Process

- Alignment with other policies still under development (Review of the Renewable Energy White Paper, Climate Change Response Policy White Paper)
- Investment decisions in conflict with the IEP and Climate Change Policy should be postponed and reconsidered in a transparent decision-making process once those papers are finalised
- The relevant government departments should consult with each other to develop a coherent approach
- Civil society input
  - Task group compositions (NMTRM no civil society members)
  - Submissions of civil society should be considered and responded to
- Lack of transparency on choice of parameters and weightings

Modelling

- Not possible to directly compare scenarios
- Nuclear option fixed in all relevant scenarios
  - no weighting comparison
  - risk factors not taken into account
- ‘Scenario models are basic’ – insufficient base for policy decisions

Costs

- Externalities – true cost of coal and nuclear should be incorporated
- Transmission & distribution costs not incorporated – decentralised power lower T&D costs
- Learning rates not included in scenarios – renewable energy learning rates are very steep, hence RE costs are overestimated

Climate change

- Potentially catastrophic climate impacts make the choice for renewable of energy an imperative – **it is not optional**
- Carbon reduction: the draft IRP does not put SA in a position to reduce emissions to the level required by science
- An emissions cap which meets this requirement is crucial – this means a peak of **no more** than 235mt of CO2-eq by 2020, followed by a reduction as rapidly as possible
- The regional scenario is outrageous – as the largest emitter in Africa, SA has a moral responsibility to act on climate change, and not 'out-source' its emissions to other less-developed countries to not be "penalised by carbon emissions as these do not count towards the domestic target" (pg. 18 IRP)

Renewables

- There is a serious lack of ambition on renewable energy in the ‘Rev. Balanced Scenario’ – by 2020 RE should make up at least 15.3% of electricity generation, and by 2030, the target for RE should be **a minimum** of 36%
- The 5000 MW solar plant planned in Upington, ‘to be realised in the next 10 years’, is not factored into the Rev. Balanced Scenario - it must be incorporated and would mean a major shift in RE ambition of the proposed scenario

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Demand Side Management

- Eskom: potential of DSM = 12,933 MW – Rev. Balanced scenario limits DSM to 3420 MW from 2017 onwards for no apparent reason
- Demand forecast used in IRP: 454 TWh/a in 2030 is very high compared to other sources
  - IEA World Energy Outlook: 371 TWh/a in 2030
  - CSIR Moderate: 371 TWh/a in 2030
- Choice of high demand forecast not clarified in IRP
- DSM/EE is the most cost-effective way to reduce carbon emissions

No Kusile

Kusile is not needed and must be cancelled

- as shown by MTRMP & scenarios
- when using realistic demand curves
- when using DSM potential

No Kusile means

- Emission reduction: 36.8 millions tonnes CO2eq
- ~150 billion ZAR available for renewables

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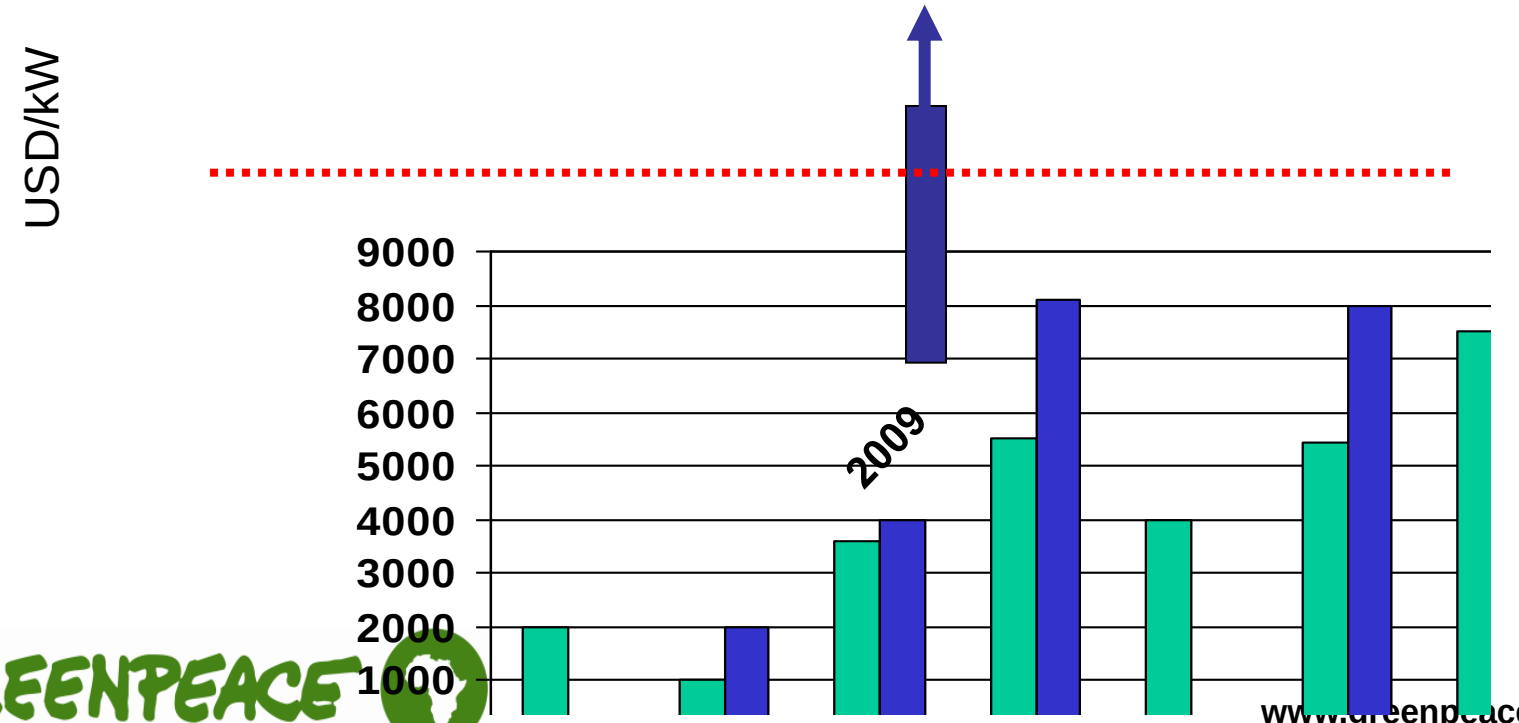
Nuclear: dangerous waste of time

- Not clean nor sustainable
- Expensive
- Radioactive waste legacy
- Safety risks
- Proliferation risks
- Failure to deliver
- Blocking solutions

Nuclear: dangerous waste of time

- Failure to deliver - construction French reactors
- Nuclear costs: IRP 26575 ZAR/kw = 3800 $/kW



Conclusion

- The draft IRP2010 insufficiently reflects ambition needed to fight climate change
- The reliance of the draft IRP2010 on nuclear energy is unwise and unacceptable
- The draft IRP2010 shows that Kusile coal-fired power plant should be canceled