

Chairperson of the Portfolio Committee of Energy
Mr Fikile Majola
Per email: Mr Arico Kotze
akotze@parliament.gov.za

Copy to:
The Honourable Minister Jeff Radebe
Department of Energy
192 Visagie Street
Corner Paul Kruger & Visagie Street
Pretoria
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Per email: Ms Princess Duma
Princess.duma@energy.gov.za

25 October 2018

Response to IRP public hearings and expectations for the IRP itself

Dear Mr Majola,

We the undersigned support the response by Energy Governance South Africa to the process surrounding the draft Integrated Resource Plan (IRP) 2018 public hearings held in October 2018.

We further support their Key principles and components for the IRP itself.

Energy Governance South Africa (EGSA) ¹ is a network of concerned individuals and organisations dedicated to promoting good governance in the energy sector. Project 90 by 2030 is an environmental non-profit organisation² that co-ordinates the EGSA network.

¹ <http://www.egsa.org.za/>

² <https://90by2030.org.za/>

Board of Governors: Lorna Fuller (Director), Glen Tyler (Chairperson),
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Project 90 by 2030 is an 18A registered PBO



PCE Public hearings process

1. During the first two days of the hearings, the Question and Answer sessions did not happen, and the members of parliament did not openly interrogate what was presented to them – despite some of the presentations clearly showing conflicting information. Our view is that **this does not constitute meaningful engagement**, and the process ended up being a one way flow of information without interaction or interrogation.
2. Some presentations contained **questionable and unreferenced figures which were not queried**. One example, among several questionable nuclear figures, was the claim Koeberg supports 64 000 jobs annually, whereas the Eskom website³ puts this number at 1 200.
3. It is still **not clear how these inputs will feed into the IRP update process**, or how this links to the work by the Department of Energy in finalising the IRP. This should have been explained at the outset in the invitation for public submissions.
4. There needs to be **more attention given to the voices from communities**. They are the most affected by electricity prices along with the environmental and health impacts of electricity generation, but currently have the least access to involvement in the IRP process. Some community members did not get the opportunity to speak at the hearings on the 23rd and 24th October 2018 as the programme did not allow enough time for them.

Key principles for the IRP

We, submit that the final IRP **must** contain, and be based on, **at least** the following principles in order to be a reasonable and lawful plan that is aligned with the Constitution of the Republic of South Africa:

1. It must be **based on only the latest, accurate and objective data for the modelling assumptions**. Furthermore, it must verify and reference all sources of information, findings and conclusions; including those regarding GDP forecasts; energy-intensity; learning rates; job creation and costs of different technology options.
2. It must **operate within a strict, ambitious carbon budget**, aligning with the latest scientific consensus on climate change, which clearly indicate keeping global temperature rise to below 1.5 degrees Celsius is critical to avoid catastrophic climate change.
3. The Reference Case should be **the least cost combination of technologies** to achieve South Africa's electricity requirements. When other scenarios are run, 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.
4. 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.
5. Given the uncertainties in energy planning around disruptive technologies, effects of climate change, trajectory of the economic and demand for utility scale electricity; it must be based on **flexible planning and adaptive management**, while meeting long term social, economic and environmental objectives.
6. Given that SA is a semi-arid country and our water resources are already over-subscribed, a situation which will be exacerbated by climate change, any national planning decisions regarding energy need to be **based on the lowest possible impacts on water resources**, both in terms of quantity and quality.

³ http://www.eskom.co.za/Whatweredoing/ElectricityGeneration/KoebergNuclearPowerStation/TheKoebergExperience/Pages/The_Koeberg_Experience.aspx

Key components of the IRP:

Based on research and analysis aligning with the principles listed above, while also addressing socio-economic and environmental concerns, we assert that **the IRP must:**

1. provide and **urgent shift from fossil fuels to renewable energy** by having:
 - a. **no new coal capacity;**
 - b. **increased rate of decommissioning of coal power stations;**
 - c. **no limits on renewable energy expansion;**
 - d. **renewable capacity to be added each year** to stimulate local sector
2. provide for **least cost, flexible generation** options by having:
 - a. **no new nuclear capacity**
3. address the concerns of workers by:
 - a. aligning with a **Just Energy Transition plan;** and
 - b. factoring in net job creation within the electricity sector.
4. **align with other policies and legislation** on climate change, electricity, energy and the Constitution.
5. be **updated every two years** and thoroughly evaluate the role of additional technologies or interventions such as gas, storage, energy efficiency, demand-side management, co- and embedded generation and alternative ownership models in the electricity sector.

In conclusion, the finalisation of the IRP must be conducted with **full transparency** and proper regard to the Constitution and what is in the public interest. . In this regard, the effects of the energy mix on human health, the environment, climate change and the economy are critical while also providing accessible and affordable electricity to our citizens.

Supporting groups, organisations and institutions:

Project 90 by 2030

Life After Coal (Earthlife Africa, groundWork, and Centre for Environmental Rights)

International Rivers

Friends of the Earth, South Africa

South Durban Community Environmental Alliance

Vaal Environmental Justice Alliance

350Africa.org

African Climate Reality Project

Environmental Monitoring Group

Alternative Information and Development Centre

Greenpeace Africa

WWF South Africa

SAFCEI – South African Faith Communities’ Environment Institute

Changing Lives

Gugulethu Backyarders

Tafelsig Women’s Circle

Eastridge Women’s Circle

Hillview Women’s Circle

Women of Hope for the Nation

Consent Community Movement

Western Cape Water Caucus

Delegate Children and Youth Movement

Lorna Mlofana Parents Movement

Stockholm University