

10 August 2022

Attention: The Chief Executive Officer
Nomalanga Sithole
National Energy Regulator of South Africa

Email: info@nersa.org.za

CC: Phumzile.Nkosi@nersa.org.za;
publichearings@nersa.org.za;
elizabeth.taylor@nersa.org.za;
Vuyiswa.Magubane@nersa.org.za

Dear Sir / Madam,

**METHODOLOGY FOR THE DETERMINATION OF TARIFFS AND PRICES IN THE
ELECTRICITY INDUSTRY – CONSULTATION PAPER JUNE 2022**

YOUR REF: UNKNOWN

OUR REF: EN2203-031

1. We refer to the above as well as the Electricity Price Determination Methodology (“EPDM”) workshop of 22 July 2022.
2. As you may be aware, the Organisation Undoing Tax Abuse (“OUTA”) has previously engaged and provided input in the public interest on the EPDM and Multi Year Price Determination (“MYPD”) process on many occasions. As such, we considered reiteration of our input as superfluous in submitting written comment on the consultation paper as our contentions have been sufficiently raised in the past.
3. Nevertheless, we have noted various discrepancies in the current consultation paper. We appreciate the National Energy Regulator of South Africa’s (“NERSA”) role in relation to price determination policies, reform and engagement with third party stakeholders.
4. As the adoption of the methodologies as highlighted in the consultation paper will have wide ranging effects across the entire energy sector of South Africa, we trust that an engagement between OUTA and NERSA’s technical staff with the aim to clarify certain ambiguities, anomalies and general reasoning on methodologies highlighted will not only serve NERSA’s mandate, but will also be done in the public interest.

ORGANISATION UNDOING TAX ABUSE NPC - Reg No.: 2012/064213/08

Directors: WL Duvenage (CEO), Adv. S Fick, **Non-Executive Directors:** W Modisapodi (Chair), P Majozi,
LJJ Pauwen, T Pillay Van Graan, T Skweyiya, S Ndlovu, Z Mukwevho

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5. We therefore kindly request that an engagement between our respective organisations be arranged for the purpose as highlighted above. Kindly confirm whether you would be amenable for a remote engagement, your preferred platform as well as confirmation of your availability.

6. We trust that you find the above in order and look forward to hearing from you.

Yours Sincerely,



Brendan Slade
Legal Project Manager
OUTA – Organisation Undoing Tax Abuse
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