose of data	To comply with GCC Environment and Social Safeguards Standard, v2.0
Additional comments	-

B.7.2. Monitoring-program of risk management actions

There is no parameter evaluated as “Harmful” in Section E.

B.7.3. Sampling plan

²² <https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=20644&MevzuatTur=7&MevzuatTertip=5>

²³ <https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=16159&MevzuatTur=7&MevzuatTertip=5>

²⁴ <https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=7118&MevzuatTur=7&MevzuatTertip=5>

N/A

B.7.4. Other elements of the monitoring plan

As the necessary baseline emission factors are all defined ex ante (Operating and Built Margin, see baseline description), the most important information to be monitored is the amount of electricity fed into the grid by Būget SPP. Net electricity generation is measured and recorded continuously by redundant metering devices, one of them being the main one in the substation, which provides the data for the monthly invoicing to TEIAS. Therefore, no new additional protocol is needed for monitoring emission reduction.

Power Plant Manager, is responsible for the electricity generated, gathering all relevant data and keeping the records. Generation data collected during crediting period is submitted to SGY who is responsible for calculating the emission reduction subject to verification: Generation data is used to prepare monitoring reports which are used to determine the vintage from the project activity. At the end of each monitoring period, which is planned to generally last one year, from the monthly meter reading records the net electricity generation amounts as calculated by electricity supplied to the grid minus withdrawn from the system, will be added up to the yearly net electricity generation and total project emissions will be subtracted from this amount and result data will be multiplied with the combined margin emission factor with the help of an excel spread sheet that also contains the combined margin calculation.

The collected data will be kept by the company during the crediting period and for at least two years after the crediting period for QA/QC purposes.

Because of the data acquisition and management and quality assurance procedures that are anyway in place, no additional procedures have to be established for the monitoring plan. Dedicated emergency procedures are not provided, as there is no possibility of overstating emission reductions due to emergency cases.

Section C. Start date, crediting period type and duration

C.1. Start date of the Project Activity

Start date of project activity is 28/08/2020, after the provisional acceptance.

C.2. Expected operational lifetime of the Project Activity

Expected operational lifetime of the project activity is considered as 49 years, according to the generation license.

C.3. Crediting period of the Project Activity

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C3.1. Fixed crediting period

The crediting period is fixed as 10 years.

C3.2. Start date of the crediting period

Start date of project activity is 28/08/2020, after the provisional acceptance.

C3.3. Duration of the crediting period

Crediting period is between 28/08/2020 and 27/08/2030, fixed as 10 years.

Section D. Environmental impacts

D.1. Analysis of environmental impacts

Please see section E.

D.2. Environmental impact assessment

The project complies with the relevant regulations and laws in Turkey. In line with Turkish environmental regulations, an “Environmental Impact Assessment (EIA) not required letter” was approved by the Ministry of Environment and Urbanization in 02/08/2017.

Section E. Environmental and social safeguards

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E.1. Environmental safeguards

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Impact of Project Activity on		Information on Impacts, Do-No-Harm Risk Assessment and Establishing Safeguards										Project Owner's Conclusion	
		Description of Impact (both positive and negative)	Legal requirement / Limit	Do-No-Harm Risk Assessment			Risk Mitigation Action Plans		Do-No-Harm Residual Risk Assessment		Self-Declaration		
				Not Applicable (No actions required)	Harmless (No actions required)	Harmful (Actions required)	Operational Controls	Program of Risk Management Actions	Re-evaluate Risks	Monitoring	Explanation of Conclusion	The Project Activity will not cause any harm	
Environmental impacts on the identified categories²⁵ indicated below.	Indicators for environmental impacts	Describe anticipated environmental impacts, both positive and negative from all sources (stationary and mobile), that may result from the Project Activity, within and outside the project boundary, over which the Project Owner(s) has control, and beyond what would reasonably be expected to occur in the absence of the Project Activity.	Describe the applicable national regulatory requirements /legal limits related to the identified risks of environmental impacts.	If no environmental impacts are anticipated, then the Project Activity is unlikely to cause any harm (is safe) and shall be indicated as Not Applicable (No actions required)	If environmental impacts are anticipated, but are expected to be in compliance with applicable national regulatory requirements/below the legal limits, then the Project Activity is unlikely to cause any harm (is safe) and shall be indicated as Harmless (No actions required)	If environmental impacts are anticipated that will not be in compliance with the applicable national regulatory requirements or are likely to exceed legal limits, then the Project Activity is likely to cause harm (may be un-safe) and shall be indicated as Harmful (Actions required).	Describe the operational controls and best practices, focusing on how to implement and operate the Project Activity, to reduce the risk of impacts that have been identified as Harmful .	Describe the Program of Risk Management Actions (refer to Table 3), focusing on additional actions (e.g., installation of pollution control equipment) that will be adopted to reduce the risk of impacts that have been identified as Harmful .	Re-evaluate risks after Risk Mitigation Action Plans have been developed (refer to previous two columns) for impacts that have been identified as Harmful. Indicate whether the risks have been eliminated or reduced and, where appropriate, indicate them as Harmless (No actions required)	Describe the monitoring approach and the parameters to be monitored for each impact that has been identified as Harmful and described in the PSF (refer to Table 3).	Describe how the Project Owner has concluded that the Project Activity is likely to achieve the identified Risk Mitigation Action Plan targets for managing risks to levels that are unlikely to cause any harm.	Confirm that the Project Activity risks of negative environmental impacts are expected to be managed to levels that are unlikely to cause any harm (Mark +1 for Yes or and -1 for No)	

Environmental Safeguards

Environment - Air	SO _x emissions	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	N/A	
	NO _x emissions	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	N/A	
	CO ₂ emissions	The project reduces CO ₂	N/A	N/A	-	-	N/A	N/A	N/A	Electricity generated by the	The electricity generation and consumption	+1	

²⁵ sourced from the CDM SD Tool and the sample reports are available (<https://www4.unfccc.int/sites/sdcmicrosite/Pages/SD-Reports.aspx>)

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		emissions since it reduces the amount of fossil fuel used. In case of "no project" scenario, stated amount of electricity would be generated from fossil fuels and cause air pollution.								power plant will be used to calculate emission reductions achieved by the project. Please see section B.7.1. for further details on monitoring.	will be monitored.	
	CO emissions	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	Suspended particulate matter (SPM) emissions	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	Fly ash emissions	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	Non-Methane Volatile Organic Compounds (NMVOCs)	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	Odor emissions	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	Noise Pollution	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
Environment - Land	Solid waste Pollution from Plastics	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	Solid waste Pollution from Hazardous wastes	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	Solid waste Pollution from Bio-medical wastes	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	

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	<i>Solid waste Pollution from E-wastes</i>	No e-waste pollution is anticipated during the operation of the project. If any e-waste is generated, they will be handled according to national regulations.	Regulation on Waste Management, Regulation on Electrical and Electronic Waste Control, and Regulation on Battery and Accumulator Wastes.	-	Harmless	-	N/A	N/A	N/A	If any e-waste is generated, disposal records will be present.	In any case of problems, the panels are returned to the manufacturer and further handling of the wastes are done by the manufacturer.	+1
	<i>Solid waste Pollution from Batteries</i>	No e-waste pollution is expected from the project activity.	Regulation on Waste Management	-	Harmless	-	N/A	N/A	N/A	If any e-waste is generated, disposal records will be present.	The project owner undertakes to manage batteries in compliance to the prevailing laws and regulations.	+1
	<i>Solid waste Pollution from end of life products/ equipment</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Soil Pollution from Chemicals (including Pesticides, heavy metals, lead, mercury)</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Soil erosion</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
Environment - Water	<i>Reliability/ accessibility of water supply</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Water Consumption from ground and other sources</i>	There is no water consumption from ground for the project use.	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	

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	<i>Generation of wastewater</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Wastewater discharge without/with insufficient treatment</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Pollution of Surface, Ground and/or Bodies of water</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
Environment – Natural Resources	<i>Conserving mineral resources</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Protecting/enhancing plant life</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Protecting/enhancing species diversity</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Protecting/enhancing forests</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Protecting/enhancing other depletable natural resources</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Conserving energy</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Replacing fossil fuels with renewable sources of energy</i>	The project replaces fossil fuels with renewable sources of energy since it is a solar power plant. In this way project decreases the dependence	There is no such legal limit.	N/A	-	-	N/A	N/A	N/A	Please see section B.7.1.	The clean electricity generation will be monitored	+1

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		on the fossil fuels.										
	<i>Replacing ODS with non-ODS refrigerants</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	

Note: If the score is: (a) zero or greater, the overall impact is neutral or positive and there is no net harm; and (b) less than zero, the overall impact is negative and there is net harm to Environment. Score is obtained after adding the individual scores in each of the rows in the last column of the above table.

Net Score:	+4
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Project Owner’s Conclusion in PSF:	The Project Owner confirms that the Project Activity will not cause any net harm to the environment.
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Project Submission Form

E.2. Social Safeguards

Impact of Project Activity on		Information on Impacts, Do-No-Harm Risk Assessment and Establishing Safeguards									Project Owner's Conclusion	
		Description of Impact (both positive and negative)	Legal requirement /Limit	Do-No-Harm Risk Assessment			Risk Mitigation Action Plans		Do-No-Harm Residual Risk Assessment		Self-Declaration	
				Not Applicable (No actions required)	Harmless (No actions required)	Harmful (Actions required)	Operational Controls	Program of Risk Management Actions	Re-evaluate Risks	Monitoring	Explanation of Conclusion	The Project Activity will not cause any harm
Social impacts on the identified categories²⁶ indicated below.	Indicators for social impacts	Describe the impacts on society and stakeholders, both positive and negative, that may result from constructing and operating of the Project Activity.	Describe the applicable national regulatory requirements / legal limits related to the identified risks of social impacts.	If no social impacts are anticipated, then the Project Activity is unlikely to cause any harm (is safe) and shall be indicated as Not Applicable (No actions required)	If social impacts are anticipated, but are expected to be in compliance with applicable national regulatory requirements/ legal limits, then the Project Activity is unlikely to cause any harm (is safe) and shall be indicated as Harmless (No actions required)	If social impacts are anticipated that will not be in compliance with the applicable national regulatory requirements/ legal limits, then the Project Activity is likely to cause harm (may be unsafe) and shall be indicated as Harmful (Actions required).	Describe the operational controls and best practices, focusing on how to implement and operate the Project Activity, to reduce the risk of impacts that have been identified as Harmful .	Describe the Program of Risk Management Actions (refer to Table 3), focusing on additional actions (e.g., construction of crèche for workers) that will be adopted to reduce the impacts that have been identified as Harmful .	Re-evaluate risks after Risk Mitigation Actions plans have been developed (refer to previous two columns) for impacts that have been identified as Harmful. Indicate whether the risks have been eliminated or reduced and, where appropriate, indicate them as Harmless (No actions required)	Describe the monitoring approach and the parameters to be monitored for each impact that has been identified as Harmful and to be described in the PSF (refer to Table 3).	Describe how the Project Owner has concluded that the Project Activity is likely to achieve the identified Risk Mitigation Action Plan targets for managing risks to levels that are unlikely to cause any harm.	Confirm that the Project Activity risks of negative social impacts are expected to be managed to levels that are unlikely to cause any harm (Mark +1 for Yes or -1 for No)
Social Safeguards												
Social - Jobs	Long-term jobs (> 1 year) created/ lost	The project creates long term job opportunities.	All employment s are done according to the national employment regulations. ²⁷	N/A	-	-	N/A	N/A	N/A	Please see section B.7.1.	Local employment will be monitored.	+1
	New short-term jobs (<	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	

²⁶ sourced from the CDM SD Tool and the sample reports are available (<https://www4.unfccc.int/sites/sdcmicrosite/Pages/SD-Reports.aspx>)

²⁷ <https://www.resmigazete.gov.tr/eskiler/2003/06/20030610.htm>

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	1 year) created/ lost											
	Sources of income generation increased / reduced	The project increases income by creating job opportunities.	All payments and right comply with the Labor Law. ²⁸	N/A	-	-	N/A	N/A	N/A	Records of people employed and their income by the project can be displayed with monitoring local employment .	When necessary, statement of employment can be provided.	+1
Social - Health & Safety	Disease prevention	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	Reducing / increasing accidents	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	Reducing / increasing crime	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	Reducing / increasing food wastage	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	Reducing / increasing indoor air pollution	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	Efficiency of health services	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	Sanitation and waste management	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
Social - Education	Job related training imparted or not	N/A	-	N/A	-	-	N/A	N/A	N/A	N/A	N/A	

²⁸ <https://www.mevzuat.gov.tr/MevzuatMetin/1.5.4857.pdf>

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	<i>Educational services improved or not</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Project-related knowledge dissemination effective or not</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
Social - Welfare	<i>Improving/deteriorating working conditions</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Community and rural welfare</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Poverty alleviation (more people above poverty level)</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Improving / deteriorating wealth distribution/generation of income and assets</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Increased or / deteriorating municipal revenues</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Women's empowerment</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	
	<i>Reduced / increased traffic congestion</i>	N/A	N/A	N/A	-	-	N/A	N/A	N/A	N/A	N/A	

Note: If the score is: (a) zero or greater, the overall impact is neutral or positive and there is no net harm; and (b) less than zero, the overall impact is negative and there is net harm to society. Score is obtained after adding the individual scores in each of the rows in the last column of the above table.

Net Score: +2

Project Submission Form

Project Owner's Conclusion in PSF:	The Project Owner confirms that the Project Activity will not cause any net harm to society.
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Section F. United Nations Sustainable Development Goals (SDG)

UN-level SDGs	UN-level Target	Declared Country-level SDG	Defining Project-level SDGs					Project Owner(s)'s Conclusion	
			Project-level SDGs	Project-level Targets/ Actions	Project-level Indicators	Contribution of Project-level Actions to SDG Targets	Monitoring	Explanation of Conclusion	Are Goal/ Targets Likely to be Achieved?
<p>Describe UN SDG targets and indicators</p> <p>See: https://unstats.un.org/sdgs/indicators/indicators-list/</p>	Describe the UN-level target(s) and corresponding indicator no(s)	Has the host country declared the SDG to be a national priority? Indicate Yes or No	<p>Define project-level SDGs by suitably modifying and customizing UN/ Country-level SDGs to the project scope.</p> <p>For guidance see: Integrating the SDGs into Corporate Reporting- A Practical Guide: https://www.unglobalcompact.org/docs/publications/Practical_Guide_SDG_Reporting.pdf</p> <p>Case-study from Coca-Cola and other organizations to develop organization-wide SDGs (page 114): https://pub.iges.or.jp/pub/realising-transformative-potential-sdgs</p>	Define project-level targets/actions, by suitably modifying and customizing UN/Country-level targets to the project scope. Define the target date by which the Project Activity is expected to achieve the project-level SDG target(s). Refer to the previous column for guidance	Define project-level indicators by suitably modifying and customizing UN/Country-level indicators to the project scope or creating a new indicator(s). Refer to the previous column for guidance	Describe and justify how actions taken under the Project Activity are likely to result in a direct positive effect that contributes to achieving the defined project-level SDG targets and is additional to what would have occurred in the absence of the Project Activity	Describe the monitoring approach and the monitoring parameters to be applied for each project-level SDG target and Indicator	Describe how the Project Owner has concluded that the project is likely to achieve the identified Project level SDGs target(s).	Describe whether the project-level SDG target(s) is likely to be achieved by the target date (Yes or No)
Goal 1: End poverty in all its forms everywhere	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Goal 2: End hunger, achieve food security and improved nutrition and promote sustainable agriculture	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Goal 3. Ensure healthy lives and promote well-being	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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for all at all ages									
Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Goal 5. Achieve gender equality and empower all women and girls	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Goal 6. Ensure availability and sustainable management of water and sanitation for all	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Goal 7. Ensure access to affordable, reliable, sustainable and modern energy for all	SDG Target 7.2 "By 2030, increase substantially the share of renewable energy in the global energy mix" by the utilization of solar power as a renewable energy source." Indicator 7.2.1 Renewable energy share in the total final energy consumption	Yes	Increase the share of renewables in the total installed power capacity connected to the national grid.	Provide 17,806 MWh clean energy annually.	Enhance the share of installed electricity generation capacity from renewable energy sources.	The project increases the renewable energy share in Turkey's energy production mix. It provides 17,806 MWh annual clean energy to the grid.	Calculate the share of installed capacity from renewable energy.	The project fully commissioned in 2020 and goes on without any problem.	Yes
Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive	SDG Target 8.5 "By 2030, achieve full and productive	Yes	Generated job opportunity and income	Creates employment opportunity.	Creates employment opportunity.	Creates employment opportunity.	Check employment records	Project owner created 5 employments, 4 of them are local and provided	Yes

Project Submission Form

<p>employment and decent work for all</p>	<p>employment and decent work for all women and men, including for young people and persons with disabilities and equal pay for work of equal value". Indicator 8.5.1 Average hourly earnings of female and male employees, by occupation, age and persons with disabilities</p>							<p>income since 2020 and complies with targeted SDGs so far.</p>	
<p>Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation</p>	<p>SDG Target 9.4 requires "By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities".</p>	<p>Yes</p>	<p>Supports advanced industrialization by providing a non-polluting clean and resilient energy generation facility.</p>	<p>Project implementation is a 17,806 MWh resilient energy generation facility.</p>	<p>Project provides clean energy as 17,806 MWh.</p>	<p>The project helps adaptation of clean energy technologies by implementing a solar power plant.</p>	<p>Check that the project implementation continues, and electricity generated.</p>	<p>The project fully commissioned in 2020 and complies with targeted SDGs so far.</p>	<p>Yes</p>

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	Indicator 9.4.1 CO2 emission per unit of value added								
Goal 10. Reduce inequality within and among countries	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Goal 12. Ensure sustainable consumption and production patterns	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Goal 13. Take urgent action to combat climate change and its impacts	SDG Target 13.3 "Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning". Indicator 13.3.1 Number of countries that have communicated the strengthening of institutional, systemic, and individual capacity-building to implement adaptation,	Yes	Eliminates 11,542 tCO ₂ e annually	Commission 17,806 MWh renewable energy plant.	Reduce greenhouse gas emissions by 11,542 tonnes annually.	Since the project uses solar energy, there is no GHG emissions related to the project activity. It eliminates 11,542 tCO ₂ e annually.	Calculate avoided GHG emissions every year.	The project fully commissioned in 2020 and complies with targeted SDGs so far.	Yes

Project Submission Form

	mitigation and technology transfer and development actions								
Goal 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Goal 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Goal 17. Strengthen the means of implementation and revitalize the global partnership for sustainable development	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
SUMMARY						Targeted		Likely to be Achieved	

Project Submission Form

Total Number of SDGs	4	4
Certification label (Bronze, Silver, Gold, Platinum, or Diamond) for the ACCs as defined in the PSF	Gold	Gold

Section G. Local stakeholder consultation

G.1. Modalities for local stakeholder consultation

The project activity is considered as the installation of a Solar Power Plant for supply to grid. The stakeholders for a project activity are defined as the public, including individuals, groups or communities, affected, or likely to be affected, by the proposed project activity.

According to the EIA regulations²⁹ in Turkey, a local stakeholder consultation meeting is not required for this type projects and for the projects that are smaller than 10 MW. However, project owner has conducted a local stakeholder consultation meeting by participation of residents of the nearby villages to inform the local stakeholders about the project activity and discuss their concerns, if any, regarding the project activity. The meeting was held on 01 June 2022 in Büğet, Kahramanmaraş which is where the project is located. Local stakeholders including residents of the nearby villages were invited to the meeting through a public notice and personal invitations.

At the meeting, the participants were presented with the project. The stakeholders were informed about the investment, their opinions and recommendations have been received through the evaluation forms (Please see Appendix 6.) that were distributed.

G.2. Summary of comments received

Many of the stakeholders stated that the project activity created job opportunities and that the project activity uses a clean energy source which provides national grid with electricity. In addition, the benefits and national contributions of the measures taken regarding the climate change by the project activity were frequently mentioned.

As it could be seen from the evaluation forms which were given in the Appendix 6, general feedbacks of local people are positive about the projects.

G.3. Consideration of comments received

The comments have been evaluated by the project owner and summarized as there is no negative comment/grievance according to the project implementation so far.

Section H. Approval and authorization

N/A

²⁹ <https://www.resmigazete.gov.tr/eskiler/2014/11/20141125-1.htm>

Appendix 1. Contact information of project owners

Organization name	Karomad Enerji Üretim A.Ş.
Country	Turkey
Address	Yıldızevler Mah. Ormancılar Sk, No: 10 / 5, Çankaya / ANKARA
Telephone	0 (312) 438 00 03
Fax	-
E-mail	turkermurat@bicakcilarcandarli.com
Website	-
Contact person	Türker Murat

- Appendix 2. Affirmation regarding public funding**
- Appendix 3. Applicability of methodology(ies)**
- Appendix 4. Further background information on ex ante calculation of emission reductions**
- Appendix 5. Further background information on monitoring plan**
- Appendix 6. Summary report of comments received from local stakeholders**

The forms filled by the local stakeholders are provided in this section. Their personal phone numbers are covered in order to respect their privacy

Project Submission Form



KATILIMCI BİLGİLERİ	Ad Soyad	Sadi Berk
	Telefon	
	Kurum/Görev	Kaynakçı
Proje ile ilgili <u>olumlu</u> bulduğunuz hususlar nelerdir?		
Proje den çok memnunuz çünkü ülkemiz çok faydalanıyor		
Proje ile ilgili <u>olumsuz</u> bulduğunuz hususlar nelerdir?		
Hiç bir zorunlu görmedim aksine memnunuz.		

Atın Emek Bulvarı 1328. Sokak No : 15 / 1 Aşağıöveçler 06450 Dikmen / ANKARA
Tel : 0-312-472 79 05 Pbx Faks : 0-312-472 79 07 Web : www.sgy.com.tr E-Mail : sgy@sgy.com.tr

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KATILIMCI BİLGİLERİ	Ad Soyad	Songül Sarıkuş
	Telefon	
	Kurum/Görev	Ev Hanımı

Proje ile ilgili **olumlu** bulduğunuz hususlar nelerdir?

Ülkemize elektrik ürettiği için faydalı buluyorum

Proje ile ilgili **olumsuz** bulduğunuz hususlar nelerdir?

olumsuz olduğuna düşünmüyorum çok faydalı bir proje

Project Submission Form



KATILIMCI BİLGİLERİ	Ad Soyad	Mehmet Özer
	Telefon	[REDACTED]
	Kurum/Görev	Muhasabeci

Proje ile ilgili olumlu bulduğunuz hususlar nelerdir?

Böyle projelerin artmasını istiyorum çünkü çok memnunuz

Proje ile ilgili olumsuz bulduğunuz hususlar nelerdir?

Aksi bir olay olmadığını biliyorum

Project Submission Form



KATILIMCI BİLGİLERİ	Ad Soyad	İsmail Taşın
	Telefon	[REDACTED]
	Kurum/Görev	Manav

Proje ile ilgili olumlu bulduğunuz hususlar nelerdir?

Türkiyede böyle enerji üretimini tebrik ediyorum

Proje ile ilgili olumsuz bulduğunuz hususlar nelerdir?

Sağlığımız için çok faydalı

Project Submission Form



KATILIMCI BİLGİLERİ	Ad Soyad	Tulgay Karakaya
	Telefon	[REDACTED]
	Kurum/Görev	İnşaat işçisi

Proje ile ilgili olumlu bulduğunuz hususlar nelerdir?

Elektrik üretiminde çok faydalı olduğunu düşünüyorum

Proje ile ilgili olumsuz bulduğunuz hususlar nelerdir?

Çevreye zarar vermediğine çok eminim

Project Submission Form

KATILIMCI BİLGİLERİ	Ad Soyad	YUSUF SARIKURT
	Telefon	
	Kurum/Görev	Elektrikçi

Proje ile ilgili **olumlu** bulduğunuz hususlar nelerdir?

çevre için faydalı bir zərərli yoldur

Proje ile ilgili **olumsuz** bulduğunuz hususlar nelerdir?

Projele hiç bir olumsuz görmedim
faydalıdır

TRANSLATIONS

Project Submission Form



PARTICIPANT INFORMATION	Name / Surname	Sadi Berk
	Phone	
	Establishment / Job	Welder

What are the aspects that you find **positive** about the project?

We are very pleased with the project because our country benefits a lot.

What are the aspects that you find **negative** about the project?

I did not see any harm, on the contrary, we are pleased.

Project Submission Form



PARTICIPANT INFORMATION	Name / Surname	Songül Sarıkurt
	Phone	
	Establishment / Job	Housewife

What are the aspects that you find **positive** about the project?

I find it beneficial because it produces electricity for our country

What are the aspects that you find **negative** about the project?

I don't think it's negative, it's a very useful project

Project Submission Form



PARTICIPANT INFORMATION	Name / Surname	Mehmet Özer
	Phone	
	Establishment / Job	Accountant

What are the aspects that you find **positive** about the project?

I want such projects to increase because we are very pleased

What are the aspects that you find **negative** about the project?

I know there is no unfavorable thing

Project Submission Form



PARTICIPANT INFORMATION	Name / Surname	İsmail Tavşan
	Phone	
	Establishment / Job	Greengrocer

What are the aspects that you find **positive** about the project?

I congratulate such an energy production in Turkey

What are the aspects that you find **negative** about the project?

It's very beneficial for our health

Project Submission Form



PARTICIPANT INFORMATION	Name / Surname	Turgay Karakaya
	Phone	
	Establishment / Job	Construction Worker

What are the aspects that you find **positive** about the project?

I think it is very beneficial in electricity generation

What are the aspects that you find **negative** about the project?

I'm pretty sure it's not harmful to the environment

Project Submission Form



PARTICIPANT INFORMATION	Name / Surname	Yusuf Sarkurt
	Phone	
	Establishment / Job	Electrician

What are the aspects that you find **positive** about the project?

It is beneficial for the environment, there is no harm.

What are the aspects that you find **negative** about the project?

I did not see any negative aspect about the project, it is beneficial

Appendix 7. Summary of de-registered CDM project (Type B)

N/A

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GLOBAL CARBON COUNCIL

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