

22 April 2015

Ms Mmatlala Rabothata
Department of Environmental Affairs
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Dear Ms Rabothata,

**PROPOSED ISUNDU 765/400 KV SUB-STATION AND TURN-IN TRANSMISSION LINES
APPLICATION EXTENSION REQUEST
(DEA EIA REF: 14/12/16/3/3/2/745; 12/12/20/1397/AM2)**

Since 2009, Eskom has been investigating options to bring a 765 kV transmission line from the Venus Sub-station, near Estcourt, to a new sub-station in the KZN Midlands, with two 400 kV transmission lines from the new sub-station linking into the existing Hector and Ariadne Sub-stations. This infrastructure forms a key component of the overall KZN Strengthening Programme.

Extensive environmental investigations have been undertaken between 2009 and 2011 and some portions of the infrastructure required were authorised on 11 June 2012, namely the Venus-Sigma-Hector-(Ariadne) 765/400 kV Transmission Lines (EIA: 12/12/20/1397/1, EIA: 12/12/20/1397/3) and the new Sigma Sub-station (765 kV) (EIA: 12/12/20/1397/2).

However, more detailed geotechnical investigations undertaken at the Sigma Sub-station site showed that earthworks and foundations will be exorbitantly expensive. Thus, Eskom initiated further investigations to identify if alternative, more cost-effective sub-station sites were available without needing to significantly alter the authorised VSHA transmission line corridor. The proposed Isundu site to the east of Ashburton is the outcome of this investigation.

Eskom submitted an application for the proposed Isundu Sub-station (DEA EIA REF: 14/12/16/3/3/2/745) which was accepted and signed by the Department of Environmental Affairs (DEA) 26 September 2014.

Initially the draft Scoping Report was programmed to be finalised in January 2015 and submitted for public review in February 2015. This was well within the six month period as defined in Regulation 67 of EIA Regulations 2010. However, for various reasons there have been delays in getting the scoping report finalised and it is now only to be released for public on 29 April 2015. Copies will also be provided to DEA.

After checking that the process was still within the six month timeframe in mid-January 2015, this requirement subsequently slipped our minds during February and March due to the need to concentrate on various other aspects of the project such as finalising the draft Scoping Report and submitting and following up additional funding applications to Eskom for the specialists studies proposed in the Scoping Report.

However, ACER did during this period have email correspondence and communication in regard to these applications with Ms Ndivhudza Sebei, the previous case officer for the VSHA project.

In terms of Regulation 67, ACER would like to request that the Department accept and approve the following motivations for time extensions:

- Extension of the proposed Isundu Sub-station application (14/12/16/3/3/2/745) because this forms part of a complex long-term project of strategic importance in terms of electricity provision.
- Extension of the Amendment application (12/12/20/1397/AM2) accepted by the DEA on 27 November 2014. This application is being undertaken in parallel to the Isundu EIA process and the amendment report required will only be prepared and submitted at the same time as the draft and final EIRs, once the specialists have considered the impact of the amendment and the public participation process has been completed. This is currently anticipated to be between August – November 2015.

We look forward to your favourable response to our motivation.

Please contact ACER should you have any queries.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. Scherzer', with a long horizontal stroke extending to the right.

ACER (Africa) Environmental Management Consultants

Mr Paul Scherzer

Environmental Assessment Practitioner