JOINT VALIDATION & VERIFICATION REPORT

Solar Parks in Cuyo Region

BCR-AR-755-1-001

Conformity Assessment Body | KBS

Validation & Verification Report	
Project Title	*Solar Parks in the Cuyo Region*
Project ID	*BCR-AR-755-1-001*
Project holder	*Genneia*
Project Type	*Activities in the energy sector - Non-conventional renewable energy sources – Solar Energy project.*
Grouped project	*It is a grouped project.*
Version number of the Project Document to which this report applies	*6.0*
Applied methodology(ies)	*ACM0002 - Grid-connected electricity generation from renewable sources – Version 22.0*
Project location	*Argentina* *Cuyo region* *Province of San Juan & Province of Mendoza*
Project starting date	*30/03/2023*
Quantification period of GHG emissions reductions/removals	*7 years (renewable twice)* *First period: 30/03/2023 to 29/03/2030* *Total quantification period: 21 years* *Total period: 30/03/2023 to 29/03/2044*
Estimated total and average annual amount of GHG emission reductions/removals	*Total amount of GHG emissions reductions (during the first quantification period): 902,914 tCO2e (estimated average annual amount of 128,988 tCO2e)*

	Total amount of GHG emissions reductions (during the total quantification period): 2,740,387 tCO2e (estimated average annual amount of GHG emission reductions: 130,495 tCO2e/year).
Monitoring period	*30-March-2023 to 31-October-2024*
Total amount of GHG emission reductions/removals achieved by the project in this monitoring period	*Total amount of GHG emissions reductions/removals (during the monitoring period): 123,470 tCO_2e* *Average annual amount of GHG emission reductions/removals: 2023: 43,845 tCO_2e/year and 2024: 79,625 tCO_2e/year*
Contribution to Sustainable Development Goals	*SDG 7: Affordable and clean energy* *SDG 8: Decent work and economic growth* *SDG 12: Responsible consumption and production* *SDG 13: Climate action* *SDG 15: Life on land*
Special category, related to co-benefits	*Not applicable*
Version and date of issuing	*6, 19/09 /2025*
Work carried out by	*Raúl G. Mitre; Adriana Torchelo; Sofía Castro, Mr. M.P. Prasanna*
Approved by	 *Mr. Praveen N URS, Director of Climate Change & Sustainability*

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1 Executive summary

Solar parks in the Cuyo region is a solar photovoltaic grouped project owned by Genneia S.A.

The Greenfield solar photovoltaic power plants that comprise the project are connected to the Argentine Interconnection System (SADI, from the Spanish "Sistema Argentino de Interconexión") and are located in the Cuyo region of Argentina, which includes the provinces of San Juan and Mendoza.

The project first instance (Instance 01) includes Sierras de Ullum Solar Park (PSSU) and Tocota Solar Park (PSTO III). PSSU is located in the Ullum Department, Province of San Juan, has a nominal installed capacity of 78 MW and started commercial operation on 30/03/2023. PSTO III is located in the Calingasta Department, Province of San Juan, has a nominal installed capacity of 60 MW and started commercial operation on 30/12/2023.

Regarding future instances, two solar parks that have not yet obtained their commercial authorization but will be included in the next instance are the Malargüe and Anchoris solar parks, located in the Malargüe and Luján de Cuyo departments, respectively, in the province of Mendoza.

The project quantification period of GHG emissions reductions is a renewable quantification period of 7 years to be renewed two times for a total length of 21 years.

The project description and monitoring were designed to comply with the BioCarbon Standard v3.4, specifically as a solar energy grouped project. The project applies ACM0002, Version 22.0.

The validation confirms that the ex-ante analysis of the project's GHG reductions have been carried out in an accurate, transparent and conservative manner, being estimated at an average annual amount of GHG emission reductions of 128,988 tCO2e/year and an estimated total of 902,914 tCO2e for the first 7 years GHG reduction quantification period.

At verification the total ex post net GHG emissions reductions for the monitoring period (30/03/2023 – 31/10/2024) is 123,470 tCO2e.

The purpose and scope of the validation/verification involves document review, in situ visit, interviews and consultation of secondary information sources, statement of findings, feedback with the project owner, preparation of the final report, monitoring of project activities and its annexes. The Validation and Verification Manual v2.4 of March 23, 2024 and the BioCarbon Standard v3.4 of June 28, 2024 were used for validation and verification.

The validation and verification team (VT) identified 21 findings during this joint validation and verification - 13 during validation (7 Clarification Requests and 6 Corrective Action

Requests) and 8 during verification (2 Clarification Requests and 6 Corrective Action Requests) - that were satisfactorily addressed by the project holder during the validation and verification process to ensure that the Project Description and the Monitoring Report comply with the BCR program requirements.

Finally, the validation and verification process results in a conclusion by KBS Certification Services Ltd., after gathering sufficient evidence to fully evaluate the validation and verification criteria and determine that the project is implemented in accordance with the BCR standard requirements, which is reflected in the Project Description and the Monitoring Report.

Therefore, KBS Certification Services Ltd. recommends the project for registration by the BCR.

With regards to verification, KBS Certification Services Ltd. confirms that all operations of the project are implemented and installed as planned and described in the PD, the monitoring plan is in accordance with ACM0002 v 22.0, the equipment essential for measuring parameters required for calculating emission reductions are properly maintained, the monitoring system is in place and functional, the project has generated GHG emission reductions during the monitoring period that were calculated without material misstatements in a conservative and appropriate manner. Thus, KBS Certification Services Ltd. confirms that the project has achieved 123,470 tCO2e of GHG emission reductions in the in the period 30/03/2023 – 31/10/2024.

2 Objective, scope and criteria

The objective of the validation and verification audit was to conduct an independent assessment of the project to determine:

- *The project, its activities, methods and procedures, as described in the Project Description (PD) document and its corresponding annexes, including the monitoring plan, meet the criteria established for this validation.*

- *The activities, methods and procedures, included in the Monitoring Report (MR), have been implemented in accordance with the PD and the monitoring plan.*

- *The GHG emissions reductions and/or removals reported for the monitoring period are materially accurate.*

The scope of project validation and verification is to provide an independent evaluation on the proposed project activity with respect to commitments and targets based on forecasted GHG emission reductions, sustainability and environmental and social do no-net-harm, against applicable BCR Standard rules and requirements, including but not limited to:

- *Validate the project activity; its boundaries; its areas and instances; its physical infrastructure, activities, technologies, and processes; whether its covered by the country NDC; the adequate use of an appropriate methodology; the baseline scenario and additionality; the GEI and sources; the project participants, ownership and carbon rights; leakages and the project mitigation result; conformity of the project with the requirements for grouped projects under the BCR standard; the project length and the quantification periods; the criteria and indicators related to co-benefits; the sustainable development safeguards; the contribution of the project to sustainable development objectives; the monitoring plan; the assessment of uncertainty and conservative approach; the stakeholder engagement and consultation; the compliance with Laws, Statutes and Other Regulatory Frameworks.*

- *Verify the monitoring report, its GHG emission reductions, the monitoring equipment, the procedures that guarantee quality control and assurance; the implementation of activities and their reported impacts for the monitoring period 30/03/2023 – 31/10/2024.*

With regards to validation and verification criteria, claims and assumptions made in the Project document and Monitoring Report, reference documents and interviews, were assessed against ISO 14064-2 and ISO 14064-3 and BCR Standard criteria, including but not limited to, BCR Standard v3.4, BCR Validation and Verification Manual v2.4, BCR Sustainable development goals tool v1.0, BCR Sustainable Development Safeguards tool v1.1, applied CDM methodology ACM0002 v22.0 and applicable tools, as well as other relevant rules and requirements established under BCR Standard process.

Finally, project validation and verification is not meant to provide any consulting towards the project owners. However, stated requests for clarifications and/or corrective actions may have provided input for improvement of the project submission form.

3 Validation and verification process

3.1 Level of assurance and materiality

The audit was conducted to provide a reasonable level of assurance of compliance with the criteria defined within the scope. Based on the audit findings, a positive assessment statement provides reasonable assurance that the project complies with the criteria set out in Section 2.2 and the GHG statement is materially correct and credible.

The nature and extent of validation and verification activities have been shaped according to section 10.2.5 of the BCR validation and verification manual. For all cases, the following criteria have been considered:

a) The level of assurance of the validation and verification of the GHG Project had not to be less than 95%. For that purpose, the errors that were found in the spreadsheets were

corrected; these errors never exceeded 5% error, with respect to the previous emission reductions. Therefore, it is assured that the level of assurance is not less than 95%.

b) *The material discrepancy of the data supporting the GHG Project baseline and the estimate of GHG emission reductions or removals may be up to +- 5%. For that purpose, the calculations were evaluated and errors in the calculations were corrected, those errors were never greater than 5% compared to the previous emission reductions. Thus, it is assured that there was no material discrepancy in the calculation data.*

Issues related to the document management and control system were also resolved during the audit, and errors in the reporting in the PD and MR were corrected, ensuring that the information presented in the PD and MR is accurate, as required by the BCR Standard.

The validation and verification process through document review and on site audit ensured that there were no quantitative and qualitative discrepancies in a material way that would affect the calculation of emission reductions, in the sense of overestimating the calculation data or due to errors of omission of information.

Specifically, the validation and verification have been based on the PD, MR, investment analysis and GHG emission reductions spreadsheets, proof of title, proof of right, additional documents related to baseline and monitoring methodology, the subsequent background investigation, monitoring plan, follow-up interviews and supporting documents made available to the verification team by the project holder. The information in these documents has been reviewed against the requirements of BCR Standard. KBS has employed a rule-based approach in the validation and verification focusing on the fulfillment of the rules determined by the BCR Standard. The items covered in the validation and verification included:

- *Criteria of BCR Standard Version 3.4,*
- *Criteria of CDM approved methodology, ACM0002 Version 22.0 and applicable tools,*
- *Project Document,*
- *Monitoring Report,*
- *Background investigation and follow up interviews,*
- *Stakeholder feedback, and*
- *Project's compliance with other relevant rules, including Argentina legislation.*

Furthermore, the validation and verification team used additional documentation by third parties like host country legislation and technical reports concerning the project. A desk review has been carried out to assess, among others, the:

- *Compliance with relevant law and regulations,*
- *Stakeholders' comments,*
- *Proof of title,*
- *Technical specifications of meters and calibration certificates,*
- *Commissioning Letters,*

- *Publicly available data with regards to investment analysis and common practice,*
- *Publicly available data regarding the electricity system CO_2 emission factor,*
- *Publicly available data of electricity records from the Argentine Wholesale Electricity Market Administration Company (CAMMESA).*

The validation and verification team has checked all the above-mentioned details and confirms that all the information provided is accurate.

Through interviews, host country rules and regulations related to project activity, project description, technological measures, implementation, operation, management of project activity, training of personnel, baseline and monitoring plan, stakeholders' consultation, etc., have been checked and found appropriate.

KBS applies the rule-based approach aimed at focusing on the fulfillment of the rules determined by the BCR Standard to assure not omitting any part of the mandatory processes. The discrepancies found during the validation and verification were submitted to the project holder, indicated under the titles of Corrective Action Requests (CARs) and Clarification Requests (CL). CARs and CLs were required to be addressed by the PP.

Hence the above steps have been followed to achieve a reasonable level of assurance in the joint validation and verification report. Based on the process and procedures conducted, KBS confirms that the information in the PD and MR:

- *is materially correct and is a fair representation of the actual project details, and*
- *is prepared in accordance with BCR requirements and the applied CDM methodology ACM0002 Version 22.0 for information pertaining to GHG qualification, monitoring and reporting.*

The validation and verification work has been carried out as per this requirement and the validation and verification opinions are assured, subject to the credibility of all the above.

3.2 Validation and verification activities

3.2.1 Planning

KBS Certification Services Ltd. conducts a review of the responsible party's GHG information in developing a validation and verification plan to conform to the requirements of ISO 14064-3:2019 and considering the requirements specified by the BCR Standard by: allocating competent personnel to carry out the validation and verification activities, controlling the validation and verification activities are executed using KBS planning forms, conducting a risk assessment in case of remote assessment (not applicable to this validation and verification that included onsite assessment), confirming the times and logistics required to carry out the validation and verification activities as per the audit plan prepared by the audit team and submitted to the client for approval before site visit.

The scope of the validation and verification is the independent and objective review of the implementation of the Project and ex post determination of the monitored reductions in GHG emission by the project activity. The scope and validation/verification criteria is explained in Section 2 above. The audit team with its roles and resources is mentioned in Section 3.3 and furthermore in Annex 01.

To ensure a transparent and professional execution of the validation and verification activities, the audit team leader performs a detailed planning in order to identify the types of potential material errors and their probability of occurrence, as well as to carry out the relevant evaluations of information and calculations or other evidence considered relevant for its assessment and conclusions.

The audit team prepared an audit plan and evidence gathering plan, which are unified in a single document. No adjustments or revisions to the audit plan were necessary during the course of the validation and verification processes. The audit team communicated the audit plan to the client and the responsible party well in advance.

KBS Certification Services Ltd. performed a detailed assessment of the potential risks considering the data and information gathered during the strategic analysis of the overall project information, such as calls, interviews, review of public project information and information provided by the client.

The objective of the risk analysis is to assess the likely level of risk of material misstatement or nonconformance in the verification report, as well as to enable effective verification planning, based on the strategic analysis, by identifying where the highest levels of inherent risks (IR), control risks (CR) and detection risks (DR) are located.

The validation and verification processes are planned in such a way that the level of risk is kept within the agreed limits of assurance and materiality.

In assessing the risk of material misstatement in the validation and verification report, the audit team considered, among others, the following:

- *The relevance and proportional size of emissions from emission sources;*
- *The ease and transparency of reporting;*
- *The complexity of the operations;*
- *The control environment in which the data is collected and managed; and*
- *The provisions of the monitoring plan;*

Based on the outcome of the risk analysis, the audit team designed the appropriate approach, intensity and appropriate involvement.

The audit team prepared an audit plan for the validation and verification comprising:

- *A list of the validation and verification activities to be carried out;*

- *Auditors and GHG functions involved;*
- *An assessment of whether the facility (emission sources, source streams, etc.) are correctly defined in the monitoring plan;*
- *The site visits, including the logistical aspects of the visit (e.g., agenda, who to interview, locations to visit, etc.);*
- *An assessment of compliance with the Project Description (PD) and the approved monitoring plan (MP);*
- *The specifics of the ongoing emissions monitoring; and*
- *Details of the operation, monitoring, maintenance and QA/QC procedures.*

The audit plan was shared with the client so that they could prepare for the site visit which was done on 02.12.2024.

Non conformities raised during the validation and verification can either be seen as a non-fulfilment of criteria ensuring the proper implementation of a project or where a risk to deliver high quality emission reductions is identified.

Corrective Action Requests (CARs) are issued, if:

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

The verification team uses the term Clarification Request (CL), which are issued if:

- *information is insufficient or not clear enough to determine whether the applicable GS requirements have been met.*

Forward Action Requests (FAR) indicate essential risks for further periodic verifications. Forward Action Requests are issued, if:

- *the monitoring and reporting require attention and / or adjustment for the next verification period.*

KBS Certification Services Ltd. *designed an activity plan for the collection of proof and evidence for each activity related to the validation and verification on which its conclusion is based. This activity plan in order to review the preliminary information consists of basically two stages:*

a) ***Background research****: Sources that could provide additional information for validation and verification were identified. Also, possible issues that could be potentially*

relevant to the project were identified, such as background studies that are particularly important for the project.

b) ***Document review**: The document review establishes the extent to which the submitted project documentation (PD, MR, spreadsheets, supports, etc.), meets the established validation and verification criteria. The audit team shall treat confidentially all information obtained by the client or its stakeholders during the validation and verification, or obtained from sources other than the client, and shall not disclose nonpublic information about a client or responsible party to a third party without the express consent of that client or responsible party. The audit team shall inform the client and, if appropriate, the responsible party before releasing any information into the public domain, where required by the relevant disclosure provisions of a GHG program.*

During the background study evaluated the political and legal, environmental, socio-demographic and technological policies, circumstances and trends applicable to the specific project.

The background study allowed for a risk-based validation and verification, therefore, KBS Certification Services Ltd. did not identify issues that could incur risks related to the successful implementation or realization of the project.

The validation and verification process was carried out between 11/11/2024 and 04/06/2025. The schedule and duration of the validation and verification activities are bellow illustrated:

Activity	***Location***	***Timeline***	***Total hours***
Documentary Review	*Remote*	*11/11/2024 – 01/12/2024*	*20*
On-site validation. Review of project type, eligibility and general description	*Project headquarters*	*02/12/2024*	*0.5*
On-site validation. Review of quantification of GHG emissions reduction	*Project headquarters*	*02/12/2024*	*1,5*
On-site validation. Review of Additionality	*Project headquarters*	*02/12/2024*	*1,5*
On-site validation. Review of Compliance with Laws, Statutes and Other Regulatory Frameworks, Carbon ownership and rights, Climate change	*Project headquarters*	*02/12/2024*	*1,5*

adaptation, Risk management			
On-site validation. Review of: SDSs, Stakeholder engagement and consultation, SDGs, Special categories	Project headquarters	02/12/2024 – 05/12/2024	1,5
On-site validation. Review of Grouped projects, Other GHG projects, Double counting avoidance	Project headquarters	02/12/2024	1,5
On-site validation. Review of Monitoring Plan	Project headquarters	02/12/2024 – 05/12/2024	1
On-site verification (review of Monitoring Report, monitored parameters, monitoring equipment, etc.)	Project sites	03/12/2024 – 05/12/2024	10
On-site validation and verification. Stakeholder consultation of each solar park (documentary review, procedures in place, interviews)	Project sites	02/12/2024 – 04/12/2024	3
On-site validation and verification. Final meeting	Project headquarters	06/12/2024	1
Writing and issuance of draft Validation and Verification report	Remote	25/11/2024 – 06/12/2024	32
1st round of review of findings answers	Remote	27/01/2025 – 03/02/2025	12
2nd round of review of findings answers	Remote	25/03/2025- 02/04/2025	16
3rd round of review of findings answers	Remote	02/04/2025 – 11/04/2025	10
Closing of all CARs and	Remote	14/04/2025	8

CLs			
Writing and issuance of Validation and Verification report for Technical Review	Remote	14/04/2025	16
Technical Review	Remote	14/04/2025 – 03/06/2025	24
Writing and issuance of Validation and Verification report for final approval	Remote	04/06/2025	2
Submission to the project holder	Remote	04/06/2025	1

3.2.2 Sampling

No sampling approach has been used during project validation and verification. All data provided by the project owner has been duly audited.

The audit team determined that a sampling plan was not required for this validation and verification because 100% of the relevant GHG data and information were subject to review and testing. The following considerations support this decision:

1. *Full Data Coverage*
   - *All activity data for determining the emission reductions within the Project´s operational boundaries were reviewed in their entirety.*
   - *The datasets included complete direct measurement with SMEC electricity meters, calibrated meter readings, generation values measured by SMECs crosschecked with information available on CAMMESA´s website that correspond with final values utilized for billing, covering the full reporting period.*
   - *Data for the period 2021-2023 provided by official the Argentine Secretariat of Energy from information from the latest official CAMMESA statistics, was completely checked to determine the Combine Margin EF.*
   - *No extrapolation or partial data collection was used.*

2. *Evidence Supporting Completeness and Reliability*
   - *The CAB reviewed original source documents (invoices, metered data, internal reports) and cross-checked them against CAMMESA´s website information publicly available.*
   - *Internal QA/QC procedures, calibration certificates, and monitoring protocols were evaluated to confirm data accuracy and traceability.*

3. *Assurance Level*
   - *This approach ensured that the required reasonable level of assurance was achieved, in line with ISO 14064-3 and the BCR Standard.*

- *Since all data were reviewed, the risk of material misstatement is reduced compared to selective sampling approaches.*

4. *Risk Assessment*

A qualitative risk assessment was conducted to evaluate potential sources of errors, omissions, or misinterpretations. Identified risks included:

- *Human errors during manual data entry.*
- *Misapplication of emission factors.*
- *Potential omission of sources within the organizational boundary.*
- *These risks were mitigated through:*
- *Cross-checking invoices against meter readings.*
- *Verification of emission factors against official sources.*
- *Review of boundary setting procedures.*
- *The audit team concluded that residual risk is low and does not compromise the assurance outcome.*

Based on the above, the audit team confirms that a sampling plan was not necessary, as full data coverage and robust assurance procedures ensured compliance with ISO 14064-3 (sections 6.1 and 7.1) and the BCR Standard.

3.2.3 Execution

In order to execute the validation and verification, a preliminary assessment is performed. As part of this preliminary assessment, the validation team requested the project holder for sufficient information to determine the purpose and scope of the validation or verification, considering the following:

- *if the GHG project corresponds to a type of project eligible for the Certification Program,*
- *if the GHG project applies a methodology eligible under the requirements of the Certification program,*
- *if the monitoring plan or report complies with the methodology applied by the GHG project,*
- *if the determination of the baseline considers the considerations provided by the BIOCARBON Program and by existing sectoral and national regulations.*

The preliminary assessment based on the initial information and documentation provided by the project holder, including the Project Document v1, Monitoring Report v1, investment analysis spreadsheet v1, ER spreadsheet v1, common practice analysis spreadsheet v1, monitoring period ER spreadsheet v1 and reference documents, allowed the audit team to confirm that:

- *the project corresponds to activities in the energy sector - Non-conventional renewable energy sources – Solar Energy project, eligible for BCR,*
- *the project applies ACM0002 v22.0 eligible under BCR,*

- *the monitoring plan and monitoring report complies with ACM0002 v22.0,*
- *the baseline was determined considering BCR provisions and existing sectoral and national regulations in Argentina.*

Thus, through the preliminary assessment, the audit team was able to confirm that the information provided by the project holder was sufficient to determine the purpose and scope of the validation and verification.

The validation and verification team conducted a document review that included:

- *Review of the Project Document, the methodology applied and applicable tools, the monitoring plan and quality assurance and control procedures.*
- *Review of the Monitoring Report and project implementation.*
- *Review of all data and reference documentation submitted to validate its completeness.*
- *Assessment of compliance with applicable regulations.*
- *Evaluation of documents evidencing land tenure and carbon rights for the project.*
- *Assessment of the QA&QC in place to ensure the quality of information and documentary control of the project.*
- *Other supporting documents (maps, spreadsheets, etc.).*

All the documents used to arrive to a validation and verification conclusion are listed in Annex 3 and referenced accordingly in the joint validation and verification report.

3.2.3.1 Onsite inspection

As part of the validation and verification of the project, from December 2 to December 6, 2024, an on-site visit was conducted, which included visiting the project holder headquarters in Buenos Aires and the solar parks of the project's first instance, PSSU and PSTO III, located in the province of San Juan. The activities carried out during the on-site visit were a mix of interviews, inspection and documents review aiming to:

- *Confirm the location and geographical area of the project, as reported in the PD.*
- *Observe the project implementation status.*
- *Verify possible substantial discrepancies between the activities described in the monitoring plan and those carried out on site.*
- *Conduct a risk-based review of the project to ensure that it meets the eligibility requirements of BCR Standard and the applicability conditions of the methodology.*
- *Confirm the quality control and quality assurance procedures designed.*
- *Validate data and parameters used for ex ante estimates*
- *Review of calculations and assumptions made in determining the GHG data and emission reductions*
- *Check data, calculations and assumptions made in the investment analysis and common practice for the demonstration of additionality*
- *Check of the monitoring equipment, including calibration performance and observations of monitoring practices against the requirements of the PD, ACM0002 and applicable tools*

- *Verify monitored data and parameters used for ex post GHG calculations and SDSs, SDGs and co-benefits monitoring.*
- *Verify the stakeholder consultation, ongoing communication and engagement.*

3.2.3.2 Interviews

All relevant stakeholders were interviewed in person during on-site visit with the purpose of identifying the participants and their process of enrollment in the project, as well as verify the boundaries of the project, compliance with the conditions of applicability of the methodology and potential environmental and social impacts.

The interviews yielded comments of compliance with the project, adequate owner enrolled with the information presented, and applicability and quantification based on the methodologies used.

The following table lists the relevant stakeholders' interviewed during on-site visit and the description of the consulted aspects.

Stakeholders interviewed	***Description of the consulted aspects***
Staff in project holder's headquarters: - *Antonella Martinenghi, Carbon Sr., Genneia* - *Dolores Carniglia, Environment Chief, Genneia* - *Denis Pais, Control Center (CECO) Coordinator, Genneia* - *Ricardo Monzón, Analysis and Performance Chief, Genneia* - *Gabriela Guzzo, Commercial Manager, Genneia* - *Nicolás Gaioli, Consultant, Coraliae SRL* - *Fabián Gaioli, Consultant, Coraliae SRL*	- *Project objectives and expectations.* - *Project boundary, start date, quantification period* - *Estimates and assumptions for determining GHG data.* - *Baseline and additionality (investment analysis and common practice)* - *Compliance with Laws, Statutes and Other Regulatory Frameworks* - *Carbon ownership and rights* - *Climate change adaptation* - *Risk management* - *SDSs* - *SDGs* - *Special categories* - *Stakeholder engagement and consultation* - *Grouped projects* - *Other GHG projects* - *Double counting avoidance* - *Monitoring plan, including: Management and monitoring proce-dures, Application of tools, QA & QC, Quantification of the Data, Data Source, Application of formulas, Application of Default values, etc.*

Project holder's staff in PSSU and PSTO III: *- PSSU:* *- Martín Aguilar, O&M Leader* *- Sebastián Barrionuevo, Safety, Hygiene and Environment (SHyMA) technician* *- PSTO III:* *- Rafael Escudero, O&M Leader* *- Matías Castro, SHyMA technician*	*- Interviews with relevant personnel to confirm that the operational and data collection procedures are implemented according to the Monitoring Plan* *- Monitored parameters: energy generation, SDSs, SDGs and co-benefits* *- Training* *- Communication and grievance mechanism on site* *- Analysis of operation and measurement records* *- Controls in place to detect and correct any errors or omissions in monitoring parameters* *- Monitoring equipment* *- Etc.*
Local stakeholders: *- PSSU:* *- Hugo David Domínguez, Mayor of Ullum Municipality;* *- Sandra Amaya, Vice-director of Special needs school of Ullum;* *- PSTO III:* *- Diego Ossa, Secretariat of Public Works of Calingasta Municipality;* *- Jorge Gallardo, Director of Technical school of Calingasta* *- Gabriel Oliveras, Teacher, Technical school of Calingasta* *- Marcelo Parodi, Circular entrepreneur, Ullum* *- Project holder's staff:* *Priscila D'Angelo,* *Public affairs*	*- Knowledge about the project* *- Verification of stakeholder consultation and ongoing communications* *- Relationship with the project holder* *- Collaboration of the project holder with the communities* *- Etc.*

3.2.3.3 Findings

KBS applies the rule-based approach aimed at focusing on the fulfillment of the rules determined by the BCR Standard.

Criteria for judging items such as CAR, CL or FAR were as follows:

- *Corrective action request (CAR): the project holder has made mistakes that will influence the ability of the project activity to achieve real, measurable additional emissions reductions, or the BCR Standard's requirements have not been met, or there is a risk that emission reductions cannot be monitored or calculated.*

- *Clarification request (CL): the information is insufficient or not sufficiently clear to determine whether the applicable BCR requirements have been met.*

- *Forward Action Request (FAR): to be raised to highlight issues related to project implementation that require review during subsequent verification of the project activity.*

During the validation and verification period, "Project findings" documents as per KBS templates, were used to submit the validation and verification findings separately to the project holder.

CARs and CLs are to be resolved or closed out if the project holder modifies the PD, rectifies the MR or provides adequate additional explanations or evidence that satisfies the concerns. If this is not completed, the project activity cannot be recommended for registry and issuance under BCR standard.

- *Clarification requests (CLs): 9 Clarification Requests (CL) were raised, 7 from the validation and 2 from the verification. The CLs were closed based on adequate responses from the project holder in compliance with the applicable requirements. The findings were re-assessed prior to formal acceptance and closure. All required changes can be seen in the PD, MR and relevant annexes.*

- *Corrective actions request (CARs): 12 Corrective Action Requests (CARs) were raised, 6 from the validation and 6 from the verification. The CARs were closed based on adequate responses from the project holder, which complied with applicable requirements. The findings were re-evaluated prior to formal acceptance and closure. All required changes can be seen in the PD and relevant annexes.*
- *Forward action request (FARs): No FARs were identified as a validation/verification process.*

In summary, 21 findings were raised in the present joint validation and verification:

- *13 findings from validation: 7 CLs and 6 CARs*

- *8 findings from verification: 2 CLs and 6 CARs*

The table below summarize the findings.

Areas of findings	No. of CL	No. of CAR	No. of FAR
1. Validation			
Project description	CL01	CAR01	-
Project type and eligibility	-	-	-
Grouped project (if applicable)	-	-	-
Other GHG program	-	-	-
Quantification of GHG emission reductions and removals	-	-	-
Start date and quantification period	-	CAR03	-
Quantification of GHG emission reductions and removals	-	CAR05	-
Application of the selected methodology and tools	-	CAR02	-
Project boundary, sources and GHGs	-	-	-
Baseline or reference scenario	-	-	-
Additionality	CL02	CAR04	-
Conservative approach and uncertainty management	-	-	-
Leakage and non- permanence	-	-	-
Monitoring Plan	CL07	-	-
Compliance with applicable legislation	CL03	-	-
Carbon ownership and rights	-	-	-
Risk management	-	-	-
Sustainable development safeguards (SDSs)	CL04	-	-
Stakeholder engagement and consultation	CL05	-	-
Co-benefits (if applicable)	CL06	-	-
Sustainable development goals (SDGs)	-	CAR06	-
Sub-total	**7**	**6**	**0**
2. Verification			
Project and monitoring plan implementation	-	CAR01 CAR04 CAR05	-
Quantification of GHG emission reductions and removals	CL02	CAR06	-
Sustainable development safeguards (SDSs)	-		-
Sustainable Development Goals (SDGs)	CL01		-
Climate change adaptation	-	CAR02	-
Co-benefits (if applicable)	-		-

REDD+ safeguards (if applicable)	-		-
Double counting avoidance	-		-
Stakeholders' Consultation	-	*CAR03*	-
Sub-total	***2***	***6***	***0***
Total	*9*	*12*	*0*

The detailed list of CARs and CLs raised, the responses provided, the means of verification, reasons for their closure and references to correction in the PD and MR are provided in Annex 2.

Upon resolution of the findings, the audit team concluded that the revised PD, MR and spreadsheets are accurate and complete and provide an understanding of the nature of the project, its climate benefits and demonstrates how GHG emission reductions are achieved and monitored in compliance with BCR requirements.

3.3 Audit team

The appointment process of the validation and verification team considers 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 appointed audit team has been qualified according to KBS qualification scheme for validation and verification of BCRs. They have extensive experience in energy projects, relevant social, sustainability and biodiversity knowledge.

The validation and verification team consists of the personnel described in the table below.

Role/ Qualification	***Name***	***Host country experience***	***Scope coverage***	***Technical expertise***	***Financial expertise***	***Activities carried out***
Lead Auditor	*Raul Mitre*	*X*	*X*	*X*	*X*	*Document review, Project findings, support and supervision of auditor*
Auditor, Sectoral Expert, Country Expert	*Adriana Torchelo*	*X*	*X*	*X*	*X*	*Document review, on-site visit, Project findings*
Auditor, Sectoral Expert	*Sofia Castro*		*X*	*X*		*Document review, Project Findings*

Technical Review	M.P. Prasanna		X	X	X	Technical Review
Technical & Certification (T&C)	Margaret Francis		X	X	X	Technical revision and certification
Approver T&C	Rishabh Madan		X	X	X	Approver T&C
Approver	Praveen N URS		X	X	X	Final approval

Annex 1, shows that the team meets the required compliance for validation and verification, and lists the documentation supporting the competencies of the validation and verification team required in the BCR Validation and Verification Manual.

In addition, KBS Certification Services Ltd. confirms that the validation/verification team complies with the requirements of the BCR Anti-Bribery policy detailed in BCR Validation and Verification Manual v2.4 as per their contracts with KBS and the signature of the "Confidentiality/impartiality/association with PP or CME/Availability declaration" by each member of the team.

4 Validation findings

KBS has assessed all issues relevant to the project as demonstrated below in each section. Based on the assessment of the references provided, cross-checking of evidence, interviews and PD information, KBS confirms that the project description is accurate, complete and provides insight into the nature of the project.

4.1 Project description

In accordance with BCR Project Standard v.3.4 and BCR Validation and Verification Manual Greenhouse Gas Projects v.2.4 requirements, the audit team checked through on-site visit, interviews and documents reviews, the accuracy of the project description provided in PD section 2, including, among others: the installed capacities, the technical characteristics of the solar parks, relevant dates, SDG contributions, location, etc.

Solar parks in the Cuyo region is a solar photovoltaic grouped project which Greenfield solar photovoltaic power plants are connected to the SADI and are located in the Cuyo region of Argentina, which includes the provinces of San Juan and Mendoza.

Instance 01 of the grouped project includes PSSU and PSTO III solar parks. PSSU is located in the Ullum Department, Province of San Juan, has a nominal installed capacity of 78 MW and started commercial operation on 30/03/2023. PSTO III is located in the Calingasta

Department, Province of San Juan, has a nominal installed capacity of 60 MW and started commercial operation on 30/12/2023.

The Project operates under the framework of the Argentinean Forward Market of Renewable Energies (MATER, due to its name in Spanish) which allows the commercialization of renewable electricity between private companies, setting their own conditions and without state intervention. Nevertheless, due to constrains of the SADI transmission lines, the Wholesale Electricity Market Administrator Company' (CAMMESA, due to its name in Spanish) makes public calls for renewable energy projects under MATER regime to assign the dispatch priority. PSSU and PSTO III were presented by Genneia to CAMMESA' MATER calls for dispatch priority assignment in the second and fourth quarter of 2021, respectively. CAMMESA awarded dispatch priority to 58 MW of the PSSU and 60 MM of PSTO III.

The project quantification period of GHG emissions reductions is a renewable quantification period of 7 years to be renewed two times for a total length of 21 years.

The estimated average annual amount of GHG emission reductions is 128,988 tCO2e/year and a total of 902,914 tCO2e for the first 7 years GHG reduction quantification period. For the total quantification period of 21 years a total of 2,740,387 tCO2e is estimated (average of 130,495 tCO2e/year).

The project description was verified through the permits from the environmental and energy authorities and the technical description of the project. The following evidence was checked:

- *Solar resource and production report of the Sierras de Ullum 78 MWn photovoltaic plant; ENERTIS; 29/10/2021*
- *Solar resource and production report of the 60MWn Tocota III Photovoltaic Plant; ENERTIS; 11/11/2022*
- *Addendum to the Environmental Impact Statement - Sierras de Ullum Solar Park; Eng. Anahi A. Alvarez; 8/11/2021*
- *Addendum to the Environmental Impact Statement - Tocota III Solar Park; Eng. Anahi A. Alvarez; 26/12/2022*
- *Environmental authorization PSSU; Government of San Juan; RES 1009-SEAyDS-2021*
- *Environmental authorization PSTO III; Government of San Juan; RES 1564-SEAyDS-2024*
- *CAMMESA letter of approval of Commercial Operation Date - Sierras de Ullum Solar Park; RESOL-2022-804-APN-SE#MEC*
- *CAMMESA letter of approval of Commercial Operation Date - Tocota III Solar Park; RESOL-2023-861-APN-SE#MEC.*
- *ENRE authorization of Access to Existing Transport Capacity – Sierras de Ullum; 26/12/2022; https://www.boletinoficial.gob.ar/detalleAviso/primera/278495/20221228*
- *ENRE authorization of Access to Existing Transport Capacity – PSTO III; 24/11/2023; https://www.boletinoficial.gob.ar/detalleAviso/primera/299268/20231128?busqueda=2*
- *MATER Results of Dispatch Priority Assignment; CAMMESA; https://cammesaweb.cammesa.com/mater-resultado-asignacion-prioridad-despacho/*

Furthermore, the solar parks were checked physically during the on-site visit, where it was confirmed the technology, operation as well as their geo-coordinates stated in the PD that were cross-checked with google earth and legal permits and technical documents and it was confirmed they are consistent.

***Validation CL1** was raised to ask the project participant to clarify if all solar parks of the grouped Project activity are and will operate under the framework of the Renewable Energy Electricity Term Market (MATER) scheme and to explain briefly how the MATER operates and to which CAMMESA MATER's calls PSSU and PSTO III were presented and awarded given that it's relevant information for the demonstration of additionality – common practice step.*

*Additionally, **validation CAR01** was raised given that the project holder utilized version 2.3 of the PD template to complete PD v1.0 instead of the latest available version of the PD template version 2.4 and to fill the PD according to the PD template instructions.*

After closure of the findings, the audit team concluded that the PD, which includes the monitoring plan, accurately reflects the proposed project. Additionally, through interviews with key project staff and stakeholders, the audit team confirmed the main objectives of the project activity in line with the description in the PD.

In conclusion, the audit team confirms the project description contained in the PD is accurate and contains complete details of the project activity, including schematics, specifications, and a description of how the project reduces GHG emissions by generating non-conventional renewable energy in line with the requirements and validation rules of the BCR standard and the applicable methodology and tools.

4.2 Project type and eligibility

The audit team checked that the information presented by the project holder in PD Section 1 regarding the scope, project type, project activities and project scale are correctly describe and complies with the conditions established in BCR Standard v3.4 and the Validation and Verification Manual v2.4.

Table 1. Project type and eligibility

Eligibility criteria	***Evaluation by validation/verification body***
Scope of the BCR Standard	- *The following greenhouse gases, included in the Kyoto Protocol: Carbon Dioxide (CO_2), Methane (CH_4) and Nitrous Oxide (N_2O).*

Eligibility criteria	Evaluation by validation/verification body
	- Quantifiable GHG emission reductions generated by the implementation of activities in the energy, transportation and waste sectors. The project consists of Greenfield solar photovoltaic power plants connected to the national electricity system. According to ACM0002, CO_2 emissions from electricity generation in fossil fuel fired power plants that are displaced due to project activity are the main source. KBS confirmed that the project is in line with the scope.
Project type	Activities in the energy sector The project consists of Greenfield solar photovoltaic power plants connected to the national electricity system. KBS confirmed that the project complies with the project type.
Project activity(es)	Grouped solar photovoltaic power plants
Project scale (if applicable)	Large scale All instances of the grouped project involve renewable energy project activities with an output capacity greater than 15 MW. Thus, KBS confirmed the project complies with the project scale.

4.3 Grouped project (if applicable)

The audit team assessed the compliance of the project with the requirements established in section 20.2 of the BCR Standard Version 3.4 regarding grouped projects, as follows:

Requirement	Compliance by Instance 01 (PSSU + PSTO III)	Compliance criterion for future project instances	CAB Assessment
(a) Identify during the	Instance 01 is located within the **Cuyo**	Future project instances (initial and	It has been confirmed during the on-site visit that the

validation process, the geographical area(s) within which (initial and additional) instances of the project are developed and define the criteria for the addition of new cases.	***region boundaries**, specifically in **San Juan Province**, as demonstrated in **Figure 16, Section 2.4 of the PD**. This confirms compliance with the area restriction.*	*future) will be located within the **Cuyo region**, as defined by the geographical boundaries in **Figure 9, Section 2.4 of the PD**. This encompasses the provinces of **San Juan, San Luis and Mendoza**. Any future instance must be inside these geographical boundaries.*	*geographical area encompassing the initial instance (PSSU and PSTO III) is within the Cuyo region which includes the provinces of San Juan or Mendoza and in the PD the project holder has committed to implement any additional instance of the project within the geographical limits of the Cuyo region.* *No discrepancies were found.*
(b) Comply with the guidelines of the BCR Standard, in their most recent version.	*Instance 01 complies with the **BCR Standard**, applying the latest version available at validation. Evidence is included in the PD.*	*All future instances will adhere to the **most recent version of the BCR Standard** at the time of validation/registration.*	*It has been confirmed in the PD that the initial instance (PSSU and PSTO III) complies with BCR Standard current version, and in the PD the project holder has committed to comply with the most recent version of BCR Standard in future instances.* *No discrepancies were found.*
(c) Comply with all the provisions of the BIOCARBON methodological documents they apply, in their latest release.	*Instance 01 complies with the following relevant **BIOCARBON methodological documents** in their latest version at the time of validation: BCR Standard Operating Procedures, BCR SDG Tool, BCR ADC Tool, BCR MRV Tool, BCR SDS Tool, BCR Permanence and Risk Management Tool. Also, this project complies with **other relevant methodological documents** such as: BCR Energy Sector guide for NCRE projects, CDM ACM0002 methodology, and*	*Each future instance will follow the latest applicable BIOCARBON methodological documents and other relevant documents, **following the same procedure as for Instance 01**.*	*It has been confirmed that the initial instances comply with the chosen methodology ACM0002 "Large-scale Consolidated Methodology: Grid-connected electricity generation from renewable sources" (v22.0), as stated in section 4.5.2.2* *The applicability criterion of the methodology must be complied with for inclusion of new instances.* *Furthermore, PP confirmes that all BCR tools will be followed in their latest versions.* *No discrepancies were identified.*

	CDM Tools 01, 05, 07, 23, 24 and 27. Evidence is included throughout the PD.		
(d) Include emission reductions only for validated project activities.	*This PD includes only the emission reductions from the* ***Greenfield Solar Photovoltaic Power Plants PSSU and PSTO III (Instance 01)****, which are* ***connected to the national electricity system,*** *ensuring no unvalidated activities are credited.*	*Emission reductions will only be credited for* ***validated and registered instances****.*	*It has been confirmed the project holder commitment to include emission reductions only for validated project activities (initial and additional instances) as stated in the PD and the CAB confirmed that the Monitoring Report only includes emission reductions for instance 1.* *No discrepancies were found.*
(e) Implement the GHG emission reduction activities described in the validated project document.	*Instance 01 implements the GHG reduction activities as detailed in the PD: The project consists of* ***Greenfield Solar Photovoltaic Power Plants connected to the national electricity system****, with an output capacity* ***greater than 15 MW****.*	*All future instances will implement the* ***GHG emission reduction activities*** *described in the PD (see left column).*	*The project consists of Greenfield solar photovoltaic power plants connected to the national electricity system, with an output capacity greater than 15 MW. It has been confirmed that instance 1 (PSSO and PSTO III) comply with this requirement, as confirmed in the site visit and project specifications. PP has committed for future instances to include emission reductions only for validated project activities as stated in the PD.* *No discrepancies were found.*
(f) Demonstrate that the new instances meet the conditions of applicability described in the methodology applied.	*Instance 01 complies with the* ***applicability conditions of ACM0002*** *(grid-connected renewable electricity generation project). Compliance demonstrated in* ***Section 3.1.1 of the PD****.*	*Future instances will meet* ***applicability conditions*** *defined in the* ***BCR Standard*** *and* ***ACM0002*** *methodology,* ***following the same procedure as for Instance 01****.*	*It has been confirmed that the initial instances comply with the chosen methodology ACM0002 "Large-scale Consolidated Methodology: Grid-connected electricity generation from renewable sources" (v22.0), as stated in section 4.5.2.2 of this document.*

			The applicability criterion of the methodology must be complied with for inclusion of new instances. *No discrepancies were identified.*
(g) Demonstrate that geographic areas (to be included in the project boundaries) in which there are no initial instances are subject to the same baseline scenario conditions and additionality as the areas in which are the initial instances.	*Instance 01 demonstrates compliance as described in* ***Section 3.3 (baseline)*** *and* ***Section 3.4 (additionality)*** *of the PD. These conditions apply equally across the entire Cuyo region.*	*All future instances will rely on the same* ***baseline scenario and additionality assessment than for Instance 01****.*	*It has been confirmed as per ACM0002 v22.0 that for all project instances (greenfield solar photovoltaic power plants connected to the Argentine electricity system) the project baseline scenario is that the 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 CM and this applies equally to all the Cuyo region.* *Furthermore, additionality conditions apply equally to all Cuyo region, as no geographical limitations were identified that could influence the additionality of the BCR Project that was demonstrated by investment analysis and common practice with conditions applicable to all the country (Argentina).* *No discrepancies were found.*
(h) Provide evidence of the start date of activities in the new instances, demonstrating that this date is later than the start date of the GHG emission	*Instance 01 consists of* ***PSSU and PSTO III****, with documented* ***start date on 30 March 2023****, establishing the cut-off date for future instances.*	*Future instances must have* ***start dates after 30 March 2023*** *(the start date of Instance 01 activities).*	*The start date of the present grouped project is 30/03/2023, which is the date when PSSU started commercial operation as per CAMMESA commercial authorization letter. It was also confirmed that PSTO III started to operate after the previous date on 30/12/2023 as also confirmed as per CAMMESA commercial*

reduction activities in the cases included in the validation (initial instances).			*authorization letter. It has been confirmed the project holder commitment, stated in the PD, to implement new instances with start dates of GHG emission reductions later than the starting dates of the two solar parks included in instance 1, i.e. starting dates of new instances must be after 30/12/2023.* *No discrepancies were found.*
(i) The baseline scenario shall be determined for each instance, in accordance with the applicable methodology.	*Instance 01 baseline scenario determined in line with* ***ACM0002*** *methodology (see* ***Section 3.3 of the PD****), and CDM* ***Tool05 v3.0****. GHG Baseline Emissions were calculated following the guidelines and requirements of* ***CDM Tool 07 v7.0****.*	*Each future instance will determine its* ***baseline scenario*** *according to* ***ACM0002*** *methodology,* ***CDM Tool 05*** *and* ***Tool 07****, and* ***following the same procedures as for Instance 01****.*	*It was confirmed that initial instance of the project (PSSU and PSTO III) determined its baseline in line with* ***ACM0002 methodology, CDM Tool 05 and Tool 07****. This complies with what is required in the methodology. The VT assessed all the requirements in Section 4.5.4.* *No discrepancies were found.*
(j) Additionality shall be assessed at the instance level as required by the applicable methodology. Within the eligibility criteria set at the time of registration for the inclusion of new project activity instances, criteria regarding the additionality requirements	*Instance 01 demonstrated* ***additionality at instance level*** *using* ***CDM Tool 01 v7.0*** *for assessing additionality,* ***Tool 23 v03.0*** *for assessing if the project activity was first-of-its-kind,* ***Tool 24 v03.1*** *for assessing common practice and* ***Tool 27 v14.0*** *for applying the investment analysis, as explained in* ***Section 3.4 of the PD****.*	*Additionality will be demonstrated* ***for each future instance*** *at the time of inclusion, following all the CDM Tool 01, Tool23, Tool 24 and Tool 27 requirements and the eligibility criteria defined in* ***Section 3.4 of the PD****.*	*As stated in the PD and validated by the VT, initial instance of the project (PSSU and PSTO III) used TOOL01, v7.0, and TOOL 27 to conduct investment analysis. And Tool 24, v3.1 to conduct the common practice analysis. All tools were appropriately used and were assessed in depth in section 4.5.5 by the VT.* *No discrepancies were found.*

for inclusion shall be defined.			
(k) Confirm that each instance complies with all methodology applied provisions, including the capacity limits set out in the methodologies applicable to the project type.	*Instance 01 complies with* ***all ACM0002 provisions*** *and is classified as a* ***large-scale project*** *with no capacity restriction issues, since Solar Parks of Instance 01 have a total output capacity* ***greater than 15 MW****.*	*All future instances will comply with* ***all provisions of ACM0002*** *and any applicable BCR Standard rules. No capacity limits will be exceeded, as this project type is considered* ***large-scale renewable energy project*** *(see left column).*	*All future instances will comply with* ***all provisions of ACM0002*** *and any applicable BCR Standard rules. Instance 01 complies with this requirement, and all new instances will be large scale projects, above 15 MW to comply with this requirement. No capacity limits will be exceeded, as this project type is considered* ***large-scale renewable****.* *No discrepancies were found.*

Thus, according to the previous assessment based on documents review and interviews, the audit team validated that the Solar Parks in the Cuyo Region project comply with the BCR standard conditions for grouped projects.

4.4 Other GHG program

The audit team performed thorough research on the internet and has found no evidence that the project is registered nor is it applying for registration under any other GHG program, nor has it been rejected by any other GHG program.

The audit team checked the most recognized web sites of voluntary GHG programs and can confirm that there is no similar project identified in the region, with the same type of technology and developed by the same PP. Hence, no double counting of credits is anticipated in the current monitoring period.

The following links were checked on 12/11/2024:

- *https://registry.verra.org/app/search/VCS/All%20Projects*
- *http://cdm.unfccc.int/Projects/projsearch.html*
- *https://registry.goldstandard.org/projects?q=&page=1*
- *https://thereserve2.apx.com/myModule/rpt/myrpt.asp?r=111*
- *https://projects.globalcarboncouncil.com/*
- *https://icapcarbonaction.com/en*
- *https://icapcarbonaction.com/system/files/document/250409_icap_sr25_final.pdf*
- *https://www.goldstandard.org/carbon-market-regulations-tracker*
- *https://www.gov.br/fazenda/pt-br/orgaos/spe/desenvolvimento-economico-sustentavel/sistema-brasileiro-de-comercio-de-emissoes*

Interviews were also done during on site visit. It is confirmed that the project has neither been registered nor seeking registration under any other VCM program nor been rejected.

It can be concluded that no double claiming with emissions VCM programs have been identified.

No errors, omissions, misstatements, or incomplete information have been identified in the description provided in the PD.

4.5 Quantification of GHG emission reductions and removals

During project validation the quantification of GHG emissions reductions was reviewed according to the requirements established in ACM0002 v22.0, applicable tools and the VVM v2.4 based on document review and on-site interviews with the project holders and cross-check with publicly available data.

Based on the above assessment it has been confirmed that the steps, equations and parameters applied in the PD to calculate baseline emissions, project emissions, leakage and emission reductions comply with the requirements of the ACM0002 v22.0 and applicable tools.

The steps taken to assess the emission reductions quantification is below illustrated in detail.

Baseline emissions

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

Where:

BE_y *= Baseline emissions in year y (tCO2/yr)*

$EG_{PJ,y}$ *= Quantity of net electricity generation that is produced and fed into the grid as a result of the implementation of the BCR (CDM) project activity in year y (MWh/yr)*

$EF_{grid,CM,y}$ *= 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" (tCO_2/MWh).*

As per paragraph 59 of ACM0002 v22.0, calculation of quantity of net electricity generation ($EG_{PJ,y}$) shall be calculated as follows:

$EG_{PJ,y} = EG_{facility,y}$

Where:

$EG_{PJ,y}$ = Quantity of net electricity generation that is produced and supplied to the grid as a result of the implementation of the BCR project activity in year y (MWh/yr).

$EG_{facility,y}$ = Quantity of net electricity generation supplied by the project plant/unit to the grid in year y (MWh/yr)

It was confirmed that $EG_{PJ,y}$ values contained in the spreadsheet used for emissions reduction calculation (Baseline Emissions Calculations.xlsx) and in the PD matches with the values from the Solar resource and production report of the Sierras de Ullum 78 MW photovoltaic plant; ENERTIS; 29/10/2021 and Solar resource and production report of the 60MW Tocota III Photovoltaic Plant; ENERTIS; 11/11/2022, which is in line with CDM Guidelines for Reporting and Validation of Plant Load Factors, v01.

TABLE WITH $EG_{PJ,y}$ VALUES FOR THE FIRST 7 YEARS

Power Plant	Year	$EG_{PJ,y}$ (MWh/yr)
PSSU	2023 (30/03 - 31/12)	152,097
	2024	199,646
	2025	198,870
	2026	198,087
	2027	197,301
	2028	196,511
	2029	195,717
	2030 (01/01 – 29/03)	46,994
PSTO III	2023 (30/12 - 31/12)[1]	1,014
	2024	184,571
	2025	184,118
	2026	183,660
	2027	183,196
	2028	182,724
	2029	182,246
	2030 (01/01 – 29/03)	43,822

[1] December 30th is the date when the solar park commenced operations.

The Project Holder also updated the Project Description to consider the generation forecasted of the total 21 years regarding the 2nd and 3rd crediting periods, which is shown in a summary below:

Power Plant	2ndo crediting period	Estimated $EG_{PJ,y}$ (MWh)
PSSU	30/03/2023 to 29/03/2037	1,346,281
PSTO III	30/03/2023 to 29/03/2037	1,260,969

Power Plant	3rd crediting period	Estimated $EG_{PJ,y}$ (MWh)
PSSU	30/03/2037 to 29/03/2044	1,307,462
PSTO III	30/03/2037 to 29/03/2044	1,235,120

The project holder calculated $EF_{grid,CM,y}$ based on the Argentinean Secretariat of Energy "Calculation of the CO2 Emission Factor of the Argentine Electric Power Grid" spreadsheet (https://datos.gob.ar/el/dataset/energia-calculo-factor-emision-co2-red-argentina-energia-electrica) with the latest available data of the electricity system (up to 2023) at the date of validation, using the "Tool to calculate the emission factor for an electricity system" v07.0 as a combined margin (CM), consisting of the combination of operating margin (OM) and build margin (BM) factors, according to the following steps:

Step 1. Identify the relevant electricity systems:

The Argentinean Secretariat of Energy used the Argentinean electricity system (SADI) as the project electricity system, which is operated and maintained by CAMMESA. KBS agreed with this identification done by the PP.

Step 2. Choose whether to include off-grid power plants in the project electricity system (optional).

In step 2, the Argentinean Secretariat of Energy chose option I, only grid power plants are included in the calculation.

Step 3. Select a method to determine the operating margin (OM).

In the step 3, simple OM was chosen to calculate the operating margin emission factor, using ex-ante data vintage taking into account that in Argentina electric system, the low-cost/must-run resources constitute less than 50% of total grid generation in the most recent 5 years (2019 – 2023), hence the Simple OM method can be used as it was verified by KBS by means of reviewing the generation average of the five most recent years. This review allowed the audit team to verify that low-cost/must-run resources constitute less than 50 per cent of total grid generation. Thus, KBS validated this choice.

Step 4. Calculate the operating margin emission factor according to the selected method.

Calculations of OM emission factors were made as illustrated in the PD, which is according to the tool specifications. Since the total amount of fuel and electricity generated in the system is available, option B was chosen to calculate the simple operating margin CO2 emission factor in year y.

Regarding the values used for NCV_i and $EFCO_{2,i,y}$, the audit team verified the truthfulness of the sources used by the Argentinean Secretariat of Energy in the calculation of OM emission factor and it was concluded the information used is traceable, verifiable and credible.

As a result, the calculated ex ante simple OM (2021 – 2023) was 0.447 tCO_2/MWh.

The audit team deemed the obtained value as reliable and credible.

Step 5. Calculate the build margin (BM) emission factor.

In order to calculate the BM emission factor (step 5) option 1 (ex-ante) for the first crediting period was adopted. The BM is calculated based on the most recent information available (2023) on units already built for sample group m at the time of PD submission for validation. The Argentinean Secretariat of Energy took the information from the latest official CAMMESA statistics.

KBS agreed with the data collection used to calculate the BM, hence the BM is confirmed as reliable and credible.

As a result, the ex-ante BM calculated for the year 2023 was 0.086 tCO_2/MWh.

The audit team deemed the obtained value as reliable and credible.

Step 6. Calculate the combined margin (CM) emission factor.

Finally, combined margin was correctly calculated by weighted average method, as it is explained below:

$$EF_{grid,CM,y} = EF_{grid,OM,y} \times W_{OM} + EF_{grid,BM,y} \times W_{BM}$$

Where:

$EF_{grid,OM,y}$= 0.447 tCO_2/MWh

$EF_{grid,BM,y}$= 0.086 tCO_2/MWh

W_{OM}=0.75

W_{BM}=0.25

Obtaining a result for the $EF_{grid,CM,y}$ = 0.357 tCO_2/MWh

Validation CAR05 *was raised to request the correction of the calculation of the ex-ante simple OM as a 3-year generation-weighted average as required in paragraph 42 (a) of TOOL07, V7.0. Additionally, it was requested to include in the PD the reference utilized for* $EG_{PJ,y}$ *of each solar park, and to correct tables 30 and 31 of the PD that illustrated values for a 14 years quantification period not in line with section 11.5 of BCR Standard V3.4.*

After closure of validation CAR05, the audit team confirmed the value included in the spreadsheet used for emission reductions calculation have been corrected and justified adequately.

The audit team confirmed that the values utilized in the spreadsheet used for emission reductions calculation have been justified adequately. Hence, the audit team deemed the obtained value as reliable.

Therefore, the result of the baseline emissions calculated for the first crediting period has been:

TABLE WITH BE_y *VALUES FOR THE FIRST 7 YEARS*

Power Plant	Year	$EG_{PJ,y}$ (MWh/yr)	BE_y (tCO_2/yr)
PSSU	2023 (30/03 - 31/12)	152,097	**54,269**
	2024	199,646	**71,235**
	2025	198,870	**70,958**
	2026	198,087	**70,678**
	2027	197,301	**70,398**
	2028	196,511	**70,116**
	2029	195,717	**69,833**
	2030 (01/01 – 29/03)	46,994	**16,768**
	2023	1,014	**362**

PSTO III	(30/12 - 31/12)[2]		
	2024	184,571	**65,856**
	2025	184,118	**65,694**
	2026	183,660	**65,531**
	2027	183,196	**65,365**
	2028	182,724	**65,197**
	2029	182,246	**65,026**
	2030 (01/01 – 29/03)	43,822	**15,636**
Total		**2,530,573**	**902,914**

To consider the 21 years of crediting period the total forecasted generation and Baseline Emissions of the 2nd and 3rd crediting periods are shown below:

Power Plant	2ndo crediting period	Estimated $EG_{PJ,y}$ (MWh)	BE_y (tCO_2)
PSSU	30/03/2023 to 29/03/2037	1,346,281	480,359
PSTO III	30/03/2023 to 29/03/2037	1,260,969	449,919
Total		**2,670,249**	**930,273**

Power Plant	3rd crediting period	Estimated $EG_{PJ,y}$ (MWh)	BE_y (tCO_2)
PSSU	30/03/2037 to 29/03/2044	1,307,462	466,508
PSTO III	30/03/2037 to 29/03/2044	1,235,120	440,696
Total		**2,542,582**	**907,200**

[2] December 30th is the date when the solar park commenced operations.

The audit team found that the project holder has correctly applied the selected methodology with respect to the baseline emissions calculation. All estimates of the baseline emissions can be replicated using the data and parameter values provided in the PD. Thus, the audit team deemed the obtained ex-ante baseline emissions reliable.

Project emissions

ACM0002 v22.0 considers the project emissions due to the operation of a solar power plant to be neglected.

Therefore, the project emissions are: PE_y = 0 tCO_2e

Leakage

ACM0002 v22.0 considers the leakage due to the operation of a solar power plant to be neglected.

Therefore, leakage emissions are: L_y = 0 tCO_2e

Emission reductions

Emission reductions are calculated according to ACM0002 v22.0 taking into the account the considerations explained above:

$ER_y = BE_y$

Where:

ER_y = Emission reductions in year y (tCO_2e/yr)

BE_y = Baseline emissions in year y (tCO_2/yr)

Thus, the audit team confirms that the applied methodology ACM0002 v22.0 and the referenced tools have been applied correctly to calculate baseline emissions and net GHG emission reductions for the project crediting period.

TABLE WITH ERs FOR THE FIRST 7 YEARS

Year	*GHG emission reductions in the baseline scenario (tCO_2e)*	*GHG emission reductions in the project scenario (tCO_2e)*	*GHG emissions attributable to leakages (tCO_2e)*	*Estimated Net GHG Reduction (tCO_2e)*

2023 (30/03 - 31/12)	54,630	0	0	54,630
2024	137,090	0	0	137,090
2025	136,651	0	0	136,651
2026	136,208	0	0	136,208
2027	135,762	0	0	135,762
2028	135,312	0	0	135,312
2029	134,858	0	0	134,858
2030 (01/01 – 29/03)	32,403	0	0	32,403
Total	902,914	0	0	902,914

As the project has a total length of 21 years, with a quantification period of 7 years renewed twice in accordance with the BCR Standard v3.4 requirements, the total GHG emission reductions expected for the entire project duration are shown below:

Three 7-year quantification periods	Estimated Net GHG Reduction (tCO_2e), after rounding down
FIRST 7 YEARS	902,914
SECOND 7 YEARS	930,273
THIRD 7 YEARS	907,200
Total length of 21 years	**2,740,387**

4.5.1 Start date and quantification period

As previously stated, the start date of the present grouped project is 30/03/2023, which is the date when PSSU started commercial operation as per CAMMESA commercial authorization letter. It was also confirmed that PSTO III started to operate after the previous date on 30/12/2023 as also confirmed as per CAMMESA commercial authorization letter.

Thus, audit team confirmed that the grouped project start date is within the 5 years prior to the start of the validation requirement to certify and register a project under BCR.

Regarding the quantification period, ***validation CAR03*** *was raised since the project's quantification periods and total length stated in PD v1 didn't comply with requirements established at section 11.5 of BCR standard, V3.4*

After closure of validation CAR03, the audit team validated that the project's total length is 21 years, with a quantification period of 7 years renewed twice in line with BCR standard v3.4 requirement.

Additionally, as per the technical lifetime of the solar parks, the project operational lifetime is 30 years according to the technology provider specifications.

After reviewing the supporting documents, the information gathered during the audit process and closure of CAR03, the audit team considers the project start date, quantification period and duration of the project are accurate.

4.5.2 Application of the selected methodology and tools

4.5.2.1 Title and Reference

The following eligible methodology and applicable tools valid at the time of submission of the project for registration were applied:

- *ACM0002 Grid-connected electricity generation from renewable sources, Version 22.0*
- *TOOL01: Tool for the demonstration and assessment of additionality, Version 07.0.0*
- *TOOL05: Baseline, project and/or leakage emissions from electricity consumption and monitoring of electricity generation, Version 03.0*
- *TOOL07: Tool to calculate the emission factor for an electricity system, Version 07.0*
- *TOOL23: Methodological tool: Additionality of first- of-its-kind project activities, Version 03.0*
- *TOOL24: Methodological tool: Common practice, Version 03.1*
- *TOOL27: Methodological tool: Investment analysis, Version 14.0*

Additionally, BCR projects are required to use BCR's tools valid at the time of submission of the project for registration:

- *BCR Standard Version 3.4*
- *BCR Sustainable Development Goals (SDGs) Tool Version 1.0*
- *BCR Avoiding double counting Tool version 2.0*
- *BCR Sustainable Development Safeguards Tool version 1.0*
- *BCR Permanence and risk management Tool Version 1.1*

The audit team confirms the project activity has applied correctly the above mentioned CDM methodology and CDM and BCR tools.

4.5.2.2 Applicability

The project activity complies with the applicability criteria of ACM0002 v22.0 since it is a grid-connected renewable energy power generation project activity that installs Greenfield power plants. The methodology explicitly covers renewable energy electricity generation projects that supply electricity to a grid, with no exclusions relevant to solar PV. The audit team verified this statement, as follows:

Applicability assessment of ACM0002 v.22:

Applicability Conditions	***Means of validation***
This methodology is applicable to grid-connected renewable energy power generation project activities that: *a) Install a Greenfield power plant;* *b) Involve a capacity addition to (an) existing plant(s);* *c) Involve a retrofit of (an) existing operating plants/units;* *d) Involve a rehabilitation of (an) existing plant(s)/unit(s); or* *e) Involve a replacement of (an) existing plant(s)/unit(s).* *f) Install a Greenfield power plant together with a grid-connected Greenfield pumped storage power plant. The greenfield power plant may be directly connected to the PSP or connected to the PSP through the grid.*	*Solar parks in Cuyo region project consists of installation of greenfield solar power plants.* *KBS verified this statement by means of onsite visit and review of environmental impact assessments.*
In case the project activity involves the integration of a BESS, the methodology is applicable to grid-connected renewable energy power generation project activities that:	*Not applicable.* *The project consists of solar power plants with no BESS.* *KBS verified this statement by means of onsite visit and review of environmental*

a) *Integrate BESS with a Greenfield power plant;*
b) *Integrate a BESS together with implementing a capacity addition to (an) existing solar photovoltaic or wind power plant(s)/unit(s);*
c) *Integrate a BESS to (an) existing solar photovoltaic or wind power plant(s)/unit(s) without implementing any other changes to the existing plant(s);*
d) *Integrate a BESS together with implementing a retrofit of (an) existing solar photovoltaic or wind power plant(s)/unit(s).*
e) *Integrate a BESS together with a Greenfield power plant that is operating in coordination with a PSP. The BESS is located at site of the greenfield renewable power plant.*

Table. Combinations of renewable energy technologies and mode of BESS applicable for integration

Renewable Energy Technology / ***Mode of installation of BESS***	***Solar photovoltaic or wind***	***Other renewable technologies***
BESS + (a) Greenfield plant(s)	*Eligible*	*Eligible*
BESS+ capacity addition to existing plant(s)	*Eligible*	*Not eligible*
BESS with no other changes to the existing plant(s)	*Eligible*	*Not eligible*
BESS + retrofit to	*Eligible*	*Not eligible*

impact assessments.

existing plant(s)			
The methodology is applicable under the following conditions: a) Hydro power plant/unit with or without reservoir, wind power plant/unit, geothermal power plant/unit, solar power plant/unit, wave power plant/unit or tidal power plant/unit; b) In the case of capacity additions, retrofits, rehabilitations or replacements (except for wind, solar, wave or tidal power capacity addition projects) 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/unit has been undertaken between the start of this minimum historical reference period and the implementation of the project activity. c) In case of Greenfield project activities applicable under paragraph 5 (a) above, the project participants shall demonstrate that the BESS was an integral part of the design of the renewable energy project activity (e.g. by referring to feasibility studies or investment decision documents); d) The BESS should be charged with electricity generated from the associated renewable energy power plant(s). Only during exigencies may the BESS be charged with electricity from the grid or a fossil fuel electricity generator. In such cases, the corresponding GHG emissions shall be accounted for as project emissions following the requirements			a) Applicable. The project activity consists of solar power plants. b) Not applicable. The project activity consists of Greenfield power plants. c) Not applicable. The project consists of Greenfield power plants with no BESS. d) Not applicable. The project does not have a BESS. e) Not applicable. The project does not involve PSP. KBS verified these statements by means of onsite visit and review of environmental impact assessments.

under section 5.4.4 of the methodology. The charging using the grid or using fossil fuel electricity generator should not amount to more than 2 per cent of the electricity generated by the project renewable energy plant during a monitoring period. During the time periods (e.g. week(s), months(s)) when the BESS consumes more than 2 per cent of the electricity for charging, the project participant shall not be entitled to issuance of the certified emission reductions for the concerned periods of the monitoring period. *e) In case the project activity involves PSP, the PSP shall utilize the electricity generated from the renewable energy power plant(s) that is operating in coordination with the PSP during pumping mode.*	
In case of hydro power plants, one of the following conditions shall apply: *(a) The project activity is implemented in existing single or multiple reservoirs, with no change in the volume of any of the reservoirs; or* *(b) The project activity is implemented in existing single or multiple reservoirs, where the volume of the reservoir(s) is increased and the power density calculated using equation (7), is greater than 4 W/m²; or* *(c) The project activity results in new single or multiple reservoirs and the power density, calculated using equation (7), is greater than 4 W/m²; or* *(d) The project activity is an integrated hydro power project involving multiple reservoirs, where the power density for any of the reservoirs, calculated using equation (7), is lower than or equal to 4 W/m², all of the following conditions shall apply:*	*Not applicable. The project consists of solar power plants.* *KBS verified these statements by means of onsite visit and review of environmental impact assessments.*

(i) The power density calculated using the total installed capacity of the integrated project, as per equation (8), is greater than 4 W/m²; (ii) Water flow between reservoirs is not used by any other hydropower unit which is not a part of the project activity; (iii) Installed capacity of the power plant(s) with power density lower than or equal to 4 W/m² shall be: a. Lower than or equal to 15 MW; and b. Less than 10 per cent of the total installed capacity of integrated hydro power project.	
In the case of integrated hydro power projects, project holder shall: (a) Demonstrate 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; or (b) Provide 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. The purpose of water balance is to demonstrate the requirement of specific combination of reservoirs constructed under CDM project activity for the optimization of power output. This demonstration has to be carried out in the specific scenario of water availability in different seasons to optimize the water flow at the inlet of power units. Therefore, this water balance will take into account seasonal flows from river, tributaries (if any), and rainfall for minimum five years prior to implementation of CDM project activity.	Not applicable. The project consists of solar power plants. KBS verified these statements by means of onsite visit and review of environmental impact assessments.

In the case of PSP, the project participants shall demonstrate in the PDD that the project is not using water which would have been used to generate electricity in the baseline.	*Not applicable. The project consists of solar power plants.* *KBS verified these statements by means of onsite visit and review of environmental impact assessments.*
The methodology is not applicable to: *a) Project activities that involve switching from fossil fuels to renewable energy sources at the site of the project activity, since in this case the baseline may be the continued use of fossil fuels at the site;* *b) Biomass fired power plants/units.*	*Not applicable. The project consists of solar power plants.* *KBS verified these statements by means of onsite visit and review of environmental impact assessments.*
In the case of retrofits, rehabilitations, replacements, or capacity additions, this methodology is only applicable if the most plausible baseline scenario, as a result of the identification of baseline scenario, is "the continuation of the current situation, that is to use the power generation equipment that was already in use prior to the implementation of the project activity and undertaking business as usual maintenance".	*Not applicable. The project consists of Greenfield solar power plants.* *KBS verified these statements by means of onsite visit and review of environmental impact assessments.*
In addition, the applicability conditions included in the tools referred in the methodology.	*KBS assessed the applicability criteria of each applicable TOOL as below illustrated.*

Regarding applicability of tools, ***validation CAR02*** *was raised given that Table 19 of PD v1.0, illustrated the tools applied by the project (Tool 01, Tool 07, Tool 23, Tool 24 and Tool 27) but the list didn't include TOOL05, didn´t state the version of each tool and didn't contain the applicability conditions of each tool and how the project meets each of them.*

The Project holder included in Table 19 the TOOL05 and all corresponding applicability conditions of each tool with corresponding explanations.

TOOL05 was applied to confirm that no baseline or project emissions from fuel combustion occur, and that leakage is not applicable to solar PV projects. Monitoring parameters are limited to electricity generation, which is consistent with the requirements of the tool.

Applicability assessment of Tool 05, v.03.0 is shown below:

Applicability Conditions	***Means of validation***

TOOL05 v3.0: Tool to calculate baseline, project and/or leakage emissions from electricity consumption *<u>Applicability conditions</u>:* *If emissions are calculated for electricity consumption, the tool is only applicable if one out of the following three scenarios applies to the sources of electricity consumption:* *(a) Scenario A: Electricity consumption from the grid.* *(b) Scenario B: Electricity consumption from (an) off-grid fossil fuel fired captive power plant(s).* *(c) Scenario C: Electricity consumption from the grid and (a) fossil fuel fired captive power plant(s).*	*This first applicability condition is not applicable as this grouped project does not calculate emissions from electricity consumption since it is an electricity generation project.* *KBS verified these statements by means of onsite visit and technical specifications of the Project.*
This tool can be referred to in methodologies to provide procedures to monitor amount of electricity generated in the project scenario, only if one out of the following three project scenarios applies to the recipient of the electricity generated: *(a) Scenario I: Electricity is supplied to the grid;* *(b) Scenario II: Electricity is supplied to consumers/electricity consuming facilities; or* *(c) Scenario III: Electricity is supplied to the grid and consumers/electricity consuming facilities.*	*This tool is used because it is referenced by methodology ACM002 v22.0 (paragraph 83) concerning the procedures for monitoring the amount of electricity generated in the project scenario. In this case the Project corresponds to Scenario I: electricity is supplied to the grid.* *In this regard, the applicability condition is met. KBS verified this statement by means of onsite visit and technical specifications of the Project.*
This tool is not applicable in cases where captive renewable power generation technologies are installed to provide electricity in the project activity, in the baseline scenario or to sources of leakage. The tool only accounts for CO2 emissions.	*The Project does not use captive renewable power generation technologies. Hence this Project is applicable.* *KBS verified this statement by means of onsite visit and technical specifications of the Project.*

TOOL07 was applied to calculate the grid emission factor for displaced electricity. The emission factor was calculated based on official grid statistics and applied in accordance with the tool.

Applicability assessment of Tool 07, v 07.0 is shown below:

Applicability Conditions	***Means of validation***
TOOL07 v7.0: Tool to calculate the emission factor for an electricity system *Applicability conditions:* *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).*	*This tool was applied to estimate OM, BM, and CM when calculating baseline emissions, as the project activity generates solar photovoltaic energy that is injected into the grid and displaces electricity from the grid's margin.* *KBS verified this statement by means of onsite visit and technical specifications of the Project.*
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.	*The spatial extent of the proposed project activity is defined as the interconnected Argentine electricity grid, namely the "Sistema Argentino de Interconexión" (SADI), within which the wholesale electricity market (Mercado Eléctrico Mayorista, MEM) operates. Consequently, off-grid power plants are excluded since they are not subject to MEM rules, and therefore, option IIa and option IIb of this tool will not be used.* *KBS verified this statement by means of onsite visit and technical specifications of the Project.*
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.	*This grouped project meets this condition, as it is developed in Argentina, which is*

	not an Annex I country[3]. This was confirmed by the audit team,
Under this tool, the value applied to the CO2 emission factor of biofuels is zero.	*Not applicable, since no biofuels are involved in this project activity, the CO2 emission factor for biofuels will not be used. KBS verified this statement by means of onsite visit and* technical specifications of the Project.

Through an exhaustive review and cross-checking and closure of CAR02, the audit team corroborated that the selected methodology and tools are applicable to the project activity and were correctly justified and applied with respect to the following: Project boundaries, baseline identification, formulas for determining emission reductions, additionality, methodologies employed and monitoring.

Given that the project is a greenfield solar PV facility, no additional historical or baseline project data were required.

The audit team confirmed the absence of fossil fuel use, combustion emissions, or other leakage sources.

Applicability criteria were checked against the project´s design as established in the PDD, which clearly demonstrate compliance.

The audit team confirms that ACM0002, and all of its corresponding tools were applied in their entirety, without omission of parameters, equations, or procedures as required by the BCR Standard.

4.5.2.3 Methodology deviations (if applicable)

The audit team verified that the project is fully in accordance with ACM0002 v22.0 and hence deviation of methodology is not applicable.

[3] *Annex I countries are available in the following link.*

4.5.3 Project boundary, sources and GHGs

In accordance with ACM0002 v22.0, the project boundary includes the project power plant/unit and all power plants/units connected physically to the electricity system that the BCR project power plant is connected to.

This statement was verified by the audit team by means of on-site inspection and documental review of technical description and the SADI map.

The sources of GHG identified in the PD are deemed to be appropriate.

	GHG involved	***Means of Validation***
Baseline emissions	*CO_2*	*Emissions from the generation of electrical power by fossil power plants in Argentinean Interconnected Power System.*
Project emissions	-	*Considered to be neglected as per ACM0002 v22.0*
Leakage	-	*Considered to be neglected as per ACM0002 v22.0*

In accordance with the project activity nature and the applied methodology, the emission sources are properly described in the PD. The GHG emissions occurring within the project boundary as a result of its implementation are all addressed by the applied methodology. Thus, there are not GHGs emissions within the project boundary caused by the implementation of the project activity which contribute to more than 1% of the expected annual emission reductions and which are not addressed in by the applied methodology. This was verified by Kthe audit team by means of the documental review of the project.

4.5.3.1 Eligible areas in the GHG project boundaries (for AFOLU projects)

Not applicable.

4.5.4 Baseline or reference scenario

The project activity comprises the installation of Greenfield grid-connected solar power plants in the Cuyo region in Argentina.

As described in Section 4.5.2.2 of this report, the audit team has confirmed that all applicability conditions of ACM0002 v22.0 are satisfied for the proposed project activity.

Therefore, as per paragraph 27 of ACM0002 v22.0, the baseline scenario for such greenfield renewable electricity generation projects is the electricity delivered to the grid by the project activity that 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" (TOOL07 v7.0).The relevant grid is the Argentinean National Interconnected Electricity System (SADI).

While ACM0002 v22.0 defines the baseline scenario in a prescriptive manner, the audit team performed a detailed assessment in line with ISO 14064-3:2019, the BCR Standard, and the VVM to ensure that the scenario is transparently justified and supported by adequate evidence. The assessment addressed the following:

a) Assumptions, methods, parameters, and data sources:
- *Verified that the Combined Margin (CM) approach was applied as per Tool 07 v7.0, as required by ACM0002 v22.0, using official data from the Argentine Secretariat of Energy from information from the latest official CAMMESA as the source of grid emission factor data and IPCCC sources.*
- *Cross-checked that the parameters and equations applied in the PD match the specifications of Tool 07 v7.0.*
- *Confirmed transparency and appropriateness of data sources (national statistics, official grid generation mix, and operational data).*

b) Uncertainty and conservativeness:
- *Assessed whether uncertainty in emission factor calculation was addressed.*
- *Confirmed that conservative assumptions were applied in line with the guidance of Tool 07 (e.g., application of lower confidence factors and the combined margin calculation procedures).*

c) Relevant national and sectoral policies:
- *Reviewed Argentina's renewable energy promotion policies (e.g., RenovAr and MATER schemes and national targets under Law 27.191) and the National Plan for Climate Change Adaptation and Mitigation (PNAyMCC).*
- *Confirmed that no existing policies invalidate or change the applicability of ACM0002 for this project activity.*
- *Verified that sectoral circumstances (ongoing grid expansion and renewable penetration in SADI) were taken into account in the project justification.*

d) Consistency of baseline identification procedures:
- *Confirmed that the procedures for baseline identification are consistent with ACM0002 v22.0 requirements and aligned with emission factors, activity data, and projection variables of grid GHG emissions.*
- *Verified traceability of data used for the baseline calculations.*

e) Data quality assurance (ISO 14064-2):
- *Verified that procedures to ensure data quality, transparency, accuracy, and consistency were implemented.*
- *Confirmed that all sources, calculations, and emission factors are documented, traceable, and reproducible.*

Based on the applicability conditions already demonstrated in Section 4.5.2.2 and the assessment above, the validation team concludes that the baseline scenario has been correctly identified and justified according to ACM0002 v22.0, the BCR Standard, and ISO 14064-3:2019..

4.5.5 Additionality

In line with BCR Standard and the Baseline and Additionality Guidance, project additionality has been demonstrated considering the requirements of ACM0002 v22.0. According to it, additionality shall be demonstrated as per CDM TOOL01. Also, TOOL 27 was used to conduct investment analysis.

The audit team reviewed in detail the investment analysis done by the project holder, as this is fundamental to demonstrate the additionality of the project. The analysis was checked for correctness of the IRR calculation, traceability of the data and parameters and the correct variation application of the relevant variables done for the sensitivity analysis. The auditor checked that the investment analysis was done as per the applied tools and applied methodology.

Furthermore, the relevant parameters applied in the investment analysis were checked to confirm those are supported by relevant evidence and cross-checked the applied values versus values from studies of the sector.

The auditor assessment of additionality analysis was done following the step approach of the applied TOOL 01, as follows:

Step 0: Demonstration whether the proposed project activity is the first-of-its-kind.

It was confirmed the project is not the first-of-its-kind since by the time of the project start date there were already in Argentina various solar photovoltaic power plants operational according to CAMMESA's data on installed capacity contained in base data for monthly reports publicly available (https://cammesaweb.cammesa.com/informe-sintesis-mensual/)

Step 1: Identification of alternatives to the project activity consistent with current laws and regulations.

Sub-step 1a (Define alternatives to the project activity):

The project holder identified 2 possible alternatives,

Alternative Scenario 1 (AS1): The proposed project activity undertaken without being registered as a BCR project activity.

Alternative Scenario 2 (AS2): Continuation of the current situation (no project activity or other alternatives undertaken, e.g. thermal power plants), i.e., the electricity that is delivered to the grid by the project activity in the project scenario is generated by the operation of grid-

connected power plants and by the addition of new generation sources in this scenario, which represents the baseline scenario.

The auditor checked the possibility of other realistic scenarios and confirmed that the area of the project is an area with potential for solar parks development due to the solar resource potential. That fact doesn't make the same suitable for other kind of project that could be implemented by the project holder.

The auditor confirmed during the on-site visit that alternative 1 (implementation of the project without participation in the carbon market) is realistic because solar parks are being developed in the host country, and alternative 2 is also realistic as it represents the pre-project situation and baseline scenario.

Sub-step 1b (consistency with mandatory laws and regulations): the auditor confirmed there is no regulation in Argentina that prohibits the development of solar parks or that limits the operation of power plants of other technologies.

In this regard, the most relevant national laws and regulations pertaining power generation in Argentina are:

- Law N° 24,065 "Electric Energy Regime" and its Decree N°1,398/92 that establish the rules for power generation projects and do not require any specific energy source or technology for power generation.

- Environmental legal requirements: the environmental matters in Argentina are jurisdiction of the Provincial Governments. The governments of the provinces of San Juan and Mendoza where the grouped project is located do not require and do not restrict any type of power plant or energy source. Also, the environmental legal requirements in all the other Argentine provinces do not restrict any type of power plant.

Based on this analysis, the auditor confirmed there is no regulation in Argentina that prohibits the development of solar parks or that limits the operation of power plants of other technologies. Thus, the alternative scenarios comply with Argentine regulations.

Step 2 Investment analysis

***Validation CAR4** was raised to request revision and correction of the following items of the investment analysis: definition of the dates of the investment decision and point of no return of each solar park; provision of complete reference documents for each input value utilized in the investment analysis; correction of the project energy generation values in the investment analysis spreadsheet to match with the baseline emission calculations and the reference reports of solar resource and production; review of the investment analysis length and depreciation as per the project technical lifetime; justification of the declining of the energy price after the project 10 first years; inclusion of a list of all input values, the date of the reference and the name of the reference in the investment analysis spreadsheet and/or*

the PD for transparency; correction of the inflation rate value according to TOOL27 requirements; and inclusion in the sensitivity analysis of variations in the Capex and energy price and vary each parameter (energy produced, Opex, Capex, energy price) to achieve benchmark and describe in the PD the likelihood of each variation.

Sub-step 2a. Determine appropriate analysis method

The project activity generates financial and economic benefits other than carbon credits related income. Thus, simple cost analysis (Option I) cannot be applied. Thus, according to the tool, the investment comparison analysis (Option II) or the benchmark analysis (Option III) has to be used. As per on-site visit and confirmation with the project holder there is no alternatives to compare the investment for the project holder. Thus, benchmark analysis (Option III) has been chosen.

Sub-step 2b. Option III. Benchmark analysis

For the investment analysis the project holder applied TOOL 27 Investment analysis.

In accordance with TOOL 27 the IRR (after tax) has been selected as financial indicator and the WACC has been used as a market benchmark.

As per TOOL 27, project holder selected the cost of equity (re) from the default value for the expected return on equity post-tax, in real terms, for energy industries projects (Group 1) in Argentina provided in the Appendix of the tool:

$r_e = 24.01\%$.

Since this value was calculated in real terms, it was converted to nominal terms to determine the final cost of equity

$$\textbf{Nominal cost of equity } (r_e) = (1 + r_{eR}) * (1 + IR) - 1$$

Where:

r_{eR} = *Cost of equity in real terms (-)*

IR = Inflation rate (-)

Solar Park	r_e	***Reference***
PSSU	*0.2875*	*The average forecasted inflation rate for the United States, as published by the IMF (International Monetary Fund World Economic Outlook) for the period 2022 to 2026, was used, with a value of 3.82% (file "Inflation Rate IMF.xlsx" available to the VT). This inflation rate*

		was determined in accordance with paragraph 17 of TOOL27.
PSTO III	*0.2728*	*The average forecasted inflation rate for the United States, as published by the IMF (International Monetary Fund World Economic Outlook) for the period 2023 to 2027, was used, with a value of 2.64% (file "Inflation Rate IMF.xlsx" available to the VT). This inflation rate was determined in accordance with paragraph 17 of TOOL27,*

The cost of debt (rd) was also determined by the project holder following TOOL 27. In this regard, according to paragraph 25 of TOOL27, if the benchmark is based on parameters that are standard in the market, the cost of debt should be 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. In compliance with this, the cost of debt was determined by the project holder based on an average of the dollarized commercial international lending rates of Argentina obtained from the "Banco Central de la República Argentina"), valid by the time of the investment decision in each solar park, which represents a national benchmark for the market's cost of debt. The applied values are as follows:

Solar Park	r_d	***Reference***
PSSU	*4.89%*	*Average dollarized international commercial lending rates for Argentina in August 2021 (the month preceding the investment decision in September 2021); Banco Central de la República Argentina.*
PSTO III	*5.31%*	*Average dollarized international commercial lending rates for Argentina in August 2022 (the month preceding the investment decision in September 2022) - Banco Central de la República Argentina.*

For the proportion of financing that are equity and debt, according to paragraph 27 of TOOL27 information about financial structure of companies in the Argentine energy sector was used. The project holder utilized an average of debt/equity finance structure using financial information from Argentine energy companies (Pampa Energía Soluciones S.A., Aluar Aluminio Argentino S.A.I.C, 360 Energy Solar S.A. and YPF Energía Eléctrica S.A.). The sources gathered to obtain this information were the Financial Statements of the companies from date valid at the time of the project investment decision publicly available. The auditor verified the sources and calculations and found them accurate. The resulting proportions of equity and debt financing were:

Solar Park	w_e	w_d	Reference
PSSU	42.62%	57.38%	"Estados Financieros al 31 de diciembre de 2020 de Pampa Energía Soluciones SA.pdf" (Page 5) Estados Financieros al 31 de diciembre de 2020 de Aluar SAIC.pdf (Page 4) "Estados Financieros al 31 de diciembre de 2020 de 360 Energy Solar SA.pdf" (Page 9) "Estados Financieros al 31 de diciembre de 2020 y 2021 de YPF Energía Eléctrica SA.pdf" (Page 46)
PSTO III	48.67%	51.33%	"Estados Financieros al 31 de diciembre de 2021 de Pampa Energía Soluciones SA.pdf" (Page 5) Estados Financieros al 31 de diciembre de 2021 de Aluar SAIC.pdf (Page 4) "Estados Financieros al 31 de diciembre de 2021 de 360 Energy Solar SA.pdf" (Page 11) "Estados Financieros al 31 de diciembre de 2020 y 2021 de YPF Energía Eléctrica SA.pdf" (Page 46)

For the corporate tax rate, the value of the income tax in Argentina is 35% as stated in Argentine Law 27,430.

As per paragraph 16 of the TOOL 27 local commercial lending rates or WACC are appropriate benchmarks for a project IRR. Required/expected returns on equity are appropriate benchmarks for an equity IRR. Benchmarks supplied by relevant national authorities are also appropriate. The project holder decided to use the WACC as benchmark for the project IRR, which was calculated as follows:

$$WACC = r_e \times w_e + r_d \times w_d \times (1 - Tc)$$

Where:
r_e = *Cost of equity (-)*
w_e = *Percentage of financing that is equity (-)*
r_d = *Cost of debt (-)*
w_d = *Percentage of financing that is debt (-)*
Tc = Corporate tax rate (-)

The resulting WACC for each solar park is:

Solar Park	WACC	Reference
PSSU	14.08%	Calculated and Checked in Investment Analysis – Base 0
PSTO III	15.05%	Calculated and Checked in Investment Analysis – Base 0

The audit team checked the correct application of the formula, as per TOOL 27 in Investment analysis spreadsheet. Additionally, the audit team checked other references to cross-check whether the calculated WACC is appropriate. The checked sources were:

- Low-Cost Finance for the Energy Transition, IRENA, 2023, https://powermin.gov.in/sites/default/files/uploads/Low_Cost_Finance_for_Energy_Transitio n.pdf
- Estimation of the capital cost rate for renewable energy projects in Latin America https://sedici.unlp.edu.ar/handle/10915/154238

As per the first source the WACC was 13.8% for onshore wind projects in Argentina. As per the second source the WACC was 23.01% in general for renewable energy projects in Argentina. Thus, it can be confirmed that the applied WACC by the project holder was not overestimated, and it is considered appropriate by the audit team.

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

The assessment of the parameter applied for the financial analysis is provided in the following tables for each of the solar parks of instance 1:

PSSU

FA Input Parameters	–Unit	Value	Evidence assessed by the auditor
Date of the investment decision taken by the project participant	Date	30/09/2021	Corresponding to the approval of the Base 0 Date (BoD), as indicated in the file "BoD – PSSU.pdf
Project Technical Lifetime	Years	25	Based on the linear performance warranty given by JINKO (provider of solar panels).
Net Energy Generation	GWh	200.42	Energy generation was forecasted based on a P50 assessment. This analysis is part of a solar resource assessment conducted by a qualified third party (ENERTIS) contracted by Genneia for this purpose. Checked and found consistent and correct.
Energy price	US$/MWh	63.85	The higher tariff between January 2021 and August 2021 obtained from Economic Transaction Documents (DTEs) generated by CAMMESA and available only to MEM agents (Genneia is one of them). It was checked and found correct. Also, this represents a higher value that the real average contracted price for the Project (60.4 US$/MWh), which make it a conservative value.
Production Degradation	%	0.40	Based on the solar resource assessment conducted by ENERTIS.
Capex	MUS$	-68.87	Based on market CAPEX values reported for year 2020 by the International Renewable Energy Agency (IRENA) this represents USD 883/KW which as value 13% lower than 2019. However, the PP also presented the analysis done with quotations received for expenses related to equipment (panels, trackers, inverters and TCs, cables, transportation, 33kV cells,

			control systems, meteorological station, SOTR), construction works (electrical, mechanical, civil, and for O&M), and other related costs, which was 59.96 MUS$ (representing approx. 80% of the total CAPEX), even with this more conservative value more than 20% lower than the one originally used, the Auditor checked the analysis and it was still below the benchmark. Also, the auditor compared it with CAPEX real values which is also higher than the obtained CAPEX with quotations, hence determining that Project´s real additionality.
Opex	*MUS$*	*-1.53*	*Based on the Opex of another Genneia solar park -Ullum I- which was operating at the time of the investment decision. This was checked and found correct. Even though this was the base for the calculation, the OPEX used was 15% less (detailed calculations provided in shared emails), hence more conservative, as leads to a higher IRR. Also, the Auditor compared it with the real OPEX value during the projects operation and the value used in the calculations was 20% lower, which means the IRR was higher than in reality, hence more conservative in order to evaluate the additionality.*
Opex anual adj. (Inflation rate)	*%*	*3.82*	*Average forecasted inflation rate for the United States, as published by the IMF (International Monetary Fund World Economic Outlook) for the period 2022 to 2026.*
Turnover Tax & Other	*%*	*1.50*	*Based on Ley 2188-I - 2021 from the Province of San Juan, Argentina.*
Debit & Credit Tax	*%*	*0.60*	*Based on Ley N° 25.413 from Argentina.*
Income Tax	*%*	*35.00*	*Based on Ley N° 27.430 from Argentina.*

PSTO III

FA Input Parameters	***–Unit***	***Value***	***Evidence assessed by the auditor***
Date of the investment decision taken by the project participant	*Date*	*29/09/2022*	*Corresponding to the approval of the Base 0 Date (BoD), as indicated in the file "BoD – PSSU.pdf*
Project Technical Lifetime	*Years*	*25*	*Based on the linear performance warranty given by JINKO (provider of solar panels).*
Net Energy Generation	*GWh*	*185.02*	*Energy generation was forecasted based on a P50 assessment. This analysis is part of a solar resource assessment conducted by a qualified third party (ENERTIS) contracted by Genneia for this purpose. Checked and found consistent and correct.*

Energy price	*US$/MWh*	*62*	*Higher tariff between January 2022 and August 2022 obtained from Economic Transaction Documents (DTEs) generated by CAMMESA and available only to MEM agents (Genneia is one of them). It was checked and found correct. Also, this represents a higher value that the real average contracted price for the Project (60.4 US$/MWh), which make it a conservative value.*
Production Degradation	*%*	*0.40*	*Based on the solar resource assessment conducted by ENERTIS.*
Capex	*MUS$*	*-51.42*	*Based on market CAPEX values reported for year 2020 by the International Renewable Energy Agency (IRENA) this represents USD 883/KW which as value 13% lower than 2019. However, the PP also presented the analysis done with quotations received for expenses related to equipment (panels, trackers, inverters and TCs, cables, transportation, 33kV cells, control systems, meteorological station, SOTR), construction works (electrical, mechanical, civil, and for O&M), and other related costs, which was 59.96 MUS$ (representing approx. 80% of the total CAPEX), even with this more conservative value more than 20% lower than the one originally used, the Auditor checked the analysis and it was still below the benchmark. Also, the auditor compared it with CAPEX real values which is also higher than the obtained CAPEX with quotations, hence determining that Project´s real additionality.*
Opex	*MUS$*	*-1.49*	*Based on the Opex of another Genneia solar park -Ullum I- which was operating at the time of the investment decision. This was checked and found correct. Even though there were other detailed calculations shared by email, the PP adopted the most conservative approach, that was using the total Opex derived from a linear extrapolation from Ullum I´s data based on power ratings, as leads to a higher IRR. In this case the Auditor compared it with the real OPEX value during the projects operation and the value used in the calculations was 0.5% lower, which confirms that the project is additional.*
Opex anual adj. (Inflation rate)	*%*	*2.64*	*Average forecasted inflation rate for the United States, as published by the IMF (International Monetary Fund World*

			Economic Outlook) for the period 2023 to 2027.
Turnover Tax & Other	%	1.50	Based on Ley 2188-I - 2021 from the Province of San Juan, Argentina.
Debit & Credit Tax	%	0.60	Based on Ley N° 25.413 from Argentina.
Income Tax	%	35.00	Based on Ley N° 27.430 from Argentina.

CAR 4 was raised and successfully closed. See Anex II.

As a result of applying the above values in the investment analysis, the project IRR of each solar park of instance 1 was:

Post-tax project IRR for PSSU = 9.01%
Post-tax project IRR for PSTO III = 10.89%

The audit team reviewed the correct IRR calculations. The calculations are traceable and correct.

Sub-step 2d. Sensitivity analysis
In accordance with paragraphs 28-29 of the TOOL 27 a sensitivity analysis has to be conducted by applyingreasonable variations to the initial investment and project revenues and cost that constitute 20% of either the project cost or revenues. A variation should at least cover a range from - 10% to +10%.
The project holder provided the sensitivity analysis as per required by the TOOL 27 in the Investment analysis spreadsheet, applying variations to 4 parameters: CAPEX, Energy tariff, load factor and OPEX. The results of the variation are above illustrated:

PSSU - Table as per Investment analysis – Base 0

Parameter	***Variation***	***Project IRR***
Investment (Capex)	*-10%*	*10.19%*
Electricity price	*+10%*	*10.14%*
Net electricity generation (Capacity Factor)	*+10%*	*10.14%*
Opex	*-10%*	*9.22%*

The obtained variations which would make the project profitable (IRR 14.08%) are:

CAPEX: - 33.7% (45.7MUS$)

Electricity price: +48.5% (94.8 US$/MWh)

Net electricity generation (Capacity Factor): +48.5% (297.6 GWh)

OPEX, (no change makes the project profitable)

PSTO III - Table as per Investment analysis – Base 0

Parameter	***Variation***	***Project IRR***

Investment (Capex)	-10%	12.54%
Electricity price	+10%	12.27%
Net electricity generation (Capacity Factor)	+10%	12.27%
Opex	-10%	11.26%

The obtained variations which would make the project profitable (IRR 15.05%) are:

CAPEX: - 25.35% (38.4MUS$)

Electricity price: +34% (83 US$/MWh)

Net electricity generation (Capacity Factor): +34% (247.9 GWh)

OPEX, (no change makes the project profitable)

The variation of 10% for the sensitivity analysis was selected by the project holder only as the starting point of the analysis following the TOOL 27 recommendation. Nonetheless, the project holder was beyond and performed an analysis to determine the variation limits that will turn the project into a profitable investment. As above illustrated, the variations needed to achieve benchmark are very high, and not within market ranges.

Furthermore, the auditor analyzed the expected variation as per the available references:

- *CAPEX: when comparing the project CAPEX/MWh (883 USD/KW) based in the reference (Renewable power generation cost in 2020, Renewable Power Generation costs in 2020 Report page 71) with other sources such as data from IRENA in 2019 from "Solar Business Hub", stating a total installed cost of approx. 995 USD/KW, the Project is more conservative. Furthermore, in Argentina, specific data indicates that in 2020, the installed cost for utility-scale solar PV projects was about USD 1,200 per kW[4]. This figure is higher than the global average for that year, and represents a variation of +35% from the Project´s CAPEX, hence the value used by the Project developer is very conservative.*
- *ELECTRICITY PRICE: When comparing the project electricity price (63.85 USD/MWh) which is the highest tariff among all PPA´s signed in the decision year vs. the mean value of PPA prices (60.4 USD/MWh) for April 2025, that is the latest information available from PPAs signed by Genneia SA., an upper variation is difficult to be plausible as it is already a highest tariff. Thus, the Project used a conservative value and is not likely to obtain the variation required to reach the benchmark as stated above.*
- *NET ELECTRICITY GENERATION (CAPACITY FACTOR): When comparing the project PLF (29.34% for PSSU and 25% for PSTO III) vs. the reference (Renewable power generation cost in 2022, IRENA, 2023) (between 15% to 25%) a variation of +10%*

[4] https://www.statista.com/statistics/1301953/argentina-cost-of-electricity-utlity-scale-solar-by-component/

variation is very conservative as it is already high as per market standards hence much more conservative.

- *OPEX: When comparing the project OPEX (PSSU: 1,592,491 and PSTO III: 1,592,491 USD/MW/year) vs. the references NREL Transforming Energy[5] (23,000 USD/MW/year in 2020 and 24,000 USD/MW/year in 2022) corresponding to 1,794,000 for PSSU and 1,440,000 for PSTO III). For PSSU is more conservative as the value used is less than the referenced value. Regarding PSTO III a a variation with +9% is found. So the -10% variation is considered conservative.*

Outcome of Step 2: After closure of CAR4, it was concluded that the proposed component project activity doesn't reach the benchmark in any of the possible circumstances, hence is unlikely to be financially/economically attractive.

Step 3: Barrier Analysis

No barrier analysis was used. It is not mandatory when financial analysis is used.

Step 4: Common practice analysis

The auditor checked the common practice analysis as required by the TOOL 01, following the step approach provided in the TOOL 24 version 3.1.

***Validation CL02** was raised to request the project holder to provide further information and description about "Electricity Supply Program from Renewable Sources " or "RenovAR" and the Renewable Energy Electricity Term Market or "MATER" schemes, including the periods when each of them operated to clarify why it has been concluded that this represents a different investment climate on the dates of the investment decision of each solar park.*

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

Solar Park	**Installed capacity (MW)**	**-50%**	**+50%**
PSSU	*78*	*39*	*117*
PSTO III	*60*	*30*	*90*

[5] *https://atb.nrel.gov/electricity/2023/residential_battery_storage/utility-scale_pv?utm_source=chatgpt.com*

Step 2: identify similar projects (both CDM and non-CDM) which fulfil all the conditions stated in the TOOL 24

For this step the project holder provided the following official sources:

- *CAMMESA monthly reports: https://cammesaweb.cammesa.com/informe-sintesis-mensual/*
- *Renovar Program power plants: https://public.tableau.com/app/profile/datosenergia/viz/AdjudicacionesRenovARMINEMArgentina/AdjudicacionesRenovArArgentina*

Specifically, the database file "BASE_INFORME_MENSUAL.zip" was downloaded, and the spreadsheet "Potencia instalada.xlsx," located within the "Bases_Oferta_INFORME_MENSUAL" folder, was used. This file served as the basis for filtering data according to common practice criteria, resulting in the Excel files: "PSSU - Potencias Instaladas CAMMESA.xlsx" and "PSTO III - Potencias Instaladas CAMMESA.xlsx.", that were provided to the VT and which were used to generate the tables included in this section. This information was checked and confirmed by the auditor, no discrepancies were found.

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}.

The result of this step was:

Nall = 8 for PSSU

Nall = 3 for PSTO III

The auditor confirmed the information of this step by means of accessing the websites of CDM, Gold Standard, VCS, CERCARBONO, GCC, CSA GHG Clean projects registry, Climate Action Reserve, among others, to verify if the registered project activities, project activities submitted for registration and project activities undergoing validation were excluded. It was verified that the information provided by the project holder is traceable, reliable and credible.

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, Ndiff.

The project holder obtained the Ndiff values for each solar park by identifying those plants which technology is different to the technology used by this grouped project according to the definitions of TOOL24 v03.1. as follows:

The project uses solar photovoltaic energy as the source of power generation but is part of the " Electricity Supply Program from Renewable Sources " or "RenovAR". This is defined according to paragraph 12 (d)(ii) of Tool 24 v03.1, as projects awarded in RenovAR have a different investment climate than this grouped solar project, which involves Private Power Purchase Agreements (PPAs) made under the Renewable Energy Electricity Term Market or "MATER" regime, for both PSSU and PSTO III.

The difference lies in that MATER involves higher financial risk than RenovAR due to the absence of state-backed guarantees; risks associated with not having secured grid dispatch; and the lack of a subsidized tariff, which results in a reliance on market conditions. Consequently, the difference between RenovAR and MATER in terms of investment climate can be summarized as follows:

- ***12(d)(ii):** RenovAR features a higher energy price because it is subsidized as part of the program, whereas MATER does not include such subsidies since the energy price is determined through an agreement between the energy generator and a private buyer.*

- ***12(d)(iii):** In the case of MATER, the promotional aspect lies in Law 27,191, which requires large energy users to obtain 20% of their energy from renewable sources; one option to meet this requirement is to purchase energy through MATER contracts.*

- ***12(d)(iv):** Both regimes have their own terms and conditions for inclusion and exclusion. The footnotes in Section 2 of the PD provide detailed information on the operation of each regime, including the legal requirements for participation.*

The above statement and evidences were checked by the auditor and found correct.

According to the above analysis, as per calculation done by the project holder,

Solar Park	Nall	Ndiff	F	Nall-Ndiff
PSSU	8	8	0	0
PSTO III	3	3	0	0

In accordance with TOOL 24 if Nall - Ndiff > 3 and factor F is >2 the proposed project is a "common practice".

The auditor reviewed the common practice calculation sheet for correctness versus the step approach provided in the TOOL 24 version 3.1, and traceable versus the information used for the calculation, which is the official information and public available https://cammesaweb.cammesa.com/informe-sintesis-mensual/.

After closure of the above CL, the auditor verified that the proposed project is not a common practice.

In summary, the additionality was assessed by reviewing all the information mentioned in the PD, investment analysis spreadsheet, supporting documents and cross-checked with relevant sources. Based on this analysis, the information mentioned in the PD is duly supported by evidence quoted therein. The verification team has described all steps taken, and sources of information publicly available by CAMMESA and other relevant sources, which were used to cross-check the information. The verification team determined that the evidence assessed is publicly appropriate and from reliable sources, hence it is credible and appropriate.

Consequently, the project demonstrates additionality in accordance with the applied ACM0002 methodology and the related TOOL 01.

4.5.6 Conservative approach and uncertainty management

The GHG emissions of the baseline scenario are based on CDM tool to calculate the emission factor of the electric grid (TOOL07 v7.0). Project's emission reduction calculations are based on CDM methodology ACM0002 v22.0. TOOL07 and ACM0002 use conservative assumptions, values, and procedures to ensure that there is not overestimation of emission reductions or increases in GHG removals, applying mechanisms to manage uncertainty in the quantification of baseline and mitigation results.

By reviewing the PD, baseline emissions spreadsheet and supporting documents and conducting cross check with relevant sources, it was confirmed that the data and parameters used to calculate the combined margin emission factor to estimate the reduction of GHG emissions are consistent with the emission factors, activity data, projection of GHG emissions and the other parameters used to construct the inventory national of GHG and the national reference scenario as illustrated in section 5.5 above.

Additionally, as also stated in section 5.5 the $EG_{PJ,y}$ values contained in the spreadsheet used for emissions reduction calculation (Baseline Emissions Calculations.xlsx) and in the PD matches with the values from the Solar resource and production report of the Sierras de Ullum 78 MWn photovoltaic plant; ENERTIS; 29/10/2021 and Solar resource and production report of the 60MWn Tocota III Photovoltaic Plant; ENERTIS; 11/11/2022, which is in line with CDM Guidelines for Reporting and Validation of Plant Load Factors, Version 01.

Thus, it is no necessary to apply the percentages defined for the discount factor provided in the guidelines for managing uncertainty.

4.5.7 Leakage and non- permanence

Leakage is not applicable as per paragraph 71 of ACM0002 v22.0.

Project permanence monitoring will be developed at each periodic verification previously stipulated by the project holder, under the indicators and procedures established within the PD.

4.6 Monitoring plan

4.6.1 Description of the monitoring plan

In accordance with the applicable validation requirements related to the monitoring plan the compliance assessment process was evaluated with the following items:

a) necessary data and information to estimate GHG reductions or removals during the quantification period;

The monitoring for the estimation of emissions is carried out according to the verification periods stipulated by the project and under the guidelines of ACM0002 methodology. In each verification period the activity data must be monitored.

In the PD the project holder has fixed for the first crediting period the Combined margin CO_2 emission factor for Argentinean electrical grid with a value of 0.356 tCO_2/MWh determined and validated as described in section 3.5 above.

For the estimation of GHG emission removals or reductions, $EGP_{J,y}$ will be monitored in accordance with the monitoring plan, measured continuously by the power plants' meters, maintained and verified in accordance with CAMMESA's Electric-Commercial Metering System (SMEC due to its name in Spanish). The measurement will be recorded monthly.

b) data and supplementary information for determining the baseline or reference scenario;

As per ACM0002 V22.0 there is no data and supplementary information required for determining the baseline or reference scenario.

c) specification of all potential emissions that occur outside the project boundaries, attributable to the activities of the GHG Project (leakage);

As per ACM0002 V22.0 there is no leakage.

d) information related to the assessment of environmental and social effects of the project activities;

The project holder has conducted environmental impact assessments for PSSU and PSTO III (Addendum to the Environmental Impact Statement - Sierras de Ullum Solar Park; Eng. Anahi A. Alvarez; 8/11/2021 and Addendum to the Environmental Impact Statement - Tocota III Solar Park; Eng. Anahi A. Alvarez; 26/12/2022) in line with Argentine environmental regulations and obtained the environmental approval for each of them (Environmental

authorization PSSU; Government of San Juan; RES 1009-SEAyDS-2021 and Environmental authorization PSTO III; Government of San Juan; PSSU and RES 1564-SEAyDS-2024).

The environmental impact assessments analyzed the potential effects on biodiversity and ecosystems within the project boundaries. The audit team reviewed the assessment and confirmed that actions and corrective measures to prevent and/or mitigate the environmental impacts resulting from the project activities were defined as part of an environmental management plan included in the environmental impact assessment of each solar park.

Furthermore, to address the risks related to environmental and socio-economic safeguards that may arise from the activities of this grouped project, the assessment questionnaire included in Annex A of the Sustainable Development Safeguards Tool v1.1 of the BCR Standard was answered by the project holder as contained in the PD. The audit team reviewed the justifications of the responses and the supporting reference documents (Code of Conduct, Health, Safety, and Environmental Management Plan, 2022 Sustainability Report) and can confirm the veracity of the answers provided.

Additionally, given that this is a grouped project, as stated in the PD, the project holder is committed to considering all sustainable development safeguards addressed in the PD for future instances and properly address them in due course. For that purpose, considering the identified environmental and social effects of the project activity, the project holder included as monitored parameters:

- *Land affected by environmental liabilities;*
- *Restored soil in the project area;*
- *Response to Hazardous Waste Spill;*
- *Bacteriological and Physicochemical Quality of Water for Human Consumption;*
- *Report of mitigation measures for bird incidents;*
- *Traffic and Road Safety Hazards;*
- *Wildlife and Habitat Impacts during Construction and Abandonment Phases;*
- *PM10 (Respirable Thoracic Particulate Matter);*
- *Community Mental Health and Well-being.*

The audit team assessed the monitoring parameters, including the sources of data, monitoring procedures, frequency, equipment (when applicable), and QA/QC procedures and found all of them adequate and aligned with national regulations and BCR standard requirements.

e) procedures established for the management of GHG reductions or removals and related quality control for monitoring activities;

The Quality Control and Quality Assurance Procedures for the project are presented in Section 16 of the PD. Through the implementation of the necessary manuals, procedures, guidelines and formats, it is ensured that the requirements and recommendations indicated

in ACM0002, the requirements of Genneia management system, as well as legal and regulatory requirements are met.

The audit team reviewed the quality controls of the information and the chain of custody of the data from formulation and monitoring to traceability in order to arrive at an adequate distribution of the benefits of the project.

f) description of the methods defined for the periodic calculation of GHG reductions or removals and leakage;

Section 16 of the PD defines the methods for the periodic calculation of GHG reduction according to ACM0002 and the quality assurance and quality control actions of this aspect. It was assessed that the data collection and processing process complies with the principles of accuracy, completeness, timeliness, relevance and ease of use.

g) the assignment of roles and responsibilities for monitoring and reporting the variables relevant to the calculation of reductions or removals;

Section 16 of the PD describes the roles and responsibilities established for monitoring and reporting the variables relevant to the calculation of reductions, including details on the Information Management System, responsibilities and controls.

Thu, it is possible to identify the quality control in the monitoring and the roles and responsible parties in order to have the quantification in accordance with the methodology and the latest versions of the documentation of the BCR.

h) the related procedures with the assessment of the project contribution whit the Sustainable Development Goals (SDGs);

The audit team had reviewed that the project holder applied the BCR SDG Tool to assess the the project contribution to SDGs in accordance with the provisions provided by the BCR standard.

Regarding the monitored parameters the following findings were raised:

- ***Validation CL07** requesting the project holder to clarify if: i) according to CAMMESA SMEC rules and procedures is feasible for the project holder to verify the meters at least once every three years; ii) SDG 12 and indicator 12.c.1 will be monitored as stated in PD v1.0 section 10 since it was not included in section 16.1.2; iii) the number of "Internships provided to EPET 7 students" will be monitored as per section 12 and if internships will be provided only to EPET 7 or different schools in San Juan and Mendoza where the grouped project is located.*
- ***Validation CAR06** regarding SDG target 9.4.1 included in PD v1.0 given that it concerns to 'CO2 emissions per unit of value added' in the manufacturing industries (https://worldbank.github.io/sdg-metadata/metadata/en/9-4-1/) and according to the*

International Standard Industrial Classification of All Economic Activities (ISIC), Version 4 (https://unstats.un.org/unsd/classifications/Econ/Download/In%20Text/ISIC_Rev_4_publication_English.pdf), the energy supply industry are not classified as manufacturing industries. Thus, the project holder was requested to review the contribution of the project to SDG target 9.4.1.

After closure of the CAR, the audit team can conclude that the SDGs identified and selected by the project (SDG 7, SDG 8, SDG 12, SDG 13 and SDG 15) are in line with those applicable to renewable energies projects:

Furthermore, considering the identified contributions of the project to SDGs, the project holder defined as monitored parameters:

- *EGPJ,y as indicator of SDG 7 (7.2.1) and SDG 13 (13.2.1);*
- *Attendance of online training sessions as indicator of SDG 13 (13.3.1 and 13.3.2);*
- *Internships provided to regional school students as indicator of SDG 13 (13.3.2);*
- *Residues reused and repurposed as indicator of SDG 12 (12.5.1) and SDG 13 (13.3.1 and 13.3.2);*
- *Employment Records as indicator of SDG 8 (8.2.1);*
- *Restored soil in the project area as indicator of SDG 15 (15.3.1);*
- *Response to Hazardous Waste Spill as indicator of SDG 12 (12.5.1)*
- *Recycled material as indicator of SDG 12 (12.5.1).*

The audit team assessed the monitoring parameters, including the sources of data, monitoring procedures, frequency, equipment (when applicable), and QA/QC procedures and found all of them adequate in terms of the established procedure for the evaluation of each monitored parameter and aligned with BCR standard requirements.

i) criteria and indicators related to the contribution of the project to sustainable development objectives;

Based on the SDG Tool and according to the project holder criteria based on the project baseline as defined in the PD, the indicators and targets related to each SDG are listed below:

SDGs	***Indicators***	***Project contribution***
7 Ensure access to affordable, reliable, sustainable, and modern energy for all	*7.2.1 Renewable energy share in the total final energy consumption*	*By installing and operating solar parks that generate photovoltaic energy, the project directly increases the proportion of renewable energy within the national grid (SADI). This clean energy production displaces electricity that would otherwise be generated from fossil*

		fuels, thereby reducing the country's carbon footprint and advancing the transition to a more sustainable energy system. The impact of this contribution is both significant and permanent, with its effectiveness measurable in terms of megawatt-hours (MWh) of solar energy produced and supplied to the grid
8 Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all	*8.2.1 Annual growth rate of real GDP per employed person*	*The proportion of adults with access to financial institutions or mobile-money services is expected to rise due to the project, as monitored by employment records and the number of workers with bank accounts.*
12 Ensure sustainable consumption and production patterns	*12.5.1 National recycling rate, tons of material recycled*	*The project implements waste management and recycling initiatives, contributing to increase national recycling rate and supports a circular economy.*
13 Take urgent action to combat climate change and its impacts	*13.2.1 Number of countries that have communicated the establishment or operationalization of an integrated policy/strategy/plan which increases their ability to adapt to the adverse impacts of climate change, and foster climate resilience and low greenhouse gas emissions development in a manner that does not threaten food production (including a national adaptation plan, nationally determined contribution, national*	*By generating clean energy, the project contributes to the National Promotion Regime for the use of Renewable Energy Sources for the Production of Electrical Energy (Law 27,191) and the National Plan for Climate Change Adaptation and Mitigation (PNAyMCC).* *Additionally, the project promotes climate change education and awareness through training programs and workshops, which contributes to integrating mitigation and adaptation strategies into national curricula.* *Furthermore, the project enhances local and institutional capacity by offering training in solar energy system operations, thereby bolstering resilience against climate change.*

	communication, biennial update report or other) *13.3.1 Number of countries that have integrated mitigation, adaptation, impact reduction and early warning into primary, secondary and tertiary curricula* *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*	
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	*15.3.1 Proportion of land that is degraded over total land area*	*The project includes land restoration and rehabilitation activities during the abandonment phase to mitigate land degradation caused by construction and maintenance.*

The audit team found the criteria, indicators and contributions defined for each SDG that the project contributes to adequate.

j) procedures associated with the monitoring of co-benefits of the special category, as applicable;

***Validation CL06** was raised given that the grouped project intends to achieve the Orchid category only for the Community Benefits component. Thus, biodiversity conservation and gender equality components illustrated in the BCR standard v3.4 for this category*

have not been included. Thus, the project holder was requested to clarify its compliance with the BCR requirements.

The answer provided by the project holder was that it would not pursue co-benefits. Thus, after closure of CL06 this item is not applicable.

k) *criteria and indicators defined to demonstrate the additional benefits and measurement of co-benefits and the specific category, as applicable.*

Not applicable.

Additionally, the following criteria were evaluated:

a) *National circumstances and the context of the GHG Project: the audit teams assessed the Argentine circumstances and context regarding the energy sector and environmental issues and can confirm that the project monitoring is in compliance with national circumstances and requirements.*

b) *Monitoring good practices, adequate for the follow-up, and control of the activities of the GHG mitigation effort: KBS confirms that all indicators of importance for project performance monitoring and reporting have been incorporated into the project monitoring plan. The frequency, responsibility and authority for recording, monitoring, measuring and reporting of project activities have been clearly developed with a good practice management system, which has also established effective training measures, as well as stipulations explained within the methods and protocols being used.*

c) *Procedures to ensure data quality under ISO 14064-2: the reported parameters, including their source, monitoring frequency and review criteria for measurements and equipment management, as stated in the PD, were verified as correct. The required management system procedures, including responsibility and authority for monitoring activities, were verified to be consistent with the PD. The audit team found that the knowledge of personnel associated with project monitoring activities was satisfactory.*

4.6.2 Data and parameters determined at registration and not monitored during the quantification period, including default values and factors.

As per the revised TOOL07 "Tool to calculate the emission factor for an electricity system", the following parameter are listed as fixed ex-ante parameter for estimating emission reductions.

Parameter	Value	Verification Assessment
$EF_{grid,OM,y}$	0.447 tCO_2/MWh	*Ex-ante* Simple Operating Margin option of Step 3 of the TOOL07 v7.0 has been chosen and found correct, as explained in section 4.5 above. Data

		for the period 2021-2023 provided by the Argentine Secretariat of Energy from information from the latest official CAMMESA statistics. The following link was checked: http://datos.energia.gob.ar/dataset/calculo-del-factor-de-emision-de-co2-de-la-red-argentina-de-energia-electrica?_gl=1*r48hgi*_gcl_au*MjEwNTEwMDE2Ni4xNzIyODczMzA2. The document "Cálculo del factor de emisión de la red 2013 a 2023.xlsx" was checked with all the official sources. For NCV_i and $EFCO_{2,i,y}$, the audit team verified the truthfulness of the sources used by the Argentinean Secretariat of Energy and it was concluded the information used is traceable, verified and credible. The OM emission factor calculation was checked and found correct.
$\mathbf{EF_{grid,BM,y}}$	0.086 tCO_2/MWh	Option 1 of Step 5 of the TOOL07 v7.0 has been chosen using last available data (year 2023) provided by the Argentine Secretariat of Energy from information which took the information from the latest official CAMMESA statistics. The data is confirmed as reliable and credible. The BM emission factor calculation was checked and found correct.
$\mathbf{EF_{grid,CM,y}}$	0.357 tCO_2/MWh	Values have been correctly applied as per the PDD. The source is the EF tool (e.g., TOOL7). The weights applied were as follows as per the TOOL07: $\mathbf{W_{BM}}$ **= 0.25%** $\mathbf{W_{OM}}$ **= 0.75%**

By reviewing the PDD, baseline emissions spreadsheet and supporting documents and conducting cross check with relevant sources, it was confirmed that the data and parameters used to calculate the combined margin emission factor to estimate the reduction of GHG emissions are consistent with the emission factors, activity data, projection of GHG

emissions and the other parameters used to construct the inventory national of GHG and the national reference scenario as illustrated in section 4.5 above.

4.6.3. Data and parameters monitored

As per the "Tool to calculate the emission factor for an electricity system" (version 7.0), the data and parameter to be monitored in order to calculate the Emission reductions, is the following:

Data / Parameter	$EG_{PJ,y}$
Data unit	*MWh/year*
Description	*Net electricity generated in the year y*
Source of data	*SMEC records*
Value to be applied	***PSSU:*** *173,153 MWh/year* ***PSTO III:*** *141,169 MWh/year* *(per year average for Instance 01; estimated ex-ante)* *See file "Baseline Emissions Calculations.xlsx" available to the VT.*
Purpose of Data / Parameter	*Calculation of baseline emissions. This parameter will be also used as an indicator of SDG 7 (7.2.1) and SDG 13 (13.2.1),*
Measurement procedures (if any)	*Direct measurement with the SMEC (electricity meters installed at the switchgear building of each solar park, see Figure 16), and data is collected by CAMMESA.*
Monitoring Frequency	*Continuous measurement and at least monthly recording. Typically, the measured data is read once every 24 hours using tele-metering technology (remotely).*
Monitoring Equipment	*High-precision metering panels are installed in each solar park's switchgear building. These panels include both primary meter/s and redundant meter/s, which are connected to transformers in the metering cell. The meters are of precision class 0.2s/0.5r and are equipped with certified tariff discriminators, built-in recorders, communication modems, and protection equipment.*
QA/QC Procedures to be applied	*The verification of the meters will be done as established by the national authorities (CAMMESA)[6]. In this regard, the generation values will be obtained from public reports issued by CAMMESA,*

[6] *CAMMESA establishes measurement quality audits to ensure the accuracy of data used in economic transactions among MEM agents and the reliability of records collected by the SMEC. As the responsible party, CAMMESA conducts equipment tests and verifications either directly or through third-party contracts. A field audit system is in place to monitor MEM agents' actions at their SMEC measurement points, verify compliance with current standards, and ensure the quality of the recorded information. These verifications are performed on a random basis, and until a verification is completed, CAMMESA continues to consider the meter as verified. Detailed information on this process is available on CAMMESA's dedicated website.*

	as the measurements recorded by the SMEC are collected by CAMMESA and published on its website on a monthly basis. *The setup of the metering panels allows accurate measurement, recording, and remote or local data download by CAMMESA, ensuring precise and reliable monitoring of energy generation for emission reduction verification.* *Since CAMMESA is the national electricity wholesale market management company, it is not necessary to cross-check these generation values.*
Any comment	*All data collected as part of the monitoring process is archived electronically and kept at least for two years after the end of the last quantification period.*

As explained in sections above the following are the parameters determined to be monitored in order to comply with climate change adaptation, SDGs and SDS:

	Data/parameter	***Purpose of data and parameters***
Climate Change adaptation	***Number of floodings***	*To assess the effectiveness of drainage planning and soil movement control*
	Abandonment phase report on water runoff	*To confirm that water runoff issues were managed appropriately during the abandonment phase.*
	Report on operational suspensions due to weather	*To evaluate the effectiveness of weather-related safety protocols in protecting personnel and the environment.*
	SHyMA meeting attendance and minutes	*To ensure regular stakeholder engagement in safety and environmental risk management.*
	Emergency drill reports	*To ensure preparedness for extreme weather events through regular emergency drills.*
	Attendance of online training sessions	*To assess community engagement and the reach of the "Energizate" Program. This parameter will be also used as an indicator of SDG 13 (13.3.1 and 13.3.2).*

SDGs	***Internships provided to regional school students***	*To measure the involvement of local students in renewable energy projects. This parameter will be also used as an indicator of SDG 13 (13.3.2).*
	Residues reused and repurposed locally	*To measure the effectiveness of the Circular Economy Courses in reducing waste. This parameter will be also used as an indicator of SDG 12 (12.5.1) and SDG 13 (13.3.1 and 13.3.2).*
	Employment Records	*The project creates jobs in the renewable energy sector; therefore, this parameter will be used as an indicator of SDG 8 (8.2.1).*
SDS and SDG	***Restored soil in the project area***	*To verify that the soil in the project area is restored to its natural productive conditions following the dismantling phase. This parameter will be used as an indicator of an environment SDS and SDG 15 (15.3.1).*
	Response to Hazardous Waste Spill	*To ensure proper containment, remediation, and disposal of hazardous waste spills. This parameter will be used as an indicator of an environment SDS and SDG 12 (12.5.1).*
	Recycled material	*To promote recycling and reduce waste during the project lifecycle, particularly during the abandonment phase. This parameter will be used as an indicator of an environment SDS and SDG 12 (12.5.1).*
	Land affected by environmental liabilities	*To ensure that any environmental liabilities are identified and addressed before the abandonment phase. This parameter will be used as an indicator of an environmental SDS.*
	Bacteriological and Physicochemical Quality of Water for Human Consumption	*Ensure that water used in the project complies with national water quality standards to protect human health. This parameter will be used as an indicator of an environmental SDS.*

SDS	***Report of mitigation measures for bird incidents***	*To reduce and monitor the impact of the project on bird populations. This parameter will be used as an indicator of an environmental SDS*
	Traffic and Road Safety Hazards	*To manage and minimize the impact of project-related traffic on local infrastructure and road safety. This parameter will be used as an indicator of an environment and a social SDS.*
	Wildlife and Habitat Impacts during Construction and Abandonment Phases	*To minimize the adverse effects of project activities on local wildlife and habitats. This parameter will be used as an indicator of an environmental SDS.*

In conclusion, after reviewing the evidence provided, consultations with stakeholders and communications with the project holder, the audit team confirms that:

- *The monitoring plan described in the PD complies with the requirements of the applied methodology.*
- *The project holder and the GHG mitigation project have an operational and management structure to be put in place to implement the monitoring plan in accordance with the regulatory framework of Argentina and the BCR requirements, as it was verified by the auditor during onsite inspection at each solar park.*
- *The means of implementation of the monitoring plan, including data management and quality control and assurance control processes, are sufficient to ensure that the emission reductions, SDSs, SDGs and co-benefits achieved from the project activity are verifiable and thereby satisfying the requirement of BCR. The monitoring plan will give an opportunity for real measurements of achieved emission reductions.*
- *There are no host country requirements pertaining to monitoring of any sustainable development indicators. Therefore, there are no such parameters identified in the PD.*
- *The details of information flow control were verified, with defined delivery, review and approval responsibilities and the key aspects for document management and control, as well as the structuring of files and documentation.*

In summary, it was verified that the monitoring plan reflects good monitoring practice appropriate to the project type and the project holder is able to implement the monitoring plan.

4.6.3 Changes in the monitoring plan

4.6.3.1 Temporary deviations

Not applicable. There were no temporary deviations from monitoring plan proposed in the project documentation, the applied methodologies, or other relevant regulation.

4.6.3.2 Permanent changes to the monitoring plan, BCR program methodologies in use, or other regulatory documents related to BCR program methodologies

Not applicable. There were no permanent changes to the monitoring plan.

4.7 Compliance with Laws, Statutes and Other Regulatory Frameworks

To ensure compliance with applicable legislation the project holder has in place a Document Management System which follows the policies and methodologies established for the development of projects related to energy generation and climate change. These policies are designed to identify and follow up the legal requirements established on issues related to the project, its participants, areas of impact and compliance activities. This approach allows mitigating future legal risks given that its actions in the development of a project are carried out within the established legal limits.

The audit team confirmed by document review and onsite visit the project holder has procedures in place to periodically evaluate compliance with legal requirements.

***Validation CL03** was raised to request the project holder to clarify and describe and demonstrate in the PD conformity of the project with all relevant local, regional and national laws, statutes and regulatory framework applicable, including with regards to Indigenous Peoples' rights in case future instances could be developed nearby IPs.*

After closure of the CL, the audit team confirmed the project compliance with each of the regulations identified and presented in the PD according with the following assessment:

Laws, Statutes and Other Regulatory Frameworks	***Requirements/Description***	***Assessment of compliance***
United Nations Declaration on the Rights of Indigenous Peoples and ILO Convention 169 on Indigenous Peoples	*Protection of Indigenous Peoples' rights*	*There is no presence of indigenous populations and/or territorial claims by indigenous communities within the project areas for Instance 01 or in the neighboring properties.*

No. 24,065 ***(National Law)***	*Legal aspects related to the Wholesale Electricity Market (MEM) and its rights and obligations.*	*The Argentine Secretariat of Energy, on behalf of the National Executive Power of the Republic of Argentina, authorized GENNEIA S.A. to operate as a MEM agent for the PSSU solar park under Resolution RESOL-2022-804-APN-SE#MEC and for the PSTO III solar park under Resolution RESOL-2023-861-APN-SE#MEC. Both resolutions were checked in the folder titled "MEM Agent Authorizations".*
No. 6,634 ***(Provincial San Juan Law)***	*General Environmental Law: Guiding principles for the preservation, conservation, protection, and improvement of the provincial environment.*	*Both solar parks, PSSU and PSTO III, conducted environmental impact assessments prior to construction to ensure compliance with all environmental criteria. These assessments are available and were checked by the auditor.*

4.8 Carbon ownership and rights

The audit team assessed GENNEIA S.A. carbon ownership and rights by reviewing the Secretariat of Energy of the Argentinean Government Resolutions RESOL-2022-804-APN-SE#MEC and Resolution RESOL-2023-861-APN-SE#MEC for PSSO and PSTO III, respectively, that authorize GENNEIA S.A. to act as Wholesale Electricity Market (MEM as per its name in Spanish, "Mercado Eléctrico Mayorista") Agent for its projects PSSO and PSTO III. As stated in the resolutions, for this purpose GENNEIA SA had complied with the requirements of current Argentine regulations regarding the provision of corporate and commercial documentation. Thus, the Secretariat of Energy of Argentina had reviewed all the documents concerning GENNEIA SA ownership of PSSO and PSTO III and due to that authorized GENNEIA S.A. to be the MEM Agent of its solar parks.

The EIA approvals of PSSU and PSTO III by the Government of the Province of San Juan also confirm GENNIA S.A. ownership of the solar parks.

Furthermore, the audit team checked that GENNEIA S.A. holds full land-use rights for the area in which the solar parks are located according to the land ownership titles or land lease agreement.

It was also assed based on documents review, onsite visit and interviews that there are no evidence of indigenous or local traditional communities residing in or having territorial claims within the project area of PSSO and PSTO III.

Based on the above assessment, KBS confirms that GENNEIA S.A. is the sole owner of PSSO and PSTO III and the company declares that it will be the sole owner of future solar parks that will be part of this grouped project.

4.9 Risk management

Genneia has in place an Enterprise Risk Management System (ERM) which supports decision-making and planning, addressing environmental issues and adapting to them. The ERM allows for the design of mitigation measures for identified risks within the framework of adaptive management. The risks specific to the project activity, and the proposed mitigation measures were assessed following a structure based on the risk classification from the BCR "Risk and Permanence Tool".

The evidence presented by the project holder corresponds to the risk identification matrix contained in the PD and the monitoring plan for risk management. The risk matrix identifies and presents measures to mitigate the risks related to the project activities, taking into account environmental, financial and social risks related to the execution of project activities. The risk analysis matrix is above illustrated.

Risk Category	***Condition***	***Identified Risks***	***Approach/Management***
Environmental	*Identify the potential natural and anthropogenic risks to which the GHG mitigation activities may be exposed and the measures necessary to*	*The solar power generation of each park is exposed to climate threats that can generate greater technical losses than usual (more frequent and intense load peaks); lower efficiency and power*	*Use of more resistant materials to high temperatures and strong winds; periodic update of the fragility curve of assets to seasonal events; consideration of climate variables in investment decisions; automation and monitoring of management;*

	mitigate such risks.	*of plants; possible failure of substations due to flooding risks; damage to equipment and infrastructure from fires/falling trees/dragging sediment.*	*improvement of contingency plans for emergencies such as fires, paralysis of plants, and power outages (see reversal risk section).*
Financial	*Identify potential financial risks associated with the expected costs and cash flow of the project and the measures necessary to mitigate the financial risks.*	*Variation in the costs of raw materials and emission rights, and market behavior uncertainty.*	*The area responsible for making projections and developing long-term pathways takes into account national and international decarbonization plans.*
		Uncertainty associated with technological development. Threats associated with technological degradation and cybersecurity.	*The company has Innovation and Development units, as well as Technical and Performance Analysis. Operational performance analyses are also carried out from the CECO. With the implementation of the "New Genneia Information System," operational risks were overcome. Continuing with the plans initiated in 2021, addressing business continuity risks and those associated with information security, a Cybersecurity IT/OT assessment will be carried out.*
		Regulatory or fiscal changes; uncertainty about the financing framework and support for renewable energy development (RenovAr, MATER).	*In this regard, climate risk is a fundamental influencing factor and an additional variable in the usual financial and regulatory risk analysis and is therefore included in each investment*

			evaluation.
Social	Determine, in the medium and short term, the risks associated with the participation of local communities and stakeholders in the activities proposed by the project holder.	Changes in behavior and preferences of stakeholders towards more sustainable energy solutions. Increase in demand for accountability in different reporting formats.	The company has an Integrity and Compliance Program, with a Code of Conduct, an Integrity and Compliance Policy, and complementary procedures. Annually, Genneia prepares its Sustainability Report.

KBS was able to verify through the documentary review and onsite visit that the risk is analyzed in a detailed and consistent manner and did not detect during the review process any non-compliance with regulations or inconsistencies reported in the project. Thus, KBS can conclude that the evidence presented allows it to address the provisions of the Risk and permanence tool. The BCR project holder takes actions to ensure that the benefits of the project are sustained over time.

4.10 Sustainable development safeguards (SDSs)

As previously mentioned, the project holder conducted an environmental impact assessment for each solar park of the initial instance of the grouped project according to the appliable regulations and those assessments obtained the required approvals to be able to implement the projects. The audit team reviewed the documents to confirm the EIAs analyzed the potential effects on biodiversity and ecosystems within the project boundaries and they include an environmental management plan that define actions and corrective measures to prevent and/or mitigate the environmental impacts resulting from the project activities.

Additionally, the audit team confirmed that to address the risks related to environmental and socio-economic safeguards that may arise from the activities of the project, the project holder utilized the assessment questionnaire included in Annex A of the Sustainable Development Safeguards Tool v1.1 which is contained in the PD.

***Validation CL04 was raised to request the** project holder to clarify the specific mitigation/preventive actions taken to prevent in actual and future instances: child labor, inequitable access to land, etc., particularly disadvantaging women in rural or indigenous communities affected by land use changes in any instance of the project, underrepresentation of women in stakeholder consultations, conflict over land resources*

and/or rights land acquisition, imposing restrictions and all results in section 8.2.1.3 due to any instance of the project, impacts in indigenous people and cultural heritage due to any instance of the project, market distortions or increased competition since the response is that the project does not entail or result in these activities, losing traditional economics practices and knowledge systems. Additionally, it was requested to clarify if monitoring of heavy metal content in wastewater is relevant considering the characteristics of the wastewater effluent in the solar parks.

After closure of the previous finding, the audit team assed the answers and justification for each of the questions and found them appropriate and supported with reliable and recent references.

4.11 Stakeholder engagement and consultation

***Validation CL05** was raised to request the project holder to clarify and provide further information about the stakeholder consultation according to the provisions on BCR Standard version 3.4 section 16.1 and PD template Version 2.4 section 9, the project holder is requested to clarify and provide further information about the stakeholder consultation conducted before validation including: (a) the scope of stakeholder consultations; (b) the number of stakeholders consulted; (c) the means used to invite interested parties to participate in the consultations; (d) the information that was made available to stakeholders during the consultation process; (e) the meetings, workshops and other processes developed in the framework of the stakeholder consultation. Provide evidence that invitations were sent to relevant stakeholders, inviting them to comment. If any of the relevant stakeholders did not receive an invitation, the project holder should provide appropriate justification. Provide evidence about the ongoing monitoring and engagement activities conducted at each solar park as stated in pages 114 and 115 of the PD. In PD section 9.1 provide a summary of the comments received. In PD section 9.2 describe how comments have been considered. If complaints or grievances were filed by stakeholders, provide a full explanation of how they were addressed and whether they have been satisfactorily resolved.*

After closure of CL5, the audit team could assess and confirm that the project holder has included all issues missing and has corrected the PD (Step 6), accordingly and in line with PD template version 2.4 section 9 instructions.

The stakeholder engagement and consultation process were carried out following the guidelines established for this process by Genneia's Integrated Management System (SIG) checked by the auditor. A detailed document for each one of the stakeholder's comments received was available to the CAB in the "Stakeholders complaints, inquiries, and claims.xlsx" spreadsheet included in evidences sent to the VT. Furthermore, all comments received were solved in a timely and appropriate manner, as indicated in the "Status" column within the "Tratamiento y Cierre" column in the same spreadsheet. Evidences were checked by the auditor and found correct.

The audit team assessed through document review, onsite visit and interviews with stakeholders that the project holder has in place methods for identifying, engaging and

guaranteeing ongoing communications with local stakeholders, that includes various communication and dialogue channels: telephone numbers, email address, mailbox at the entrance of the sites, complaints, queries and claims book; among others.
Furthermore, procedures for monitoring stakeholder consultation are in place with progress of consultations documented in a monitoring spreadsheet.

The project holder presented the evidence of the procedures and registries in place. The audit team assessed the evidence and was able to verify that the comments received did not lead to its inclusion or changes in the project design.

Thus, the audit team confirms that the project has in place an ongoing stakeholder consultation system and that stakeholders' comments received during the verified monitoring period were attended and solved in a proper manner.

4.12 Public consultation

Additionally, according to BCR Standard rules, the project was submitted for public consultation on the BCR website for 30 days from 23/10/2024 until 22/11/2024. No comments were received.

5 Verification findings

5.1 Project and monitoring plan implementation

5.1.1 Project activity implementation

The project activity is in operational stage as evidenced by the on-site visit to the two solar parks of instance 1 (PSSU and PSTO III) and cross-checked with publicly available information at CAMMESA website.

All the physical components and project boundary are in conformity with the description in the PD.

The nominal capacity of PSSU and PSTO III is 78 and 60 MW, respectively as confirmed during the site visit and also through the technical specification and publicly available reports of CAMMESA and found in-compliance with the PD.

PSSU and PSTO III were commissioned on 30/03/2023 and 30/12/2023, respectively as stated in the PD and as per the commercial authorization letters from CAMMESA.

Based on the site visit and the reviewed project documentation like the technical specification, meters and equipment nameplates, energy reports, operational license and

permits, commissioning certificates, calibration certificates of energy meters, etc. the verification team confirms that the project was implemented and operated as described in the PD.

Furthermore, the verification team confirms that:

- *There is not any material discrepancy between project implementation and the project description in the PD.*
- *The monitoring plan is completely implemented and is suitable with actual monitoring system (i.e., process and schedule for obtaining, recording, compiling, and analyzing the monitored data and parameters).*

- *There is no methodology deviation applied to this project.*

Further it was verified as per energy generation records and documentation review that during the monitoring period PSSU operated under normal conditions. Meanwhile, PSTO III was subject of curtailments due to oscillations caused by an issue in the carrier's grid that affected all solar parks connected to the same node, leading to a decrease in energy generation by the solar park and thus, on GHG emission reductions below the ex-ante estimations.

In conclusion, according to the above assessment, the audit team can confirm that the project implementation has been carried out in accordance with the PD and in line with the monitoring plan. There are no material discrepancies between the project implementation and the PD.

5.1.2 Monitoring plan implementation and monitoring report

The audit team confirmed through site visit inspection, documentation review, and analysis of baseline and monitoring data, that the actual monitoring system complies with the monitoring plan contained in the PD and there is no deviation in monitoring plan and procedures.

The audit team reviewed and verified all the parameters presented in the monitoring plan with the requirements of ACM0002 and applicable tools. In this regard, the Monitoring Plan contains all the required parameters, with adequate descriptions regarding: Data source, measurement procedures, monitoring frequency and QA/QC procedures to be applied.

To ensure compliance with ISO 14064-3 (clauses 7.4.13 and 7.4.14) and the BCR Standard, the following steps and evidence were documented:

To perform an Uncertainty Assessment and Conservative Approach, the audit team identified sources of uncertainty, such as:

- *Emission factors (ex-ante estimated parameters were adequate and in line with the PD, as explained in Section 4.6.2)*

- *Activity data (Net electricity generated in the year y - $EG_{PJ,y}$)*
- *Baseline scenario assumptions and projection parameters (comparison of the monitored data with the assumptions established in the PD.*
- *Assessed uncertainty using the methods recommended by ISO 14064-3 and applied conservative assumptions in line with TOOL07 v7.0 and ACM0002 v22.0.*
- *Verified that these conservative assumptions mitigate risks associated with data variability and model projections.*

Evidence Reviewed

- *Baseline scenario calculation spreadsheets ("Baseline and Net GHG Emission Reductions Calculations.xlsx")*
- *Monitoring data and activity records for the periods from 01/01/2023-31/10/2024 for PSSU and from 20/12/2023 – 31/10/2024 for PSTO III, taken directly from the data published by CAMMESA in the monthly reports that are the official data of energy generated and billed and is publicly available[7].*
- *National inventory references and IPCC guidelines (used in the ex-ante calculation of the CM Emission Factor)*
- *Project-specific monitoring report, monitoring equipment and QA/QC procedures as detailed in Section 15 of the MR and crosschecked on site.*

All evidence was cross-checked against the Monitoring Plan established in the PD and MR and validated for consistency with the latter. Annex 3 shows all evidences checked throughout the validation and verification process.

Discount Factor Evaluation

The discount factor defined in the uncertainty management guidelines was evaluated. Based on traceable evidence and conservative assumptions applied to all key parameters, the audit team concluded that the discount factor is not applicable because all major sources of uncertainty were addressed through conservative parameter selection. And also, because cross-checking calculations confirmed that the residual uncertainty does not require additional discounting.

All assumptions, calculations, and decisions are traceable and fully aligned with the requirements of ISO 14064-3 and the BCR Standard.

5.1.2.1 Data and parameters

[7] *CAMMESA Reports: Excel files "Generacion local Mensual PSSU" and "Generación local Mensual PSTO III" were checked by the VT.*

5.1.2.1.1 Data and parameters determined at registration and not monitored during the monitoring period, including default values and factors

The audit team verified the appropriateness of the emission factors, IPCC default values and any other reference values that have been used in the calculation of emission reductions during the monitoring period and confirmed that the ex-ante estimated parameters were adequate and in line with the PD, as explained in Section 4.6.2

5.1.2.1.2 Data and parameters monitored

During verification all relevant monitored parameters of the monitoring plan have been verified regarding the appropriateness of the verification method, the correctness of the values applied for ER calculation, the accuracy and applied QA/QC measures. All monitoring parameters have been measured / determined without material misstatements and are in line with all applicable standards and relevant requirements. It is confirmed that the monitoring mechanism is effective and reliable.

The following findings were raised:

- ***Verification CL02** to request to clarify differences found in the net electricity generation monitored values between the measured values with the project's meters and the values provided in CAMMESA monthly reports and adopt a conservative approach for the quantification of emission reductions,*
- ***Verification CAR05** to request to correct the format of the tables of section 15.2.2 according to the tables model provided in the MR template v3.4 and provide all information required as per this format. E.g.: complete information of the 2 main and 2 back-back electricity meters (SMEC) at each solar park (type, accuracy class, serial number, calibration frequency, date of last calibration and validity).*

After closure of the above findings and as per the document review and site visit inspection, it is confirmed that all the parameters were monitored in accordance with the monitoring plan contained in the PD during the present monitoring period. Following are the details of monitoring of the monitored parameters:

Data / Parameter	$EG_{PJ,y}$
Data unit	*MWh/year*
Description	*Net electricity generated in the year y*

<table>
<tr><td>Measured /Calculated /Default:</td><td>Direct measurement with the SMEC electricity meters installed at the switchgear building of each solar park and data is collected by CAMMESA and GENNEIA S.A. with the SOTR.
During the site visit and through document review, it has been confirmed that the readings of net electricity supplied can be taken from the main and back- up meters installed at each solar park. The metering readings are used for emission reduction calculation purposes. The net electricity can also be downloaded from CAMMESA web site in monthly reports.</td></tr>
<tr><td>Source of data</td><td>CAMMESA and GENNEIA S.A.
The audit team assessed the reference documents provided by the project holder (“Energia horaria PSSU y PSTO III.xlsx”; “Generación local Mensual PSSU.xlsx”; “Generación local Mensual PSTO III.xlsx”) and publicly available data in CAMMESA webpage and confirmed the accuracy of the data.</td></tr>
<tr><td>Value(s) of monitored parameter</td><td>
<table>
<tr><th>Year</th><th>Solar Park</th><th>$EG_{PJ,y}$</th></tr>
<tr><td>2023</td><td rowspan="2">PSSU</td><td>122,827 MWh</td></tr>
<tr><td>2024</td><td>142,487 MWh</td></tr>
<tr><td>2023</td><td rowspan="2">PSTO III</td><td>57 MWh</td></tr>
<tr><td>2024</td><td>80,675 MWh</td></tr>
<tr><td colspan="2">Total for this monitoring period</td><td>346,046 MWh</td></tr>
</table>
</td></tr>
<tr><td>Indicate what the data are used for (Baseline/ Project/ Leakage emission calculations)</td><td>Calculation of baseline emissions.
Also used as an indicator of SDG 7 (7.2.1) and SDG 13 (13.2.1).</td></tr>
<tr><td>Monitoring equipment (type, accuracy class, serial number, calibration frequency, date</td><td>High-precision metering panels are installed in each solar park's switchgear building. These panels include both two primary meters and two redundant meters as back-up, both of which are connected to transformers in the metering cell. The meters are of precision class 0.2s/0.5r and are equipped with certified tariff discriminators, built-in recorders, communication modems, and protection equipment. The characteristics of the meters are shown below:</td></tr>
</table>

of last calibration, validity)	

Meter Description	Type	Accuracy class	Serial Number	Calibration frequency*	Last calibration date	Validity*
SDULM71P	Primary meter	0.2s	MW-1806A010-02	Established by CAMMESA	13/09/2023	Established by CAMMESA
SDULM71C	Back-up meter	0.2s	MW-1806A013-02	Established by CAMMESA	13/09/2023	Established by CAMMESA
SDULM72P	Primary meter	0.2s	MW-1806A022-02	Established by CAMMESA	13/09/2023	Established by CAMMESA
SDULM72C	Back-up meter	0.2s	MW-1806A033-02	Established by CAMMESA	13/09/2023	Established by CAMMESA
TOC3M71P	Primary meter	0.2s	MW-2302A475-02	Established by CAMMESA	18/01/2024	Established by CAMMESA
TOC3M71C	Back-up meter	0.2s	MW-2302A476-02	Established by CAMMESA	18/01/2024	Established by CAMMESA
TOC3M72P	Primary meter	0.2s	MW-2210A126-02	Established by CAMMESA	17/01/2024	Established by CAMMESA
TOC3M72C	Back-up meter	0.2s	MW-2210A121-02	Established by CAMMESA	17/01/2024	Established by CAMMESA

All calibration certificates for the SMECs were checked and verified.

Measuring/ Reading/ Recording frequency	*Continuous measurement and at least monthly recording. Typically, the measured data is read once every 24 hours using tele-metering technology (remotely).* *During site visit it has been verified that the energy is monitored continuously and reported daily.*
Calculation method (if applicable)	*NA*
QA/QC procedures applied	*Generation values measured by the SMECs were crosschecked with the information available on the website of CAMMESA that corresponds with the final values utilized for billing.* *Crosscheck was assessed and verification CL1 was raised and successfully closed*

The audit team considers the project holder presented all the necessary parameters required by the selected methodology. The values are clearly described and the monitoring means detailed in the MR meet the requirements of presenting traceable and sufficient information to determine their calculation and the quality procedures required by the methodology.

All other parameters regarding climate change adaptation, SGS and SDS, were also monitored as per the monitoring plan established in the PDD. The specific parameters are mentioned in the sections below.

5.1.2.2 Environmental and social effects of the project activities

For the monitoring period, the project holder considered the assessment questionnaire from Annex A of the Sustainable Development Safeguards Tool v1.0 of the BCR Standard which was completed in Section 8 of the Project Description Document and the environmental and socio-economic safeguards were monitored as illustrated in section 15.2.2 of the MR.

***Verification CL02** was raised to request clarification about the values of the following monitored parameters during the present monitoring period in line with the indicators defined in the PD: Internships provided to regional school students, Residues reused and repurposed, local workers hired during construction and operational phases.*

The below table provides a summary of the Climate Change adaptation of the project activity:

#	***Ex-post parameters***	***VVB assessment and conclusion***
1	*Number of floodings*	*This parameter is measured regularly during all stages of each solar park, especially after significant weather events. As per document "Monitoreo de situaciones en los parques 2023_2024.xlsx". Number of floodings documented: PSSU: 0; PSTO III: 1* *Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.*
2	***Report on operational suspensions due to weather***	*Documents instances where operations were suspended due to weather conditions and the impact on personnel, equipment, or the environment. This indicator is used to evaluate the effectiveness of weather-related safety protocols in protecting personnel and the environment. It is measured continuous, with reports after each suspension event.* *Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.*

3	**SHyMA meeting attendance and minutes**	Number of meeting held were PSSU: 133 and PSTO III: 81. Evidences were checked such as files: "Planificación – PSSU.xlsx"and Planificación – PSTO III.xlsx", which contains a Gantt-style schedule with all planned meetings (both executed and rescheduled), along with a breakdown of the total number of meetings generated, by area (Avance tab), and other relevant details (Notas tab). The folder "Fotos," which provides photographic evidence of some meetings conducted during the monitored period Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.
4	Emergency drill reports	Number of drills conducted for PSSU: 1 and PSTO III: 2. Evidence was checked such as: drill procedures ("Procedimiento Simulacros de Emergencia.pdf"), drill reports ("Drill Report 1 - PSTO III - LLamado de emergencia.pdf"; "Drill Report 2 - PSTO III - Respuesta ante accidente.pdf"; "Drill Report 1 - PSSU - Simulacro ante emergencia nocturna.pdf"), a timeline with the planification and execution of drills ("Planificación – PSSU.xlsx" ; "Planificación – PSSU.xlsx"), and photographic evidence of the drills ("Fotos" folder). Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.

The below table provides a summary of the SDS and SDGs of the project activity:

#	**Ex-post parameters**	**VVB assessment and conclusion**
1	Attendance of online sessions	Number of participants in training programs: 31. This parameter tracks the number of individuals from the local community who participated in the "Energizate" Program training sessions. Evidence called "Detalle de cursos brindados.pdf" was checked. This parameter will be also used as an indicator of SDG 13 (13.3.1 and 13.3.2). Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.

2	*Internship provided to regional school students*	*Monitors the internships offered to students from regional schools under the Professional Internships program. Evidence "Convenio Prácticas profesionales EPET7.pdf". This parameter will be also used as an indicator of SDG 13 (13.3.2)* *This parameter is based in a qualitative assessment. Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.*
3	*Residues reused and repurposed locally*	*This indicator is used to measure the effectiveness of the Circular Economy Courses in reducing waste and provide evidence of the implemented courses. This parameter will be also used as an indicator of SDG 12 (12.5.1) and SDG 13 (13.3.1 and 13.3.2)* *The following evidence was checked: "Informe final Curso Economía Circular.pdf"; "Donación Juguetes.pdf"; "Donación Herramientas.pdf"; "Donación Madera.jpeg"; "Donación Madera 2.jpeg"; "Donación Pallets"; "Donación Sierra Sin Fin.pdf".* *This parameter is based in a qualitative assessment. Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.*
4	*Employment Records*	*Employment in the construction, operation, and maintenance of solar parks. The following evidence was checked: "Listado Personal Operación – PSSU y PSTO III.xlsx"; "Listado Personal Construcción – PSSU.xlsx"; "Listado Personal Construcción – PSTO III.xlsx".* *This parameter is based in a qualitative assessment. Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.*
5	*Response to Hazardous Waste Spill*	*# of Hazardous Waste Spills documented: **PSSU:** 0; **PSTO III:** 11. Evidence such as "Hazardous Waste Spills Matrix – PSSU.xlsx" & "Hazardous Waste Spills Matrix – PSTO III.xlsx". was checked.*

		Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.
6	*Bacteriological and Physicochemical Quality of Water for Human Consumption*	*<u>Expected values</u>: (According to Ley Nacional N° 19.587– Decreto Reglamentario N° 351/79 – Anexo I Artículo 58)* *<u>Bacteriological Parameters</u>:* *Coliforms Bacteria: Absence/100 ml* *Escherichia coli: Absence/100 ml* *Pseudomonas aeruginosa: Absence/100 ml* *Mesophilic bacteria: <10 CFU/ml* *<u>Physicochemical Parameters</u>:* *pH (6,5 – 8,5), amonio (0,2 mg/lt); cadmio (0,005 mg/lt); cinc (5 mg/lt); cloro residual (0,2mg/lt); cloruro (350 mg/lt); cobre (1 mg/lt); fluoruro (1,7 mg/lt); sólidos disueltos totales (1500 mg/lt) y sulfatos (400 mg/lt).* *Evidences were checked: "Certificado de Analisis de agua Mayo - PSTO III.pdf"; "Certificado de Analisis de agua Mayo - PSSU.jpg"; "Certificado de Analisis de agua Julio - PSSU.pdf"; "Certificado de Analisis de agua Agosto - PSSU.pdf".* *Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.*
7	*Report of mitigation measures for bird incidents*	*This indicator is used to reduce and monitor the impact of the project on bird populations. This parameter will be used as an indicator of an environment SDS.* *The evidence: "Monitoreo de situaciones en los parques 2023_2024.xlsx", was checked and found correct* *This parameter is based in a qualitative assessment. Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.*
8	*Traffic and Road Safety Hazards*	*<u>Number of traffic incidents within the project areas</u>: **PSSU:** 1 ; **PSTO III:** 1. Monitored throughout the construction phase and during major maintenance activities.*

		The following documents were checked: "Monitoreo de situaciones en los parques 2023_2024.xlsx"; "Manejo Defensivo Protocolo.pdf"; "Viaje metodo CONVOY - PSTO III.docx". *Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.*
9	*Wildlife and Habitat Impacts during Construction and Abandonment Phases*	*Significant impacts documented: **PSSU:** 0; **PSTO III:** 0* *The following evidence wqs checked: "Registro de Fauna - PSSU 2024.xlsx"; "Registro de Fauna - PSTO III 2023.xlsx"; "Registro de Fauna - PSTO III 2024.xlsx"; "Wildlife and Habitats impacts matrix - PSSU.xlsx"; "Wildlife and Habitats impacts matrix - PSTO III.xlsx"; "Monitoreo de situaciones en los parques 2023_2024.xlsx".* *No significant wildlife and habitat impacts were recorded during the monitored period for PSSU and PSTO III.* *Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.*
10	*PM10 (Respirable Thoracic Particulate Matter)*	*< 0.05 mg/m³ for the three tested samples. Results in: "Air Quality Results.pdf". checked by the auditor.* *Information on the equipment used to measure PM10 was checked and found correct.* *Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.*
11	*Community Mental Health and Well-being*	*Number of Complaints/Concerns/Comments Received: **PSSU:** 0; **PSTO III:** 1. The following evidence was checkes: Seguimiento Mental Health and Well-being.xlsx", and evidence of the training provided to ensure safe driving practices by park personnel is included in the document "Reinducción Conducción Segura y Velocidades - Reclamo Social Mayo 2024.pdf".*

		Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.

After closure of the above finding, the audit team assessed each monitored parameter, the reference documents provided by the project holder and the onsite visit and can confirm all of them are aligned with the provisions in the monitoring plan of the PD.

5.1.2.3 Procedures for the management of GHG reductions or removals and related quality control for monitoring activities

The audit team can attest that all indicators relevant to project performance monitoring and reporting have been included in the project monitoring plan. The frequency, responsibility and authority for recording, monitoring, measuring and reporting of project activities have been clearly developed with a "best practice" management system in mind, which has also established effective and necessary quality control measures and procedures in the collection of monitoring data, as well as the stipulations of the methodologies being used.

5.1.2.4 Description of the methods defined for the periodic calculation of GHG reductions or removals, and leakage

The monitoring methods in place for the periodic calculation of GHG emission reductions were assessed based on document review, site visit inspection and the quality control performed by the audit team to confirm they are in line with the provisions of ACM0002 and applied tools, the description in the monitoring plan of the PD, as well as with CAMMESA requirements.

By this assessment, the audit team confirmed that the procedures for data generation, aggregation, recording, calculation and reporting, the organizational structure and roles and responsibilities, the QA&QC, emergency procedures, meters verification and all aspects of the monitoring methods are in accordance with the methodology and tools applied as well as with CAMMESA requirements.

5.1.2.5 Assignment of roles and responsibilities for monitoring and reporting the variables relevant to the calculation of reductions or removals

Through documents review and site visit inspection the audit team was able to verify that the organizational structure outlines the roles and responsibilities of each team member responsible within the monitoring plan for the proper implementation and execution of the Monitoring, Reporting, and Verification (MRV) of the project.

Furthermore, it was verified that the job descriptions that detail the role and responsibilities of the team members (plant managers, coordinator of control center operations, O&M technicians, O&M leader, plant administrative, security, health and environment (SHyMA) technician and monitoring coordinator) with regards to monitoring and reporting the

variables relevant for the calculation of GHG emission reductions as described in Table 51 of the PD are in place and each team member is aware of their responsibilities.

Thus, through the above mentioned assessment, the audit team confirmed that under the project management system the roles and responsibilities for project monitoring are in place in line with the provisions of the MRV tool and the PD.

5.1.2.6 Procedures related whit the assessment of the project contribution whit the Sustainable Development Goals (SDGs)

Verification CL01 *to request the project holder to clarify is section 4 of the MR the following in line with the MR template v3.4 instructions: i) the activities performed during the monitored period that contributed to the achievement of each SDG, the results of the monitored parameters and their contribution to each SDG indicator defined; ii) describe how the project activities contribute to achieving any nationally stated sustainable development priorities, including any provisions for monitoring and reporting the same; iii) review the project's contribution to SDG 9.*

Section 4 of the MR was updated including activities performed during the monitored period that contribute to achieve each SDG and referred to the results in section 15.2.2. SDG 9 was removed from the project contribution to SDGs.

The Project holder stated that because Argentina is currently in the process of redefining its nationally stated sustainable development priorities, it is not yet possible to assess this grouped project's contribution to these priorities within the current monitoring period. The sources have been checked, and found correct.

5.1.2.7 Procedures associated with the monitoring of co-benefits of the special category, as applicable

Verification CAR04 *was raised to request the project holder to include in section 12 of the monitoring report, the measurement and tracking of co-benefits as per the MR template v3.4 instructions.*

As stated in the validation findings section the project holder answered that it would no longer pursue the special category. Thus, this item is not applicable.

Additionally, the monitoring of compliance with applicable legislation was assessed by the audit team.

Verification CAR01 *was raised to request the project holder, in line with MR template v3.4 instructions and BCR standard section 11.7, to: i) provide evidence of compliance with applicable legislation related to the activities carried out by the GHG mitigation activities; ii) describe the documented procedure, and the Documentary Management System in place, which identifies relevant legislation and regulations access them on an ongoing basis, demonstrating that it has a process for periodically compliance.*

The project holder has described and demonstrated the compliance of the project with applicable legislation and has provided the procedure of legal and other requirements compliance in place.

5.2 Quantification of GHG emission reductions and removals

The verification team has reviewed the ER spreadsheet and checked all the formulae and verified them to be correct and in line with the monitoring plan of the PD and the applied monitoring methodology.

All the monitored parameters are described above. All the ex-ante parameters which are used in the calculation of emission reduction are presented in the MR transparently. It is confirmed that all the ex-ante parameters have been correctly used in the emission reduction calculation.

Baseline emissions were calculated as per ACM0002 Version 22.0.

No project emissions are considered for the project activity as the project activity has no fossil fuels consumption for electricity generation. It has been checked this is in line with the applied methodology and in compliance with the PD.

As per the methodology and as defined in the registered VCS PD, no leakage is considered in the project activity and the same is followed in this monitoring period. Thus, it follows the PD.

All arrangements described in the Monitoring Plan have been checked. No deviations have been identified.

As no project emissions and no leakage were identified for the project, $ER_y = BE_y$.

Thus, the audit team confirms that:

- *According to the applied methodology, the conservativeness of the achieved emission reduction was checked, and the detailed emission reduction calculation has been transparently provided in the ER sheet.*
- *All the formulae and the calculation procedure were checked.*
- *In the opinion of the audit team, the assumptions, emission factors and default values that were applied in the calculations have been justified.*
- *There were no manual transposition errors between the data sets in the ER spreadsheets during the current monitoring period.*
- *The data has been measured directly from meters and it was cross-checked from the official monthly records downloaded from CAMMESA web site.*

- *All the formulae have been found to be correctly applied in the GHG emission removals calculations.*

- *The excel spreadsheets were cross checked with the archived monitored data and no discrepancies were found.*

- *After revision of the MR /1/ and calculation spreadsheet /2/, it is concluded that the GHG emission reductions spreadsheets are transparent and clearly referenced.*

Thus, the audit team is confident that the quantification of GHG emission reductions is correct, accurate, traceable, and conservative.

5.2.1 Methodology deviations (if applicable)

Not applicable. There were no methodology deviations during the present monitoring period.

5.2.2 Mitigation results

The audit team performed a detailed and traceable assessment of the mitigation results reported by the project. The purpose of this assessment was to ensure that the emission reductions are correctly calculated, reliable, and fully attributable to the project activities, in line with the requirements of the BCR Standard and ISO 14064-3:2019.

1. *Assessment of Data Reliability:*
    - *The nature and quality of evidence for key parameters were assessed, including monitoring records, CAMMESA reports, and official emission factor sources.*
    - *Default values applied from the ACM0002 v22 methodology and Tool 07 were confirmed to be consistent with approved guidance.*
    - *On-site verification confirmed that data collection systems and procedures were applied correctly, and metering equipment was calibrated in accordance with industry standards.*

2. *Evaluation of Calculations:*
    - *The emission reduction calculations were reviewed in detail, including spreadsheet formulas, unit conversions, and aggregations.*
    - *Independent recalculation of baseline emissions, project emissions, and net GHG reductions was performed by the audit team. Results were consistent with those reported in the Monitoring Report.*
    - *No discrepancies were identified between the submitted spreadsheets and the verified calculations.*

3. *Consistency of Parameters and Tools*
    - *Cross-checks confirmed the consistent use of parameters throughout the Monitoring Report, calculation spreadsheets, and referenced tools.*

- *Application of fuel emission factors, baseline assumptions, IPCCC values and project generation data was consistent and traceable.*

The verified GHG emission reductions is presented in the following sections in a clear and traceable manner. A summary is shown below:

BE_y *= 346,046 MWh x 0.357 tCO2/MWh = 123,470 tCO2e*

As per the methodology the Emission reductions for this project activity will be BEy = ERy

Hence, ERy = 123,470 tCO2eAs above mentioned, ***verification CL02*** *was raised concerning* $EG_{PJ,y}$*, y values crosschecked with CAMMESA reports and* ***verification CAR06*** *was raised concerning the consistency of the values illustrated in the PD and ER spreadsheet to guarantee all of them match and are reproducible and that the final result of ERy in the present monitoring period was determined in a conservative manner.*

After closure of the above findings the audit team concludes that the ACM0002 v22 methodology and all referenced tools were correctly and consistently applied. The mitigation results are accurate, reliable, and transparently traceable to the verified monitoring data. Therefore, the reported net GHG emission reductions for the monitoring period are considered valid and in compliance with the requirements of the BCR Standard and ISO 14064-3:2019

5.2.2.1 GHG baseline emissions

According to ACM0002 Version 22.0 baseline emissions include only CO2 emissions from electricity generation in fossil fuel fired power plants that are displaced due to the project activity. The methodology assumes that all project electricity generation would have been generated by existing grid-connected power plants and the addition of new grid-connected power plants.

According to the methodology, the baseline emissions are to be calculated as follows:

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

Where:

BE_y *= Baseline emissions in year y* (tCO_2/yr)

$EG_{PJ,y}$ *= 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/yr)*

$EF_{grid,CM,y}$ *= Combined margin* CO_2 *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"* (tCO_2/MWh)

$EF_{grid,CM,y}$ has been determined ex ante as per the Tool to calculate the emission factor for an electricity system V7.0 as stated in section 5.5 of this report and it was verified that the same values were utilized in the MR and ER calculation spreadsheet.

$EG_{PJ,y}$ has been monitored and determined as stated in section 5.1.2.1 of this report.

As above mentioned CL1 was raised concerning $EG_{PJ,y}$, y values crosschecked with CAMMESA reports and CAR6 was raised concerning the consistency of the values illustrated in the PD and ER spreadsheet to guarantee all of them match and are reproducible and that the final result of ER_y in the present monitoring period was determined in a conservative manner.

After closure of CL, the baseline emissions during the present monitoring period were verified to be:

BE_y = 346,046 MWh x 0.357 tCO2/MWh = 123,470 tCO2e

5.2.2.2 GHG project emissions

According to the applicable methodology for this project activity, PE = 0

5.2.2.3 GHG leakage

According to the applicable methodology for this project activity, LE = 0

Hence, as per the methodology the Emission reductions for this project activity will be, BEy = ERy

As above stated, CAR6 was raised concerning the consistency of the values illustrated in the PD and ER spreadsheet to guarantee all of them match and are reproducible and that the final result of ERy in the present monitoring period was determined in a conservative manner.

After closure of CAR6, the audit team confirmed that:

ERy = 123,470 tCO2e

5.3 Stakeholder engagement and consultation

The audit team assessed through document review, onsite visit and interviews with stakeholders that the project holder has in place methods for identifying, engaging and guaranteeing ongoing communications with local stakeholders, that includes various communication and dialogue channels: telephone numbers, email address, mailbox at the entrance of the sites, complaints, queries and claims book; among others.
Furthermore, procedures for monitoring stakeholder consultation are in place with progress of consultations documented in a monitoring spreadsheet.

The project holder presented the evidence of the procedures and registries in place. The audit team assessed the evidence and was able to verify that the comments received did not lead to its inclusion or changes in the project design.

CAR03 was raised to request the project holder to provide in MR specific information regarding the ongoing communication with stakeholders during the monitored period and to include in the MR a summary of the stakeholder comments received during the present monitoring period and project holder responses.

The project holder has provided in the MR specific information about the ongoing communication with stakeholders during the monitored period and provide evidence.

During the verified monitoring period the company received 7 comments in total related to PSSU and 3 comments related PSTO III. In the table 14 of the MR, the summary of considerations and actions taken in response to the comments received from stakeholders were shown. According to the Queries and claims monitoring spreadsheet "Seguimiento QCyR.xlsx", the audit team verified that the consultations were to ask for donations (3), to visit the solar parks (1), to ask for a talk about the project (1), to request information for a thesis (1), request for equipment for solar installation (1), request for toys for Children´s Day (1), request for sponsorship for the renewable energy room, and to complain about the vehicles speed (1). All the consultations were answered and solved on time.

Thus, the audit team confirms that the project has in place an ongoing stakeholder consultation system and that stakeholders' comments received during the verified monitoring period were attended and solved in a proper manner.

5.4 Sustainable development safeguards (SDSs)

See table which provides a summary of the SDS of the project activity, with the VVB assessment and conclusion (above section 5.1.2.2 Data and Parameters). As per Section 5.1.2.2 of the MR "Data and parameters monitored", sub-section "SDS and SDGs".

The following tables summarize the SDS from the assessment questionnaire in section 8 of the PD.

Sector	*Sustainable Development Safeguards*	*Verification Assessment*
8.1 Environment	*8.1.1 Land Use: resource efficiency and pollution prevention and management*	*Mitigation Measures for land degradation and for waste management. This parameter can be found in Section 16: Monitoring Plan.*

	8.1.2 Water	
	8.1.3 Biodiversity and ecosystems	The indicator to monitor these mitigation measures will be the wildlife impacts during all phases of the projects and measures to mitigate the negative impact of chemical contamination or pollution in soil, water and air, this parameter can be found in Section 16: Monitoring Plan.
	8.1.4 Climate Change	The project activities have the potential to alter the phenology and behavior of species, affecting reproductive cycles, migration patterns, and interactions with other species, thus disrupting ecosystem dynamics. The indicator to monitor these mitigation measures will be the report of mitigation measures for bird incidents and this parameter can be found in Section 16: Monitoring Plan.
8.2 Social	8.2.1 Human Rights	No potential risks regarding: - "Labor and Working conditions", - "Gender equality and women empowerment" - Indigenous people and cultural heritage Potential risk regarding: - Land acquisition, restrictions and land Use, Displacement and Involuntary resettlement. Measures are also being implemented to mitigate this impact - Community health and safety: The indicator to monitor this mitigation measure will be the community mental health and well-being by assessing the number of complaints and concerns related to the project formally received by community

		members. This parameter can be found in Section 16: Monitoring Plan.
	8.2.2 Corruption	No potential risks are found. Justification for the response was checked in the MR (section 8.2.2) and found correct.
	8.2.3 Economic Impact	No potential risks are found. Justification for the response was checked in the MR (section 8.2.3) and found correct.
8.3 Governance and Compliance		No potential risks are found. Justification for the response was checked in the MR (section 8.3) and found correct.

Description stated in the MR is accurate and according to the evidence provided. No discrepancies were found.

5.5 Sustainable Development Goals (SDGs)

Through document review and onsite visit the audit team was able to evaluate the compliance of the criteria and indicators that the project establishes to determine how the activities of the project contribute to the objectives of the SDG, using the BCR's SDG tool. Based on this assessment, it was possible to verify that during the verified monitoring period the project contributed to:

- *SDG 7 by increasing renewable energy's share in the SADI, impacting in Global Indicator 7.2.1 by generating measurable megawatt-hours (MWh) of clean energy that displaces fossil fuel-based electricity, thereby advancing Argentina's transition toward sustainable energy.*

- *SDG 8 by creating jobs in construction, operation, and maintenance, positively affecting GDP per employed person (Indicator 8.2.1). Employment records track the creation of stable jobs that promote financial inclusion (Indicator 8.10.2) by enabling workforce access to banking and financial services.*

- *SDG 12 by recycling and waste reduction strategies ensure sustainable material handling during all project phases, aligning with Indicator 12.5.1, while contributing to Indicator 12.c.1 by reducing fossil fuel dependence and subsidy requirements.*

- *SDG 13 by complying with Argentina's climate laws and plans (Law 27,191 and PNAyMCC), helping to meet Indicator 13.2.1 through renewable energy integration. Training programs bolster local climate resilience and awareness, aligning with Indicators 13.3.1 and 13.3.2, monitored through participant records and training feedback.*

- *SDG 15 by land restoration during the project's abandonment phase, addressing Indicator 15.3.1. by rehabilitating disturbed land areas, the project mitigates land degradation and promotes sustainable land management, with progress tracked by documenting hectares restored.*

Verification CL01 *was raised to request further clarification about activities, measurements and contributions to the indicators and successfully closed.*

In conclusion, the audit team was able to verify through the documentary review and onsite visit that the SDGs identified correspond and are reported in accordance with the BCR's SDG tool. Thus, the project contributes to the fulfillment of the Sustainable Development Goals, which are adopted by the Argentine state as a member of the United Nations and as part of the 2030 Agenda.

5.6 Climate change adaptation

The audit team assessed the environmental impact assessments (EIA) of PSSU and PSTO III and confirmed they include climate change adaptation measures derived from the GHG project activities.

Verification CAR02 *was raised to request the project holder to demonstrate in MR section 6 the actions carried out related to climate change adaptation during the monitoring period, demonstrating that these are derived from the GHG Project activities in line with MR template v3.4 instructions and BCR standard v3.4 requirements. For example: the number of floodings reported in section 15 doesn't demonstrate the actions conducted by the project holder to adapt to these events. Similarly, in section 15 it's not demonstrated if during the monitoring period there have been operational suspensions due to weather and how the project holder carried out adaptation actions. The same applies to the actions associated with the other indicators.*

It was confirmed through document reviewed and, onsite visit that during the present monitoring period the project holder has implemented the following actions that contribute to climate change adaptation:

The project holder has described in MR and provided references to demonstrate the actions carried out related to climate change adaptation during the monitoring period that are derived from the GHG Project activities.

5.7 Co-benefits (if applicable)

Verification CAR04 was raised given that MR V1.0 section 12 lacked information as required in the MR template instructions regarding co-benefits. Thus, the project holder was requested to include the measurement and tracking of co-benefits.

The project holder has removed the application to co-benefits, hence, CAR was closed.

5.8 REDD+ safeguards (if applicable)

Not applicable.

5.9 Double counting avoidance

The audit team assessed the double counting avoidance of the project in accordance with the "Avoiding Double Counting" Tool of the BCR standard.

In this regard, it was confirmed that the four scenarios described in the ADC Tool are met in this grouped project:

a) A ton CO2e is counted more than once to demonstrate compliance with the same GHG mitigation target.
b) One ton CO2e is counted to demonstrate compliance with the GHG mitigation objective.
c) A ton CO2e is counted more than once to obtain remuneration, benefits or incentives.
d) A ton CO2e is verified, certified or credited and assigned more than one serial for a single mitigation outcome.

Regarding the provisions in place to avoid the double issuance of VCC, the audit teams has confirmed that this grouped project has not been included or registered in any other GHG program (CDM, VS, GS, GCC, etc.). Additionally, it was confirmed the project activity has no potential overlap with other policies, programs, and mechanisms (i.e. I-RECs).
Also, the "Framework Contract signed between the Biocarbon's Registry and Project Holders" addresses this topic by prohibiting, in its Seventh clause, Double Accounting and the double issuance of VCC.

Therefore, the audit team considers that the information provided by the project holder and publicly available data reviewed allows concluding that the project in in compliance of the double counting avoidance requirements.

6 Internal quality control

The validation/verification team reviewed the monitoring documentation, as part of the PD, and considered that they are in accordance with the procedures described in the validated monitoring plan and the monitoring plan and checked if there were any differences that could cause an increase in the estimates of GHG emission reductions in the current monitoring periods.

The validation/verification team has confirmed that there are no significant material discrepancies between the actual monitoring system and the monitoring plan established in the PD and the methodologies applied, so there is no overestimation of the requested reductions. In addition, the project holder effectively monitors the parameters required to determine the project reductions as required by the monitoring plan and applicable methodology.

The reported parameters, including their source, monitoring frequency and review criteria, as indicated in the PD, were verified as correct. The necessary management system procedures, including responsibility and authority for monitoring activities, were verified to be consistent with the PD. The knowledge of personnel associated with the project monitoring activities was found to be satisfactory by the audit team.

Finally, in KBS's quality management process, there is an internal review of the audit process, in which an assurance is made of the scope, the program rules and how the validation and verification report manages to gather this evidence and its adequate management to present the final statement. For this purpose, the final validation and verification report prepared by the audit team was reviewed by an independent technical review team to confirm if the internal procedures established and implemented by KBS were duly complied with and such opinion/conclusion is reached in an objective manner that complies with the applicable BCR requirements. The technical review team is collectively required to possess technical expertise of all the technical area/sectoral scope the project activity relates to. All team members of technical review team were independent of the verification team. The technical review team may accept the opinion of audit team or raise additional findings in which case these must be resolved before requesting for the technical review process may accept or reject the verification opinion. The technical review process is recorded in the internal documents of KBS and the additional findings gets included in the report. The final report approved by the technical reviewer is submitted for administration review. The administration review team will review the final documentation. After the final approval, the final set of documents are prepared by the Technical Manager or his deputy and signed by the authorized signatory of KBS. In case any of the persons performing this final internal quality, control approval process has acted as a part of the Assessment Team or Technical Review team, the approval can only be given by personnel who are not part of those teams. If the final set of documents has been satisfactorily approved, they are submitted to BCR standard.

7 Validation and verification opinion

The validation/verification team confirms that the evidence is of sufficient quantity, appropriate quality and reliable. The reported values, notation, units and sources in the monitoring report for all the monitoring parameters have been cross checked with the emission reduction sheet and monitoring report. During the course of validation and verification and on-site audit, the data submitted by the project holder was cross verified with the values mentioned in the emission reduction sheet and monitoring report. The procedure for data monitoring, recording, transfer and compilation was also verified and found in compliance with the monitoring plan as mentioned in the revised PD.

The validation confirms that the ex-ante analysis of the project's GHG reductions have been carried out in an accurate, transparent and conservative manner, being estimated at an average annual amount of GHG emission reductions of 128,988 tCO2e/year and an estimated total of 902,914 tCO2e for the first 7 years GHG reduction quantification period.

Evidences referred for verification of individual monitoring parameter and fixed parameters are defined in section 6 above. It is confirmed by the assessment team that the reported emission reductions have been conservatively calculated. A list of referred documents for verification is also included in Annex 3 of this report.

Based on the information seen and evaluated we confirm that the implementation of the project has resulted in 123,470 tCO_2e emission reductions during period from 30/03/2023 until 31/10/2024.

Finally, the validation and verification process results in a conclusion by KBS Certification Services Ltd., after gathering sufficient evidence to fully evaluate the validation and verification criteria and determine that the project is implemented in accordance with the BCR standard requirements, which is reflected in the Project Description and the Monitoring Report.

Therefore, KBS Certification Services Ltd. recommends the project for registration by the BCR.

With regards to verification, KBS Certification Services Ltd. confirms that all operations of the project are implemented and installed as planned and described in the PD, the monitoring plan is in accordance with ACM0002 v 22.0, the equipment essential for measuring parameters required for calculating emission reductions are properly maintained, the monitoring system is in place and functional, the project has generated GHG emission reductions during the monitoring period that were calculated without material misstatements in a conservative and appropriate manner. Thus, KBS Certification Services Ltd. confirms that the project has achieved 123,470 tCO2e of GHG emission reductions in the in the period 30/03/2023 – 31/10/2024.

8 Validation statement

The validation statement is attached to this document.

9 Verification statement

The verification statement is attached to this document.

Furthermore, a declaration was provided that the GHG statement verification was conducted in accordance with ISO 14064-3, along with the applicable version.

10 Facts discovered after verification/validation

Not applicable

Annex 1. Competence of team members and technical reviewers

Provide documentation to demonstrate the required competence of the validation team members and technical reviewers.

The audit team consists of the following members:

Raúl González Mitre	*Lead auditor*
Adriana Torchelo	*Auditor*
Sofía Castro	*Auditor*
M. P. Prasanna	*Technical reviewer*

A summary of the curricula vitae of the team members are provided below:

Mr. Raul G. Mitre is a professional and entrepreneur with more than 15 years of experience in climate change, especially in Monitoring, Reporting and Verification and more than 20 years of experience in management systems. He has a degree in Industrial Administration, specializing in productivity and quality from the National Polytechnic Institute. He holds a Master's degree in Quality Management from the University La Salle of México City, a Master's degree in Project Management from the the University Ramon Llull of Barcelona, a postgraduate degree in Integrated Management Systems from the University of Wismar in Germany, an MBA from the University La Salle of Andorra and a PhD in Sustainability form the Pan American Center for Higher Education University. He has worked in several international companies as Climate Change Manager and GHG Senior Auditor, evaluating more than 250 projects in more than 20 countries all over the globe. He has the scope to assess projects which aim to reduce emission reduction in sectors like renewable energy, energy demand, energy efficiency, transport, industry, waste management, agriculture and forest management. He is also an international auditor of ISO 9001 (quality), ISO 14001 (environment), ISO 45001 (occupational safety), ISO 37001 (anti-bribery), ISO 50001 (energy), ASCA (corporate social responsibility), ISCC (International Sustainability Carbon Standard), RSB (Round Table of Sustainable Biomaterials), Bonsucro and consultant and trainer specialized in the same standards. He is a delegate and internal auditor certified by the German Society for Quality, as well as a certified quality management technician by the European Organization for Quality (EOQ).

Mrs. Adriana Torchelo holds a degree in Chemical Engineering from the University of the Republic (UDELAR) and a Master's degree in Business and Administration from the University of Montevideo (UM). She is also an ISO 9001 and ISO 14001 certified specialist and a Certified Measurement and Verification Professional (CMVP). She has 20 years of experience in climate change, working for governmental institutions, international

institutions and private companies in Latin America. As a consultant, she has developed and monitored more than 40 GHG emissions reduction projects, mostly of renewable energies in Argentina, Brazil, Chile, Uruguay, among other countries. She also developed and implemented GHG programs of activities and nationally appropriate mitigation actions and has collaborated and supervised the elaboration of cities climate actions plans aligned with Paris Agreement in Argentina, Ecuador, Brazil, Bolivia, Perú and México. Since 2022 she has been an auditor at KBS.

Mr. M.P. Prasanna holds a Bachelor's degree in Mechanical Engineering. He has around 33+ years of experience in Quality management systems. He is a Certified Internal Auditor in Integrated Management System (QMS ISO-9001:2015, EMS ISO 14001:2015 & ISO 45001:2018 OHSAS). Certified Lean Six Sigma Black Belt holder from TUV. He has handled various GHG Projects of CDM, GS, VCS and GCC and has been instrumental in preparing Audit plans, conducting onsite/remote audits, and preparing final validation and verification reports.

The audit team is qualified in accordance with KBS Certification Services Limited qualification scheme for validation and verification of projects as below illustrated in KBS certificates of competence.

Personnel Name:	*Raúl González Mitre*				
Schemes	☒ *CDM*	☒ *GCC*	☒ *GS*	☒ *VCS*	☒ *Other GHG Schemes (Cercarbono, Biocarbon)*
Qualified to work as:					
Team Leader	☒	*Technical Expert*	☒		
Validator/Verifier	☒	*Financial Expert*	☒		
Technical Reviewer	☒	*Local Expert (Latin America)*	☒		
Area(s) of Technical Expertise					
Sectoral Scope	*Technical Area*				
SS: 01: Energy industries (renewable/non-renewable sources)	*TA 1.1: Thermal energy generation from fossil fuels andbiomass including thermal electricity from solar* *TA 1.2: Energy generation from renewable energy sources*				
SS 3: Energy demand	*TA 3.1: Energy Demand*				
SS 4: Manufacturing Industries	*TA 4.1: Cement and lime production*				

SS 7: Transport	TA: 7.1: Transport
SS 13: Waste handling and disposal	TA 13.1: Waste Handling and Disposal
	TA 13.2: Manure
SS 14: Afforestation and reforestation	TA 14.1: Afforestation and reforestation
Approved by (Manager C & T)	Shikha Sharma
Approval date:	06/12/2021

Personnel Name	Adriana Torchelo				
Schemes	☒ CDM	☐ GCC	☐ GS	☒ VCS	☒ Other GHG Schemes (Cercarbono, Biocarbon)
Qualified to work as					
Team Leader	☐	Technical Expert	☒		
Validator/Verifier	☒	Financial Expert	☒		
Technical Reviewer	☐	Local Expert (Chile, Argentina, Uruguay)	☒		
Area(s) of Technical Expertise					
Sectoral Scope		Technical Area			
SS 01: Energy industries (renewable/non-renewable sources)		TA 1.2: Energy generation from renewable energy sources			
SS 13: Waste handling and disposal		TA 13.1 Waste Handling and Disposal			
SS 14: Afforestation and reforestation		TA 14.1 Afforestation and reforestation			
Approved by (Manager Competence & Training)		Shikha Sharma			
Approval date		02-09-202202-09-202202-09-2022			

Personnel Name	*Sofia Castro*				
Schemes	☒ *CDM*	☒ *GCC*	☒ *GS*	☒ *VCS*	☒ *Other GHG Schemes (Cercarbono)*
Qualified to work as					
Team Leader	☒	*Technical Expert*	☒		
Validator/Verifier	☒	*Financial Expert*	☐		
Technical Reviewer	☐	*Local Expert (Costa Rica, Honduras, Nicaragua)*	☒		
Area(s) of Technical Expertise					
Sectoral Scope		***Technical Area***			
SS 01: Energy industries (renewable/non-renewable sources)		*TA 1.1: Thermal energy generation*			
		TA 1.2: Renewable Energy Generation			
SS 13: Waste handling and disposal		*TA 13.1: Solid waste and wastewater*			
Approved by *(Manager Competence & Training)*		*Dushyant Parashar*			
Approval date		*10-09-2024*			

Personnel Name	*Mr. M.P. Prasanna*				
Schemes	☒ *CDM*	☒ *GCC*	☒ *GS*	☒ *VCS*	☒ *Other GHG Schemes (VCS CCB, Cercarbono)*
Qualified to work as					
Team Leader	☒	*Technical Expert*	☒		

Validator/Verifier	☒	*Financial Expert*	☐
Technical Reviewer	☒	*Local Expert (India)*	☒
Area(s) of Technical Expertise			
Sectoral Scope		***Technical Area***	
SS 1 – Energy Industries *(renewable/non-renewable sources)*		*T 1.2: Energy generation from renewable energy sources*	
SS 3 – Energy Demand		*TA 3.1 – Energy Demand*	
SS 7 - Transport		*TA 7.1 - Transport*	
***Approved by** (Manager Competence and Training)*		*Mr. Dushyant Parashar*	
Approval date		*21-03-2024*	

Annex 2. Clarification requests, corrective action requests and forward action requests

CL FROM THIS VALIDATION

Finding ID	CL 1	Type of finding	Clarification	Date 06/12/2024
Section No.				
4.1 Project Description				
Description of finding				
Project holder is requested to clarify if all solar parks of the grouped Project activity are and will operate under the framework of the Renewable Energy Electricity Term Market (MATER) scheme and explain briefly how the MATER operates and to which CAMMESA MATER's calls PSSU and PSTO III were presented and awarded given that it's relevant information for the demonstration of additionality.				
Project holder response (22/01/2025)				
For future instances of the grouped project, what matters is not necessarily the participation of the solar parks in those instances within the MATER regime, but rather the existence of an "investment climate" distinct from that of solar parks operating under the RenovAR regime. MATER represents this distinction for the current instance, but another mechanism could represent it in the future, provided it clearly differentiates itself from the conditions established by the RenovAR regime. *An explanation of how both MATER and RenovAR operate has been included in Section 2 of the Project Document.*				
Documentation provided by the project holder				
In the common practice analysis, a footnote (Note D, page 59) was added, referencing relevant links and a spreadsheet (available in Annex 03 of the evidences sent to the VT)				

that demonstrates the granting of dispatch priority to both PSSU and PSTO III under the MATER regime.
CAB assessment (28/01/2025)
The project holder has clarified in section 2 of the PD the MATER and RenovAR schemes and their differences regarding the investment climate. Additionally, has provided reference (https://cammesaweb.cammesa.com/mater-resultado-asignacion-prioridad-despacho/) to the MATER calls in the 2nd and 4th quarter of 2021 where PSSU and PSTO III received the dispatch priority. ***CL is closed.***

Finding ID	*CL 2*	***Type of finding***	***Clarification***	***Date*** ***06/12/2024***
Section No.				
4.5.5 Additionality (Step 4)				
Description of finding				
Regarding step 4 of the common practice analysis conducted, given that the PD states that the similar renewable energy power plants identified in Step 3 (39 for PSSU and 34 for PSTO III) apply technologies that are different to the technology applied in the proposed project activity based on paragraph 12 d) of CDM TOOL24 v03.1 "Investment climate on the date of the investment decision", project holder is requested to describe the "Electricity Supply Program from Renewable Sources " (RenovAR) and the Renewable Energy Electricity Term Market (MATER) schemes, including the periods when each of them operated and clarify why it has been concluded that this represents a different investment climate on the dates of the investment decision of each solar park.				
Project holder response (22/01/2025)				
A detailed description of the functioning of both mechanisms (RenovAR and MATER) was included in Section 2 of the PD. Additionally, a footnote was added in the section				

analyzing common practice (Footnote D, page 59), clarifying that both mechanisms represent different investment environments, as explained in Section 2 of the PD.
Documentation provided by the project holder
The same documentation applies as for CL 01.
CAB assessment (28/01/2025)
The project holder is requested to clarify in PD section 4, step 4 of the common practice, if RenovAR was available by the time of the investment decision in each solar park of Instance 01 and why the justification of the different technology is based on paragraph 12 (d)(ii) ((d) Investment climate on the date of the investment decision, inter alia:...(ii) Subsidies or other financial flows) of Tool 24 v03.1, providing reference documents (reports, analysis, news) to the statement included in PD section 2: "This framework provides greater pricing flexibility and market-driven dynamics, enabling renewable energy projects to compete based on their efficiency and negotiation capabilities. However, MATER involves higher financial risk due to the absence of state-backed guarantees and reliance on market conditions." *The project holder is requested to clarify why the output of step 2 include other renewable energy projects (wind and hydro) and not only solar projects, considering the provisions of TOOL24, Version 03.1, Step 2 (b) and (c) or correct the analysis accordingly. Additionally, please provide in the PD the specific information for each item a) to f) of Step 2 regarding each solar park of instance 1 of the project. Correct the common practice spreadsheet accordingly.* ***CL is open.***
Project holder response (25/03/2025)
It was clarified in Section 3.4, Step 4 of the PD that RenovAR program was available at the time of the investment decision for each solar park in Instance 01. *Regarding the justification for the different technology, points d(iii) and d(iv) were added because the differences between RenovAR and MATER encompass issues related to subsidies and other flows (d(ii)), promotional policies (d(iii)), and legal regulations (d(iv)). To address this, additional explanations of both regimes were included in Section 2 of the PD, along with supporting links provided as footnotes, and the explanation of the differences was enhanced in the common practice section (Section 3.4, Step 4).* *Concerning the higher financial risk mentioned in Section 2 of the PD, this is due to the absence of the state-backed guarantees offered by the RenovAR program, the lack of a subsidized tariff (with the tariff instead determined by an agreement between the energy generator and a private buyer at a market-driven price), and, above all, because the*

generator operating under MATER must request dispatch priority from CAMMESA—which may not be granted due to grid saturation—thereby increasing the financial risk of a project under the MATER regime. In fact, PSTO III is currently experiencing lower-than-expected performance due to curtailment, with its assigned capacity being reduced to 14 MW as a result of changes in dispatch priority granted by CAMMESA amid grid saturation. This reduction is evident in the lower emission reductions recorded during the first monitoring period for PSTO III. If PSTO III had been operating under the RenovAR program, this reduction would not have occurred.

The reason for including other renewable energy projects (wind and hydro) and not just solar was due to a lack of clarity in TOOL24 version 03.1 regarding this point. According to paragraph 14(c) of the tool, similar projects are defined as those that use the same energy source as the proposed project activity. However, if "energy source" is interpreted according to the definition of "different technology" provided in paragraph 12(a): "Energy source/fuel (example: energy generation by different energy sources such as wind and hydro and different types of fuels such as biomass and natural gas)", this creates a contradiction. Projects with a different energy source under that definition would have been excluded in step 2, and thus could not be excluded later in step 4 on the basis of being "different technology." Additionally, we considered it more conservative to include a larger number of projects against which the current project must differentiate itself to avoid being considered common practice. Nevertheless, in accordance with the request in the second paragraph of this CL, wind and hydro projects were excluded from the analysis, and only solar projects were retained.

Documentation provided by the project holder

No additional documentation is provided beyond what has been added in the PD in sections 2 and 3.4 (step 4).

CAB assessment (02/04/2025)

It was verified that Section 3.4 of the PD included now only solar plants as per the tool. The source file "Potencia instalada.xlsx, from "BASE_INFORME_MENSUAL_2024-02.zip" was downloaded directly from CAMMESA´s official webpage, and all information is consistent and correct.

The justification of the different of technology was added and found correct.

However, the excel sheets "PSSU-Potencias instaladas CAMESA" and "PSTO III – Potencias Instaladas CAMMESA" need to be updated with the new analysis as per the PDD.

Also, in Table 27 of the PD, regarding similar projects of PSTO III, the Project Holder is considering PSSU which is part of this Project. Explain and or correct.

CL is open.
Project holder response (03/04/2025)
Excel sheets mentioned in the finding were corrected accordingly. Regarding Table 27 of the PD, PSSU was removed since this was found incorrect.
Documentation provided by the project holder
No additional documentation was provided.
CAB assessment (11/04/2025)
The excel sheets were corrected and Table 27 was updated accordingly. Nos discrepancies were found. ***CL is closed.***

Finding ID	*CL 03*	***Type of finding***	***Clarification***	***Date*** ***06/12/2024***
Section No.				
4.7 Compliance with Laws, Statutes and Other Regulatory Frameworks				
Description of finding				
The project holder is requested to clarify: - *Conformity of the project with all relevant local, regional and national laws, statutes and regulatory frameworks applicable, including with regards to Indigenous Peoples' rights in case future instances could be developed nearby IPs, according to PD template instructions.* *The documented procedure (the "Documentary Management System") in place to identify relevant legislation and regulations, access them on an ongoing basis,*				

demonstrating there is a process for periodically reviewing compliance, as per BCR standard section 11.7.
Project holder response (22/01/2025)
The text addressing compliance with relevant laws, presented in Section 4 of the PD, was updated to address these points.
Documentation provided by the project holder
Relevant links can be found in Footnotes F, G, and H. Annex 06 of the evidences sent to the VT includes a document titled "Procedure for Legal Compliance," which describes the procedure for ensuring legal compliance as part of the Documentary Management System.
CAB assessment (28/01/2025)
The project holder has included in PD section 4 the relevant laws that directly impact project activities and justified the project's compliance of solar parks of Instance 01 with each of them and provided references to support that that has been checked. The project holder also clarified that for future Instances the same process will be followed. *Additionally, the documented procedure "Documentary Management System" in place has been provided and it has been revised to confirm there is a process for periodically identification of relevant legislation and regulations and access them on an ongoing basis in line with BCR standard section 11.7 requirement.* ***CL is closed.***

Finding ID	*CL 04*	***Type of finding***	***Clarification***	***Date*** ***06/12/2024***
Section No.				
4.10 Sustainable development safeguards				
Description of finding				

The project holder is requested to clarify the specific mitigation/preventive actions taken to prevent in actual and future instances: - *Child labor (section 8.2.1.1),* - *Inequitable access to land, etc., particularly disadvantaging women in rural or indigenous communities affected by land use changes in any instance of the project (section 8.2.1.2)* - *Underrepresentation of women in stakeholder consultations (section 8.2.1.2)* - *Conflict over land resources and/or rights land acquisition, imposing restrictions and all results in section 8.2.1.3 due to any instance of the project. Additionally, provide further development about action to mitigate/prevent communities losing access to common resources.* - *Impacts in indigenous people and cultural heritage due to any instance of the project (section 8.2.1.4)* - *Market distortions or increased competition since the response is that the project does not entail or result in these activities, but the justification indicates that the environmental impact assessments have addressed potential impacts on local economies and that indicates awareness about possible market distortions. (section 8.2.3).* - *Losing traditional economics practices and knowledge systems; negatively impacting small-scale enterprises or informal economies; and lack of economic resilience due to any instance of the project (section 8.2.3)* *Additionally, please clarify if monitoring of heavy metal content in wastewater is relevant considering the characteristics of the wastewater effluent in the solar parks. Correct section 16 accordingly.*
Project holder response (22/01/2025)
In each of the mentioned sections, relevant information was added to address each point.
Documentation provided by the project holder
Footnotes J to R respond to each point raised in this CL.
CAB assessment (28/01/2025)
The clarification request has been partially answered in the PD given that not all the risks above mentioned in the clarification request have been addressed considering not only actual but future instances of the project. Thus, the project holder is requested to clarify

in the PD the mitigation/preventive action or justification and commitment for the following risks in future instances of the project.

- *Inequitable access to land, etc., particularly disadvantaging women in rural or indigenous communities affected by land use changes in any instance of the project (section 8.2.1.2);*
- *Conflict over land resources and/or rights land acquisition, imposing restrictions and all results in section 8.2.1.3 due to any instance of the project.*
- *Communities losing access to common resources, such as forests, water bodies, or grazing lands, due to land acquisition or use restrictions, in future instances since it was not addressed in answer to question "1" as mentioned in the PD.*
- *Impacts in indigenous people and cultural heritage due to any instance of the project (section 8.2.1.4).*
- *Losing traditional economic practices and knowledge systems, potentially undermining cultural heritage and resilience to economic shocks in communities? (section 8.2.3): It was selected there is no impact, and it was added "This will be properly assessed for future solar parks of future Instances." Please clarify, the preventive/mitigation actions to be taken or proposed or committed to guarantee that.*

Regarding the monitoring of heavy metal content in wastewater, the project holder has removed it from PD section 8 and 16 without a justification. Please, clarify why the parameters have been removed and if there is no legal environmental requirement to monitor this parameter (EIA, etc.).

CL is open.

Project holder response (25/03/2025)

Mitigation/preventive action or justification and commitment for the risks included in this CL, and regarding future instances of the project, were included in the corresponding tables in section 8 of the PD.

Heavy metal content in wastewater was removed because, although it was originally planned to be monitored, it was determined that such monitoring is not relevant since the only wastewater generated in the solar parks consists of feces and urine from employees using the portable toilets on-site. Monitoring heavy metal content in this type of waste is considered unnecessary, and there is no legal requirement to monitor this parameter.

Documentation provided by the project holder

Not Applicable

CAB assessment (31/03/2025)
The Section 8 of the PDD has been updated as per requested. The project holder now included aspects such as mitigation/preventive action or justification and commitment regarding future instances. Also, regarding indigenous people (section 8.2.1.4) the Project Holder confirms that the grouped project complies with the protection of Indigenous Peoples' rights, as addressed in section 4 of the PD "Compliance with laws, statutes and other regulatory framework", Section 8.2.3 was also updated and found correct. *Explanation regarding why heavy metals content in wastewater has been removed, was included. Even though some solar panels contain heavy metals, which can leach into soil or water (posing an environmental hazard), due to an improper handling during installation or decommission, it was found that other measures are included to prevent these possible impact, such as "Land affected by environmental liabilities", "Response to Hazardous Waste spills", "Bacteriological and Physicochemical quality of water for human consumption" and "Recycled material", hence this elimination is accepted as there is no legal requirement.* ***CL is closed.***

Finding ID	*Cl 05*	***Type of finding***	***Clarification***	***Date*** ***06/12/2024***
Section No.				
4.11 Stakeholder engagement and conclusion				
Description of finding				
According to BCR Standard version 3.4 section 16.1 and PD template version 2.4 section 9, the project holder is requested to clarify and provide further information about: *- The stakeholder consultation conducted before validation to provide information on the project's activities, design and facilitate access to all information related to the project's potential environmental and social effects, and demonstrate how the process meets the relevant requirements: (a) the scope of stakeholder consultations;*				

(b) the number of stakeholders consulted; (c) the means used to invite interested parties to participate in the consultations; (d) the information that was made available to stakeholders during the consultation process; (e) the meetings, workshops and other processes developed in the framework of the stakeholder consultation. - *Provide evidence that invitations were sent to relevant stakeholders, inviting them to comment. If any of the relevant stakeholders did not receive an invitation, the project holder should provide appropriate justification.* - *In PD section 9.1 Provide a summary of the comments received.* *In PD section 9.2 describe how comments have been considered. If complaints or grievances were filed by stakeholders, provide a full explanation of how they were addressed and whether they have been satisfactorily resolved.*
Project holder response (22/01/2025)
In Section 9 of the PD, Point 6 (Communication to Stakeholders) includes information on how the stakeholder consultation process was conducted, providing evidence of public hearings held to invite stakeholders to comment on the construction projects of both solar parks in Instance 01 (PSSU and PSTO III). *Section 9.1 provides a summary of the comments received.* *Section 9.2 describes how these comments were considered and addressed.*
Documentation provided by the project holder
Documentation of relevant public hearings conducted as part of the stakeholder communication process was added to Annex 08 of the evidences sent to the VT. *The document "Stakeholders Complaints, Inquiries, and Claims.xlsx" in Annex 08 has been updated.*
CAB assessment (2801/2025)
The project holder has partially addressed the CL. Specifically, regarding the public hearings, although the minutes of the public hearings for each solar park were provided as references, in line with PD template version 2.4 section 9 instructions, the project holder is requested to provide the following information in the PD for each project with regards to the public hearings conducted within the framework of the solar parks environmental approvals: *(a) the scope of stakeholder consultations;* *(b) the number of stakeholders consulted;*

(c) the means used to invite interested parties to participate in the consultations; *(d) the information that was made available to stakeholders during the consultation process;* *(e) the meetings, workshops and other processes developed in the framework of the stakeholder consultation.* ***CL is open.***
Project holder response (25/03/2025)
All the information requested for the public hearings was included in step 6 "Communication to stakeholders" within section 9 of the PD.
Documentation provided by the project holder
New documents were added to Annex 08 as referenced in section 9 of the PD.
CAB assessment (31/03/2025)
The project holder has included all issues missing and has corrected the PD (Step 6), accordingly and in line with PD template version 2.4 section 9 instructions. ***CL is closed.***

Finding ID	*CL 06*	***Type of finding***	***Clarification***	***Date*** ***06/12/2024***
Section No.				
4.6.1 Description of Monitoring plan				
Description of finding				
According to the PD v1.0 the grouped project intends to achieve the Orchid category only for the Community Benefits component. Thus, biodiversity conservation and gender equality components illustrated in the BCR standard v3.4 for this category have not been				

included. The project holder is requested to clarify its compliance with the BCR requirements.
Project holder response (22/01/2025)
It was decided to remove the project's application to co-benefits.
Documentation provided by the project holder
Not applicable.
CAB assessment (28/01/2025)
The project holder has decided not to apply to co-benefits and has updated the PD accordingly. ***CL is closed.***

Finding ID	*Cl 07*	***Type of finding***	***Clarification***	***Date*** ***06/12/2024***
Section No.				
4.6.1 Description of Monitoring plan				
Description of finding				
Regarding data and parameters to be monitored, the project holder is requested to clarify: - *If according to CAMMESA SMEC rules and procedures is feasible for the project holder to verify the meters at least once every three years. Otherwise, provisions of TOOL05 (Baseline, project and/or leakage emissions from electricity consumption and monitoring of electricity generation Version 03.0) shall be considered: "The calibration of meters, including the frequency of calibration, should be done in accordance with national standards or requirements set by the meter supplier or requirements set by the grid operators"*				

- *If the SDG 12 and indicator 12.c.1 will be monitored as stated in PD section 10: "The effectiveness of this shift will be monitored through national energy expenditure reports, analysis of changes in fossil fuel subsidy allocations, or comparisons of energy sourcing before and after project implementation, effectively tracking either the reduction in national fossil fuel subsidies or the increase in national renewable energy subsidies." However, it was not included in section "16.1.2 Data and parameters to be monitored". If it will be monitored, include it in PD section 16.*

If the number of "Internships provided to EPET 7 students" will be monitored as per section 12 instead of "N/A (qualitative assessment)" for the value to be applied as stated in section 16. Additionally, please clarify if internships will be provided only to EPET 7 or different schools in San Juan and Mendoza where the grouped project is located.

Project holder response (22/01/2025)

The verification of the meters will be conducted by CAMMESA agents in accordance with national standards or requirements established by them. Consequently, the text stating that the verification of the meters would take place every three years has been corrected accordingly (first table in Section 16.3 – QA/QC Procedures to be applied).

Indicator 12.c.1 will not be applied and has been removed from the PD.

The internships provided to EPET 7 students are monitored through reports that validate these internships, and this will be done qualitatively. This has been properly corrected, and the name of the parameter to be monitored has also been updated to "Internships provided to school students."

Documentation provided by the project holder

Not additional documentation provided for this CL.

CAB assessment (28/01/2025)

The project holder has addressed all issues raised and has corrected the PD accordingly.

Regarding meters calibrations or verifications, it was confirmed that CAMMESA has in place its own procedures and electricity billing meters are sealed and cannot be calibrated or verified by any project holder. Up to date, according to CAMMESA procedures, 240 measurement points are audited per year, divided equally between the North and South zones. The selection of the nodes to be audited is random, following a sampling grid that allows for a global overview of the entire SMEC node park. In addition to the annual audit plan, the regulations provide that CAMMESA may require a specific

Audit to be carried out on a SMEC node in the event of alleged deviations in its quality. *https://cammesaweb.cammesa.com/auditoria/* ***CL is closed.***

CAR from this Validation

Finding ID	*CAR 01*	***Type of finding***	***Corrective***	***Date*** ***06/12/2024***
Section No.				
Several (PD template)				
Description of finding				
Project holder has utilized version 2.3 of the PD template. Meanwhile, version 2.4 is already available. Thus, project holder is requested to utilize the latest version of the PD template and review that all sections are filled according to the instructions. For example, the general description of the project provided in section 2 doesn't contain the description of ¨(c) The special category(ies) to which the project is proposed to apply, with a brief description of the criteria by which the project demonstrates compliance¨ required as per the PD template instructions.				
Project holder response (22/01/2025)				
This was corrected accordingly.				
Documentation provided by the project holder				
Not applicable.				
CAB assessment (28/01/2025)				
It was verified that the project holder has updated the PD to version 2.4. ***CAR is closed.***				

Finding ID	*CAR 02*	***Type of finding***	***Corrective***	***Date*** ***06/12/2024***
Section No.				
4.5.2.2 Applicability				
Description of finding				
Table 19 illustrates the tools applied by the project (Tool 01, Tool 07, Tool 23, Tool 24 and Tool 27). However, the list doesn't include TOOL05, doesn't state the version of each tool and doesn't contain the applicability conditions of each tool and how the project meets each on them as required according to paragaph 14 of ACM0002 v22.0.				
Project holder response (22/01/2025)				
This was corrected accordingly.				
Documentation provided by the project holder				
Not applicable.				
CAB assessment (30/01/2025)				
The CAR was partially answered. TOOL05 was not added and some of the applicability conditions of each tool were not included in the PD. E.g.: for TOOL01 and TOOL07. *The project holder is requested to correct the PD to include TOOL05 all the applicability conditions of each tool with the corresponding explanation about how the project meets each of them.* ***CAR is open.***				
Project holder response (25/03/2025)				

TOOL05 was added accordingly. The applicability conditions for each of the tools used were also included. Additionally, the missing explanations detailing how the project meets each of these applicability conditions were provided.
Documentation provided by the project holder
Table 19 of the PD.
CAB assessment (26/03/2025)
It was verified that the Project holder included TOOL05 and all corresponding applicability conditions of each tool with corresponding explanations. PD was updated. ***CAR is closed.***

Finding ID	*CAR 03*	***Type of finding***	***Corrective***	***Date*** ***06/12/2024***
Section No.				
4.5.1 Start date and quantification period				
Description of finding				
The project's quantification periods and total length stated in PD section 3.2.3.2 doesn't comply with requirements established at section 11.5 of BCR standard, V3.4. Thus, project holder is requested to correct these parameters. Please, replicate this correction in the MR.				
Project holder response (22/01/2025)				
This was corrected accordingly as evidenced in tables 29 & 30.				
Documentation provided by the project holder				

Files "Baseline Emissions Calculations.xlsx" and "Emission Factors Calculation.xlsx" in Annex 05 of the evidences sent to the VT were corrected accordingly
CAB assessment (30/01/2025)
The project's quantification periods and total length have been corrected, from 14 years to 7 years and from 42 to 21 years, in line with section 11.5 of BCR standard, V3.4. Thus, project holder is requested to correct these parameters. Please, replicate this correction in the MR. ***CAR is closed.***

Finding ID	*CAR 04*	***Type of finding***	***Corrective***	***Date*** ***06/12/2024***
Section No.				
4.5.5 Additionality				
Description of finding				
The following points of the investment analysis are not in line with the requirements established in TOOL 27, Version 14.0 and need to be revised and corrected accordingly: - *Time of the investment decision and point of no return: the dates of investment decision of each of the two solar parks of the initial instance have not been stated in the PD and supported with evidence as required in paragraph 10 of TOOL27 to confirm all input values used in the investment analysis and the benchmark are valid and applicable at the time of the investment decision taken by the project participant. In this regard, according to information provided during site visit relevant dates are the dates of the approval of the CAPEX of each project: 30/09/2021 (PSSU), 27/09/2022 (PSTO III). Additionally, the point of no return date of each solar park should be stated and supported with evidence.* - *Input values:* - *Provide complete reference documents for each input value utilized in the investment analysis. For example: i) the cost of debt was calculated based on financial reports of other Argentine energy companies dated 31/12/2023, which is after the solar farms of the first instance started to operate and thus, after the time of the investment decision; ii) The cost of debt is also based on*				

a reference from 31/12/2023 after the time of the investment decision; iii) explain if land lease costs are included in O&M, etc.

- *The Project energy generation values in the Investment analysis spreadsheet doesn't match with the values in the Baseline emission calculations spreadsheet and the reference reports "Solar resource and production report of the Sierras de Ullum 78 MWn photovoltaic plant"; 29/10/2021(Table 3.8) and "Solar resource and production report of the 60MWn Tocota III Photovoltaic Plant"; ENERTIS; 11/11/2022 (Table 3.7).*
- *The investment analysis length (25 years) matches neither with the 30 years technical lifetime of the solar panels according to the provider guarantee nor with the 30 years energy generation projections in the solar resource and production reports. According to TOOL27, if a shorter period than the technical lifetime is chosen, the investment analysis shall include the fair value of the project activity assets at the end of the assessment period. However, a 25-year linear depreciation was utilized. Please, review or justify.*
- *Energy price: an energy price of 60 USD/MWh is used for the first 10 years of the solar parks according to PPAs prices and from year 11 to 25 the price utilized is 45 USD/MWh according to spot price. Justify considering the project and its instances that have been designed to operate under the MATER.*
- *Include a list of all input values, the date of the reference and the name of the reference in the investment analysis spreadsheet (Annex 2 of the evidences sent to the VT) and/or the PD.*

- *Inflation rate: the reference utilized (inflation-adjusted geometric average return on equity in the US market relative to the long-term US government bonds for 1973 - 2022) is not in line with the options established in paragraph 17 of TOOL27 (inflation forecast of the central bank of the host country for the duration of the crediting period, or if this information is not available, the target inflation rate of the central bank, or if this information is also not available, the average forecasted inflation rate for the host country published by the IMF or WB for the next five years after the start of the project activity).*
- *Sensitivity analysis: only Energy produced and Opex were considered for this analysis. This is not in line with paragraph 28 of TOOL27 that requires that "Variables, including the initial investment cost, that constitute more than 20% of either total project costs or total project revenues should be subjected to reasonable variation…". Thus, project holder is requested to include variations in Capex and Energy price. Furthermore, it is requested not only to conduct the +/- 10% variation but to vary each parameter (energy produced, Opex, Capex, energy price) to achieve benchmark and describe in the PD the likelihood of each variation considering publicly available data of other projects, reference local or regional values of Capex, Opex, plant load factor, etc., and also the final values of the projects given it is already operative. Additionally, it is requested to include the calculation of the sensitivity analysis (+/- 10% and to achieve benchmark) illustrating each result in the Excel spreadsheet.*

Project holder response (22/01/2025)
Time of investment decision was firstly assumed as the time of commercial authorizations for the start of operations for each solar park as it is the project start date according to BCR Standard. This was corrected accordingly to be in line with the requirements established in TOOL27. Investment decision was established as the time of the Base 0 Date as indicated in the Sub-step 2b of the investment analysis (section 3.4 of the PD). Investment decision dates are: 30/09/2021 for PSSU and 29/09/2022 for PSTO III. *Input values:* *- Regarding the cost of debt, financial reports were corrected to match the investment decision dates for each solar park as evidenced in the "Investment analysis.xlsx" spreadsheet available in Annex 03 of the evidences sent to the VT.* *- Energy generation values in the investment analysis now match baseline emission calculations and are both obtained from ENERTIS generation reports (solar resources reports) made for each solar park and available in Annex 04 of the evidences sent to the VT.* *- Investment analysis has a length of 25 years + 5 years of exit value, which match the total of 30 years of technical lifetime of the solar panels.* *- Energy price was recalculated and evidence for these prices is provided in the "Pricing" tab within the "Investment analysis.xlsx" spreadsheet, and in the "PPAs Price.xlsx" spreadsheet, both available in Annex 03 of the evidences sent to the VT.* *- A list of all sources utilized for input values was included.* *Inflation rate for each solar park was determined according to TOOL27 as can be evidenced in Sub-step 2b of the investment analysis (section 3.4 of the PD) and in the "Investment analysis.xlsx" spreadsheet. Inflation rates values were 3.82% for PSSU and 2.64% for PSTO III, and were established according to data from IMF.* *Sensitivity analysis was corrected accordingly both in the PD (page 51) and in the spreadsheet "Investment analysis.xlsx".*
Documentation provided by the project holder
Regarding investment decision dates, documents "BoD – PSSU.pdf" and "BoD – PSTO III.pdf" were provided in Annex 03 as evidence.

Regarding input values: *- Corrected financial reports for cost of debt (to match investment decision date) are referenced in the tab "We & Wd" and are available in the folder "Estados Financieros" in Annex 03.* *- "Baseline emissions calculations.xlsx" energy generation values were corrected.* *- As previously mentioned, energy price was recalculated and evidence for this prices is provided in the "Pricing" tab within the "Investment analysis.xlsx" spreadsheet, and in the "PPAs Price.xlsx" spreadsheet, both available in Annex 03 of the evidences sent to the VT.* *- Tabs "Sources – PSSU" and "Sources – PSTO III" provide evidence of each input value used and its origin.* *"Inflation Rate IMF.xlsx" is available to the VT and provides evidence for the calculation of new inflation rates established for both solar parks of Instance 01.* *Corrected sensitivity analysis is available in the tab "Sensitivity Analysis" in the "Investment analysis.xlsx" spreadsheet as part of the evidences sent to the VT.*
CAB assessment (31/01/2025)
The time of the investment decision of each solar park was confirmed, the cost of debt was corrected based on data available by the time of the investment decision, etc. *However, the following issues remains open and require to be clarified and corrected:* *- The point of no return date of each solar park was not stated in the PD and supported with evidence.* *- Weighting of debt and equity: according to TOOL 27, paragraph 27: "If the benchmark is based on parameters that are standard in the market, then the typical debt/equity finance structure observed in the sector of the country should be used." The project holder utilized reference values of debt/rate of a few energy companies (Pampa Energía Soluciones S.A., Aluar Aluminio Argentino S.A.I.C., 360 Energy Solar S.A. and YPF Energía Eléctrica S.A.) in Argentina to calculate an average debt/equity rate. Although the resulting average weighting is more conservative that the 50%/50% of the tool, the project holder is requested to clarify in the PD why the debt/equity average of the selected companies represents the typical debt/equity finance structure in Argentina for the energy sector. Additionally, please clarify, why Genneia debt/equity rate included in version 1 of the PD was replaced by Aluar Aluminio Argentino S.A.I.C.* *- Energy generation values for each solar park in the investment analysis still don't match with the data provided in the baseline emission calculations spreadsheet as*

per ENERTIS generation reports (page 25 for PSSU and page 23 for PSTO III). Please, correct.

- *Price of energy: ACM0002 V22.0 paragraph 38 states that for greenfield power plants, "to assess the economic attractiveness of the project activity, the project participants shall use the highest possible tariff that they may receive by supplying the electricity to the grid. Only in exceptional cases, where project participants can justify showing data on the load/consumption and generation pattern of the project activity, may other tariffs be applied." However, for each solar park, the project holder calculated an annual average price of MATER PPAs based on monthly average prices of the 12 months prior to the investment decision, which is around 60 USD/MWh. Thus, the project holder is requested to clarify why these averages prices were utilized instead of the highest price of the MATER PPAs on August 2021 for PSSU and August 2022 por PSTO III, which are the latest data available by the time of the investment decision, respectively, or correct the value based on the reference document.*

  Additionally, please, provide the reference (including the link) for the monthly exchange rate values utilized in the file "PPAs Price.xls" to calculate the prices in USD.
- *Cash flow in nominal terms: the project holder is requested to explain why only Opex was adjusted for inflation but not the price of energy. If prices of energy are fixed and not adjusted for inflation, reference has to be provided. Otherwise, adjust the price of energy for inflation in the cash flow in nominal terms or conduct the cash flow in real terms with no adjustment of Opex for inflation and correcting the benchmark accordingly.*
- *CAPEX: the reference provided from SAP system is the final CAPEX of each solar park as per the date of the report 31/12/2023. Additionally, it includes indirect costs and financial costs that should not be included in the CAPEX. For the investment analysis at the time of the investment decision, the CAPEX must be based on references valid by that time. Please, provide the CAPEX value at the time of the investment decision supported by an Excel table detailing each component of the CAPEX and the reference documents (indicating name of the document, date, author, etc.) valid by the time of the investment decision and provide each of them (offers, contracts, etc.).*
- *Opex: the print screen of the emails and Excel files provided to support the Opex of each solar park are not sufficient evidence to audit and validate the Opex cost. Please, provide an Excel table detailing each component of the Opex and the reference documents (indicating name of the document, date, author, etc.) valid by the time of the investment decision and provide each of them (offers, contracts, landlease, etc.).*
- *As per TOOL01, sub-steps 2c and 2d must be included and clearly described in the PD. Additionally, in sub-step 2c, the list of all input values utilized in the cash flow, and the reference document for each one (including the name of the file, date, author and link in case of publicly available data) shall be included.*
- *Sensitivity analysis: only +/- 10% variation was included. As previously requested, the project holder is requested not only to conduct the +/- 10% variation but to vary each parameter (energy produced, Opex, Capex, energy price) to achieve benchmark and*

describe in the PD the likelihood of each variation considering publicly available data (e.g.: other projects, reference of local or regional values of Capex, Opex, plant load factor, etc.) Also, given that the solar parks of Instance 01 are already operative, provide the final values of (CAPEX, OPEX, energy price) with the corresponding reference documents and the IRR calculation.

CAR is open.

Project holder response (25/03/2025)

- Regarding the point of no return, the no-return date for both parks is the date on which the Tracker purchase contract was issued, by which time the Inverter purchase had already been initiated. Together, these investments account for approximately 20% of each park's CAPEX, marking a point of no return. For PSSU, the Inverter purchase contract was issued on December 28, 2021, and the Tracker purchase contract was issued on January 20, 2022, with the latter date considered the point of no return for this solar park. For PSTO III, the Inverter purchase contract was issued on October 4, 2022, and the Tracker purchase contract was issued on October 13, 2022, with the latter date being the point of no return for that park. Within the "Investment analysis" folder in Annex 03 of the evidences sent to the VT, excerpts from these contracts are available to support these dates. Also, this information about the point of no return was included in the investment analysis section in the PD (section 3.4, sub-step 2b).

- Regarding the weighting of debt and equity, the energy companies used as references to establish We and Wd are the main renewable energy generation companies in the country. Among these, only those that were found to publicly disclose their financial statements were considered, as publishing such information is not a legal requirement for all companies in Argentina. This selection ensures that the analysis reflects the typical debt/equity financing structure for the energy sector in Argentina. The debt/equity structure of Genneia S.A. was excluded from the analysis because, while its financial statements could serve as a reference, it is also the proponent of the project. Therefore, its exclusion was deemed both a conservative and technically sound approach.

- Regarding the energy generation values for each solar park in the investment analysis not matching the data provided in the baseline emissions calculations spreadsheet as per the ENERTIS generation reports, this discrepancy was promptly corrected.

- Regarding the selected energy price, changes were implemented based on the auditor's requirement that the average of PPAs from the one-year period immediately preceding the investment decision should not be used. Instead, all PPA contracts signed prior to the investment decision, but within the same year in which the decision was made for each solar park, were included. For PSSU, this means all solar energy sales PPAs executed between January 2021 until August 2021 were considered, and for PSTO III, all such PPAs executed between January 2022 until August 2022 were included. In accordance with paragraph 38 of ACM0002 v22.0, contracts from other renewable energy sources were excluded because the load factor for solar generation differs from

that of other renewables. Although the CAB requested the use of the latest available data at the time of the investment decision, using all PPAs signed in the decision year represents a more conservative approach, given the limited number of such contracts, thereby allowing for a more representative determination of the highest possible tariff. For example, while the latest available data of PPAs sales for the case of PSTO III is from August 2022, no solar energy PPA was signed in that month; the closest available contract dates to the investment decision are from May 2022. All considered PPAs, along with the agreed price, are included in the "Pricing" tab of the "Investment analysis – Base 0.xlsx" file. The highest tariff among these was the energy price used to conduct the investment analysis, again in accordance with paragraph 38 of ACM0002 v22.0. It is important to note that the signing dates of these PPAs were obtained from the "CONTRATOS MATER" tab within the file "ANEXO_INFORME_MATER 2023-02.xlsx," published by CAMMESA and publicly available on its website[8], and located in the "Info Soporte PPAs" folder sent to the VT. In green are all solar energy sales PPAs executed between January 2022 and August 2022 (PSTO III PPAs), and in orange, all solar energy sales PPAs executed between January 2021 and August 2021 (PSSU PPAs). Additionally, the signing price for each PPA was obtained from the Economic Transaction Documents (DTEs) generated by CAMMESA, which are available only to MEM agents, including Genneia. Since these documents are not public, the corresponding DTEs for the months corresponding to the PPAs included for each solar park are provided in the "DTEs CAMMESA" folder, along with an instruction guide titled "Guía DTEs.pdf." This folder is located within the "Info Soporte PPAs" sent to the VT. In this context, the instruction guide explains that the monthly exchange rate values used in the "PPAs Price.xls" file to calculate the prices in USD are derived from the wholesale dollar rate published by the Central Bank of Argentina, consistent with the exchange rate utilized by CAMMESA and included in the DTEs. Finally, since the original DTEs are provided, the "PPAs Price.xls" file was discarded because it consolidates several monthly DTEs and was prepared by Genneia personnel.

- Regarding energy prices being fixed and not adjusting for inflation, this is because they reflect the prices established in Private Purchase Agreements (PPAs). These agreements set fixed prices at the time of contract signing, with a predetermined duration at that frozen price. Consequently, a fixed energy price is used in the cash flow, determined by the highest energy price contracted in the most recent agreements prior to the investment decision (August 2021 for PSSU and May 2022 for PSTO III). Additionally, PPA prices are not adjusted for inflation in U.S. dollars over time but rather follow market dynamics (specifically, the MATER market in this case). In fact, the observed trend in PPA contract prices shows a decrease in more recent agreements compared to the past. Therefore, maintaining a constant PPA value throughout the analyzed years is a conservative approach, while adjusting it for inflation would be inappropriate, as it does

[8] https://cammesaweb.cammesa.com/infantmater/

not align with the nature of PPAs nor market dynamics. As a result, the fact that PPA prices remain fixed for the reasons outlined above does not invalidate the calculation of cash flow in nominal terms.

- Regarding the CAPEX, the required corrections have been incorporated. These updates have been included in the "Info Soporte Capex" tab within the file "Investment Analysis – Base 0.xlsx", which is available in the "Investment Analysis" folder sent to the VT. This tab provides a detailed breakdown of the CAPEX for both PSSU and PSTO III, including budgets linked to the investment decision-making process. The reference documents supporting the values presented in this tab are also specified therein and can be found in the "Info Soporte Capex" folder within the Investment Analysis section. These documents consist of quotes provided by various suppliers, which collectively constitute the total CAPEX for each solar park. However, it is important to clarify that while most quotes correspond to the period of the investment decision, some are dated slightly later. This is because, at the time of the investment decision, CAPEX estimates were based on preliminary offers and informal discussions with suppliers rather than formal quotes. As part of Genneia's internal corporate policies, once the investment and budget allocation for the solar parks were approved, formal requests for quotations were made to these suppliers. Consequently, some of the obtained quotes are dated slightly after the investment decision. Given that it was explicitly requested on multiple occasions—including during meetings with CAB members—that the CAPEX information be fully backed by reference documents such as quotations, a slightly lower CAPEX value was constructed compared to the original estimate. This conservative approach ensured that only CAPEX components with formal quotations were included in the initial CAPEX, excluding any expenditures that were not explicitly quoted. As a result, there are minor differences (below 20%) between the initial CAPEX and the current CAPEX. However, the initial CAPEX presented is a representative, conservative and well-supported estimate of the actual investment.

- Regarding the OPEX, the Base 0 OPEX is derived from the detailed calculations provided in the shared emails and represents an initial estimate based on the operating expenses of another Genneia solar park—Ullum I—which was fully operational at the time of the investment decision for both parks. Each component of the OPEX recorded in 2020 for Ullum I, along with its associated costs, is supported by appropriate documentation demonstrating that these expenses are justified. This information is included along with additional details on the calculation of the Base 0 OPEX in the "Info Soporte Opex" tab within the "Investment analysis – Base 0.xlsx" file sent to the VT.

- Regarding TOOL01, sub-steps 2c and 2d have been incorporated into Section 3.4 of the PD. Additionally, a comprehensive list of the input values used in the cash flow analysis, along with the appropriate references for each input, was promptly added in the corresponding section (sub-step 2c of Section 3.4).

- Regarding sensitivity analysis, the CAB required that each parameter be varied to reach the benchmark and justify why those values are unlikely to occur. Although this is not mandated by TOOL27 v14.0 nor ACM0002 v22.0, the analysis was conducted at the CAB's request, and the details are provided in the "SA = WACC" tab of the "Investment

analysis – Base 0.xlsx" file. Additionally, since the solar parks are currently operational, the CAB requested the final values for CAPEX, OPEX, and Energy Price along with the supporting documents and the IRR calculation. While this request is not required by TOOL01 or ACM0002 v22.0, the final values are the following:

PSSU		***PSTO III***		***BOTH PARKS***
CAPEX (U$)	***OPEX (U$)***	***CAPEX (U$)***	***OPEX (U$)***	***PPA price (U$)***
64,042,097	*1,796,000*	*55,363,401*	*1,362,000*	*58.9*[9]

Supporting documentation for CAPEX and OPEX values is presented in a live meeting between CAB members and Genneia representatives, as agreed, since these data are considered confidential. Moreover, because the IRR must be calculated as of the investment decision date—and not as of the current date—it has not been presented. Compiling this information would require substantial effort from Genneia's staff and is not a mandatory requirement. Furthermore, during a meeting with the CAB, after presenting this explanation, they confirmed that it was not necessary to provide this data.

Documentation provided by the project holder

All supporting documentation is included within the folder "Investment analysis" sent to the VT.

CAB assessment (31/03/2025)

- Regarding the point of no return, the no-return date for both parks was states in section 3.4 in the PDD version 3. These dates were checked as per the evidence sent by the Project Holder regarding the Tracker purchase contract and the Inverter purchase which represent 20% of the solar park´s CAPEX, a point of no return, evidence was check and found correct. Closed.

- Weighting of debt and equity: This was found correct, as the project holder used references from the main renewable energy generation companies in the country that publicly disclosed their financial statements. The tool states that if information is not available, 50% debt and 50% equity financing may be assumed. Hence, as the weighting values obtained by the Project Holder are more conservative, it was found appropriate to

[9] *Mean value of PPA prices for January 2025, that is the lastest information available from DTEs published by CAMMESA. The corresponding DTE can be found in folder – Investment analysis – Info Soporte PPAs - DTEs CAMMESA. The mean value of PPA for January 2025 can be found in the file "PPA price actual.xlsx" inside the folder "Info Soporte PPAs" sent to the VT.*

use the latter average values. For PSSU: 42.62% (We) and 57.38% (Wd) and for PSTO III: 48.67% (We) and 51.33% (Wd). Closed.

- The energy generation values were corrected accordingly as per ENERTIS generation reports. It was found correct in the "investment analysis" and PDD version 3. Closed.

- Price of energy: In accordance with paragraph 38 of the ACM0002 v.22, the project holder updated the energy pricing in the "Investment Analysis – Base 0", with the highest tariff among all PPA´s signed in the decision year. The evidences were checked and the information found correct. However, please explain why the following plants from the ANEXO_INFORME_MATER 2023-02 were not included: Year 2021: Parque solar los Andes-Minecamy, Parque Fotov. La Cumbre – Agentes Pecuemiy y PKCULCMX. Year 2022: Los Andes-agente demandante SAIMITON?

- Cash flow in nominal terms:

Since the PPAs specifies fixed prices for its entire duration, it is appropriate to keep energy revenues constant in the cash flow analysis. In a nominal cash flow analysis, one incorporate future cash flow without adjusting for inflation if those cash flows are contractually fixed. Since the PPA price is frozen, adjusting it for inflation would misrepresent the actual revenue. Furthermore, the Project holder´s observation that PPA prices have been decreasing in recent agreements suggests that keeping the price fixed is a conservative assumption. Hence, since the PPA does not include indexation or escalation clauses, it would be incorrect to artificially adjust prices upwards with inflation. Closed.

- CAPEX: "Info Soporte Capex" tab within the file "Investment Analysis – Base 0.xlsx" was checked, however, the backup documents consist of quotes provided by various suppliers, which collectively constitute the total CAPEX for each solar park, however received several months post the date of the investment decision. It is clear that these quotes represent a more real and well supported investment analysis post the date of the investment decision, however as per the TOOL, the PP must show the data available at the time of making the investment decision, supported by publicly available data (e.g.: other projects, reference of local or regional values, etc). The actual CAPEX based on real quotes may be used as a comparative.

- OPEX: "Info Soporte Opex" tab within the "Investment analysis – Base 0.xlsx", the comparative table in PSTO III, had an incorrect formula (cells N102, N103, N104). Please also compare the data from the emails with usual ranges for OPEX in public available data and market sources.

- Regarding TOOL01, the PD was updated and all steps have been included. Closed.

- Regarding sensitivity analysis, the client showed the auditor the SAP where the real information of the Projects can be seen, just for comparison purposes: the real CAPEX

for PSSU and PSTO III was shown, however the financial costs should not be considered. The final values should be corrected just for comparison purposes.

CAR is open.

Project holder response (07/04/2025)

- Regarding the Price of Energy, the CAB requested clarification on why certain plants were not included. As the CAB was able to verify within the files provided, these plants—despite having signed PPAs—did not have contracted energy at the time of the investment analysis. As a result, the reported PPA price for those plants was 0 USD/MWh. The reason behind this is unknown and beyond our control, as this information is sourced from reports issued by CAMMESA—the Administrator of the Argentine Wholesale Electricity Market—which is the official authority responsible for publishing the prices of the signed agreements.

- Regarding the CAPEX used for the investment analysis, changes were introduced to the originally used CAPEX values. Specifically, a more conservative CAPEX—fully backed by specific quotations for each solar park and including only those components with formal quotes—was initially used to conduct the investment analysis. However, the CAB has requested a CAPEX value dated prior to the investment decision, in accordance with the requirements of the investment analysis TOOL. Although our interpretation of the TOOL differed, we have now incorporated the CAPEX values that were presented at the respective board meetings for each park. These were based on market values derived from reports published by the International Renewable Energy Agency (IRENA)—specifically, the June 2021 edition for PSSU and the July 2022 edition for PSTO III. These updated CAPEX figures resulted in changes to the calculated IRRs and to the sensitivity analysis, all of which have been reflected in both the Project Description (PD) and the file "Investment Analysis – Base 0.xlsx." The CAPEX based on real quotations has still been included as a complementary reference to the market-based CAPEX.

- Regarding the OPEX, the calculation formula has been corrected accordingly. Additionally, benchmark OPEX market values were included in the "Info Soporte Opex" tab within the file "Investment Analysis – Base 0.xlsx" to enable comparison and provide further justification for the figures used.

- Regarding the sensitivity analysis, financial costs were duly excluded as required. The final values for the sensitivity analysis parameters, reflecting these adjustments, are presented below along with the corresponding changes.

CAPEX (U$)			***OPEX (U$)***			***PPA price (U$)***
	PSSU	***PSTO III***		***PSSU***	***PSTO III***	***BOTH PARKS***

Equipos	46,024,311	32,995,155	Seguros	99,495	208,502	
BOP	11,718,224	13,172,443	O&M	1,368,845	847,576	
Gastos indirectos	2,467,074	6,257,884	Usufructo	482,718	445,500	
	60,209,609	**52,425,482**		**1,951,058**	**1,501,578**	**60.4**[10]

Documentation provided by the project holder

Changes were incorporated in the file "Investment analysis – Base 0.xlsx". Also, tables 21 to 24 of the PD were changed accordingly and new IRRs were incorporated.

CAB assessment (10/04/2025)

- Regarding the Price of Energy, it was checked and found correct. Closed.

- CAPEX: Changes were introduced to the originally used CAPEX values, which now incorporates the CAPEX values that were presented at the respective board meetings for each park prior to the investment decision. These were based on market values derived from reports published by the International Renewable Energy Agency (IRENA)—specifically, the June 2021 edition for PSSU and the July 2022 edition for PSTO III. These updated CAPEX figures resulted in changes to the calculated IRRs and to the sensitivity analysis, all of which have been reflected in both the Project Description (PD) and the file "Investment Analysis – Base 0.xlsx."

However, the auditor compared it with a more conservative CAPEX—fully backed by specific quotations for each solar park and including only those components with formal quotes. The CAPEX based on real quotations has still been included as a complementary reference to the market-based CAPEX, and it confirms the additionality of the Project.

- OPEX: Regarding the OPEX, the calculation formula has been corrected accordingly. Additionally, benchmark OPEX market values were included in the "Info Soporte Opex" tab within the file "Investment Analysis – Base 0.xlsx" to enable comparison and provide

[10] *Mean value of PPA prices for April 2025, that is the lastest information available from PPAs signed by Genneia SA. The corresponding price of each PPAs can be found in Folder – Investment analysis – Info Soporte PPAs – PPA price actual.xlsx.*

further justification for the figures used. The auditor checked the evidence and found it correct. *- Regarding the sensitivity analysis, financial costs were duly excluded as required. The final values for the sensitivity analysis parameters, reflecting these adjustments were presented for comparison purposes and found correct.* *CAR is closed.*

Finding ID	*CAR 05*	***Type of finding***	***Corrective***	***Date*** ***06/12/2024***
Section No.				
4.5 Quantification of GHG emission reductions and removals				
Description of finding				
The following points of the GHG emissions reduction/removal in the baseline scenario are not in line with requirements and need to be revised and corrected accordingly: - *The ex-ante simple OM was calculated as the simple average of OM from 2021, 2022 and 2023 instead of a "3-year generation-weighted average" as required in paragraph 42 (a) of TOOL07, V7.0. Additionally, the calculation was not included in the "Emission Factor Calculation" spreadsheet.* - *The PD doesn't state which is the reference (ENERTIS generation reports) utilized for the net electricity generation supplied to the grid by each solar park, according to the requirement established by CDM Guidelines for Reporting and Validation of Plant Load Factors, Version 01.* *Tables 30 and 31 of the PD illustrates values for a 14 years' quantification period which is not in line with section 11.5 of BCR Standard V3.4.*				
Project holder response (22/01/2025)				
Ex-ante simple OM was corrected by calculating the 3 year weighted-average. *Reference utilized for the net electricity generation supplied to the grid by each solar park was provided in section 3.7.3 of the PD (page 62).*				

Tables 30 and 31 are now tables 29 & 30 and were corrected accordingly.
Documentation provided by the project holder
In the tab "4 a) Simple OM 2007-2023" from the spreadsheet "Emission Factors Calculation.xlsx" provided in evidence sent to the VT, the corrected 3-year weighted average simple OM is calculated and highlighted in red. *ENERTIS generation reports are provided to the VT as the reference utilized for the net electricity generation supplied to the grid by each solar park.*
CAB assessment (31/01/2025)
It was confirmed that the calculation of the ex-ante simple OM has been correctly corrected, the reference to ENERTIS generation reports have been included in the PD and the baseline emission tables have been corrected. ***CAR is closed.***

Finding ID	*CAR 06*	***Type of finding***	***Corrective***	***Date*** ***06/12/2024***
Section No.				
4.6.1 Description of the Monitoring plan				
Description of finding				
SDG target 9.4.1 concerns to 'CO2 emissions per unit of value added' in the manufacturing industries (https://worldbank.github.io/sdg-metadata/metadata/en/9-4-1/) and according to the International Standard Industrial Classification of All Economic Activities (ISIC), Version 4 (https://unstats.un.org/unsd/classifications/Econ/Download/In%20Text/ISIC_Rev_4_publication_English.pdf), the energy supply industry are not classified as manufacturing industries. *Thus, the project holder is requested to review the contribution of the project to SDG target 9.4.1 and update the SDG tool accordingly. Please, replicate this correction in the Monitoring Report.*				

Project holder response (22/01/2025)
SDG 9 was removed from achieved SDGs.
Documentation provided by the project holder
Not applicable.
CAB assessment (30/01/2025)
The project holder has removed the SDG target 9.4.1. ***CAR is closed.***

VERIFICATION FINDINGS

CL:

Finding ID	*CL 01*	***Type of finding***	***Clarification***	***Date*** ***06/12/2024***
Section No.				
5.4 Sustainable Development Goals (SDGs)				
Description of finding				
Regarding the project contribution to SDGs, according to the MR template v3.4 instructions and BCR standard v3.4 provisions, the project holder is requested to clarify is section 4 of the MR: - *The activities performed during the monitored period that contributed to the achievement of each SDG, the results of the monitored parameters and their contribution to each SDG indicator defined.*				

- *Describe how the project activities contribute to achieving any nationally stated sustainable development priorities, including any provisions for monitoring and reporting the same.* *Additionally, according to the corresponding finding in the PD, the project holder is requested to review the project's contribution to SDG 9.*
Project holder response (23/01/2025)
Clarifications were added accordingly in section 4 of the MR. SDG 9 was removed from the project contribution to SDGs.
Documentation provided by the project holder
Documentation provided to demonstrate the achievement of each SDG is clearly specified in section 15.2.2 of the MR.
CAB assessment (31/01/2025)
The project holder has described in the MR the activities performed during the monitored period that contribute to achieve each SDG and referred to the results in section 15.2.2. *Nevertheless, it has not described how the project activities contribute to achieving any nationally stated sustainable development priorities, including any provisions for monitoring and reporting the same. Please, clarify in the PD and provide reference to Argentina nationally stated sustainable development priorities.* ***CL is open.***
Project holder response (10/02/2025)
Information regarding nationally stated sustainable development priorities was added in the last paragraph of section 4 of the MR.
Documentation provided by the project holder
Foot notes were added to complement the information included in section 4 of the MR.
CAB assessment (27/03/2025)

The Project holder stated that because Argentina is currently in the process of redefining its nationally stated sustainable development priorities, it is not yet possible to assess this grouped project's contribution to these priorities within the current monitoring period. The sources have been checked and fund correct. Hence, this will be evaluated in next verification once nationally stated sustainable development priorities are again adopted. *Finding is closed.*

Finding ID	*CL 02*	***Type of finding***	***Clarification***	***Date*** ***06/12/2024***
Section No.				
5.1.2. Monitoring plan implementation and monitoring report				
Description of finding				

Project holder is requested to clarify:

i) The above differences in the net electricity generation between the measured values with the project's meters and the values provided in CAMMESA monthly reports and adopt a conservative approach for the quantification of emission reductions:

PSSU	***Project meters***	***CAMMESA report***	***Difference***
01/01/2023 – 31/12/2024	*123,864*	*122,827*	*0,84%*
01/01/2024 – 31/10/2024	*142,482*	*142,487*	*0,00%*
PSTO III	***Project meters***	***CAMMESA report***	***Difference***
30/12/2023 - 31/12/2023	*12*	*56,834*	*-358,14%*
01/01/2024 - 31/10/2024	*80,691*	*80,675*	*0,02%*

ii) The values of the following monitored parameters during the present monitoring period in line with the indicators defined in the PD: Internships provided to EPET 7 students, Residues reused and repurposed, local workers hired during construction and operational phases.
Project holder response (23/01/2025)
i) It was decided to use the values from the CAMMESA reports for the net electricity generation values used. A conservative approach for the quantification of emission reductions was taken. This decision was made because CAMMESA is the national authority responsible for verifying and validating the net electricity generation values for each power generation plant in the country. *ii) Those are qualitative parameters as specified both in the corrected PD and the corrected MR, thus no values are provided.*
Documentation provided by the project holder
i) Relevant files are provided to the VT (refer to the first table of section 15.2.2 of the MR). *ii) Documentation is clearly specified in the monitoring tables for each parameter, and can be found in section 15.2.2 of the MR.*
CAB assessment (31/01/2025)
It was confirmed that the project holder adopted the values published by CAMMESA in the monthly reports that are the official data of energy generated and billed and is publicly available. *It was confirmed that the monitored parameters were corrected in the PD and the MR and are based on qualitative assessment and records.* ***CL is closed.***

CARs:

Finding ID	*CAR 01*	***Type of finding***	***Corrective***	***Date*** ***06/12/2024***

Section No.
5.1 Project and monitoring plan implementation
Description of finding
According to MR template v3.4 instructions and BCR standard section 11.7, the project holder is requested to: *- Provide evidence of compliance with applicable legislation related to the activities carried out by the GHG mitigation activities.* *- Describe the documented procedure, and the Documentary Management System in place, which identifies relevant legislation and regulations access them on an ongoing basis, demonstrating that it has a process for periodically compliance.*
Project holder response (23/01/2025)
Evidence of compliance with applicable legislation related to the activities carried out by the GHG mitigation activities was provided in section 5 of the MR. *The Documentary Management System was described in section 4 of the corrected PD.*
Documentation provided by the project holder
The procedures for the Documentary Management System is available in Annex 01 of the information sent to the VT of the MR.
CAB assessment (31/01/2025)
The project holder has described and demonstrated the compliance of the project with applicable legislation and has provided the procedure of legal and other requirements compliance in place. ***CAR is closed.***

Finding ID	*CAR 02*	***Type of finding***	***Corrective***	***Date*** ***06/12/2024***

Section No.				
5.5 Climate change adaption				
Description of finding				
Regarding climate change adaptation, as per the MR template v3.4 instructions and BCR standard v3.4 requirements, project holder is requested to demonstrate in MR section 6 that project holder carried out actions related to climate change adaptation during the monitoring period, demonstrating that these are derived from the GHG Project activities. For example: the number of floodings reported in section 15 doesn't demonstrate the actions conducted by the project holder to adapt to these events. Similarly, in section 15 it's not demonstrated if during the monitoring period there have been operational suspensions due to weather and how the project holder carried out adaptation actions. The same applies to the actions associated with the other indicators.				
Project holder response (23/01/2025)				
This was corrected accordingly.				
Documentation provided by the project holder				
Documentation is clearly specified in the monitoring tables available in section 15.2.2 of the MR.				
CAB assessment (31/01/2025)				
The project holder has described in MR and provided references to demonstrate the actions carried out related to climate change adaptation during the monitoring period that are derived from the GHG Project activities. ***CAR is closed.***				

Finding ID	*CAR 03*	***Type of finding***	***Corrective***	***Date***

				06/12/2024
Section No.				
Stakeholder Consultation				
Description of finding				
Regarding stakeholders' consultation, as per the MR template v3.4 instructions and BCR standard v3.4 requirements, project holder is requested to provide in MR section 10 specific information regarding the ongoing communication with stakeholders during the monitored period and provide evidence as follows: Describe the process for, and the outcomes from, ongoing communication with stakeholders, carried out before verification. Include details on the procedures or methods used for engaging local stakeholders, documenting the outcomes of the stakeholder comments, and the mechanism for on-going communication with local stakeholders, among other aspects. *Include in the MR a summary of the stakeholder comments received during the present monitoring period and project holder responses. Particularly, regarding the comment received on 25/04/2024 in PSTO III, which is related to a complain about speed from a public institution, the project holder is requested to provide further information and evidence about how it was solved.*				
Project holder response (23/01/2025)				
This was corrected accordingly.				
Documentation provided by the project holder				
Regarding the complaint received on 25/04/2024 in PSTO III, information on how this complaint was addressed is provided in section 9 of the MR and in the corresponding table for the parameter "Community Mental Health and Well-Being" in section 15.2.2 of the MR.				
CAB assessment (31/01/2025)				
The project holder has provided in the MR specific information about the ongoing communication with stakeholders during the monitored period and provide evidence. ***CAR is closed.***				

Finding ID	*CAR 04*	***Type of finding***	***Corrective***	***Date*** ***06/12/2024***
Section No.				
5.1 Project and monitoring plan implementation				
Description of finding				
Regarding co-benefits, according to MR template v3.4 instructions, project holder is requested to include in section 12 of the monitoring report, the measurement and tracking of co-benefits.				
Project holder response (23/01/2025)				
The application for co-benefits was removed from the project.				
Documentation provided by the project holder				
Not applicable.				
CAB assessment (31/01/2025)				
The project holder has removed the application to co-benefits. ***CAR is closed.***				

Finding ID	*CAR 05*	***Type of finding***	***Corrective***	***Date*** ***06/12/2024***
Section No.				

5.1 Project and monitoring plan implementation
Description of finding
The project holder is requested to correct the format of the tables of section 15.2.2 according to the tables model provided in the MR template v3.4 and provide all information required as per this format. E.g. : complete information of the 2 main and 2 back-back electricity meters (SMEC) at each solar park (type, accuracy class, serial number, calibration frequency, date of last calibration and validity).
Project holder response (23/01/2025)
This was corrected accordingly.
Documentation provided by the project holder
Refer to section 15.2 of the MR.
CAB assessment (31/01/2025)
The format of the tables has been corrected and the tables have been completed accordingly. ***CAR is closed.***

Finding ID	*CAR 06*	***Type of finding***	***Corrective***	***Date*** ***06/12/2024***
Section No.				
5.1.2. Monitoring plan implementation and monitoring report				
Description of finding				
The project holder is requested to review the consistency of the values of $E_{GPJ,y}$, $EF_{grid,CM,2023}$, BE_y and ER_y illustrated in MR section 26 and the ER spreadsheet to guarantee				

all of them match and are reproducible and that the final result of ER_y in the present monitoring period was determined in a conservative manner.
Project holder response (23/01/2025)
This was corrected accordingly.
Documentation provided by the project holder
Tables 16, 17 and 18 of the MR were corrected. Also, files "Baseline and Net GHG Emission Reductions Calculations.xlsx", "Diferencia reducciones ex-ante vs ex-post.xlsx" available in Annex 05 of the information sent to the VT, were corrected.
CAB assessment (31/01/2025)
It was confirmed that the tables and the ER spreadsheet have been corrected and all values matches. ***CAR is closed.***

Annex 3. Documentation review

Document Title / Version	Author	Organization	Document provider (if applicable)
PD	NA	Genneia	Genneia
MR	NA	Genneia	Genneia
Emission Factors Calculation spreadsheet	NA	Genneia	Genneia
Baseline Emissions Calculations spreadsheet (exante)	NA	Genneia	Genneia
Investment analysis – Base 0 spreadsheet	NA	Genneia	Genneia
Baseline and Net GHG Emission Reductions Calculations spreadsheet (monitored period) v1.0	NA	UNFCCC CDM	https://cdm.unfccc.int/
ACM0002 Grid-connected electricity generation from renewable sources, Version 22.0	NA	UNFCCC CDM	https://cdm.unfccc.int/
Tool for the demonstration and assessment of additionality, Version 07.0.0	NA	UNFCCC CDM	https://cdm.unfccc.int/
Baseline, project and/or leakage emissions from electricity consumption and monitoring of electricity generation, Version 03.0	NA	UNFCCC CDM	https://cdm.unfccc.int/
Tool to calculate the emission factor for an electricity system, Version 07.0	NA	UNFCCC CDM	https://cdm.unfccc.int/
Methodological tool: Additionality of first-of-its-kind project activities, Version 03.0	NA	UNFCCC CDM	https://cdm.unfccc.int/
Solar resource and production report of the Sierras de Ullum 78 MWn photovoltaic plant; 29/10/2021	NA	ENERTIS	Project Holder
Solar resource and production report of the 60MWn Tocota III Photovoltaic Plant; 11/11/2022	NA	ENERTIS	Project Holder
Addendum to the Environmental Impact Statement - Sierras de Ullum Solar Park; 8/11/2021	Eng. Anahi A. Alvarez	NA	Project holder
Addendum to the Environmental Impact Statement - Tocota III Solar Park; 26/12/2022	Eng. Anahi A. Alvarez	NA	Project holder
Environmental authorization PSSU; DIA-RES 1009_SEAyDS-2021_PSSU.pdf		Government of San Juan	Project holder
Environmental authorization PSTO III; DIA-Res 1564-SEAyDS-2024-Pisto III.pdf		Government of San Juan	Project holder
CAMMESA letter of approval of Commercial Operation Date - Sierras de	NA	CAMMESA	Project holder

Document Title / Version	Author	Organization	Document provider (if applicable)
Ullum Solar Park; 13/09/2023. Certificate N. H-S-23-057 / N. H-S-23-058			
CAMMESA letter of approval of Commercial Operation Date - Tocota III Solar Park; 14/01/2024 Certificate N. H-S-24-004 / N.H-S-24-005	NA	CAMMESA	Project holder
ENRE authorization of Access to Existing Transport Capacity – Sierras de Ullum; 26/12/2022;	NA	ENRE	https://www.boletinoficial.gob.ar/detalleAviso/primera/278495/20221228
ENRE authorization of Access to Existing Transport Capacity – PSTO III; 24/11/2023;	NA	ENRE	https://www.boletinoficial.gob.ar/detalleAviso/primera/299268/20231128?busqueda=2
MATER Results of Dispatch Priority Assignment	NA	CAMMESA	https://cammesaweb.cammesa.com/mater-resultado-asignacion-prioridad-despacho/
CAMMESA monthly reports:	NA	CAMMESA	https://cammesaweb.cammesa.com/informe-sintesis-mensual/
Renovar Program power plants	NA	MINEM	http://www.minem.gob.ar/www/833/25897/proyectos-adjudicados-del-programa-renovar
Investment Analysis evidences: - Inflation Rate IMF.xlsx - BoD - PSTO III.pdf - Cost of Debt (BCRA).pdf - Ley San Juan Punto de no retorno - BoD - PSSU.pdf - Info Soporte Capex - Info Soporte Opex - Info soporte PPAs - Estados Financieros		Genneia	Project holder
Common Practice: - PSTO III - Potencias Instaladas CAMMESA.xlsx - PSSU - Potencias Instaladas CAMMESA.xlsx - Prioridad de Despacho - Proyectos Asignados Trimestralmente.xlsx		CAMMESA	Consultant
Code of Conduct	NA	Genneia	Project holder

Document Title / Version	***Author***	***Organization***	***Document provider (if applicable)***
EIA and Baselines: - *PSSU-EIA.pdf* - *PISTO III – EIA.pdf* - *PSSU- Linea de Base de Biota.pdf* - *PSTO III- Linea de Base de Biota.pdf*		*Genneia*	*Project holder*
Health, Safety, and Environmental Management Plan	*NA*	*Genneia*	*Project holder*
Genneia 2022 Sustainability Report	*NA*	*Genneia*	*https://www.genneia.com.ar/sustentabilidad.php*
Law N° 24,065 "Electric Energy Regime"	*NA*	*Government of Argentina*	*https://www.argentina.gob.ar/normativa/nacional/ley-24065-464/actualizacion*
Decree N°1,398/92	*NA*	*Government of Argentina*	*https://www.argentina.gob.ar/normativa/nacional/decreto-1398-1992-9802/texto*
Compliance with laws: - *Procedure for legal compliance.pdf* - *MEM Agent Authorizations* - *Land Lease Agreements*			
Public Hearings: - *"Public Hearings – PSSU.pdf"* - *"Public Hearings – PSTO III.pdf"* - *"Stakeholders complaints, inquiries, and claims.xlsx"* - *"[Solar Park name] - Análisis de Contexto y Partes Interesadas.xlsx"* - *Guidelines for Stakeholder Consultation.pdf*		*Genneia*	*Project holder*
Training programs and workshops: - *Acciones con la Comunidad.pdf*		*Genneia*	*Project holder*
Organizational Structure: - *Solar Assets Administrator.pdf* - *SHyMA Technician.pdf* - *Plant Manager.pdf* - *O&M Technician.pdf* - *O&M Leader.pdf* - *Control Center Operations Coordinator.pdf*		*Genneia*	*Project holder*
INTEGRATED MANAGEMENT SYSTEM Manual: SIG Guidelines / "Seguimiento QCyR.slsx	*Ninoska Arce*	*Genneia*	*Project holder*

Document Title / Version	***Author***	***Organization***	***Document provider (if applicable)***
Water monitoring: - *Certificado de Análisis de agua Agosto – PSSU* - *Certificado de Análisis de agua Julio – PSSU* - *Certificado de Análisis de Mayo – PSSU* - *Certificado de Análisis de agua Mayo- PSTO III* *Monitoreo de situaciones en los parques 2023_2024-xlsx*		*Government of San Juan – Centro Bio Tecnologico e INSEMI* *and* *Genneia*	*Government of San Juan – Centro Bio Tecnologico e INSEMI* *and* *Genneia*
Drill Reports - *Drill Report 1- PSSU - Simulacro* - *Drill Report 1 – PSTO III – Emergencia* - *Drill Report 2 – PSTO III – Respuesta ante accidente* - *Planificación – PSSU* - *Planificación – PSTO III* - *Emergencies procedures*		*Genneia*	*Genneia*
Employment records - *Lista Personal construcción – PSSU.xlsx* - *Lista Personal construcción – PSTO III.xlsx* - *Listado personal operación – PSSU y PSTO III.xlsx* - *Prioridad a Proveedores locales*		*Genneia*	*Genneia*
Online training sessions - *"Detalle cursos brindados.pdf"*		*Genneia*	*Genneia*
Internships provided to regional school students - *"Convenio Prácticas profesionalizantes EPET7.pdf".*		*Genneia*	*Genneia*
Residues reused and repurposed locally - *"Informe final Curso Economía Circular.pdf";* - *"Donación Juguetes.pdf"; "Donación Herramientas.pdf";* - *"Donación Madera.jpeg"; "Donación Madera 2.jpeg";* - *"Donación Pallets"; "Donación Sierra Sin Fin.pdf".*		*Genneia*	*Genneia*
Response to Hazardous Waste Spill		*Genneia*	*Genneia*

Document Title / Version	Author	Organization	Document provider (if applicable)
- "Hazardous Waste Spills Matrix – PSSU.xlsx" & "Hazardous Waste Spills Matrix – PSTO III.xlsx			
Traffic and Road Safety Hazards - "Manejo Defensivo Protocolo.pdf"; "Viaje metodo CONVOY - PSTO III.docx		Genneia	Genneia
Community Mental Health and Well-being - "Seguimiento Mental Health and Well-being.xlsx", - "Reinducción Conducción Segura y Velocidades - Reclamo Social Mayo 2024.pdf		Genneia	Genneia
Wildlife and Habitat Impacts during Construction and Abandonment Phases - Registro de Fauna - PSSU 2024.xlsx"; - "Registro de Fauna - PSTO III 2023.xlsx"; - "Registro de Fauna - PSTO III 2024.xlsx"; - "Wildlife and Habitats impacts matrix - PSSU.xlsx"; - "Wildlife and Habitats impacts matrix - PSTO III.xlsx"; - "Monitoreo de situaciones en los parques 2023_2024.xlsx".		Genneia	Genneia
PM10 (Respirable Thoracic Particulate Matter) - "Air Quality Results.pdf"; "Air Quality Monitoring – Methodological Procedures.pdf"; "Calibration Certificates.pdf".		Genneia	Genneia

Annex 4. Abbreviations

Abbreviations	Full texts
BE	Baseline Emission
BM	Build Margin
CAMMESA	Wholesale Electricity Market Manager Company (Compañía Administradora del Mercado Mayorista Eléctrico)
CAR	CAR Corrective Action Request
CDM	Clean Development Mechanism

CH_4	*Methane*
CL	*Clarification Request*
CM	*Combined Margin*
CO_2	*Carbon dioxide*
ENRE	*National Entity of Electric Regulation (Ente Nacional de Regulación Eléctrica)*
DR	*Desk Review*
EIA	*Environmental Impact Assessment*
FAR	*Forward Action Request*
GHG	*Green House Gas*
GW	*GW Giga Watt*
GWh	*GWh Giga Watt hour*
IPCC	*IPCC Intergovernmental Panel on Climate Change*
KBS	*KBS KBS Certification Services Private Limited*
kW	*kilo Watt*
kWh	*kilo Watt hour*
LSC	*Local Stakeholder Consultation*
MP	*Monitoring Plan*
MR	*Monitoring Report*
MW	*Mega Watt*
MWh	*Mega Watt hour*
N_2O	*Nitrous Oxide*
OM	*Operating Margin*
PD	*Project Document*
PE	*Project Emission*
PLF	*Plant Load Factor*
RFR	*Request for Registration*
SADI	*Interconnected Argentine System (Sistema Argentino de Interconexión)*
SDSs	*Sustainable Development Safeguards*
SDGs	*Sustainable Development Goal*
tCO_2e	tCO_2e *Tonnes of Carbon dioxide equivalent*
UNFCCC	*United Nations Framework Convention on Climate Change*
V or v	*Version*

NOTE: This format shall be completed following the instructions included. However, it is important to highlight that these instructions are complementary to the BCR STANDARD, and the BioCarbon Validation & Verification Manual, in which more information on each section can be found.