



# Centre for Environmental Rights

## Advancing Environmental Rights in South Africa

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Our ref: CER34.25/RH/NL  
13 December 2019

Dear Sir

### REQUEST FOR WRITTEN REASONS: INTEGRATED RESOURCE PLAN FOR ELECTRICITY, 2019

1. We refer to our letter of 5 November 2019 wherein we requested, on behalf of our clients, groundWork<sup>1</sup> and Earthlife Africa NPC,<sup>2</sup> written reasons for the National Energy Regulator of South Africa's (NERSA) decision to concur in the promulgation of the updated Integrated Resource Plan for Electricity (IRP) published on 18 October 2019.<sup>3</sup> A copy of this letter is attached for your ease of reference.
2. We had requested that these reasons be provided, on an expedited basis, by 5 December 2019. We have not yet received your response, despite the 5 December 2019 deadline having passed.
3. We emphasise that we still require, and continue to await, the reasons as requested.
4. Kindly furnish us with your response as soon as possible and by no later than **3 February 2020**, in accordance with section 5 of the Promotion of Administrative Justice Act, 2000.

<sup>1</sup> groundWork is a non-profit environmental justice campaigning organisation working primarily in South Africa, in the areas of Climate & Energy Justice, Coal, Environmental Health, Global Green and Healthy Hospitals, and Waste. See more information at: [www.groundwork.org.za](http://www.groundwork.org.za).

<sup>2</sup> Earthlife Africa is a non-profit organisation, founded in Johannesburg, South Africa, in 1988, that seeks a better life for all people without exploiting other people or degrading their environment. See more information at: <http://earthlife.org.za/>.

<sup>3</sup> Available at <https://cer.org.za/wp-content/uploads/2019/10/Integrated-Resource-Plan-18-October-2019.pdf>.

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5. Our clients' rights are fully reserved.

Yours faithfully

**CENTRE FOR ENVIRONMENTAL RIGHTS**

per: 

**Nicole Loser**

**Attorney**

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