



Sappi
Presentation
at the IRP 2 2010
Stakeholder
function
7 June 2010

sappi

COMMENTS ON THE 29 PARAMETERS FOR THE PREPARATION OF THE IRP(E) 2 2010

» **Presented by:**

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- **Thank you for registering Sappi as a Stakeholder of the IRP 2 2010 Project**
- **Thank you for the opportunity to present Sappi's preliminary comments on the 29 Parameters for the preparation of the IRP 2 2010**

Sappi Background

- Sappi is a global paper company with Mills worldwide. Sappi SA –
 - Has 8 Saw, Pulp & Paper Mills
 - Is a Key Consumer of electricity with an annual consumption of more than 2500GWh and a maximum demand of more than 300 MVA
 - Mills are fed by Eskom (5) and local authorities (3)
 - Co-generates more than 45% of its total electrical demand at 3 of its Mills from a combination of fossil fuel and renewable black liquor obtained from the pulping making processes and wood waste
 - Has the potential to increase its power generating capacity from wood waste
 - Is a signatory to the Energy Accord

- **Apart from being registered as a Stakeholder, Sappi participates also through Stakeholders such as the EIUG, BUSA and the EETC of the NBI**
- **Sappi is committed to engage in the process and will make detail comments made by 2010-06-11**

■ General

- The set of 29 Parameters are well structured to form a composite framework for the IRP(E). **We need clarification of continual reference to the existence of 32 Parameters.**
- The IRP must equitably take into account **all sources and combinations thereof** to generate electrical energy
- All producers of electricity must be given **equitable access to the transmission infrastructure**
- The traditional role of **Eskom** must be limited to **power generation within the borders of SA** and **transmission country wide**
- The **ISMO** must be established without delay

- **Parameters to be added**
 - **Transmission Infrastructure** – if transmission was meant to be included in Distribution Infrastructure, then it must be split into two separate Parameters
 - **IPP Generation**
- **Parameters identified “not to be considered”**
 - Time must be made available to consider Para 20 **Generating Plant Location** and 26 **Distribution Infrastructure**

- **High level comments on specific Parameters**
 - **D1: Add **Illegal consumption** to Energy Forecast**
 - **D6: Consider the Introduction of **different time zones** in the country to smooth ou peaks**
 - **D6: If **load shift** is considered essential, why has DSM funding being withdrawn?**
 - **D10: **Benefits of own generation:****
 - Less dependency on unreliable supplies
 - Reduced dependency on coal
 - More efficient use of fuel, less strain on resources

- **Recommendations to improve the structure of and facilitate commenting on the Parameters:**
 - **Add a heading: **Definition** and clearly define each Parameter to avoid misinterpretation**
 - **Include a **List of Abbreviations and Acronyms** used in the Parameters and in the Plan**
 - **Number all Parameters** both chronologically and with its corresponding subject number
 - **Number the subheadings** of the Parameters
 - **Publish all documents in **MS Word format****



**THANK
YOU**

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