Comments on the NERSA Cofit Consultation Paper Feb 2011

Item	Section	Subject
1	Explanatory Memo point ©	Cofit Technology
2	Glossary	COD
3	Glossary	Cogen definition
4	Glossary	Off gases
5	2,3	PPA
6	Section 4.3	Connection.
7	Section 5.3	Eligibility for Cogen
8	Section 5.8	Connection
9	Section 7.4	Capital costs
10	Section 7.4	Total investment costs
11	Section 7.4	Fixed O&M
12	Section 7.4	Variable O&M
13	Section 7.4	Fuel cost
14	Section 7.4	Heat rate
15	Section 7.4	Generated power

Comments.

Some blurring of definitions: Cogeneration or Biomass? Woodchips/Bagasse as primary feeds are Biomas

What about phased developments? This is private investment and phases will occur

The test should be whether the process qualifies under the CDM mechanism.

Gas Engines to be included here.

How will bankability be insured?

Surely what is meant is 'Displacement' and NOT ACTUAL connection?
Most cogenerators have power needs greater that their cogeneration.
Again the test is: will it receive CDM's? Discard coal will not as far as we know.

Cofit SHOULD INCLUDE parallel supply AND 'Displacement' arrangements.
The BENEFIT to the Grid and Supply is still the same.

This can be low depending on the waste energy stream to be treated before use.
Eg: for a gas engine, the gas may need treatment before combustion. Suggest a range.
$2500 - $3000 depending on the technology used.
What about Financial, Legal and Development costs?

This figure is low. How was it derived?

as above.

What if the waste gas is a pollutant, needs treatment before use and is issued free?

Steam cycle and Gas cycle efficiencies differ. Offer range to include both cycles.

The table should include Nominal generation and Net generation to account for auxiliary power