

Validation and Verification Report for True Manufacturing Company, Inc.

American Carbon Registry

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1. Introduction

First Environment, Inc. (First Environment) provides this validation/verification report to True Manufacturing Co., Inc. (True) as a deliverable of the American Carbon Registry (ACR) project validation and verification process.

It covers the validation and verification of the following Projects and reporting periods:

Project Name	ACR Project ID	Reporting Period
Advanced Refrigeration US49 - ARS 005	ACR640	January 1 – December 31, 2020
Advanced Refrigeration CAL - ARS 005B	ACR641	January 1 – December 31, 2020
Advanced Refrigeration CAN - ARS 005C	ACR642	January 1 – December 31, 2020

Each Project reports emission reductions for a single 10-year crediting period beginning on January 1 of the reporting year.

First Environment, Inc. (First Environment) conducted validation and verification activities from the date of the kickoff meeting through November 11, 2021.

2. Objectives

The purpose of the validation and verification was, through review of appropriate evidence, to establish that:

- the objectives of the ACR Validation and Verification Standard Chapters 1.B and 8.B are met;
- the Projects conform to the requirements of the criteria discussed in Section 3 of this report; and
- the data reported are accurate, complete, consistent, transparent, and free of material error or omission.

Validation activities also include an assessment of the likelihood that implementation of the project will result in the emission reductions as stated by True in the GHG Project Plan.

3. Validation/Verification Scope & Criteria

Specific scope metrics for the validation/verification are outlined in the table below:

Geographic Boundaries	<p>True manufacturing plants located in:</p> <ul style="list-style-type: none">• O'Fallon, MO• Bowling Green, MO• Mexico, MO• Pacific, MO <p>Consisting of sales of advanced refrigeration equipment segregated by location in:</p> <ul style="list-style-type: none">• United States (excluding California)• California• Canada
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Greenhouse Gases Verified	Emissions reductions (expressed in units of Carbon Dioxide equivalents (CO ₂ -e) resulting from refrigerant replacement; Project emissions from use of eligible refrigerant R-290 (propane))
Reporting Periods	1/1/2020 – 12/31/2020
Data Sources	Historical True sales and accounting records Equipment product specifications
Level of Assurance	Reasonable assurance
Definition of Materiality	Misstatements greater than five percent of the emission reductions assertion in each reporting period were considered material. Qualitative non-conformities with and discrepancies in the GHG Project Plan and Monitoring Report between the validation and verification criteria were also considered material.

The following outlines the guidance and protocols used to conduct the validation and verification:

Standards of Validation/Verification	<ul style="list-style-type: none"> • ACR Standard, Version 7.0, December 2020 (ACR Standard) • Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removals from Advanced Refrigeration Systems, Version 2.0 (the Methodology), including Errata and Clarification issued May 15, 2021
Validation/Verification Process	<ul style="list-style-type: none"> • ACR Validation and Verification Standard, Version 1.1, May 2018 • ISO 14064-3: Specification with guidance for the validation and verification of greenhouse gas assertions, 2006

The GHG Project Plan—the final version of which is dated November 7, 2021—was also used to inform the verification process.

4. Project Description

True manufactures Stand-Alone Commercial refrigeration units, an eligible Refrigerant Sector and Segment under the Methodology. The Projects consist of the transition from high global warming potential (GWP) refrigerants to a low-GWP refrigerant, R-290 (propane), in the manufacture of these refrigeration products. The transition to a low-GWP refrigerant results in a net reduction in greenhouse gas (GHG) emissions over the lifetime of the manufactured refrigeration products.

The GHG Project Plan provides additional details about the Projects.

5. Overview of the Validation and Verification Process

To review the Projects' GHG information, the following validation and verification process was used:

- conflict of interest review;
- selection of Audit Team;
- initial interaction and kickoff meeting with primary True contacts;

- development of the validation/verification plans and sampling plan;
- site visit;
- review and evaluation of GHG information systems and data;
- follow-up interaction with True contacts for corrective action or supplemental data as needed; and
- final statement and report development.

The process was utilized to gain an understanding of the Projects' emission sources and reductions, to evaluate and verify the collection and handling of data, the calculations that lead to the results, and the means for reporting the associated data and results.

5.1 Conflict of Interest Review

Prior to beginning any third-party assessment, First Environment conducts an evaluation to identify any potential conflicts of interest associated with the engagement. No potential conflicts were found for these Projects. A project-specific conflict of interest form was also filed with the ACR for each Project.

5.2 Audit Team

First Environment's Audit Team consisted of the following individuals who were selected based on their validation and verification experience, as well as familiarity with industrial gas operations:

Lead Assessor – Michael Carim
Validation/Verification Team – Emily Saul, Logan Simpson
Internal Reviewer – James Wintergreen

5.3 Audit Kick-off

The audit process was initiated with a kick-off meeting on July 9, 2021 with the primary True contact. The meeting focused on confirming the scope, schedule, and data required for validation and verification.

5.4 Development of the Validation & Verification Plans

The Audit Team formally documented the validation/verification plan as well as determined the data sampling plan. The validation/verification plan was informed by the kick-off meeting where key elements of the validation and verification scopes were discussed including project team members, project level of assurance, materiality threshold, and standards of reporting and evaluation. It also provided an outline of the validation and verification processes and established project deliverables. True was afforded the opportunity to comment on the key elements of the plans for validation and verification. A separate data-sampling plan was designed to review all project elements in areas of potentially high risk of inaccuracy or non-conformance.

5.5 Site Visit

Mr. Michael Carim performed a site visit at True's headquarters and manufacturing facility in O'Fallon, Missouri on November 14, 2019, and a site visit at True's Bowling Green, Missouri manufacturing facility on November 15, 2019 during previous validation/verification activities for True. The site visits included interviews with key personnel and facility tours to assess GHG

project boundaries, site operations, data collection processes, and information management systems. Key True personnel interviewed during the site visits included:

- Charles Hon
- Todd Van Hoggstrate
- Kristen Jones

The data management system assessed during these site visits is the same system utilized for data collection in the current Projects; therefore, no additional on-site inspection was warranted for the current verification process.

5.6 Emissions Reduction Data and Calculation Assessment

This assessment used information and insights gained during the previous steps to evaluate the collected data and the reported emissions reduction quantities and identify if either contained material or immaterial misstatements.

5.7 Corrective Actions and Supplemental Information

The Audit Team made requests for corrective action during the validation and verification processes. True provided sufficient responses to all requests. These requests and True's responses are described in Appendix A of this report.

5.8 Validation & Verification Reporting

Validation and verification reporting, represented by this report, documents the validation and verification processes and identifies their findings and results. Validation and verification reporting consists of this report for True, along with a signed verification statement. Both the report and statement are submitted to ACR as part of the validation/verification reporting process.

6. Validation Results

6.1 Project Boundary

The Project boundary is defined as emissions from Equipment Operation (SSR 5), Equipment Service/Recharges (SSR 6), and EOL/Equipment Disposal (SSR 7). Fugitive emissions of refrigerants occur in the baseline and project scenarios during the operation, servicing, and end-of-life of the refrigeration products. Emission reductions occur from the replacement of high-GWP refrigerants with a low-GWP refrigerant, R-290.

The Audit Team assessed the source, sink, and reservoir (SSR) determination included in the GHG Project Plan and found the justification accurate and in accordance with the Methodology.

Overall, True provided an accurate description of the Project boundary and a comprehensive justification for the project SSRs.

6.2 Baseline Scenario

The baseline scenario is defined as the continued use of the baseline refrigerants in the manufacture of Stand-Alone Commercial Refrigeration units. Due to regulatory requirements in effect in California, Washington, New Jersey, and Canada in 2020, the baseline scenario for these jurisdictions was approved by ACR through a deviation request made by True. In

California, Washington, and New Jersey, the baseline scenario is defined as the continued use of a refrigerant with a GWP of 850; for Canada, a refrigerant with a GWP of 1425 is assumed in the baseline scenario.

For all other jurisdictions within the Projects' boundaries, the baseline refrigerant and associated GWP is assigned consistent with the defaults prescribed by the Methodology.

6.3 Emission Reduction Quantification Methodologies and Calculations

Emission reductions are quantified in accordance with the procedures described in the Methodology and the ACR Standard. The equations are correctly identified and the calculation of GHG emission reductions is presented in a transparent manner, incorporating all relevant GHG sources, sinks, and reservoirs.

Baseline emissions are quantified according to Equation 1 in the Methodology based on the quantity of refrigerant used in the baseline system and the annual amortized emission rate of the baseline refrigerants. The quantity of refrigerant used is based on the quantity and default refrigerant charge size of each equipment type produced during the project scenario.

Project emissions are quantified according to Equation 2 in the Methodology based on the quantity of alternative refrigerant used in the project system and an annual amortized emission rate set equal to that used in the baseline system. The quantity of alternative refrigerant used is based on quantity and a default charge size of each equipment type produced during the project scenario.

Leakage emissions are not accounted for in the Project boundary and are not quantified under the Methodology.

Total net emission reductions are determined according to Equation 3 in the Methodology by subtracting project emissions from baseline emissions.

After reviewing the quantification procedure and supporting evidence, the Audit team concluded that the methodologies and the applicable tools have been applied correctly to calculate baseline emissions, project emissions, and net GHG emission reductions and removals.

6.4 Data Monitoring and Management System

The monitoring plan described within the GHG Project Plan includes all relevant data and parameters required to obtain a reliable result of generated emission reductions and meets the requirements of the Methodology. The primary variables monitored in order to determine and account for emission reductions are presented in Table 1 below.

TABLE 1: Monitoring Parameters

Monitoring Parameter	Method of Estimation	Frequency of Measurement	Unit of Measurement	Frequency of Recording
Quantity of refrigerant used in the baseline system ($Q_{BR,j,i}$)	Sales records and Table 4 of Methodology	Each sale of refrigeration units	Kilograms	Each sale of refrigeration units
Quantity of alternative refrigerant used in the project system ($AR_{k,i}$)	Sales records and US EPA SNAP Regulation	Each sale of refrigeration units	Kilograms	Each sale of refrigeration units

Monitoring Parameter	Method of Estimation	Frequency of Measurement	Unit of Measurement	Frequency of Recording
Annual amortized emission rate of refrigerant in baseline system ($ERA_{REF,j}$)	Table 4 of Methodology	Once at validation	Percentage	Once
Annual emission rate of alternative refrigerant in project system ($ERA_{REF,k}$)	Set equal to emission rate of baseline system	Once at validation	Percentage	Once
GWP of the baseline refrigerant ($GWP_{REF,j}$)	Table 4 of Methodology or Approved Deviation Request	Once at validation	Dimensionless	Once
GWP of alternative refrigerant used in project system ($GWP_{REF,k}$)	Table 3 of Methodology	Once at validation	Dimensionless	Once

The GHG Project Plan includes a complete description of the frequency, responsibility, and procedures for recording, storing, monitoring, and measuring all project data. All requirements in Sections 5.1 and 5.2.1 of the Methodology are addressed by the monitoring plan contained within the GHG Project Plan.

The adequacy of the data management systems described in the monitoring plan was assessed during the site visits by reviewing system controls with manufacturing plant personnel and during the current desktop assessment through tracing data back to its origin.

6.5 QA/QC Procedures

The GHG Project Plan includes QA/QC procedures for data that meet the requirements of the Methodology. Specifically, datasets documenting sales of advanced refrigeration units can be compared to bills of lading to confirm equipment shipments. Further, the data management system used to record equipment sales and ARS equipment production serves as the basis for customer billing by True and is subject to both internal accounting controls and external audits, thereby providing an additional layer of quality assurance.

Due to the strong QA/QC procedures surrounding production and sales records, minimal data uncertainty is foreseen.

6.6 Project-specific Conformance to ACR Eligibility Criteria, including Additionality

The Projects meet the eligibility requirements set forth in the ACR Standard as described in Table 2 below.

TABLE 2: ACR Eligibility Criteria

Eligibility Requirement	Conformance Details	Validation Conclusion
Start Date	The start date for each project is January 1, 2020 – December 31, 2020	Consistent with requirement.
Minimum Project Term	N/A – project type does not contain risk of emission reduction reversal	N/A

Eligibility Requirement	Conformance Details	Validation Conclusion
Crediting Periods	Ten years – January 1, 2020 through December 31, 2029	Consistent with requirement.
Real	Refrigerant transition is performed in accordance with an approved ACR methodology to produce verifiable evidence of emissions mitigation.	Consistent with requirement.
Emission or Removal Origin	The project proponent reduces non-energy direct emissions through the manufacture and sale of the advanced refrigeration systems.	Consistent with requirement. True retains ownership of emission reductions through terms and conditions with purchasers of ARS equipment.
Offset Title	True retains rights to GHG emission reductions associated with the refrigerant transition through terms and conditions with end users.	Consistent with requirement. True retains ownership of emission reductions through terms and conditions with customers.
Additional	Project satisfies additionality test in approved methodology and Regulatory Test in ACR Standard.	Project conforms to ACR additionality criteria. See Section 6.7 below for conformance details.
Regulatory Compliance	The manufacturing facilities were in compliance with regulatory requirements relative to refrigeration product manufacturing during the reporting periods.	An attestation was provided to First Environment by True to confirm regulatory compliance throughout the reporting period for each Project.
Permanent	N/A – project type does not contain risk of emission reduction reversal.	N/A
Net of Leakage	N/A – the Methodology does not account for leakage.	N/A
Independently Validated and Verified	True contracted First Environment, Inc. to provide independent, trustworthy, and objective third-party validation and verification services to the Projects.	First Environment is an ANAB-accredited and ACR-approved validation/verification body. Audit activities were performed independently and in accordance with all ACR requirements.
Environmental & Community Assessments	No negative community or environmental impacts are identified. Net positive impact due to lower GHG emissions.	Consistent with requirement. Projects occur in refrigeration unit manufacturing processes at private industrial facilities. No negative external environmental or community impacts are created from the refrigerant transition.

The Project activities comply with the applicability requirements of the Methodology. The table below lists the relevant applicability requirements and identifies how the Projects meet them.

TABLE 3: Methodology Criteria

Eligibility Requirement	Conformance Details	Validation Conclusion
Location	All True manufacturing plants are located in North America	Consistent with requirement.
Refrigerant Sector and Segment	Stand-Alone Commercial Refrigeration	Consistent with requirement. Manufacturing plants produce stand-alone commercial refrigeration units.
Start Date	See Table 2 above	
Alternative Refrigerant	R-290 (Propane)	Consistent with requirement.

None of the Projects participate in any other GHG emission trading or compliance programme nor have they been rejected by another GHG programme.

6.7 Additionality

The Projects satisfy the requirements for the demonstration of additionality specified by the ACR Standard by passing an approved practice-based performance standard and a regulatory surplus test.

All Projects consist of the use of an eligible refrigerant in the manufacture of Stand-Alone Commercial refrigeration units, which is an Eligible Refrigerant Sector and Segment listed in the Methodology; therefore, all satisfy the performance standard specified by the Methodology.

In 2020, regulations came into force in California, New Jersey, Washington, and Canada that prevent the use of HFC-134a and R-404a in Stand-Alone Commercial refrigeration applications. However, these regulations do not mandate a low-GWP refrigerant such as R-290 in refrigeration unit manufacturing. Additionally, True provided a management attestation confirming that the transition to propane at the manufacturing facilities was voluntary.

6.8 Approved Variance or Deviations

All Projects obtained approved deviations from ACR during the validation process to allow for the use of an alternative GWP for the baseline refrigerant in the following jurisdictions.

TABLE 4: Baseline Refrigerants

Jurisdiction	GWP per Approved Deviation
California New Jersey Washington	850
Canada	1425

The deviation was necessary because regulatory requirements in these jurisdictions prevent the use of the default baseline refrigerants specified in Table 4 of Methodology in stand-alone commercial refrigerant applications in 2020.

The Projects also obtained a deviation from ACR during the validation/verification process to allow validation/verification activities to proceed without a site visit.

7. Verification Results

During the verification process, First Environment reviewed the Projects' Monitoring Reports, GHG emission reduction assertions, and supporting documentation for the current reporting periods to ensure consistency with the GHG Project Plan and the Methodology. Discrepancies between Project documentation and the verification criteria were considered material and identified for corrective action. Additionally, First Environment assessed the GHG emission reduction assertions and underlying monitored data to determine if either contained material or immaterial misstatements. The results of these reviews are discussed in greater detail below.

7.1 GHG Information Verified

Emission reduction calculations were reviewed to ensure accuracy in the formulas used and the raw data used as inputs. Formulae were tested to ensure they were consistent with the calculation methodology described in the Methodology and GHG Project Plan. Total baseline emissions were quantified in accordance with Equation 1 from the Methodology.

The quantity of refrigerant used in the baseline system ($Q_{BR,j,i}$) was calculated from sales data documenting the number of units, equipment type, and location of refrigeration units sold during each reporting period. Equipment type was designated based on the model identification codes of each unit and the corresponding default charge size was assigned for each transaction. Equipment type is supported by product specification sheets available on True's website. The quantity of units, geographic location, and model associated with each transaction can be traced through True's accounting system and is recorded on bill of ladings.

The annual amortized emission rate of the baseline refrigerants ($ERA_{REF,j}$) was correctly selected from the Methodology based on refrigerant segment type. The GWPs of baseline refrigerants ($GWP_{REF,j}$) were determined from Table 4 of the Methodology or the approved deviations described in Section 6.8 above, as applicable.

Project emissions associated with equipment operation and disposal were quantified using Equation 2 from the Methodology. The quantity of alternative refrigerant used in the project system was calculated from the same sales data used for the baseline system. The quantity of units and location of each sales transaction was used, and a maximum refrigerant charge size of 0.15kg was assumed for each unit sold based on the maximum allowable charge size for propane in stand-alone commercial refrigeration equipment specified by US EPA SNAP regulations. First Environment determined this charge size to be conservative in determining the quantity of alternative refrigerant used by the Projects.

The annual amortized emission rate of the alternative refrigerants ($ERA_{REF,k}$) was set equal to the emission rate of the baseline refrigerants and the GWP of alternative refrigerant ($GWP_{REF,k}$) was correctly selected from the Methodology.

Total emission reductions were computed using Equation 3 from the Methodology. All emission sources within the project boundary are properly accounted for in calculations.

7.2 Verification Assessment Techniques and Processes Employed

Copies of the sales data used in the calculations, including the equipment type and quantity of units sold by location and shipping bills of lading, were compared with the data used in the final calculations and tested for transcription or mathematical errors. First Environment sampled all areas identified as being of high risk of inaccuracy, uncertainty, or misstatement and performed other data checks in order to assess whether the project sufficiently mitigated data uncertainty. The assessments performed on this data, as described above, confirmed the reliability of the evidence provided and verified the accuracy of the information flow. Additionally, First Environment performed recalculations of emission reductions for the entire reporting period to assess whether they were free of material misstatement. First Environment found the emission reduction calculations to be free of material misstatement.

The evidence provided was consistent with the requirements of the Methodology and the validated GHG Project Plan and meets generally accepted evidentiary standards for best practices in GHG accounting.

8. Audit Findings

True provided good documentation for the emissions estimates as well as the procedures surrounding the data collection process. To complete the validation and verification processes, First Environment issued corrective action requests and clarification requests. Through communications with the Audit Team, True was able to resolve all requests made by First Environment during the validation and verification processes.

The findings issued, as well as True's responses, are summarized in Appendix A of this report.

9. Validation & Verification Conclusion

First Environment was retained to provide validation and verification services to True for the Projects' GHG emission reductions assertions based on the following fundamentals:

- *Level of assurance:* Reasonable assurance.
- *Validation/Verification objectives:* To assure project conformance with the validation/verification criteria and that the requirements of the ACR Validation and Verification Standard, Chapters 1.B and 8.B are met. Validation objectives also include an assessment of the likelihood that implementation of the Projects will result in the emission reductions stated in the GHG Project Plans.
- *Validation/Verification criteria:* American Carbon Registry Standard, Version 7.0, December 2020; Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removals from Advanced Refrigeration Systems, Version 2.0.
 - The verification process was also informed by the GHG Project Plan
- *Definition of materiality:* Misstatements of greater than five percent of the GHG reduction assertion and qualitative non-conformities with validation and/or verification criteria are considered material.
- *Scope, including:*

- *Boundaries of the assertion:* The operation of the refrigeration equipment, emissions resulting from the recharging and servicing of that equipment, and end-of-life (EOL) / disposal emissions
- *The physical infrastructure, facilities, and activities within the assertion:* Stand-Alone Commercial Refrigeration equipment.
- *GHG sources, sinks, and reservoirs included within the assertion:* Emissions reductions (expressed in units of Carbon Dioxide equivalents (CO₂-e) resulting from refrigerant replacement; Project emissions from use of eligible refrigerant R-290 (propane)).
- *The time period for the assertions:* January 1 to December 31, 2020

Based on the assessments performed and the historical evidence collected, First Environment concludes that the GHG Project Plan is in conformance with the specified validation criteria and the Project GHG emissions reductions, due to the transitions to a low-GWP refrigerant by the True manufacturing plants for the above-referenced time periods, can be considered with a reasonable level of assurance:

- consistent with the GHG Project Plan,
- in conformance with the ACR Standard and the Methodology, and
- without material discrepancy.

Verified results show:

ACR640

January 1 to December 31, 2020	Total
Baseline Emissions (tCO ₂ e)	367,108
Project Emissions (tCO ₂ e)	61
Emissions Reductions (tCO ₂ e)	367,047

ACR641

January 1 to December 31, 2020	Total
Baseline Emissions (tCO ₂ e)	18,613
Project Emissions (tCO ₂ e)	8
Emissions Reductions (tCO ₂ e)	18,605

ACR642


January 1 to December 31, 2020	Total
Baseline Emissions (tCO ₂ e)	16,106
Project Emissions (tCO ₂ e)	4
Emissions Reductions (tCO ₂ e)	16,102

10. Lead Verifier Signature



Michael M. Carim
Senior Associate

11. Independent Internal Reviewer Signature

A handwritten signature in black ink, appearing to read "Jay Wintergreen", with a large, stylized initial "J" and a long horizontal flourish extending to the right.

James Wintergreen
Senior Associate

APPENDIX A – VALIDATION/VERIFICATION FINDINGS

ID	Corrective Action Request	Summary of Participant Response	VVB Conclusion
1	An incorrect baseline default charge size is assigned to several types of equipment in the project dataset. See Column K on tab 'Misstatements' for detailed description.	Charge sizes assigned in the project data set were revised, as relevant, to be consistent with the equipment type identified.	Response is acceptable. Minor differences remain but are immaterial and do not affect the verification conclusion.
2	Unit counts are incorrectly doubled for some dual compressor models resulting in an overstatement of baseline emissions; project emissions are understated for some models because the reported unit count total does not reflect the second compressor loop in the equipment. See "2020 ARS data issues_8-18-21.xlsx" for dual compressor system models for which baseline emissions are double counted and project emissions underestimated.	Reported unit counts for each equipment model were corrected to resolve overstatements of baseline emissions or understatements of project emissions.	Response is acceptable. Minor differences remain but are immaterial and do not affect the verification conclusion.
3	The Monitoring Reports have not been prepared using the current version of the ACR Template.	The Monitoring Reports were revised to use the current version of the ACR Template.	Response is acceptable.

ID	Clarification Request	Summary of Participant Response	VVB Conclusion
1	Please confirm the appropriate equipment type from Table 4 of the Methodology for the identified equipment models. See tab 'Clarification Requests' for detailed description.	True provided confirmation of the equipment types for all units in the reported dataset.	Response is acceptable.