

Comments on the NCCRS March 2011

by

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Sustainable Energy Africa

Association incorporated under Section 21

Sustainable Energy Africa

- Not for profit
- Integrate sustainable energy into urban development
- 13 year experience in implementation at city level – energy strategies, energy efficiency, SWH, local LTMS scenario planning, and learning network of cities (City Energy Support Unit and SEED)
- Partner with LG, close cooperation with Salga, SACN, national departments
- Urban focus: high consumption, majority of the poor in absolute terms, critical for rural areas that our cities WORK



Overarching

- Mitigation, adaptation and development intertwined – response must be everywhere
- = governance at the heart
- Detail the how and where accountability lies



Adaptation: Human Health

- 5.3: Human Health
 - Cc impacts compounded by poor living conditions and energy central to this
 - Energy poverty (access, costly, health)
 - ∅ Need to reinvigorate the national electrification programme in a way that is responsive to conditions of informality (review standards and approaches)
 - ∅ Need to support LG to get Free Basic Alternative Energy policy working
 - ∅ Climate proof low income housing – insulate ceilings (should be key part Working for Energy, 5.4.8)



Mitigation: Energy

- 5.4 Energy
 - EE immediately cheapest option to meet demand; a RE and EE programme is cheaper than generating with conventional sources;
 - Given that there are 3 ways to mitigate emissions (as outlined in point 5.4.2):
 - ∅ 5.4.1 document should specify the carbon constraint (the TARGET) within which all energy planning should take place; this should be in line with RBS
 - ∅ 5.4.3 Market-based policy measures should include a review of existing market distortions: subsidies and risk 'shifters' that support the existing industrial base (incl elec generation);
 - ∅ All new state investment should be scrutinised to ensure that they support the goals of this policy: note IRP, new fuel lines



Mitigation: Energy

- 5.4 Energy Ctd
 - ∅ 5.4.6 FIT to include micro RE generation and facilitate Municipal distributors as buyers/sellers for locally embedded generation;
 - 5.4.8 Nuclear:
 - ∅ Need to ensure that there is no viable safe equivalent – models show RE and EE can supply our needs;
 - ∅ MUST consult citizens in choice that has such substantial economic and environmental consequences



Mitigation: Energy

- 5.4 Energy Ctd
 - 5.4.13 - 17: Efficiency
 - ∅ include an EE target in line with national strategy
 - ∅ NERSA to include EE target in Distribution Licenses
 - ∅ Support LG to achieve through scaling up NT support, tariff fund and ensuring capacity at LG to develop EE plan and implement
 - ∅ Support exploration of LG revenue/financing systems (incl decoupling) that will enhance efficiency



Mitigation: Energy

- 5.4 Energy Ctd
 - 5.4.13 - 17: Efficiency
 - ∅ Include public buildings in building efficiency regulation
 - ∅ Regulate to ensure all public procurement factors in efficiency – through life cycle accounting practices and emissions criteria in tender evaluations
 - ∅ Regulate for efficient technologies in industry (even where makes financial sense, business may wait for tech improvement)
 - ∅ 5.4.8 Working for Energy: need to scan relevant government institutions to assess capacity
 - ∅ 5.4.19: detail coordination and management of GHG inventory process and alignment with local level inventories and funding for this



Mitigation: Transport

- Achieving climate emissions reduction targets requires transformation transport sector
 - ∅ Replace ‘continue to put in place policies’ with ‘there will be a massive state-led investment in public transport infrastructure’;
 - ∅ National grants should ensure that local infrastructure development (roads, public transport, service provision) enhances densification of urban areas in support of public transport and NMT
 - ∅ Again, build on impressive work being done, around planning, notably COJ and SEED network



5.9: Human society, livelihoods and services

- Welcome support to explore urban resilience and new approaches to service delivery at local level
 - Resource sensitive urban design (water, waste, energy)
 - Develop better understanding of impacts of informality on urban resilience
 - Enforce alignment of local development with national EE/RE targets – how?
 - Enforce healthy densification of urban areas through making this a requirement of IDP and Spatial Development Frameworks and related legislation (zoning schemes)
 - Mandate for resource efficiency in the delivery of low income housing and also make mention here of national building standards
 - Ensure supporting energy and climate plans builds capacity and not a flurry of consultant reports
 - New way of doing things – is a process, so consideration of institutional support (local-national) that facilitates iterative process of change and learning



Governance (6 – 8)

- Alignment and leadership:
 - 6: ‘our agreed responses to cc must now be considered in the development of policy’
 - 7: inter-ministerial committee and inter govt com
but practically? IRP2?
- 7.4 and 8: expand to spell out role of LG as nb site of implementation:
 - ∅ MM mandate to include CC function
 - ∅ Build into law via MSA and IDP
 - ∅ Institutional mechanism to enhance support to LG (as above – dynamic and learning based)
 - ∅ Review of financial and human resources at local level: funding to meet expanded mandate; grants in support of policy goals, revenue and tariff mechanisms to support policy goals, MFMA constraints on policy goals, human capacity to implement....



Thank you



3/17/11



Energy Economic trends 1971 - 2000

