

FISH HOEK VALLEY RATEPAYERS & RESIDENTS ASSOCIATION

(Incorporating Fish Hoek, Clovelly and Sun Valley)

~~Central Circle, Fish Hoek 7975~~

Web: <https://www.fhvrra.org.za/>

Facebook: www.facebook.com/FHVRRA/

Heritage Western Cape: Conservation Body

TO: NATIONAL ENERGY REGULATOR SOUTH AFRICA (NERSA)
MR DENNIS SEEMELA: irp-procurement.newcap@nersa.org.za

SUBJECT: COMMENTS ON NEW NUCLEAR PLANT

DUE: 5 FEBRUARY 2021

Our understanding is that in light of Eskom's lack of electricity generation capacity, existing plant break-downs and high cost of maintenance (as reasons for decommissioning, including Koeberg, further diminishing capacity and increasing the base load gap) and that burning coal causes ecological problems, the National Energy Regulator of South Africa (NERSA) wants to allow Eskom to procure new nuclear energy generation capacity of 2 500 MW from an IPP (Independent Power Producer).

In your request for comments, you wanted feedback on several points, as listed below.

Are alternatives feasible? Is nuclear your recommended energy source secure?¹

Renewable energy is infinitely cheaper and quicker (build cycle) to produce power. Nuclear means sinking back into subsidised kickbacks.

Eskom's main argument against renewable energy sources is that they don't match its peak periods of early morning and early evening. However, this is solvable. Molten salt (concentrated solar power) is used to store power. Then there is wind to balance solar.

What will be the impact on the electricity tariff (the current "cost plus" model is unaffordable as it doesn't control fruitless and wasteful "state capture" expenditure)?²

If we add nuclear, the cost will SOAR since that is a deliberately expensive choice up front.

Is nuclear the energy source best practice? What are the risks and challenges? Will it help mitigate climate change?³

We say "No" to all three. The risks and challenges outweigh the benefit.

Note that wind and sun are free.

Will the new Generation, Transmission and Distribution Eskom companies be

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2 <https://www.facebook.com/FHVRRA/posts/830374704205251>

3 <https://www.facebook.com/FHVRRA/posts/833840103858711>

viable?⁴

We feel that Eskom should get out of the generation business entirely. To be viable, Transmission can put out a tender for base load and choose the cheapest, sustainable supplier. Distribution by municipalities should be allowed if they can assist with the base load as Cape Town's Steenbras pumped storage scheme does by lowering Eskom's load shedding by one stage.

Due to nuclear plants taking 10 years to build in developed countries, what will South Africa do until then?⁵

We appeal for the cheaper solar and wind energy options. We need to make it easy for people, especially those with low incomes, to install these alternative electricity generating options in their homes. This would make cooking and heating by using electricity more economically viable and safer than burning coal or wood in homes. With many small scale energy generation schemes (SSEGS) contributing to the grid, there is less likelihood of any single failure (or lack of generation) bringing down the grid or even requiring load shedding ever again. Transmission can still generate revenue from household demand while residents can lower their monthly tariff to zero, but have to provide any excess free to Transmission or local Distribution via two-way electricity meters.

We agree that we still need to sustain the Transmission infrastructure.

Note that a huge wind farm could be built in a year with enough output to supply ample power to the Western Cape. Why wait 10 years for a Nuclear Power Station in order to finance a corrupt Government during that period only to find it doesn't work.

Should the IPP (Independent Power Producer) sell directly to Eskom or should the IPP form a joint venture with a state-owned entity (SOE) or be a fully owned SOE?⁶

The government cannot manage or afford the state owned enterprises (SOEs). Transmission and Distribution for the municipalities that are not able to distribute, should become private businesses based upon audit-able profit and loss.

We feel that the IPPs should continue selling directly to Transmission or Distribution / municipalities if sufficiently close-by.

Will building a reactor benefit local companies and boost employment?⁷

We are not convinced. During construction, some local labour might be used. We have lost the higher level skills through emigration.

Summary

In conclusion, **we are against any nuclear plant builds.**

- We cannot wait ten years to improve the base load capacity;

4 <https://www.facebook.com/FHVRRA/posts/834577387118316>

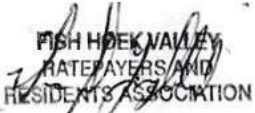
5 <https://www.facebook.com/FHVRRA/posts/835012980408090>

6 <https://www.facebook.com/FHVRRA/posts/835682983674423>

7 <https://www.facebook.com/FHVRRA/posts/836277930281595>

- Nuclear plants are expensive to build and maintain as we have witnessed at Koeberg;
- Renewable energy is infinitely cheaper and quicker to build electricity power producers;
- We feel that renewable energy can meet the demands at peak loads;
- While we have the opportunity to move away from polluting coal and diesel burners for generating electricity, let's make a clean break and remove nuclear generators as well as their spent, still radioactive, fuel must be safely stored and they are a continual threat to locals inhabitants from a Chernobyl melt-down event;
- The government should get out of electricity Generation and not enter into any future partnerships or SOE creations. We support Transmission and a much smaller Distribution, but feel that distribution by municipalities should be allowed only if they can assist with the base load;
- We appeal that Distribution or municipalities must install two-way meters with remote disconnect ability from the grid for safe line maintenance purposes; and
- IPPs should sell directly to Transmission or Distribution / municipalities if sufficiently close-by.

Although we have done so in the past, we do not wish to speak at the associated public hearing (possibly on Zoom).

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