

2111008
N. Toman

I, the undersigned, Nidal Toman holder of I.D. [redacted] having been notified that I must tell the truth and nothing but the truth and that if I do not do so, I will be subject to criminal penalties under the law, hereby declare as follows:

1. My name is Nidal Toman, I am an engineer and a Project Manager in Gaza Distribution Electricity Company (GEDCO). GEDCO is responsible for the distribution of electricity in the Gaza Strip. I make this affidavit to update the court regarding Israel's decision to reduce the amount of electricity supply and fuel to the Gaza Strip.
2. On Sunday, 20 January 2008, at 20:00, the power plant had to completely stop the production of electricity due to shortage in industrial diesel. The Gaza Strip has now lost a primary source of electricity. It now has only 120 megawatts supplied by Israel and 17 megawatts supplied by Egypt to the Rafah area.
3. During peak periods, such as the current winter months, the demand for electricity in the Gaza Strip is approximately 240 megawatts, and could reach even more according to the weather. We are thus left with a deficit of a minimum of 103 megawatts, a total deficit of about 43% for the entire Gaza Strip.
4. In the light of this situation, GEDCO is not able to supply the needed power required for the operation of hospitals, the water sector, sewage systems, bakeries and other health facilities.
5. Due to the shut down of the power plant, which supplies the highly populated Gaza City and the Middle Area, Gaza City will suffer from a deficit of 70%.
6. The electricity network in the Gaza Strip is extremely vulnerable and cannot adequately handle all the changes and instability in the power supply to the Gaza Strip. We are facing one crisis after another, struggling to maintain the survival of a very fragile system.
7. Due to the restrictions on import, we are also suffering from severe shortage of spare parts and cement, limiting our possibility to repair and keep the system going. We don't even have electric fuses for maintenance and repair.

Affidavit

Abu J...
to ...
Abu J...

8. The vulnerability of the system means that, in addition to the scheduled power outages, there are much longer local power outages caused by problems in the system. For example, it is currently very cold in Gaza. We have scheduled power outages for 12 hours daily in some areas. But when the electricity returns after having been out for 12 hours, consumers rush to use electricity before the next outage to heat their homes, to refrigerate medicines and food, and to pump water to their homes. The rush of demand often causes the local line to collapse, requiring GEDCO crews manually to reduce load to coordinate supply with consumption. That means that in localized areas, the power outages can be much, much longer than what is scheduled. Thus far, they have reached 16 hours and longer in some areas, and we expect them to become longer without the power plant.
9. The process of reducing load manually is dangerous. The low voltage pillars which we disconnect manually are designed to be switched on and off no more than twice a year. But the electricity deficit requires us to switch them off 5-6 times a day on average. The frequent switching on and off causes the low voltage pillars to burn out and explode.
10. On Saturday, Jan. 19, in the northern Gaza City, at approximately 20:00, we had to take down part of the local transformers, because the line kept disconnecting. As GEDCO technicians Ahmed Kasem and Ahmed Abu Watteh took down the low voltage pillars, the pillar exploded, and Ahmed Abu Watteh suffered burns in his face and hands, while Ahmed Kasem suffered burns in his hands. They are still hospitalized for treatment.
11. I declare that this is my name, this is my signature, and the content of this affidavit and attachment, which I have signed, is true.

N. Tom...

Signature

21/1/2008

Date

Advoca
Del Att: