

The Honourable Minister David Mahlobo

Minister of Energy
Department of Energy
Private Bag X15 Private Bag X96
Hatfield Pretoria
0028 0001
Per email: deidre.nkopane@energy.gov.za

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cc. Director General Mr. Tseliso Maqubela
Per email: nokuthula.mbeje@energy.gov.za

Honourable Minister David Mahlobo

REQUEST FOR MEETING WITH CIVIL SOCIETY ORGANISATIONS REGARDING IRP/IEP

As civil society organisations and citizens working towards the achievement of environmental and social rights, environmental and energy justice in our communities across South Africa, the signatories to this letter would like to take this opportunity to congratulate you on your appointment as Energy Minister. We believe that the Energy ministry is of critical importance in the food-energy-water nexus, in determining the energy future of our country, and in the realisation of the constitutional environmental right.

When you became the new Minister of Energy, the country's first energy plan (the Integrated Energy Plan (IEP)), and an update of the country's electricity plan (the Integrated Resource Plan (IRP)) were already well underway. The importance of the integrity of this process cannot be understated, and we write to request a meeting with you to discuss the importance of the IEP/IRP and the energy trajectory of the country.

We believe that the key issues of discussion would be:

1. providing clarity on the timelines and immediate next steps in the development of the final IEP and IRP;
2. providing clarity as to what meaningful public participation in the remaining IEP/IRP process will entail, and at what stage/s the public will be able to comment and for what period/s;
3. providing clarity on how meaningful public participation will continue to shape the IEP/IRP process;
4. providing clarity on the status of the existing determinations for coal, nuclear, gas and renewable energy;
5. providing clarity on the way forward with the heavily-delayed Independent Power Producer agreements that Eskom has thus far continued to refuse to sign; and
6. the long-term energy vision for South Africa.

Given the potentially-catastrophic implications of climate change, and South Africa's particular vulnerability to such impacts, we believe that urgent steps to ensure just transition away from coal and towards publicly-owned renewable energy are required, combined with energy efficiency. As such, we believe that there are eleven key principles that the IRP should adhere to, at a minimum:

1. The Base Case scenario should be **the least cost combination of technologies** to achieve South Africa's electricity requirements. After that, policy adjustments and constrained scenarios can be run, but any deviation from the least cost should be made public and fully explained, so that policy-makers and the public are able to make a value-for-money assessment of the deviation.[\[1\]](#)
2. It must take **full account of the external costs** of the different technologies, ensuring that all external costs to human health, the environment, and the climate are factored into cost calculations in respect of different technology options.[\[2\]](#)
3. It must be **based on only the latest, accurate projections and input data**, including data on South Africa's GDP, electricity demand (with proper consideration of improved energy efficiency and grid deflection), and technology cost and price comparisons.
4. It must clearly indicate and **explain all assumptions on which all modelling is based**, and it must verify and reference all sources of information, findings and conclusions; including those regarding job creation; GDP forecasts; energy-intensity; learning rates; and costs of different technology options.
5. It must **not arbitrarily constrain or limit renewable energy projections and investments**.
6. It must be **based on the latest scientific information and international best practice**, including the latest scientific conclusions on climate change, which clearly indicate that keeping global temperature rise to below 1.5 degrees Celsius is critical to avoid catastrophic climate change.
7. The electricity sector carbon constraint must be derived from **integrated, full sector energy planning**. It must, at a bare minimum, take into account South Africa's mitigation commitments in its Nationally Determined Contribution (NDC) under the Paris Agreement and **be consistent with South Africa's obligations under the Paris Agreement and the United Nations Framework Convention on Climate Change, as well as South Africa's National Climate Change Response Policy**. The NDC commitments must not be modelled as a potential future scenario, but as an existing commitment, with which South Africa has undertaken to comply. It must also take into account that South Africa will need to submit stricter and more rigorous mitigation commitments in its NDC every 5 years. It should take into account that decarbonising the electricity sector is the lowest cost mitigation option for the country to meet these international commitments.
8. It must be **consistent with South Africa's other international obligations**, including the Convention on Biological Diversity, the international law obligations to avoid transboundary air pollution and regional water treaties.
9. It must **take into account the international move away from fossil fuels and nuclear** and the financial implications of future stranded assets and of nuclear decommissioning costs – including the implications of managing the long-term risk of nuclear waste – as a result of proceeding with plans for future new coal and nuclear projects.

10. It must be **consistent with the requirements of national legislation**, as well as the objectives of the Electricity Regulation Act, 4 of 2006 including ensuring that the interests and needs of present and future electricity customers and end users are safeguarded and met, and promoting the use of diverse energy sources and energy efficiency.
11. It must **promote the realisation of the fundamental human rights in the Constitution**, in particular the rights: to an environment not harmful to health or well-being, and to have the environment protected for the benefit of present and future generations (section 24); to human dignity (section 10); to life (section 11); and to access to food and water (section 27). In this regard, there must be a full assessment into the impacts of different technology and energy source choices on these constitutional rights.

In summary, decisions on our energy mix must be taken with full transparency and proper regard to what is in the best interest of all South Africans. In this regard, the Minister must give serious consideration to the negative impacts of coal on human health, the environment (including our scarce water resources), global climate change, and the economy.

In our view, the current IEP/IRP process has had substantial flaws, and that a less-than-adequate IEP/IRP will not provide South Africa with least-cost electricity, will not promote social and environmental justice, and will not enable South Africa to meet its international climate change obligations. This would also open up government to potential legal challenges.

We believe that these issues are urgent, and require a robust dialogue. We would therefore request a meeting with you at your earliest convenience. Please propose possible meeting dates in December.

We await your response to this letter, and would request such response by 24 November 2017.

Yours sincerely

Greenpeace Africa and The Life After Coal Campaign (consisting of groundWork, the Centre for Environmental Rights and Earthlife Africa Jhb)