

21 January 2013

**Attention of Mark Gordon,
Chief Director Integrated Environmental Authorisations**

Dear Mr Gordon,

Further to phone conversations with yourself and Mr D Smit, with reference to:

(i) Application by Eskom Holdings for EIA for new Main Transmission Station at Houhoek, and associated power lines and substation.

DEA Ref: 12/12/20/2541 also 14/12/16/3/3/2/401.

Current status: Draft Scoping Report issued 29 Nov 2012. EAP: BKS (Pty) Ltd ref J01887.

(ii) Application by SAGIT Energy Ventures for EIA for Langhoogte Wind Farm near Botrivier.

DEA Ref: 14/12/16/3/3/2/260.

Current status: Draft EIA Report issued 16 January 2013. EAP: Gibb (Pty) Ltd ref J30284A.

(iii) Application by Epispan Ltd for Caledon Wind Farm near Botrivier.

DEA Ref: 12/12/20/1701.

Current status: Revised FEIR submitted to DEA for review 31 October 2012. EAP: Gibb (Pty) Ltd ref J29164.

It appears that both of the above Wind Farm applications are at advanced stages of decision making with the connections to the grid apparently properly considered and defined by the specialists concerned. However, the descriptions of these connections are totally contradicted in the Eskom DSR, to an extent which it is considered must be investigated urgently.

The FEIR for the Caledon Wind Farm (93 MW initially, originally 243 MW) states (Executive Summary page 5) that "with the upgraded design of the on-site substation, there is no need for any upgrade of Houhoek substation". This report was issued in January 2012. The DEIR (Dec 2012) for Langhoogte Wind Farm (140 MW capacity) states that the new 8 km long 132 kV power line would be connected direct to Houhoek – no mention of any upgrade of the substation (see section 3.2).

Notwithstanding the above, the Eskom DSR states that both Caledon and Langhoogte facilities are planning for connection to the grid in 2016 but "there is only capacity for one of them". It is also stated that "Caledon Wind Farm will have to find a route for a double circuit from the north to Houhoek" (see section 3.3.4 (c)).

Construction of facilities and infrastructure for Caledon Wind Farm, also for about 8 km of power line to Houhoek, assuming no better solutions become available, is not an activity covered by the current application. The impacts of such a power line, in addition to the cumulative implications for residents in the Botrivier area, with the other new power line connecting Langhoogte Wind Farm to Houhoek from the Southeast, must surely need to be assessed.

Eskom's latest published Transmission Development Plan (2013-2022) includes major expenditure in the Cape to accommodate natural growth of electricity demand and the integration of wind energy:

- New Houhoek Main Transmission Station (MTS) in Botrivier (R500 million),
- New Vryheid Substation, east of Swellendam, maybe associated with a cluster of Wind Farms nearby,
- Retention of existing Houhoek Substation, maybe upgraded for the Langhoogte Wind Farm,
- Upgrading of transmission lines in area supplied from Bacchus MTS.

It is relevant that sustainability of a project should be considered in the EIA process, when it is remembered that the total rated capacity of these two Wind Farms is about 230 MW, so all the

infrastructure must be rated for 230 MW, even though the output will only be about 60 MW–70 MW per annum average.

It is proposed that the above Wind Farm applications are put on hold and that the Caledon one should be totally revised to include the activity of constructing the new power line and any other required changes. It is requested that the current commenting period for the Eskom project be extended until all these issues are resolved. Further, the impact of the cluster of Wind Farms near Swellendam, which are presumably intended to be connected to the new Vryheid MTS, once they are finally approved, should be examined, particularly the impact on the Houhoek requirements.

Please note that my interest is only because of participation as an I&AP in various Wind Farm applications, mostly in the Overberg, Western Cape.

Sincerely,

A handwritten signature in black ink that reads "B.P. McMahon". The signature is written in a cursive style and is underlined.

Brian McMahon, registered I&AP
PO Box 136
Greyton 7233
Western Cape.
Tel: 028 254 9673

Cc: Conrad Agenbach, DEA
Cc: D Smit, DEA

Note that the following have not yet been copied, until I get some response from DEA:

Cc: Anthony Barnes, Chief Director Integrated Environmental Management, DEA&DP.
Cc: Walter Fyvie, Environmental Consultant, Gibb (Pty) Ltd.
Cc: Mamokete Maimane, Environmental Management, BKS (Pty) Ltd.