Package of measures to deal with climate change:
The Carbon tax and energy efficiency tax incentive

Riaan Labuschagne, National Treasury

Energy Efficiency Tax Incentives Workshop
Responding to the challenge(s)

- In acknowledging the need to take appropriate action to contribute towards international efforts to address the challenges as a result of climate change the government is proposing a package of measures to deal with both mitigation and adaptation.

- **Energy** is one of the key input resources for economic growth & development. It is important for poverty alleviation & improvement in quality of life.

- **Fossil-fuel based** (high carbon intensive) of especially our current electricity generation mix have negative environment consequences, contribute to climate change and local air pollution.

- **Reducing the carbon intensity** of the South African economy will *inter alia* be driven by improved energy efficiency and a reduction in the energy intensity of the economy.
Electricity in South Africa is particularly carbon intensive due to the almost exclusive use of coal,
Energy system externalities in South Africa, vivideconomics, Jan 2014
South Africa’s response to its economic & social challenges and to climate change

- Promoting higher levels of **economic growth & job creation** are key policy objectives.
- So how do we balance the need for higher levels of growth and the energy & carbon intensive nature of our economy with our desire and commitment to help reduce GHG emissions.
- “the choices – the trade offs – we are told we must make between financial success and environmental success, between doing well and doing good, are just plain false (Confessions of a Radical Industrialist, Ray Anderson (with Robin White, 2009) (page xv – xvi)).
- South Africa **voluntary committed** (at COP 15 in 2009) to curb GHG emissions by 34% by 2020 and 42% by 2025 below the BAU trajectory with emissions peaking in 2020 - 2025, stabilising in 2025 - 2035 and declining in absolute terms from around 2035, subject to support from developed countries in the areas of climate finance, capacity building & technology transfers.
- South Africa **reaffirmed** its commitments in **Paris Agreement 2015** and endorsed the submission of its Nationally Determined Contribution (NDC).
### IEA: GHG – emissions: Sectoral Approach

<table>
<thead>
<tr>
<th>Country</th>
<th>2010</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>People's Republic of China</td>
<td>23.84%</td>
<td>22.07%</td>
</tr>
<tr>
<td>United States</td>
<td>17.73%</td>
<td>18.95%</td>
</tr>
<tr>
<td>India</td>
<td>5.37%</td>
<td>4.88%</td>
</tr>
<tr>
<td>Russian Federation</td>
<td>5.22%</td>
<td>5.40%</td>
</tr>
<tr>
<td>Japan</td>
<td>3.78%</td>
<td>3.91%</td>
</tr>
<tr>
<td>Germany</td>
<td>2.52%</td>
<td>2.71%</td>
</tr>
<tr>
<td>South Korea</td>
<td>1.86%</td>
<td>1.70%</td>
</tr>
<tr>
<td>Canada</td>
<td>1.77%</td>
<td>1.87%</td>
</tr>
<tr>
<td>Islamic Republic of Iran</td>
<td>1.68%</td>
<td>1.69%</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>1.60%</td>
<td>1.74%</td>
</tr>
<tr>
<td>Saudi Arabia</td>
<td>1.47%</td>
<td>1.31%</td>
</tr>
<tr>
<td>Mexico</td>
<td>1.38%</td>
<td>1.37%</td>
</tr>
<tr>
<td>Indonesia</td>
<td>1.36%</td>
<td>1.24%</td>
</tr>
<tr>
<td>Italy</td>
<td>1.32%</td>
<td>1.48%</td>
</tr>
<tr>
<td>Brazil</td>
<td>1.28%</td>
<td>1.23%</td>
</tr>
<tr>
<td>Australia</td>
<td>1.27%</td>
<td>1.31%</td>
</tr>
<tr>
<td>France</td>
<td>1.18%</td>
<td>1.26%</td>
</tr>
<tr>
<td>South Africa</td>
<td>1.15%</td>
<td>1.31%</td>
</tr>
<tr>
<td>Poland</td>
<td>1.01%</td>
<td>1.01%</td>
</tr>
<tr>
<td>Chinese Taipei</td>
<td>0.89%</td>
<td>0.89%</td>
</tr>
<tr>
<td>Spain</td>
<td>0.89%</td>
<td>1.08%</td>
</tr>
<tr>
<td>Ukraine</td>
<td>0.88%</td>
<td>1.05%</td>
</tr>
<tr>
<td>Turkey</td>
<td>0.88%</td>
<td>0.89%</td>
</tr>
</tbody>
</table>
CO\textsubscript{2} emissions (metric tons per capita) in 2010 (WB, 2014)
### GHG Inventory, 2010 - Estimates

<table>
<thead>
<tr>
<th>2010: GHG Inventory (Estimates) -- Categories</th>
<th>Emissions - CO2 Eq (Gg)</th>
<th>Emissions - CO2 Eq (Gg)</th>
<th>Total Emissions - CO2 Eq (Gg)</th>
<th>Percentage Contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1 - Energy</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A - Fuel Combustion Activities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.A.1.A - Electricity</td>
<td>236 798</td>
<td>402 817</td>
<td></td>
<td>82.66%</td>
</tr>
<tr>
<td>1.A.1.B - Petroleum Refining</td>
<td>2 284</td>
<td></td>
<td></td>
<td>82.66%</td>
</tr>
<tr>
<td>1.A.1.C - Manufacture of Liquid Fuels (Synfuel)</td>
<td>28 611</td>
<td></td>
<td></td>
<td>82.66%</td>
</tr>
<tr>
<td>1.A.2 - Manufacturing Industries and Construction</td>
<td>41 117</td>
<td></td>
<td></td>
<td>82.66%</td>
</tr>
<tr>
<td>1.A.3 - Transport</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Civil Aviation</td>
<td>3 670</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Road Transport</td>
<td>43 440</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rail Transport</td>
<td>497</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.A.4 - Other Sectors</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B - Fugitive emissions</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 - Industrial Processes and Product Use</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.A - Mineral Industry</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cement production</td>
<td>4 187</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lime production</td>
<td>502</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Glass Production</td>
<td>104</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.B - Chemical Industry</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.C - Metal Industry</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Iron and Steel Production</td>
<td>24 147</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ferroalloys Production</td>
<td>11 809</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aluminium production</td>
<td>1 468</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 - Agriculture, Forestry, and Other Land Use</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 - Waste</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total National Emissions and Removals</td>
<td>(25 714)</td>
<td></td>
<td></td>
<td>4.96%</td>
</tr>
<tr>
<td>International Bunkers</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>International Bunkers</td>
<td>2 572</td>
<td></td>
<td></td>
<td>100.00%</td>
</tr>
</tbody>
</table>
South Africa’s response to climate change has two objectives:

– Effectively manage inevitable climate change impacts through interventions that **build and sustain** South Africa’s social, economic and **environmental resilience** and emergency response capacity.

– Make a fair **contribution** to the global effort to stabilise **greenhouse gas (GHG) concentrations in the atmosphere** at the level that avoids dangerous anthropogenic interference with the climate system within a **timeframe that enables economic, social and environmental development to proceed in a sustainable manner.**
Climate Change Response Policy Package – Mitigation Instruments

- One of the elements in the overall approach to mitigation is: The deployment of a range of economic instruments to support the system of desired emissions reduction outcomes, **including the appropriate pricing of carbon** and economic incentives, as well as the possible use of emissions offset or emission reduction trading mechanisms …

- A **carbon tax** and tax incentives such as the energy efficiency tax incentive will provide appropriate price signals to help nudge the **economy** towards a more sustainable growth path.

- The design of these interventions will **not compromise** the competitiveness of the South African economy and will minimise any potential **negative impact on households**.

- The Department of Environmental Affairs (DEA) aims to set limits on future emissions (desired emission reduction outcomes by sector - **DEROs** and carbon budgets at company level)
Climate Change Policy Measures

- Carbon pricing should be the “core” policy measure to mitigate GHG emissions. However, it is not a complete solution on its own, supplementary policies should include energy efficiency (short-term) and technology support policies (long-term)
Process with Carbon Tax Policy Proposal

- Environmental Policy Framework
  - International Framework
    - COP 15 - Copenhagen Accord
    - COP 17 - Durban Platform
    - COP 21 - Paris Agreement
  - National Framework
    - Environmental Fiscal Reform (EFR)
    - National Climate Change Response Policy (NCCRP)
    - National Development Plan (NDP)
  - Carbon Tax Policy Process
    - 2010 Discussion Document
    - 2013 Carbon Tax Policy Paper
    - 2014 Carbon Offsets Paper
    - 2015 Draft Carbon Tax Bill
    - 2016 Revised Carbon Tax Bill
      - Carbon Offsets regulations
      - Trade Exposure regulations
      - Performance regulations
    - 2017 Carbon Tax Act Implementation

Mitigation

Adaptation
Overview of the proposed carbon tax policy package

**Revenue**

- Carbon tax at R120 per ton of CO$_2$e from 2017
- 60% basic tax-free threshold
- Max of 10% tax-free allowance for trade exposure
- 10% tax-free allowance for process and fugitive emissions
- Up to 5% performance allowance
- 5% tax-free allowance for complying with carbon budgets information requirements
- 5 or 10% allowance for Carbon Offsets – to reduce the carbon tax liability

**Revenue Recycling**

- Tax-free allowances of 60-95% - effective tax rate of R6 - R48 t/CO$_2$e
- No impact on electricity prices until 2020
- Tax-free thresholds phased down after 2020

- Energy Efficiency Savings tax incentive
- Credit against Eskom's carbon tax liability for the renewable energy premium built into the electricity tariffs
- Credit for the electricity levy
- Support for the installation of solar water geysers
- Enhanced free basic electricity / energy for low income households
- Improved public passenger transport & support for shift of freight from road to rail
A carbon tax at R120 per ton of CO₂e above the suggested thresholds with annual increases of 10 per cent until 2020 is proposed as from 2016.

A basic tax-free threshold of 60 per cent is proposed.

Additional tax-free allowance for process emission (10%)

Additional relief for trade-exposed sectors (max 10%)

Carbon offsetting allowed to reduce carbon tax liability (max 5% or 10%)

The overall tax-free allowance for an entity will be capped at 95 per cent of actual verified emissions.

Tax-free thresholds will be reduced during the second phase (2020 to 2025) and may be replaced with absolute emission thresholds thereafter.
# Proposed carbon tax design features: (2)

<table>
<thead>
<tr>
<th>Sector</th>
<th>Basic tax-free threshold (%)</th>
<th>Maximum additional allowance for trade exposure (%)</th>
<th>Additional allowance for process emissions (%)</th>
<th>Additional allowance for fugitive emissions (%)</th>
<th>Total (%)</th>
<th>Maximum offset (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electricity</td>
<td>60</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>60</td>
<td>10</td>
</tr>
<tr>
<td>Petroleum (coal/gas to liquid)</td>
<td>60</td>
<td>10</td>
<td>-</td>
<td>-</td>
<td>70</td>
<td>10</td>
</tr>
<tr>
<td>Petroleum – oil refinery</td>
<td>60</td>
<td>10</td>
<td>-</td>
<td>-</td>
<td>70</td>
<td>10</td>
</tr>
<tr>
<td>Iron and steel</td>
<td>60</td>
<td>10</td>
<td>10</td>
<td>-</td>
<td>80</td>
<td>5</td>
</tr>
<tr>
<td>Cement</td>
<td>60</td>
<td>10</td>
<td>10</td>
<td>-</td>
<td>80</td>
<td>5</td>
</tr>
<tr>
<td>Glass and ceramics</td>
<td>60</td>
<td>10</td>
<td>10</td>
<td>-</td>
<td>80</td>
<td>5</td>
</tr>
<tr>
<td>Chemicals</td>
<td>60</td>
<td>10</td>
<td>10</td>
<td>-</td>
<td>80</td>
<td>5</td>
</tr>
<tr>
<td>Pulp and paper</td>
<td>60</td>
<td>10</td>
<td>-</td>
<td>-</td>
<td>70</td>
<td>10</td>
</tr>
<tr>
<td>Sugar</td>
<td>60</td>
<td>10</td>
<td>-</td>
<td>-</td>
<td>70</td>
<td>10</td>
</tr>
<tr>
<td>Agriculture, forestry, land use</td>
<td>100</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>100</td>
<td>0</td>
</tr>
<tr>
<td>Waste</td>
<td>100</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>100</td>
<td>0</td>
</tr>
<tr>
<td>Fugitive emissions – coal mining</td>
<td>60</td>
<td>10</td>
<td>-</td>
<td>10</td>
<td>80</td>
<td>5</td>
</tr>
<tr>
<td>Other</td>
<td>60</td>
<td>10</td>
<td>-</td>
<td>-</td>
<td>70</td>
<td>10</td>
</tr>
</tbody>
</table>
Carbon Tax Design:
Tax Base Considerations (1)

- The carbon tax will cover all **direct GHG** emissions from sources that are owned or controlled by the relevant entity (**Scope 1**) emissions.
- These emissions relate to energy use (i.e. fuel combustion and gasification) and non-energy industrial processes.
- It will apply to all stationary direct and process emission sources.
- Based on fuel **inputs with approved emissions factors**, or an approved transparent and verified monitoring procedure.
Carbon Tax Design: Tax Base Considerations (2)

- Entities that engage in activities that produce direct GHG emissions will be liable for the tax and will need to submit their tax returns based on their own / self assessment of emissions.

- Department for the Environment (DEA) is working on the development of mandatory reporting requirements of emissions in South Africa for economic sectors through the National Atmospheric Emissions Inventory System (NAEIS), which shall begin in January 2016.

- The NAEIS / DEA will help the verification process of the self reported GHG emissions for the purpose of the carbon tax liability. (for SARS’ auditing purposes)
Revenue Recycling (1)

• In general, “full” earmarking of specific tax revenue streams are not in line with sound fiscal management practices. However, the efficient recycling of revenue is important.

• Revenue recycling mechanisms for structural adjustment:
  – On budget allocations: Independent Power Producers programme to incentivize renewable energy uptake, Electricity Demand Side Management programme, enhanced free basic energy / electricity programme, Carbon Capture and Storage rebate.
  – Tax shifting: reducing or not increasing other taxes (potential phasing-down of the electricity levy).
  – A range of environmental tax incentives, including Energy efficiency savings tax allowance.
Incentives for cleaner production – energy efficiency

- A number of environmental statutes and regulations require the private sector to **eliminate inefficiencies** in the use of energy, water and raw materials. To complement these measures, market-based instruments are playing a greater role. Incentives for energy-efficient investments have been explored. Current legislation provides for a three year 50:30:20 per cent **accelerated depreciation** allowance for investments in renewable energy and biofuels production.

- It is proposed that investments by companies in energy-efficient equipment should qualify for an additional allowance of up to 15 per cent on condition that there is documentary proof of the resulting energy efficiency savings (after a two-or three year period), certified by the Energy Efficiency Agency.
Energy Efficiency Savings Tax Incentive: Policy Intent (1)

- Energy efficiency savings can indeed be viewed as one of the low-hanging fruits to help address climate change concerns and energy security.

- However, energy efficiency savings requires investment in EE technologies, process modification & behaviour change.

- The conversion of old technologies to new ones often involves a substantial amount of capital expenditure.

- The perceived long pay-back period tends to discourage business from making upfront investments relating to energy efficiency savings.

- Policy response:
  - Encourage energy efficient processes;
  - Accelerating uptake of cleaner technologies and innovation
  - Support the demand side management efforts.

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Energy Efficiency Savings Tax Incentive: Policy Intent (2)

- Energy efficiency savings may be achieved through improved **production processes** including new equipment installations and/or processes.
- Given the contribution that energy efficiency savings can make towards a reduction in the demand for energy (especially electricity) and resulting reduction in CO$_2$ emissions, it is deemed appropriate to encourage greater levels of energy efficiency savings.
- A carbon tax and tax incentives such as the energy efficiency tax incentive will **provide appropriate price signals** to help nudge the economy towards a more sustainable growth path.
- The Energy Efficiency Tax Incentive (EETI) is a complementary mechanism (i.e. carrot) to the proposed carbon tax. Some of the **carbon tax revenue will be recycled** through this EES Tax Incentive.
• SINCE it has become necessary to promote the efficient utilisation of energy to safeguard the continued supply of energy and to combat the adverse effects of greenhouse gas emissions related to fossil fuel based energy use on climate change;

• AND SINCE energy efficiency saving may be considered as a potentially successful method to guarantee the efficient utilisation of energy;

• AND SINCE the intended purpose of a carbon tax is to mitigate greenhouse gas emissions and also to utilise (recycle) some of the revenue to be generated from such a tax to finance incentives to advance the further efficient utilisation of energy;

• THEREFORE a tax incentive as contained in section 12L of the Income Tax Act, 1962, and these Regulations is devised to encourage the efficient utilisation of energy.
Energy Efficiency (Savings) - Definitions

- “Energy efficiency (consuming less energy to get the same amount of heat, light and / or power) is regarded as one of the most effective and cheapest sources of ‘renewable’ energy”.

- “Efficiency is about doing the same or more with less”.

- “A system is more energy efficient it uses less energy to provide the same level of service”. Wikipedia”

- “Energy Efficiency Savings are (therefore) the difference between the actual energy use under the current conditions of the considered period compared to what it would have been under these conditions if the energy efficiency measures were not implemented”. L J Grobler
Energy Efficiency Savings - Definition

- “energy efficiency” means energy efficiency as defined in the standard;

- “energy-efficiency savings” means the difference between the actual amount of energy used in the carrying out of any activity or trade, in a specific period and the amount of energy that would have been used in the carrying out of the same activity or trade during the same period under the same conditions if the energy savings measure was not implemented;


REGULATIONS IN TERMS OF SECTION 12L OF THE INCOME TAX ACT, 1962, ON THE ALLOWANCE FOR ENERGY-EFFICIENCY SAVINGS
Energy Efficiency Certificates (EEC)

• “An EEC is an instrument issued by an authority or an authorized body providing a guarantee that a certain amount of energy efficiency savings has been achieved.

• Each certificate is a unique and traceable commodity that carries a property right over a certain amount of energy efficiency savings and guarantees that the benefit of these savings has not been accounted for elsewhere”

• “Energy savings refers to certification of genuine and durable increases in the level of energy efficiency beyond what have occurred in the absence of the energy efficiency intervention”.

(LG Grobler, Energy Cybernetics)
Legislation & Regulations: Energy Efficiency Savings Tax Incentive

• Section 12L of Income Tax Act 58 of 1962
• Regulations gave effect to the incentive as from 1 November 2013 although regulations published in December 2013
• The EES incentive will run until January 2020
• The value of the incentive (i.e. a tax deduction) currently applies at 95 cents per kwh saved.
• Taxpayers that can prove EES from implementing energy efficiency measures can claim the allowance.
• The implementation of the incentives relating to energy Efficiency requires adequate measuring, monitoring and verification of energy use and commensurate efficiencies.
• Only accredited measurement and verification professional can verify the EES
• The taxpayer baseline is adjusted annually with the amount of EES claimed
• Over time some of the carbon tax revenues to be “recycled” to fund this tax incentive
Energy efficiency tax incentive
Option A **equipment** (did not proceed with)

Qualifying Equipment

- based on investments in new qualifying energy-efficient equipment/technology/apparatus

- investments in such new qualifying energy-efficient equipment would qualify for an additional "top-up" deduction/allowance of:

- Up to 15 per cent purchase price subject to the lodging of documentary proof:
  - of the resultant energy efficiency savings
  - over a two or three year period.
Energy efficiency tax incentive: Option B “Process” (this option accepted)

**Process Energy Efficiency**

- Companies that achieve energy efficiency savings

- through improved production processes (whether through new equipment, new procedures, etc.)

- An additional tax deduction / allowance equal to:
  - the energy efficiency savings in kWh or kWh equivalent
  - multiply by 45 cent

- incorporate adjustment of annualised energy efficiency savings in subsequent baseline energy efficiency determination
Developments in the EES Incentive

• The Minister of Finance announced in Budget 2015 that:
  – Incentive will be increased from 45c/kWh to 95c/kWh
  – Extension of incentive scheme to include CPP.
• SARS published draft Interpretation Note in 2016 for public comment.
• Currently reviewing comments received with the intention to publish revised (IN) later in the year.
• Other considerations:
  - Administrative concerns
  - Treatment of renewable sources: Biomass waste, CHP.
In summary

- To facilitate the transition to a sustainable economy, the efficient use of natural resources such as energy, water and raw materials is vital.
- “Most energy efficiency investments pay for themselves within three years, but all require at least some up-front costs”. TIME, January 12, 2009. ‘Wasting our Watts’ by Michael Grunwald”.
- “When incentives are properly aligned, efficiency happens, and innovation does too”.
- “…as the world enters an age of economic and environmental limits, not all solutions are created equal. Coal and oil are too dirty. Nuclear and solar are too costly. Wind is the fastest-growing source of new energy, but it’s still only some 1% of the supply. (However a lot has happened since 2009). Efficiency is the only cost-effective energy source that addresses global warming, energy dependence and volatile prices.
Thank you
s12L of the Income Tax Act (1)

(1) For the purpose of determining the taxable income derived by any person from carrying on any trade in respect of any year of assessment ending before 1 January 2020, there must be allowed as a deduction from the income of that person an amount in respect of energy efficiency savings by that person in respect of that year of assessment determined in accordance with subsection (2), subject to subsection (3).

(2) The amount of the deduction contemplated in subsection (3) must be calculated at 45 cents per kilowatt hour or kilowatt hour equivalent of energy efficiency savings.

(3) A person claiming the deduction allowed in terms of subsection (2) during any year of assessment must obtain a certificate issued by an institution, board or body prescribed by the regulations contemplated in subsection (5) in respect of the energy efficiency savings for which a deduction is claimed in respect of that year of assessment containing-
(a) the baseline at the beginning of the year of assessment;
(b) the reporting period energy use at the end of the year of assessment;
(c) the annual energy efficiency savings expressed in kilowatt hours or kilowatt hours equivalent for the year of assessment including the full criteria and methodology used to calculate the energy efficiency savings; and
(d) any other information prescribed by the regulations contemplated in subsection (5).

(4) A deduction must not be allowed in terms of this section if the person claiming the allowance receives any concurrent benefit in respect of energy efficiency savings.
5) The Minister of Finance, in consultation with the Minister of Energy and the Minister of Trade and Industry, must make regulations prescribing—
(a) the institution, board or body that must issue the certificate contemplated in subsection (3);
(b) the powers and responsibilities of the institution, board or body contemplated in paragraph (a);
(c) the information that must be contained in the certificate contemplated in subsection (3) in addition to the information contemplated in that subsection;
(d) those benefits that constitute concurrent benefits for the purpose of subsection (4); and
(e) any limitation of energy sources in respect of which the allowance may be claimed.

[S. 12L inserted by s. 27 of Act 17/2009, amended by s. 27 of Act 7/2010 and substituted by s. 29 of Act 22/2012 w.e.f. 1 November 2013]