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STAKEHOLDER MAPPING FOR ELECTRICITY SECTOR REFORM IN LEBANON

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Acronyms

ARI Arab Reform Initiative, the convening organization and primary sponsor of this mapping.

AUB American University of Beirut.

CCGT Combined Cycle Gas Turbine, a thermal power plant configuration that uses both gas and steam turbines.

CDR Council for Development and Reconstruction, Lebanon's central public-works and project-implementation agency.

CFO Chief Financial Officer.

DFI Development Finance Institution, public or quasi-public lenders that provide long-term finance for projects.

DG Director General, used here mainly for the Director General of Electricity at the Ministry of Energy and Water.

DRE Distributed Renewable Energy, typically small- or medium-scale generation located close to consumers.

DSM Demand-Side Management, measures influence, how, and when electricity is used.

EDJ Électricité de Jbeil, a private or concession-style electricity provider in the Jbeil area.

EDL Électricité du Liban, the national, state-owned, vertically integrated electricity utility.

EDZ Électricité de Zahlé, a private or concession-style electricity provider in the Zahlé area.

EPC Engineering, Procurement and Construction, typically used for turnkey contracts in power projects.

ERA Electricity Regulatory Authority, Law 462/2002 created this independent regulator.

ESG Environmental, Social and Governance, a set of criteria used by investors when assessing projects and companies.

EU European Union, represented in Lebanon mainly through an EU Delegation.

FPM Free Patriotic Movement, one of Lebanon's main political parties.

FX Foreign Exchange, used in the report when discussing currency and exchange rate-related risk.

GIS Gas Insulated Substation, a compact high-voltage substation technology used in the transmission network.

HRW Human Rights Watch

IFI International Financial Institution, such as the World Bank and regional development banks.

IMF International Monetary Fund.

IPC Iraq Petroleum Company.

IPP Independent Power Producer, private entities that own and operate power plants and sell electricity under contract.

KI Kulluna Irada affiliated list or bloc, used in the report as shorthand for one of the emerging or independent political groupings.

KPI Key Performance Indicators.

LCEC Lebanese Center for Energy Conservation, a national energy agency that has supported renewables and efficiency programs.

LCPS Lebanese Center for Policy Studies, an independent policy research institute.

LF Lebanese Forces, one of Lebanon's main political parties.

LGIF Lebanon Green Investment Facility, a blended-finance platform designed to mobilize climate-aligned investment.

LPA Lebanese Petroleum Administration, the body overseeing Lebanon's oil and gas exploration and related policies.

MoEW Ministry of Energy and Water, the line ministry responsible for electricity, water, and related infrastructure.

MP Member of Parliament.

NCC National Control Center, the central facility for operating and monitoring the transmission grid.

NDC Nationally Determined Contribution, the climate commitments submitted under the Paris Agreement.

NGO Non-governmental Organization.

O&M Operation and Maintenance, used for service contracts and responsibilities in power plants and networks.

P2P Peer-to-Peer, used here for direct renewable energy trading between private parties under Law 318.

PPP Public-Private Partnership, contractual arrangements where public and private actors share roles and risks.

PPA Power Purchase Agreement.

PSP Progressive Socialist Party, one of Lebanon's main political parties.

PV Photovoltaic, used in reference to solar power technologies.

RE Renewable Energy, shorthand for solar, wind, and other low-carbon sources.

SNA Social Network Analysis, a method used to study relationships and influence patterns between actors.

SPS Social Protection System, used in the report to refer to the set of programs that protect vulnerable households from shocks.

TA Technical Assistance, non-lending support, such as advisory services, studies, and capacity building.

UNDP United Nations Development Programme.

WB World Bank.

WG Working Group.

1. Introduction

1.1 Context: Lebanon's Electricity Sector Reform and Green Energy Push

Lebanon's electricity sector is at a rare turning point, though not necessarily because technical or financial problems have changed. Unreliable service, massive losses, and fragmented governance have defined the sector for decades, as successive World Bank and donor diagnostics have made clear, and they are unlikely to disappear quickly. What has changed is the political context: a new president, a new government, and a brief sense that cross-bargaining – a recurring feature of Lebanon's consociational political system – might be possible again. That creates a window of opportunity to reorder priorities and build coalitions, which previously have failed to materialize. Political parties matter here because they influence Cabinet formation, ministerial appointments, parliamentary oversight, and, in practice, many of the bargains that shape electricity reforms.

The starting premise of this mapping is straightforward: without knowing who actually holds influence, how coordination happens in practice, and where the rest of the reform agendas already align, policymaking will remain reactive and fragmented. A systematic, evidence-based map of stakeholders can accelerate progress by pointing advocacy and donor efforts toward a handful of decisions that can unlock real and effective change.

That context now includes a significant green energy component. In 2023, Lebanon passed Law No. 318, which establishes a legal framework for distributed renewable energy, permits various forms of net metering, and authorizes P2P trading among private entities. At the same time, LGIF was launched to attract climate finance and develop standardized, bankable structures for clean energy and grid support investments. The two have shifted focus from sole reliance on large, centralized projects toward a diversified system where distributed assets, digital metering, and transparent settlement rules are more prominent. The policy takeaway is clear: governance reforms and investment mobilization must advance together with stakeholder alignment on regulatory clarity, consumer protection, and market access, if distributed generation is to grow responsibly.

Actor diversity and variety make alignment difficult, which is why a structured mapping is essential. On the public side, MoEW, the Parliamentary Energy Committee, and EDL each hold different leverage over policy development, legislation, and operations. Political parties, including established blocs as well as emerging or independent actors, influence agenda-setting and oversight. Development partners, such as the World Bank, UNDP, and EU, offer diagnostics, funding, and convening power; while the private sector (developers, EPC/O&M providers, banks, and DFIs) turn rules into projects and capital flow. Public-private arrangements, like EDZ and EDJ, and highly dependent public utilities (regional water establishments) add further operational stakes. Even oil and gas institutions shape expectations and fiscal narratives relevant to electricity policy. A comprehensive categorization of these groups using an Influence-Interest-Use framework lays out the foundation for targeted engagement and coalition building.

This context also highlights key choices for 2026:

First, operationalizing Law 462/2002 through a fully functioning ERA, appointed in September 2025, is not just a box-ticking exercise. It is what separates political discretion from rule-based regulation and is the only credible anchor for licensing, market conduct, and consumer protection under both legacy and renewable energy regimes.

Second, EDL must move beyond reactive crisis management and demonstrate concrete commercial and operational gains through loss reduction, digital metering, and credible performance contracts; otherwise, no tariff or subsidy reform will withstand political pressure.

Third, tariff adjustments should be paired with explicit social protections for low-income consumers and essential public services, like water and health facilities, that cannot endure further shocks.

Fourth, facilities such as LGIF will only attract serious capital if rules translate into bankable, transparent project pipelines rather than isolated deals. The

mapping connects these aspects by showing where positions already align, where resistance is strongest, and which actors can broker workable agreements.[1]

1.2 Why This Mapping Matters

Lebanon's electricity crisis is more than just a technical failure. It's a daily test of who can access basic services and on what terms. Households and small businesses have borne the cost of diesel generators for years, particularly the poor. As EDL's deficit grew, public funds vanished, and blackouts became common. Essential services, like hospitals and water providers, now rely on temporary power solutions to keep running. Any serious reform plan must start from this distribution of costs and benefits, not from a neutral grid diagram, in other words, from a purely technical, depoliticized view of the electricity system.[2]

A just energy transition focuses on democratic and accountable governance, including reform of environmental and energy policy. In Lebanon's electricity sector, this translates into three simple tests: does it increase reliable and affordable access, does it clarify who is responsible for what, and does it create space for citizens and organized groups to influence decisions that impact them? Law 462 on the regulatory authority, Law 318 on distributed renewables, and new initiatives like LGIF all meet this standard.[3]

The mapping is designed to answer these questions. It catalogs ministries, parties, EDL, and investors, and examines how their positions on ERA, EDL restructuring, tariff and subsidy reform, and distributed renewables will influence who benefits and who loses from upcoming decisions. It points out where agreement exists, such as on the need for an operational regulator, metering, loss reduction, and a functional framework under Law 318, and identifies areas where resistance is likely, including generator interests and other rentier economies.[4]

The Support Matrix and network maps that follow can guide where to invest political and convening capital, which coalitions have the best chance of advancing specific reforms, and where justice-oriented safeguards, such as consumer protection, public consultation, and essential service protections, can realistically be integrated into the sequencing.[5]

In summary, this mapping is based on the belief that reform in Arab countries must come from local analysis, inclusive participation, and a commitment to justice. It aims not to impose outside solutions, but to make the terrain clear, so all Lebanese stakeholders can navigate it strategically and together.

2 Historical and Political Background

2.1 Historical and Political Evolution Shaping Current Positions

This section examines today's reform prospects in the context of three decades of electricity politics. It traces four phases from post-war reconstruction to the current decentralization and green-finance shift, showing how each phase embedded certain interests and habits that continue to influence

1 Sorina Mortada et al., *The National Renewable Energy Action Plan of Lebanon: 2025-2030*, Lebanese Center for Energy Conservation (LCEC), September 2025, https://tinyurl.com/y8t6vxep [Mortada et al., *The National Renewable Energy Action Plan of Lebanon*]

2 Aya Majzoub et al., *"Cut Off from Life Itself": Lebanon's Failure on the Right to Electricity*, Human Rights Watch, 2023, https://tinyurl.com/3su482ab [Majzoub et al., *"Cut Off from Life Itself"*]

3 Arab Reform Initiative, "Environmental Politics Program", https://tinyurl.com/3jycj28m

4 Ali Taha and Rasha Akel, "Regulating the Energy Transition: Lebanon's New Law on Distributed Renewable Energy", The Lebanese Center for Policy Studies (LCPS), 7 February 2024, https://tinyurl.com/2cfkannk [Taha and Akel, "Regulating the Energy Transition"]

5 Yasmina El Amine, "Pathways for Energy Justice in Lebanon's Post-war Reconstruction", Arab Reform Initiative, 17 October 2025, https://tinyurl.com/yc39y2pe [El Amine, "Pathways for Energy Justice"]

positions on regulation, EDL restructuring, and distributed renewable energy. It also highlights moments when outages, fiscal crises, and donor conditionality compelled parties and institutions to adapt their stances, even when major laws like 462 remained on paper.[6]

Rebuilding and Investment: Where the Sector Started

After the civil war, Lebanon's electricity sector was rebuilt around EDL, a state-owned, vertically integrated utility that retained a legal monopoly over generation, transmission, and distribution.[7] Despite war damage, high losses, and weak commercial performance, EDL still supplied most of the country's electricity and was treated by both the government and international financiers as an essential vehicle for recovery. Early reconstruction, therefore, focused on restoring firm generation capacity and rebuilding its transmission backbone, most notably through major new thermal plants at Deir Ammar and Zahrani, alongside smaller emergency additions. The main takeaway is that post-war recovery began not with market liberalization, but with heavy public investment in restoring EDL's ability to keep the system running.

Just as important was the transmission rebuild: an integrated 220kV ring of about 339km with new substations and underground cables to move power from Deir Ammar and Zahrani into Beirut and the regions. The design standardized on 220kV – retiring the non-standard 150kV – to reduce losses and support future regional interconnections. Key early elements included 220kV GIS substations in Saida and Baalbeck and 220kV underground cables between the IPC/Beddawi (Tripoli area) and Bahsas substations.[8]

How and Was It Financed

The World Bank's "Power Sector Restructuring and Transmission Expansion Project" (approved 1996) was the flagship banking operation for power during this period. It financed the high-voltage transmission/cabling pieces and technical assistance, while co-financiers and commercial credits financed other lots. It also put in place a special account for EDL and delegated procurement management to CDR, given its experience. Because different lenders had different procurement rules, the package was unbundled into "parallel financing" lots to speed up awards. World Bank records show that the first CCGT modules were targeted for mid-1997, prompting "advance procurement" so the grid could evacuate their output when ready.[9]

The World Bank's project paperwork shows the period's project management realities as well: rights-of-way and some substation contracts lagged (especially those managed by EDL itself), the World Bank's declared mis-procurement on the NCC contract in 2000, and the loan closed in January 2002 with part of the transmission ring still incomplete, constraining Zahrani's dispatch until downstream works were finished. Even so, the northern substation that had been bombed in 1999/2000 was rehabilitated by April 2002 using project funds.[10]

While the World Bank concentrated on the grid and TA, two CCGTs and other generation packages relied on export-credit, commercial credits, and other lenders.[11] The government's plan was to outsource O&M – initially through short-term agreements and later via longer-term, risk-based "affermage"

6 Marc Ayoub et al., *Unbundling Lebanon's Electricity Sector*, PROCOL Lebanon, Institute of Global Prosperity, UCL, September 2021, https://tinyurl.com/pwv9aw68 [Ayoub et al., *Unbundling Lebanon's Electricity Sector*]

7 Christina Abi Haidar, "Laws Governing Electricity Production, Transmission, and Distribution, and the Importance of the Distributed Renewable Energy Law", Arab Reform Initiative, 20 November 2024, https://tinyurl.com/5n7unhku

8 World Bank, *Staff Appraisal Report: Lebanese Republic: Power Sector Restructuring and Transmission Expansion Project* (Report No. 15478–LE), 5 November 1996, https://tinyurl.com/2ssxh9w8 [World Bank, *Staff Appraisal Report*]

9 World Bank, *Staff Appraisal Repor*t.

10 World Bank, *Implementation Completion Report (SCL-41120) on a Loan in the Amount of US$65 million to the Lebanese Republic for the Power Sector Restructuring and Transmission Expansion Project* (Report No. 24274), 28 June 2002, https://tinyurl.com/yc2ajfyu [Word Bank, *Implementation Completion Report*]

11 An IMF survey of post-war financing at the time highlighted Zahrani and Beddawi among projects financed through commercial means, see John Wetter, "II Public Investment Planning and Progress", in *Back to the Future: Postwar Reconstruction and Stabilization in Lebanon* (Occasional Paper 176), Sena Eken and Thomas Helbling (eds.), International Monetary Fund (IMF), 1999, https://tinyurl.com/2zk8nnfy

contracts[12] – for new CCGTs and the Zouk and Jiyyeh thermal plants – marking an early (though limited) step toward private-sector performance obligations within a largely state-owned system. The EDL Action Plan (1996) also proposed converting EDL's old debt into equity and restoring the Kadisha concession, indicating an effort to clean up the balance sheet and standardize legacy arrangements.[13]

On paper, the period planted seeds for today's governance debates. Most notably, Law 462/2002 was enacted to create an independent ERA. But appointments and activation lagged, so regulatory duties continued de facto inside the ministry/EDL orbit, a structural gap that later complicated both private participation and, eventually, distributed energy rules.

By 2005: What Lebanon Had – and What Was Still Lacking

By the mid-2000s, Lebanon had two modern CCGTs in service, peaking turbines at Baalbek and Tyre, and major segments of a 220kV ring with new substations and underground cables (some completed, others delayed). These investments raised available capacity and began to lower technical constraints, but delayed grid segments and medium voltage reinforcements meant that the full benefit could not yet reach consumers, curbing Zahrani's optimal output and keeping losses high. EDL remained institutionally weak, with technical/non-technical losses and arrears still elevated, and sector restructuring (unbundling/affermage) largely unimplemented. The period, therefore, rebuilt the system's physical spine but left governance and commercial fixes incomplete, a legacy that shapes every subsequent reform cycle.[14]

Why This Matters for Today's Mapping

The period from 1990 to 2005 established two enduring realities that still shape stakeholder engagement in Lebanon's electricity sector. First, EDL's centrality, both technically and politically, was reinforced by reconstruction choices that expanded generation and transmission within a state-run architecture. This was evident in the Deir Ammar (Beddawi) combined cycle gas turbine project – roughly a 450MW plant designed to shift from diesel to gas[15] – and in the development of the 220kV ring and substation backbone, including about 339km of ring lines and major substations that anchored the grid around national public infrastructure.[16]

Second, the delayed activation of Law 462/2002 became a structural vulnerability that continues to reappear whenever Lebanon attempts to attract private capital or establish transparent market rules. As reconstruction matured, stakeholders inside and outside government began exploring independent power producer models and other forms of private participation, but this exposed unresolved preconditions, including an unclear regulatory authority, limited clarity on tariff policy and cost recovery, and fragmented decision-making across ministries, Parliament, and EDL. Political parties and parliamentary committees became more visible in shaping positions on public ownership, concession boundaries, and oversight, while localized service arrangements, such as EDZ and EDJ, later emerged as useful reference points on commercial discipline and service quality, even though they were not designed as national models for independent power producers. The stakeholder mapping for this project, therefore, examines which actors supported or resisted private participation during that period, as those positions often anticipate their current views on public-private partnerships and distributed energy markets.

As service reliability deteriorated and financial pressures deepened, especially after outages intensified in 2019, the policy debate expanded beyond thermal generation. Policymakers, political parties, civil society organizations, development partners, and private firms increasingly emphasized renewable energy, energy efficiency, loss reduction, transparency, and consumer protection. Development partners deepened both diagnostic and programmatic engagement, reinforcing the link between governance reform and access

12 Affermage contracts are lease-type public service agreements in which a private operator runs and maintains a utility, collects user fees, and pays a fixed lease fee to the public owner, while major investment remains the owner's responsibility.

13 World Bank, *Staff Appraisal Report*.

14 Word Bank, *Implementation Completion Report*.

15 Earth Link and Advanced Resources Development (ELARD), "Environmental and Social Review for Deir Ammar Power Plant and Arab Gas Pipeline" (Report), Republic of Lebanon, Ministry of Energy and Water and Electricité Du Liban (EDL), 3 February 2022, https://tinyurl.com/5dsvvf7x

16 World Bank, *Staff Appraisal Report*.

to funding, while private actors – including developers, engineers, procurers, and construction firms, operation and maintenance providers, and financiers – tested renewable pilots and stressed the importance of enabling rules for interconnection, metering, and settlement. Stakeholder interviews for this project will examine how the 2019 crisis reshaped party positions on independent regulation, tariff design, and technology choices, and whether those rhetorical shifts translated into legislative or programmatic action.

The present period is defined by a more explicit push toward clean energy and decentralization. Law 318/2023 created a legal framework for distributed renewable energy, including multiple forms of net metering and P2P transactions among private entities, while LGIF was launched to mobilize climate finance and standardize bankable structures for clean energy and grid support investments. Together, these developments shift part of the sector's future away from large, centralized projects toward distributed assets that require digital metering, settlement rules, consumer safeguards, and transparent market conduct. They also sharpen the need to activate the independent regulation envisioned in Law 462/2002 so that renewable energy expansion takes place within a credible rules-based environment. At the same time, the recent presidential election and government formation have opened a new political window, raising expectations that cross-party bargaining could break longstanding bottlenecks, if sequenced effectively.

This mapping will test whether this moment reflects genuine coalition shifts or mainly rhetorical convergence. Across these phases, a recurring set of shocks has repeatedly forced actors to reconsider their positions: power outages and declining service quality have raised the political cost of blocking reform; fiscal and fuel-supply crises have made ad hoc fixes harder to sustain, increasing pressure on loss reduction, tariff rationalization, and improved bill collection; donor programs have linked financing to concrete governance measures, such as activating the regulator, adopting tariff frameworks, and reducing losses; and new technologies and financing instruments, from rooftop solar to blended-finance facilities, have given reformers more practical alternatives to the old centralized model.[17] Any coalition building today – whether focused on empowering ERA, reducing distribution losses, or integrating green energy – must therefore start from this deeply path-dependent baseline.

The main consequence of this mapping is that Law 462/2002 sits at the center of almost every serious reform path. Without a credible regulator, neither legacy reforms tariffs, EDL performance contracts, unbundling, nor newer tools, such as Law 318 on distributed renewables and LGIF's climate-finance pipelines, can offer sufficient consumer protection or investor confidence. Green-energy instruments also cannot scale if EDL's operational problems – especially high losses and weak metering and collections – remain unresolved, since any distributed or on-grid project ultimately depends on a stable and fairly managed network. Cross-party bargaining around these laws and instruments is what will decide whether reforms move beyond declarations, which is why the Parliamentary Committee for Energy and Public Works and party advisors are treated here as central actors rather than background players.[18]

In sum, Lebanon's electricity politics have moved from post-war reconstruction and a state-centered EDL model, through tentative market opening and crisis-driven improvisation, toward an emerging decentralization and green-finance agenda. The present moment combines a political opening with a more sophisticated policy toolset – Laws 462 and 318, LGIF, and other facilities – that could shift incentives if long-standing governance and operational bottlenecks are finally addressed. The historical lens in this section is therefore not descriptive only. It is the backdrop against which the stakeholder mapping, party positions, and Support Matrix should be interpreted.[19]

Finally, this historical and political overview sets the stage for a mapping exercise that is at the heart of this paper, clearly presenting the main issues hampering sector reform and its development.

17 Majzoub et al., *"Cut Off from Life Itself"*.

18 Gebran Bassil, "Policy Paper for the Electricity Sector", Ministry of Energy and Water, June 2010, https://tinyurl.com/erhvvcdx [Bassil, "Policy Paper for the Electricity Sector"]

19 Arab Reform Initiative, "New Directions for Lebanon's Energy Sector: An Arab Reform Initiative Perspective", 22 October 2025, https://tinyurl.com/5ehh4a4p

3 Methodology and Objectives

3.1 Objectives and Key Questions

This report presents a decision-useful map of Lebanon's electricity stakeholders: who influences what, who collaborates with whom, and who supports which reforms so that reformers can target engagement, de-risk sequencing, and accelerate outcomes across both legacy and green-energy agendas.

Specific Objectives

- Stakeholder ecosystem mapping across public authorities – Parliament, EDL and other utilities, political parties, civil society, development partners, private sector actors, PPPs, and relevant oil and gas institutions – that captures mandates, formal and informal levers, incentives and constraints, and basic influence and interest scores.
- Reform initiative analysis that records stakeholder positions on key reform baskets, including the regulatory authority under Law 462/2002, EDL structure and governance, tariffs and subsidies, and the distributed renewables regime created by Law 318/2023 and related rules on net-metering, wheeling, and P2P trading, as well as emerging finance pathways, such as LGIF.
- Political party positioning through targeted interviews and a document review, producing a Support Matrix that compares the main parties and blocs, identifies potential coalitions and swing actors, and makes explicit where red lines are likely to lie.
- Actionable outputs in the form of a living Support Matrix and a basic collaboration network map that can inform advocacy strategies, donor coordination, and reform sequencing over the next three to five years.

Key Questions

Where do stakeholders converge or diverge on activating ERA under Law 462/2002? Should that law be amended before the regulator exercises its full remit? And if so, how?

What realistic pathways are there to improve EDL's commercial and operational performance, especially loss reduction, metering, and collections? What governance tradeoffs will each pathway require?

Which enabling rules and market-interface decisions are needed to translate Law 318/2023 into investable, socially acceptable pipelines, including interconnection standards, metering and settlement, net-metering caps, and P2P oversight? How can instruments such as LGIF help mobilize finance without undermining affordability and basic protection for vulnerable users?

Structure and Intended Use

This report is written as a practical tool for different users – advocacy partners, donors, and policymakers – to quickly locate the pieces that matter for their work and reuse the Support Matrix and maps in future rounds of engagement.

Section 3 sets out the methodology: how the desk review, stakeholder census, and interviews were conducted; how evidence was logged; and how confidence levels were assigned.

Section 4 maps the stakeholder field across institutions, parties, and market actors, and introduces the Influence-Interest-Use grid that underpins the Support Matrix.

Section 5 analyses the main reform baskets regulation, EDL structure, tariffs and subsidies, distributed renewables, and finance, and records where key actors stand on each.

Section 6 distills political party positions, based on interviews and public records, and locates potential coalitions and red lines.

Section 7 flags political sensitivities and data-quality issues so that readers are clear where findings are solid and where caution is needed.

Sections 8 and 9 draw out implications for reform sequencing and present concrete recommendations for short- and medium-term action, and *Section 10* concludes.

The appendices contain the stakeholder census, interview tools, a detailed Support Matrix, and a glossary of laws and decrees for reference.

The intended use is straightforward. Readers who want the technical and legal baseline can focus on Sections 2 and 3. Those preparing advocacy, dialogue, or program design can work from Sections 4 to 9 and the Support Matrix (Appendix A), which can be updated as positions shift or new actors come into play.

3.2 Desk Review Protocols

The mapping started from a structured desk review of Lebanon's electricity laws, policies, and diagnostic work. Primary legal texts include Law 462/2002 on ERA and Law 318/2023 on distributed renewable energy, together with implementing decrees and official policy papers from MoEW. These were read alongside major analytical reports by international organizations and research centers that document the sector's performance, governance gaps, and reform proposals.

Each source was logged in an evidence register with fields for type of document, date, main claims, and a simple confidence rating. Claims were coded against the main reform baskets: regulation, EDL structure, tariffs and subsidies, distributed renewables, and finance, and against stakeholder categories. Where sources disagree, the discrepancy was recorded explicitly and flagged for follow-up during interviews or targeted document checks.

3.3 Stakeholder Census Approach

On the back of this review, the project constructed a census of organizations and institutional actors that matter for electricity reform. The census covers government (Cabinet, MoEW, EDL, and other utilities), Parliament and party structures, municipal and regional utilities, civil society, development partners, private investors and service providers, PPPs such as EDZ and EDJ, and oil and gas institutions where they intersect with electricity policy. For each entry, a short "stakeholder card" records mandate, formal and informal levers, incentives and constraints, and an initial assessment of influence, interest, and dependency on electricity outcomes.

The census was built iteratively. An initial list was derived from laws, policy papers, and prior mappings, then expanded through snowballing whenever documents or interviewees named additional relevant actors. The endpoint was not an exhaustive coverage but a reasonably complete picture of institutions that have a real say over regulation, investment, operations, and oversight, or that face high stakes in outcomes.

3.4 Interview Strategy and Qualitative Data

Semi-structured interviews were used to fill any gaps, test hypotheses derived from the historical section, and capture party and institutional positions that are not fully written down. This sample prioritizes high-leverage actors in government and EDL, party portfolio-holders and MPs on the energy committee, private finance and project developers, and civil society actors involved in energy access, transparency, and environmental advocacy. Interviews followed a common guide that covers reform priorities and red lines, views on the regulator and Law 462, EDL structure and performance, tariff and subsidy reform, the implementation of Law 318, and perceived coalitions and veto players.

Qualitative data were coded thematically against reform baskets and stakeholder categories,[20] with each claim tagged for source and confidence based on corroboration and the informant's vantage point. Where positions diverged across interviews and documents, the discrepancy was retained rather than averaged out and is reflected as such in the Support Matrix and narrative analysis.

3.5 Data Triangulation and Validation

Triangulation worked along three main tracks. First, interview material was checked against public-record party statements, parliamentary minutes, and official documents to see whether private positions line up with what actors say in public. Second, interview claims were compared with donor and utility documentation, especially where financial flows, loss levels, or project pipelines are concerned. Third, stated positions on distributed renewables and market opening were tested against

20 All interviews were conducted under basic research-ethics principles: informed consent, the option of anonymization for sensitive comments, and secure handling of notes and transcripts:

available data on actual uptake of solar and other DRE solutions, as well as grid and fuel-use patterns.

Two reforms serve as test cases for validation: activation of ERA under Law 462 and implementation of Law 318 on distributed renewables. Both require alignment between legislation, decrees, and practice, and both mobilize a wide range of stakeholders. Where evidence remains inconsistent after this process, uncertainty is kept visible in the Support Matrix and in the narrative.

3.6 Literature Base Supporting the Methodology

The methodology draws on established work on stakeholder analysis and complex reform governance. Classic stakeholder-salience and power-interest frameworks are used to think about which actors can credibly block or enable change and how to prioritize engagement. Social-network analysis concepts inform the way collaboration patterns and influence clusters are described, even where this research does not run a full quantitative network model.

In parallel, guidance from applied policy analysis and qualitative research is used to structure interviews, handle discrepancies, and assess confidence in contested claims. The aim is not to reproduce academic models in full, but to adapt practical elements that help make the mapping transparent, replicable, and useful for future rounds of reform work.

Our approach draws on established frameworks:

Stakeholder salience assessing *power*, *legitimacy*, and *urgency* to determine which claims dominate at anypoint.[21]

Power-interest *(influence–interest) grids* and public sector stakeholder techniques for prioritization and engagementdesign.[22]

Stakeholder typologies analysis methods and **SNA**[23] to map coordination and influence clusters across reforms.[24]

Applied policy analysis guidance for structuring interviews and triangulation in complex governance settings.[25]

These frameworks will inform the collaboration patterns of Influence-Interest-Use rubric, the Support Matrix structure, and network mapping used in Sections 4 and 5.

4 Stakeholder Identification and Categorization

4.1 Categories and Mapping Criteria (Influence-Interest-Use Grid)

Stakeholders are assessed across three dimensions: *influence*, meaning their authority, gatekeeping role, or ability to shape financing and coalitions; *interest*, meaning the strength and visibility of their preferences and engagement; and *use* or dependency, meaning how directly they rely on electricity and reform outcomes in practice. These dimensions help distinguish between actors that must be managed closely, kept satisfied, kept informed, or simply monitored, depending on their

21 Ronald K. Mitchell et al., "Toward a Theory of Stakeholder Identification and Salience: Defining the Principle of Who and What Really Counts", *The Academy of Management Review* 22, no. 4 (1997), pp. 853–886, https://doi.org/10.2307/259247

22 John M. Bryson, "What to Do When Stakeholders Matter: Stakeholder Identification and Analysis Techniques", *Public Management Review* 6, no. 1 (2004), pp. 21–53, https://doi.org/10.1080/14719030410001675722

23 Social network analysis (SNA) is a method for mapping and analyzing relationships among people, institutions, or groups in order to understand patterns of influence, coordination, and power: Stanley Wasserman and Katherine Faust, *Social Network Analysis: Methods and Applications*, Cambridge University Press, 1994, https://doi.org/10.1017/CBO9780511815478

24 Mark S. Reed et al., "Who's In and Why? A Typology of Stakeholder Analysis Methods for Natural Resource Management", *Journal of Environmental Management* 90, no. 5 (2009) pp. 1933–1945, https://doi.org/10.1016/j.jenvman.2009.01.001

25 Ruairí Brugha and Zsuzsa Varvasovsky, "Stakeholder Analysis: A Review", *Health Policy and Planning* 15, no. 3 (2000), pp. 239–246, https://doi.org/10.1093/heapol/15.3.239

relative leverage, engagement, and operational dependence.

Scores are assigned on a simple scale from low to very high, using consistent heuristics to capture whether an actor has decisive power, partial leverage, or only marginal relevance. The full scoring criteria and prioritization logic are set out in Appendix D.

4.2 Public/Government Stakeholders (Illustrative Roles and Levers)

MoEW, including the minister's office and the Directorate General of Electricity, which leads policy design, planning, and laws and decrees preparation. It is the formal sponsor of Law 462 and Law 318, and the main interface with development partners on sector reform and investment.

Levers: policy and planning; sponsorship of regulatory activation; decrees for implementing Law 318; donor coordination.

Constraints: fiscal space; cross-government alignment; technical capacity at program scale.

Entry points: working groups; decree drafting; donor program design.

Parliamentary Public Works, Transport, Energy, and Water Committee. Its energy-focused members control the flow of draft laws and amendments from committee to plenary, including any changes to Law 462, enabling acts for ERA, and legislation that anchors tariff and social-protection frameworks. Its convening power also matters: it can call hearings, invite experts, and set the tone of public debate on reform.

Levers: legislative oversight; agenda management for bills (clarifications to Law 462/2002; enabling acts for ERA activation; tariff/social protection interfaces).

Constraints: cross-party bargaining costs; plenary dynamics.

Entry points: hearings; technical briefings; caucus advisors.

EDL leadership (Chair, CFO, Head of Operations), through its board and senior management, still runs generation, transmission, and distribution as an integrated public utility, even though unbundling has been discussed for two decades. EDL has day-to-day control over operations, losses, metering, and collections, and will be central to any move toward performance contracts, smart metering, or structural separation.

Levers: operational continuity; loss reduction; metering and collections; readiness for unbundling or performance contract models.

Constraints: CapEx constraints; HR and systems; legacy arrears.

Entry points: pilots (loss reduction, digital metering); performance contracts; data rooms.

These institutions (summarized in Table 1) are formally anchored in Law 462/2002, which was meant to separate policy from regulation by creating ERA, but has only recently begun to be activated. Until ERA is fully operational, MoEW and EDL continue to carry regulatory functions by default.[26]

26 Bassil, "Policy Paper for the Electricity Sector".

Table 1

Summary of Stakeholder Levers, Constraints, and Entry Points

Stakeholder	Levers	Constraints	Entry points
MoEW, including the Minister's Office and the Directorate General of Electricity	Policy and planning; sponsorship of regulatory activation; decrees for implementing Law No. 318/2023; coordinating with development partners	Limited fiscal space; need for cross-government alignment; technical capacity constraints at program scale	Working groups; decree drafting; donor program design
Parliamentary Public Works, Transport, Energy, and Water Committee, including energy-focused members	Legislative oversight; agenda management for draft laws and amendments, including clarifications to Law 462/2002, enabling acts for ERA activation, and tariff and social protection frameworks; convening power through hearings and expert invitations	Cross-party bargaining costs; plenary dynamics	Committee hearings; technical briefings; engagement through caucus advisors
Électricité du Liban leadership, including the Chair, Chief Financial Officer, and Head of Operations	Operational continuity; loss reduction; control over metering and collections; readiness for unbundling or performance contract models	Capital expenditure constraints; human resources and systems limitations; legacy arrears	Pilot projects on loss reduction and digital metering; performance contracts; data rooms

4.3 Political Parties

Political parties shape the electricity sector through their control of ministries, parliamentary blocs, and informal networks.

Established parties, such as the FPM, Amal, Hezbollah, LF, PSP, Tashnaq, and others, have held the energy portfolio or key committee positions over the past three decades, and their leaders are closely associated with successive policy papers, generation plans, and procurement choices. Their positions on Law 462, EDL ownership, tariff reform, and the role of PPPs remain central to what is politically feasible.

Emerging parties and independents, including Taqaddum, Lana, and "change" MPs elected in 2022, have less formal control but higher reform salience. They tend to put more emphasis on transparency, anti-capture agendas, independent regulation, and openness to distributed renewables. Entry points for this category are party policy teams and parliamentary caucuses, where technical work on draft laws and amendments is concentrated.[27]

Established parties (e.g., LF, FPM, PSP, Amal, Tashnaq, others). We will map their historic and current stances across regulatory independence, public ownership, tariff policy, and PPP boundaries.

Emerging parties and independents (e.g., Taqaddum, Lana, Ibrahim Mneimneh, etc.). We will assess reform entrepreneurship and governance/anti-capture agendas, including openness to distributed RE and rule-making transparency.

Entry points: policy advisors and parliamentary caucuses.

4.4 Civil Society

Civil society organizations have become visible actors in Lebanon's electricity debate, especially since the 2019-2020 crisis.

Groups working on energy access, governance, anti-corruption, and climate justice have documented the human impact of outages, generator dependence cost, and access rights to electricity. They exert influence through public campaigns, media interventions, legal action, and evidence generation, even if they do not control formal levers.

Levers: public opinion; media pressure; evidence generation; community uptake for distributed RE.

Needs: access to data; clear regulatory timelines; inclusion in consultation.

Entry points: public hearings; working groups; pilots on metering/efficiency.

27 Taha and Akel, "Regulating the Energy Transition".

4.5 Development Partners

Development partners have shaped Lebanon's electricity sector through diagnostics, financing, and conditionality.

The World Bank and other international financial institutions have produced repeated assessments of sector performance and have linked major loans and guarantees to reforms on regulation, tariffs, and loss reduction. UNDP has played a central role in program management, technical assistance, and, more recently, in the design of blended-finance facilities, such as LGIF. The EU has combined grants and blending instruments with broader regional energy and climate objectives, backing both generation and grid-modernization efforts.

World Bank: sector diagnostics; conditionalities; sovereign/guarantee instruments.

UNDP: program management; policy pilots; convening; all play a role in LGIF design.

EU Delegation: grants and blending; alignment with regional energy/climate aims.

L**evers:** finance; TA; convening power.

Constraints: fiduciary safeguards; coordination costs. (On LGIF and its role to unlock climate finance through blended structures, see UNDP and allied materials.[28])

4.6 Private Sector

Private sector actors are increasingly present across the electricity value chain. They include green energy firms and developers, EPC and O&M contractors, storage integrators, and service providers. They build and operate solar and other renewable projects and are directly affected by Law 318's clarity and bankability, especially its provisions on interconnection, metering, and P2P transactions. Their leverage lies in project pipelines and innovation; their main need is regulatory predictability.

Banks, DFIs, and dedicated energy funds influence which projects proceed and on what terms. They apply due diligence standards that reflect both commercial and environmental, social, and governance criteria and tend to insist on clear offtake arrangements, workable risk-sharing, and credible regulation. Specialist service firms in metering, digitalization, and grid services can drive operational gains if procurement frameworks are clear and standardized.[29]

Green energy firms (developers, EPC/O&M, storage integrators).

Levers: project pipeline; innovation.

Needs: clarity and bankability of Law 318 rules (connection, metering/settlement, P2P oversight).

Finance (banks' energy desks, DFIs, funds).

Levers: due diligence standards; pipeline selection.

Needs: risk mitigation via LGIF; regulatory certainty.

Service providers (metering/digitalization, grid services).

Levers: technology adoption; operational gains.

Needs: standardized specs; procurement pathways.

4.7 PPPs and Public Utilities with High "Use"

PPPs and certain public utilities are important, not only as actors but as test cases.

EDZ and EDJ have been frequently cited as local examples of improved service quality, with much higher collection rates and lower technical and commercial losses under concession-style arrangements. They show what disciplined operations can look like, but also raise questions about how such models interface with national regulation, tariffs, and grid integration.

Regional water establishments in Beirut and Mount Lebanon, the North, Bekaa, and the South are critical users with very high dependency on electricity to pump and treat water. They are natural candidates

28 UN Development Programme (UNDP), "Lebanon Green Investment Facility Set to Accelerate Climate Finance, Enable Climate Targets", 25 February 2014, https://tinyurl.com/4wavmd2v [UNDP, "Lebanon Green Investment Facility"]

29 Ministry of Energy and Water (MoEW), *Setting Lebanon's Electricity Sector on a Sustainable Growth Path* (Policy Statement), Republic of Lebanon, March 2022, https://tinyurl.com/3azmha7a [MoEW, *Setting Lebanon's Electricity Sector*]

for pilots that combine priority supply, demand management, and coordinated metering, since failures in their power supply translate directly into public-health and service-delivery risks.

EDZ and **EDJ:** case studies for service quality, commercial discipline, and regulatory interfaces; potential for replicable elements.

Regional Water Establishments (Beirut and Mount Lebanon, North, Bekaa, South): critical users with high dependency on electricity reliability; natural pilots for demand-management and metering coordination.

4.8 Oil and Gas Sector

Oil and gas institutions intersect with the electricity sector through narratives, expectations, and potential fiscal linkages.

The Lebanese Petroleum Administration (LPA), international license holders, and associated service providers shape public debates about future gas revenues, energy security, and regional connectivity, and are often referenced in proposals to use gas for power generation or to earmark future revenues for infrastructure upgrades. Their decisions and communication can influence investor sentiment and public expectations around “big fix” solutions and may also affect the political space for tariff and subsidy reforms.

International license holders, **LPA**, and **service/ goods providers**: stakeholders with cross-sectoral influence on energy security narratives, investment climate, and public expectations; potential fiscal/ financial linkages to electricity reform programs.

4.9 Summary Matrix

The stakeholder census and Influence-Interest-Use scores are summarized in a matrix that brings together category, leverage, incentives, and likely positions on key reform baskets (Table 2). An illustrative version includes entries for MoEW, the Parliamentary Energy Committee, EDL, major development partners, PPPs (such as EDZ and EDJ), regional water establishments, main party blocs, emerging parties, green-energy firms, and finance actors. For each, the matrix notes core incentives, stated or likely positions on regulation, EDL structure, tariffs, Law 318, and PPPs, typical alliances and entry points, and an initial confidence rating.

The matrix is an analytical tool as well as a communication device. It underpins the Support Matrix and the collaboration-network in later sections, and can be updated as new interviews are conducted, laws change, or when actors shift stance.

Table 2

Summary Matrix

Stakeholder	Category	Influence	Interest	Use	Core incentives	Stated/likely positions*	Alliances	Entry points	Data confidence
MoEW (Advisor/DG)	Public	5	5	4	Deliver reforms; donor alignment	ERA activation; implement Law 318; EDL perf. contracts	WB, UNDP, EU	Policy WGs; decree drafting	Medium
Parliamentary Energy Committee	Public	4	4	3	Legislative ownership	Clarify Law 462; regulator remit; tariff/SPS	Party caucuses	Hearings; bill scheduling	Medium
EDL: Chair/CFO/Ops	Utility	5	4	5	Operational stability; loss reduction	Metering/collections; phased restructuring	MoEW; donors	Loss-reduction pilots; data room	Medium
World Bank	Dev. partner	4	5	3	Bankability; governance	Conditionality on ERA; cost-recovery	EU; UNDP; MoEW	Program design; policy notes	High
UNDP	Dev. partner	3	4	3	Prog delivery; convening	LGIF design; capacity building	MoEW; civil society	TA windows; workshops	High
EU Delegation	Dev. partner	4	4	3	Regional alignment; investments	RE scale-up; grid digitalization	WB; UNDP; MoEW	Blended-finance; grants	High
EDZ / EDJ	PPP	3	4	5	Local service quality	Replicable service models	Municipalities	Case studies; MOUs	Low
Water Establishments	Utility	2	4	5	Reliability; cost control	Priority supply; DSM; metering	MoEW; EDL	Joint pilots	Low
LF / FPM / PSP / Amal / Tashnaq	Parties	4	4	4	Electoral responsiveness	Vary across regulators, subsidies, PPPs	Blocs	Advisor interviews	Low
Taqaddum / Lana / Indy	Parties	3	4	3	Reform entrepreneurs	Often pro-transparency, RE	Civil society	Public briefs	Low
Greens	Private	3	5	4	Pipeline growth	Net-metering; P2P; grid access	Financiers	Market dialogues	Medium
Banks / DFIs	Finance	3	4	2	Risk-adjusted returns	LGIF/guarantees; ESG	Donors; firms	Facility design	Medium

Note: *Formal party positions will be confirmed via interviews and triangulation; confidence levels will be updated accordingly.

5 Reform Initiatives and Stakeholder Positions

5.1 Overview of Key Reform Policies

Law 318/2023 (Distributed Renewable Energy)

Law 318 sets the basic framework for distributed renewable generation in Lebanon. It legalizes different forms of net-metering and allows P2P renewable-only trading through direct power-purchase agreements or equipment-leasing models. In principle, this opens space for households, businesses, and municipalities to invest in decentralized projects that improve reliability without waiting for large central plants.

The law's impact, however, depends on detailed implementing instruments. These include interconnection standards, advanced metering, settlement rules, consumer-protection provisions, and clear market conduct oversight, ideally under a functioning ERA. Without these, there is a risk that distributed renewables mainly benefit well-resourced actors and deepen inequality rather than ease it.[30]

LGIF

LGIF is conceived as a blended-finance platform to mobilize concessional and private capital for climate-aligned investments in renewables, grid digitalization, efficiency, and related infrastructure. Its purpose is to reduce investor risk, standardize bankable structures, and align projects with Lebanon's climate and energy targets. It was developed with support from UNDP, working with the Ministry of Environment and external partners to structure the facility, provide technical assistance, and help crowd in donor and development-finance support, including backing linked to the Nationally Determined Contributions Partnership process. In practice, LGIF's effectiveness will hinge on the same governance conditions as the broader reform agenda: a credible regulator, transparent procurement and tariff frameworks, and realistic loss-reduction plans. Without these, even generous climate-finance offers cannot be turned into a consistent project pipeline.[31]

5.2 Analysis Framework for Stakeholder Policy Proposals

We will code proposals into five *reform baskets*, linking each to proponents, opponents, prerequisites, and risks:

Regulatory architecture: activation/operationalization of ERA under Law 462/2002 (board appointment, remit, licensing/sanctions, consumer protection, conflict of interest safeguards).

EDL governance and structure: performance contracts, digital metering/collections, loss reduction programs, and options for functional unbundling or PPP/O&M models.

Tariffs and social protection: trajectories toward cost-reflectivity, with targeted subsidies and protections for vulnerable consumers and public service utilities (e.g., water establishments).

Distributed RE and market interfaces: implementing rules under Law 318, including interconnection codes, net-metering caps and forms, wheeling arrangements, P2P eligibility and monitoring, metering, and settlement and dispute-resolution mechanisms.

Finance and risk: LGIF eligibility criteria, blending/guarantees, FX, and offtake risk management, procurement, and transparency requirements. For legal anchors and ERA linkages, see Law 462/2002 and policy briefs connecting Law 318's implementation to ERA empowerment.

Based on this coding, for example, a proposal to introduce smart metering and time-of-use tariffs would be logged under baskets (b), (c), and (d), tagged to EDL/MoEW proponents, flagged for ERA oversight (consumer protection), and linked to LGIF financing windows (e). Evidence would be rated for confidence based on public statements,

30 Taha and Akel, "Regulating the Energy Transition".

31 UNDP, "Lebanon Green Investment Facility".

parliamentary submissions, and donor/utility documents.

5.3 Collaboration and Coordination Networks

Beyond individual positions, the mapping looks at how stakeholders work together. A basic stakeholder–initiative network is constructed in which nodes are stakeholders and edges capture joint activity, whether through co-sponsored proposals, memoranda, public endorsements, or program co-financing.

This network will help identify reform:

Coordination hubs (e.g., MoEW–Parliament–EDL; donor clusters around ERA activation, and Law 318 rule-making);

Bridging actors (civil society groups or technical agencies that connect otherwise siloed clusters); and

Structural holes where engagement should be intensified (e.g., between market actors and social protection entities for tariff reforms).

5.4 Convergence vs. Divergence in Priorities (Initial Hypotheses)

On convergence, most serious actors agree on the basics: reliability and loss-reduction are urgent, that some form of transparent, rules-based regulation is needed, and that bankable, standardized project structures are necessary to attract investment at scale. There is also broad rhetorical support for clearer consumer-protection rules in distributed renewables and for ending the worst abuses of the generator economy.

On divergence, disagreements cluster around pace and scope. Key divides concern how quickly and who empowers ERA, how far to go in restructuring or unbundling EDL, how fast tariffs can move toward cost-recovery while protecting vulnerable users, and how wide-open markets are to wheeling, P2P trading, and PPPs. These hypotheses will be tested against insights from interviews and documents, and contested points will be flagged explicitly in the Support Matrix (Table 3).

Table 3

Convergence and Divergence Matrix

Category	Issue	Note
Convergence	Standardized project structures to attract investment	Reflects the value added of LGIF
Convergence	Clear consumer protection rules for distributed renewable energy metering and P2P transactions	Broad area of likely agreement
Divergence (probable)	Pace and scope of ERA empowerment	Likely point of political and institutional disagreement
Divergence (probable)	Depth and sequencing of EDL restructuring	A possible disagreement over how far and how fast restructuring should go
Divergence (probable)	Tariff trajectories and design and targeting of social protection	Likely to divide actors over affordability and reform sequencing
Divergence (probable)	Market opening boundaries	Includes the extent of wheeling and P2P transactions under Law No. 318/2023, and the role of public-private partnerships

6 Political Party Positions

6.1 Interview Methodology with Party Advisors

This section draws on 12 semi-structured conversations with party portfolio-holders and MPs from FPM, Kataeb, PSP, and the "change" bloc, alongside a handful of people in finance and civil society who work with these files on a day-to-day basis. The discussions focused on how they interpret Law 462 and ERA; what they want to do with EDL's structure and performance; how flexible they are on tariffs and subsidies; and how they see Law 318, PPPs, and privatization in practice rather than on paper. After each round, positions were checked against party statements, policy papers, and independent analysis to filter out tactical soundbites but retain what appears consistent over time.

6.2 Major Party Stances

Law 462/2002 and ERA

Within FPM, figures who have held the energy portfolio, such as César Abi Khalil and Nada Boustani, now say they accept the idea of an independent regulator but insist that Law 462 was both flawed and externally driven and should be amended before ERA is allowed to exercise full powers. In practice, this has become the standard FPM line: call for "revisiting" Law 462, signal openness to better governance and private-sector participation, but keep real leverage in the ministry until the law is rewritten on their terms; a stance reflected in successive MoEW policy papers.

By contrast, Kataeb and PSP interlocutors treat Law 462 as the missing institutional anchor for unbundling, tariff reform, and private participation, and push for rapid ERA activation with targeted safeguards rather than a wholesale reopening of the law. Change MPs, such as Ibrahim Mneimneh, are in the same camp on the core question: for them, the regulator is the piece that has been deliberately kept off the board for two decades. They stress merit-based appointments and clear consumer-protection powers, echoing independent policy work that warns both against continued paralysis and against turning ERA into one more rent-distribution tool.

LF material sits close to this second line, where LF papers and public statements back implementing Law 462, activating the regulator and tightening procurement rules, while openly criticizing emergency contracts and opaque tenders under previous governments.

Hezbollah and Amal, for their part, have not rejected Law 462 as such, but have consistently pushed back against any step that would weaken ministerial control, keeping their public messaging focused on securing more supply and fuel deals, including proposals for Iranian-backed plants, that would preserve a highly centralized model with strong political hands on tap.

Establishing and Empowering an Independent Regulator

On the regulator's role, FPM voices argue for a technically functional ERA but with clear subordination to a political "vision". They resist any reading of the law that would give the regulator broad discretion over tariffs or licensing without prior political agreement. PSP, Kataeb, and change-bloc interviewees push in the opposite direction: a regulator with real tariff-setting and licensing powers, subject to transparency and oversight, but not day-to-day ministerial interference.

Independent analysis converges on the latter view, noting that without real autonomy, ERA risks becoming a "political economy trap" that redistributes rents without improving governance. HRW and other NGOs have urged the government to implement Law 462 and appoint ERA members in a transparent, merit-based way that preserves the independence and powers granted by the law.

EDL Restructuring and Ownership

On EDL's future, FPM interviewees defend a strong role for a reformed public utility, with restructuring and private participation framed primarily around IPPs, PPPs, and O&M partnerships rather than full unbundling. They point to wind and solar PPAs negotiated during their tenure as proof that private capital can be mobilized without dismantling EDL's integrated structure.

Kataeb, PSP, and change-bloc figures are more open to distributed structural separation and

private-sector operation. They see EDL evolving toward a transmission-system operator role, with licensed private distribution companies handling distribution and collections under ERA regulation, and with PPPs and concessions used to replicate the better parts of the EDZ/EDJ experience nationwide. This is broadly consistent with technical reform proposals from policy think tanks and international partners that link improved service quality and loss-reduction to some form of unbundling and concession model.

Hezbollah and Amal's positions on EDL restructuring are harder to pin down from written sources, but there is clear resistance to any path that would threaten existing fuel and informal generator-linked rents among their strongholds. They have signaled openness to new plants and external deals, but far less enthusiasm for deep changes in EDL's structure or for truly independent tariff-setting.

Green-Energy Targets, Law 318, and LGIF

Across parties, there is broad rhetorical support for renewables and for Lebanon's NDC commitments. Former FPM ministers backed wind and solar tenders and, in former minister Boustani's case, initiated the process that eventually produced Law 318 with international partners. PSP and Kataeb interviewees fully support Law 318 and emphasize municipal-level solar and storage projects, while highlighting the need to examine agency roles such as LCEC and to ensure that distributed renewables do not entrench new forms of capture.

Change MPs, such as Mneimneh, see Law 318 as a core achievement and stress the need for rapid decrees on net-metering, P2P trading, and consumer protection under ERA oversight, with LGIF or similar vehicles used to channel climate finance into grid-integrated projects rather than unregulated diesel or purely off-grid solutions. Independent analyses from ARI likewise argue that renewables and regional connectivity can help close Lebanon's energy gap, provided that governance is improved and distributed systems are integrated into a coherent regulatory framework.[32]

On LGIF specifically, most party interviewees have limited detailed knowledge. Where views were expressed, they combined support for climate-finance mobilization with concern about transparency and repeat funding experiences that "went nowhere" due to weak state oversight.

Oil and Gas, Regional Connectivity, and External Deals

On oil and gas, FPM, Hezbollah, and Amal have all tied electricity narratives to future offshore gas and to regional pipelines, often presenting these as medium-term solutions that would ease fiscal pressure and allow cheaper generation. Reform-minded parties are more cautious, supporting gas-to-power as part of a diversified mix but warning against treating hypothetical revenues as an excuse to delay structural reform.

Hezbollah and Amal have also explicitly backed Iranian offers to build and fuel power plants, framing them as a way to bypass Western conditionality and accelerate supply. Other parties are skeptical of these proposals, either on geopolitical grounds or because they fear locking Lebanon into new opaque deals that repeat past mistakes of fuel and generation contracts.

6.3 Support Matrix (Party-Level Snapshot)

The Support Matrix compiles these positions across the aforementioned reform baskets. It is important to note that this compilation is just a high-level grouping to distinguish different reform positions and create a clear mapping. The parties and blocs can be categorized as follows:

A "reformist regulation" cluster (Kataeb, PSP, most change MPs, and parts of LF) that strongly supports rapid ERA activation under Law 462, independent tariff-setting with targeted social protection, structural reforms at EDL, and a full implementation of Law 318 and related renewables targets.

A "conditional reform" cluster (FPM and allied technocrats) that backs the idea of a regulator, PPPs, and renewables but insists on amending Law 462 before full ERA empowerment; EDL and the ministry would maintain a strong central role.

A "supply-first" cluster (Hezbollah and Amal) that focuses on new plants, fuel deals, and resisting

32 El Amine, "Pathways for Energy Justice".

external conditionality;[33] wary of reforms that could threaten generator and fuel rents or dilute political control.[34]

A "technocratic center" around the prime-ministerial camp and some independents that broadly aligns with donor-backed reform plans, emphasizing ERA activation, loss-reduction, and tariff adjustment; framed as necessary but politically difficult steps.

The detailed matrix in Appendix A translates this into a scaled score by party for each basket, with confidence levels based on the strength and consistency of evidence. For example, on adopting ERA, Kataeb, PSP, and most change MPs "strongly support"; FPM "support with amendments"; while Hezbollah and Amal are "neutral".

6.4 Cross-Party Trends and Coalition Space

Three cross-cutting trends emerge from this mapping.

First, there is now a broad, if shallow, consensus that some form of independent regulation is unavoidable. Even actors that resisted the ERA for years now speak the language of regulation and governance, although they differ sharply on how strong and how autonomous the regulator should be. This creates an opening for coalitions that lock in basic ERA powers while leaving more contentious issues for later bargaining.

Second, while parties disagree on how far to privatize or unbundle, almost all recognize that EDL's current structure and performance are unsustainable and that loss-reduction, better metering, and more disciplined procurement are needed. This shared diagnosis, coupled with positive references to EDZ/EDJ and to regulated Distribution Service Company (DisCo) models, offers a basis for incremental restructuring that combines backbone public ownership with private-sector operation under ERA rules.

Third, renewables and Law 318 are one of the few areas where rhetoric is strongly positive across camps, even if underlying interests differ. Parties that are far apart on other issues can agree on expanding solar and wind, especially when framed as relieving pressure on households and reducing reliance on costly diesel. Highlighted by both NGOs and technical studies, the risk is that without strong consumer-protection and equity safeguards, distributed renewables could produce a "two-tier" system where wealthier users exit the grid while poorer ones remain captive.[35]

Within this landscape, ARI and its partners can play a convening role around three relatively promising coalition tracks: (a) locking in ERA activation and core powers while resisting attempts to hollow out the law; (b) building cross-party support for a gradual EDL restructuring that protects basic employment but improves performance; and (c) using the popularity of renewables to push for fair, transparent implementation of Law 318 with clear benefits for vulnerable users and essential services. These tracks are where the Support Matrix, party positions, and justice-oriented concerns intersect most clearly.

7 Political Sensitivities and Data Quality

7.1 Political Volatility and Interview Limitations

The mapping was carried out in a political system that has been in near-continuous crisis. Cabinets have fallen or gone into caretaker mode, presidents have gone un-elected for long stretches, and energy portfolios have moved between parties that do not share the same reform agenda. In this environment, the "position" of a party or minister can change between the time an interview was conducted and the time a law reaches the committee or plenary.

Access itself was uneven. Some key actors agreed to

33 New Desk, "Hezbollah, Amal Urge Lebanese State to Accept Iranian Electricity Proposal", *The Cradle*, 4 April 2022, https://tinyurl.com/3dwss35f

34 Doron Peskin, "Power Struggle: How Hezbollah Profits from Lebanon's electricity Crisis", *CTech*, 18 September 2024, https://www.calcalistech.com/ctechnews/article/u7p9xmgk9

35 Taha and Akel, "Regulating the Energy Transition".

talk only anonymously, without direct attribution. Others, particularly those with links to fuel imports, generators. or security-sensitive agencies, declined altogether. This is not surprising in a sector where contracts and rents have been central to political finance. It does mean that the picture is sharper for parties and technocrats who are already present in policy debates than for more opaque or hardline actors.[36]

7.2 Access Strategies and Their Limits

To compensate, the project used a mix of direct outreach and introductions through research institutes, development partners, and civil society organizations that are already engaged on electricity. This helped secure interviews with current and former ministers, party portfolio-holders, MPs, private finance and project developers, and advocates working on energy access and rights. In practical terms, these intermediaries reduced suspicion and signaled that the exercise was serious.

The cost of this strategy is selection bias. Actors who are already plugged into international or research networks are over-represented, while those who rely mainly on clientelist ties or closed-door bargaining remain under-represented. In addition, some interviewees used the opportunity to frame their own role in a more positive light or to shift blame onto rivals. The report treats these patterns as part of the data. Where accounts look self-serving or incomplete when set against other sources, they are given lower confidence in the Support Matrix.[37]

7.3 Political Sensitivities and Self-Censorship

The political economy of Lebanon's electricity sector is deeply contentious. Studies by AUB and The Policy Practice have documented how reforms have been stalled or reshaped by coalitions of political, commercial, and security actors who benefit from existing arrangements.[38] Interviewees were often willing to talk about "the system" in general, but more hesitant to name specific individuals, companies, or security agencies.

HRW has also shown that the failure to reform the sector has direct human-rights implications, turning electricity from a basic service into a marker of inequality and vulnerability. In this context, some respondents were understandably cautious about describing abuses or conflicts of interest on the record. This research respected those limits. Sensitive claims are anonymized and only used where they are corroborated by other sources. Where they cannot be corroborated, they are not treated as facts, even when they match widely held beliefs.[39]

7.4 Triangulation, Uncertainty, and How It Is Handled

Given these constraints, no single source is taken at face value. Interview material is systematically checked against party communiqués, parliamentary minutes, official policy papers from MoEW and EDL, and independent analysis from organizations, such as LCPS, ARI, and AUB. Where a party advisor's account of a position conflicts with voting records or published policy, the discrepancy is flagged, and the position is coded with low confidence rather than forced into a simple "for" or "against" box.

Quantitative indicators pose their own problems. Official figures for losses, collections, and generation costs differ from those reported by international organizations and independent researchers, especially in years of acute crisis. In these cases, the report focuses on orders of magnitude and direction of change, rather than on single "true" numbers. Ranges are used where needed, and the appended Support Matrix notes where data are weak or contested. The aim is to be transparent about uncertainty, not to hide it behind false precision.[40]

36 Ali Ahmad et al., *From Dysfunctional to Functional Corruption: The Politics of Reform in Lebanon's Electricity Sector* (Working Paper 30), Anti-Corruption Evidence, SOAS Consortium, December 2020, https://tinyurl.com/3vn48x55 [Ahmad et al., *From Dysfunctional to Functional Corruption*]

37 Ali Ahmad et al., "Power Sector Reforms Are New Lebanese Governments' Ultimate Test", *Middle East Institute*, 27 September 2021, https://tinyurl.com/yzryhr2j

38 Ahmad et al., *From Dysfunctional to Functional Corruption*.

39 Majzoub et al., *"Cut Off from Life Itself"*.

40 Ali Ahmad et al., "Lebanon's Independent Electricity Regulator: Avoiding the 'Political Economy Trap'" (Policy Brief, Number 65), *Lebanese Center for Policy Studies (LCPS)*, July 2021, https://tinyurl.com/3maur2nu [Ahmad et al., "Lebanon's Independent Electricity Regulator"]

8 Discussion and Implications

8.1 Power Dynamics and Influence Clusters

The mapping confirms that formal decision-making power is tightly concentrated. Cabinet, MoEW, EDL, and the parliamentary committee control laws, decrees, budgets, and major contracts, and sit at the core of most reform initiatives and donor programs. The World Bank's *Public Expenditure Review* describes the electricity sector as a "symbol" of Lebanon's wider governance crisis, where weak oversight and political interventionism have blocked the implementation of the very reforms these institutions officially endorse.[41]

Behind this formal layer is a second tier of influence. Research shows how fuel importers, generator operators, and politically connected contractors have used EDL and related contracts as vehicles for rent extraction and patronage, often in coordination with party and security networks. HRW documents similar patterns, describing the sector as a "perfect mechanism for avoiding accountability", in which boards, tenders, and even the non-appointment of ERA, become tools for distributing jobs and contracts. These actors rarely appear as "stakeholders" in official plans, but they shape the limits of what the formal centers of power can or will do.[42]

8.2 Risks and Opportunities for Reform

Three structural risks cut across all reform baskets. The first is institutional capture. The World Bank and AUB's work both warn that creating new agencies or passing new laws without changing incentive structures simply adds layers to a captured system. The ERA activation, for example, could easily reproduce old clientelist patterns if appointments are politicized and its tariff and licensing powers are curtailed by decree.[43]

The second risk is socially blind fiscal adjustment. IMF analysis of energy subsidy reform in the Arab region notes that removing implicit or explicit subsidies without credible, well-targeted compensation mechanisms can entrench poverty and public distrust, even if it improves fiscal balances. In Lebanon, the removal of the exchange-rate subsidy has already raised energy prices sharply. Without careful tariff design and social-protection interfaces, further moves toward cost-recovery risk deepening human rights concerns around electricity access, as documented by HRW.[44]

The third risk is that distributed renewables and climate-finance instruments primarily benefit better-off users and large firms. Early evidence from Lebanon's solar "boom" suggests that households and businesses with capital have been able to exit dependence on EDL and generators more quickly, while poorer users remain tied to expensive and unreliable supply, as well as to generator subscriptions. If Law 318 and LGIF are implemented without strong consumer-protection, equity, and grid-integration safeguards, they could unintentionally widen, rather than narrow, the inequality gap in access to power.[45]

External and internal pressures are creating real openings. The World Bank's 2024 decision to back a US$250 million project for grid restoration and renewable integration was explicitly tied to "continued implementation of reforms", signaling that significant financing is contingent on credible governance steps. AUB and Policy Practice research argue that crises like Lebanon's can also disrupt entrenched rent-sharing arrangements and create space for new political settlements, particularly around independent regulation. Current overlap between acute crisis, the legal tools of Laws 462 and 318, the appointment of ERA, and the availability of climate-finance offers comes closer to that kind of

41 World Bank, *Lebanon: Public Expenditure Reform Priorities for Fiscal Adjustment, Growth and Poverty Alleviation* (Report No. 32857-LB), March 2005, https://doi.org/10.1596/8480

42 MoEW, *Setting Lebanon's Electricity Sector*.

43 Ahmad et al., *From Dysfunctional to Functional Corruption*.

44 Jeong Dae Lee et al., "Reforming Energy Subsidies in the Arab Region", *IMF Notes* 2025, no. 3, https://doi.org/10.5089/9798229027267.068 [Dae Lee et al., "Reforming Energy Subsidies"]; Majzoub et al., *"Cut Off from Life Itself"*.

45 Dae Lee et al., "Reforming Energy Subsidies".

window than at any point since the early 2000s.[46] However, it is important to understand that this is a narrow, reversible window, not a structural shift, and that this paper's recommendations are designed precisely to "lock in" minimum gains.

8.3 Coordination Gaps and Entry Points

The first coordination gap is between energy policy and social protection. The IMF, which works on subsidy reform in the Arab region, stresses that price adjustments are politically and socially sustainable only when they are sequenced with credible, targeted social measures and clear communication. In Lebanon, discussions on tariffs, cost recovery, and loss-reduction have largely been led by MoEW, EDL, and donors, while poverty-targeting and social-assistance design sit in other ministries and are only loosely connected to the electricity file. Interviewees across parties flagged this split as a core weakness, noting that tariff decisions are often taken without a clear view of how they will hit specific income groups or essential services, such as water and health.[47]

A second gap lies between regulators, utilities, and local authorities. PSP, change-bloc, and finance-sector interviewees repeatedly stressed the need for an ERA-MoEW-EDL "joint roadmap" with public milestones on licensing, grid codes, and loss-reduction, and for standardized templates that allow municipalities to structure bankable solar and storage projects. Today, municipalities and regional utilities often negotiate ad hoc arrangements with developers or generator operators, with limited guidance from the center and weak national planning integration. Research on building committees in Beirut helps explain what this fragmentation looks like in practice: electricity provision is managed through a heterogeneous patchwork of EDL supply, private neighborhood generator subscriptions, and building-level coping systems, while municipalities have mainly enforced ampere pricing and metering rules that, as the report notes, also had the effect of legitimizing a largely informal sector. At the same time, private generator owners often determine prices, schedules, and terms at their own discretion, and building committees are left to manage fuel supply, maintenance, collective payments, and social disputes with little reliable technical guidance or effective public monitoring.[48]

A third gap is the marginalization of civil society and rights-focused actors from formal decision-making, despite their central role in documenting the human cost of electricity failure. HRW and other NGOs have produced detailed accounts of how outages, diesel dependence, and opaque billing practices harm low-income households, refugees, and people with disabilities, but these groups are never properly consulted on regulation, tariffs, or PPP design. Several interviewees from parties and civil society argued that this exclusion weakens both the substance and legitimacy of reforms, and called for structured, legally grounded public-consultation processes, especially around ERA rule-making and Law 318 implementation.[49]

Within this landscape, insights from the interviews and literature point to three concrete entry points that go beyond general calls for "better coordination":

Locking in a credible ERA process. Early ERA decisions on licensing, grid codes, distributed-energy rules, and consumer-protection can be used to establish habits of open consultation and transparent reasoning that are hard to reverse. Party advisors from the reformist cluster explicitly support public hearings and published rulebooks, and research from LCPS and ARI[50] shows that such practices reduce scope for capture and build trust in contentious reforms.[51]

Designing EDL pilots as coalition platforms. Loss-reduction and smart-metering pilots are often treated as technical exercises. Interviewees from PSP, the banking sector, and civil society instead see them as opportunities to bring MoEW,

46 World Bank, "World Bank Continues to Support Lebanon", 3 October 2024, https://tinyurl.com/3j24ehjb

47 Dae Lee et al., "Reforming Energy Subsidies".

48 Zeina Abla et al., *Building Committees as Spaces of Social Organizing in Beirut*, Ebla Research Collective, February 2024, https://eblaresearch.org/2024/03/read-our-research-report/

49 Ayoub et al., *Unbundling Lebanon's Electricity Sector*.

50 Pierre Saade, "Powering a Fair Future: Centering Communities in Lebanon's Just Energy Transition", Arab Reform Initiative, 17 September 2025, https://tinyurl.com/5bhrrah9; Taha and Akel, "Regulating the Energy Transition".

51 Ahmad et al., "Lebanon's Independent Electricity Regulator".

EDL, municipalities, donors, and community representatives into a single structured process with visible benefits: fewer outages, lower technical losses, and more predictable bills in specific areas. The Policy Practice suggests that when such pilots show tangible improvements, they can shift expectations and lower resistance to broader restructuring.[52]

Framing Law 318 and LGIF around equity and essential services. Finance and party interviewees converged on the idea of a "tripartite track" in which government and ERA set rules, IFIs finance grid and anchor projects, and private developers work with municipalities and utilities. If Law 318 and LGIF projects are deliberately focused on high-impact uses early on, such as water establishments, health facilities, and low-income neighborhoods, then they can demonstrate that distributed renewables and climate finance are not just for the well-off. This would align reformist parties, development partners, and rights-focused actors around specific, justice-relevant outcomes rather than abstract commitments.[53]

Taken together, these entry points offer a way to move from fragmented, crisis-driven fixes to a more sequenced and politically anchored reform path. They do not remove the underlying conflicts of interest, but they create spaces where incentives begin to shift toward more rules-based and socially aware decision-making, which is the minimum condition for any lasting change in Lebanon's electricity sector.

52 Ahmad et al., *From Dysfunctional to Functional Corruption*.

53 Mortada et al., *The National Renewable Energy Action Plan of Lebanon*.

9 Recommendations: Sequencing, Coalitions, and Safeguards

Within each time frame, italicized recommendations will be considered as anchors and should be prioritized.

9.1 Short-Term Actions (6–12 months)

Lock in a credible ERA start-up.

- *Constitute a small cross-party "ERA contact group" (committee members, party advisors, a limited number of technical experts) to agree on three or four non-negotiable features of the regulator's first year: transparent procedures for licensing and tariffs, public consultation norms, and basic consumer-protection standards.*
- Prioritize a first ERA decisions package that is technically straightforward but politically symbolic: a generic licensing rulebook, a basic grid-code for distributed renewables, and a complaint-handling procedure with clear timelines.
- Publish all ERA decisions, minutes, and consultation inputs online in a single, searchable repository, with simple summaries that parties and media can reuse.

Use EDL pilots to demonstrate gains and build trust.

- *Design two or three "whole-area" pilots (for example, one mixed urban district and one water-establishment service zone) that combine loss reduction, smart metering, and improved collections with a clear service-quality target (supply hours, voltage stability).*
- Co-brand these pilots with local authorities and at least one cross-party MP, so that political credit is shared and resistance to change is reduced.
- Build transparent "before/after" dashboards for each pilot (losses, collections, supply hours,

complaints) and commit to publishing results quarterly.

Tie tariff decisions explicitly to social protection.

- Ahead of any further tariff adjustment, convene a joint MoEW-EDL-social-protection working group to agree on: (a) a small set of social objectives (for example, protecting a basic lifeline block for low-income households and essential services); and (b) simple eligibility rules that can be administered quickly.
- *Make every tariff proposal come with a one-page "distribution note" showing expected impacts on key household types and critical public services; use this note in committee hearings and public communication.*
- Pilot at least one targeted support mechanism that can be scaled (for example, a bill credit or voucher for registered vulnerable users in a specific area).

Anchor Law 318 implementation in visible, pro-people use-cases.

- Prioritize a short list of early Law 318 decrees and circulars that enable municipal, water-utility, and health-facility projects, rather than starting with complex P2P trading arrangements.
- *Issue a simple, public "developer and municipality guide" that explains, in plain language, how to structure compliant projects under Law 318, including model clauses for contracts and Memoranda of Understanding.*
- Commit to publishing all approved distributed-RE projects above a certain size (location, capacity, offtaker type) to signal transparency and help identify gaps in coverage.

9.2 Medium-Term Measures (12–36 months)

Move from pilots to a structured EDL-distribution model.

- *On the back of the pilots, develop a time-bound roadmap for scaling disciplined distribution and collections: which areas can be rolled into performance-based contracts or concession models, and on what timeline.*
- Introduce a standard template for performance contracts (KPIs, reporting duties, penalties, and bonuses) and test it in one or two additional areas before scaling.
- Begin separating, at least functionally, EDL's roles as buyer of power, backbone grid owner, and local distribution operator, so that later legal unbundling becomes easier.

Consolidate ERA authority and practice.

- Once basic procedures are in place, expand ERA's remit in two directions: (a) gradually move tariff-methodology work from ad hoc political bargains toward rules; and (b) take on active market-conduct oversight in distributed renewables and PPPs.
- Institutionalize regular public consultations (for example, a fixed calendar for tariff-methodology updates, Law 318 rules, and major licensing decisions), and publish responses to comments.
- *Develop a formal cooperation protocol between ERA, MoEW, and EDL that clarifies who does what on data, planning, and enforcement; this reduces scope for "responsibility-shifting".*

Embed equity into distributed-RE and climate-finance pipelines.

- With LGIF and similar vehicles, agree a first-generation pipeline that deliberately over-weights projects serving water establishments, health facilities, schools, and low-income neighborhoods.
- Require all supported projects above a certain size to include: (a) a simple social-impact note (who benefits, who risks being left out); and (b) a plan for data-sharing with ERA and relevant ministries.
- Work with municipalities and municipality unions to develop a small menu of "off-the-shelf" project models (for example, rooftop PV for public buildings, community solar for low-income areas) that can be replicated without bespoke negotiations each time.

Strengthen the social-protection-energy nexus.

- Move from ad hoc compensation to an integrated design: align electricity-related support with broader social-assistance systems, using shared registries and targeted rules.

- Test one or two joint interventions where tariff changes and social-support measures are communicated and implemented together, with explicit public response monitoring.
- *Create a light, recurring forum that brings together energy, finance, and social affairs officials, plus a small number of civil society and research actors, to review the social impacts of energy measures annually.*

9.3 Longer-Term Structural Reforms and Coalition Strategy (3+ years)

Re-shape EDL and structure the market around clear roles.

- *Use lessons from pilots and early contracts to move toward a model where EDL focuses on transmission, system operation, and bulk power purchase, while licensed entities handle most distribution and retail under ERA oversight.*
- Gradually migrate staff and functions into clearer business units (transmission, system operation, distribution, customer service), even before any legal unbundling, to prepare the ground and reduce resistance.
- Align any future large-generation decisions (thermal or renewable) with this structure, so that long-term contracts reflect transparent responsibilities and risk allocations.

Consolidate a cross-party "rules over deals" coalition.

- Nurture a loose but durable coalition of reform-minded parties, MPs, mayors, professional associations, and civil-society groups that can defend basic governance principles, even when portfolios change.
- Use recurring moments of public debate (annual budget cycles, tariff decisions, major outages) to push a consistent narrative: independent regulation, transparent procurement, social safeguards, and disciplined operation are non-negotiable.
- Encourage parties to embed electricity-sector commitments in their internal documents and electoral platforms in concrete, monitorable terms (for example, "full application of Law 462, with merit-based ERA appointments", "publishing all power-sector contracts above X threshold").

Institutionalize transparency and participation.

- *Codify, in secondary legislation or internal rules, basic transparency and participation practices that have been piloted: open consultations, publication of contracts and performance data, and accessible complaint mechanisms.*
- Develop a joint "electricity and rights" monitoring platform, in partnership with research centers and NGOs, to track service, affordability, and procedural fairness over time and to feed evidence back into ERA, MoEW, and Parliament.
- Support municipal- and community-level initiatives that show what accountable, participatory energy governance can look like in practice (for example, citizen advisory panels on local projects and participatory budgeting around energy-related spending).

Keep justice and recovery at the center.

- Evaluate major electricity-sector decisions not only on technical and fiscal grounds, but against three simple questions: who gains reliable access, who bears the costs, and who has a voice in the decision.
- Use these tests explicitly when engaging with development partners, so that financing packages and technical assistance are negotiated with equity and accountability conditions in mind, not just hardware and balance sheets.
- *Treat visible gains for vulnerable users and critical public services as a core political objective, not a side benefit: these gains are what will determine whether reform is seen as a new round of burden-shifting or as part of a fairer social contract.*

10 Conclusion and Way Forward

This mapping set out to answer three simple questions: who really shapes Lebanon's electricity sector, how their positions line up or clash, and where coalitions for reform can plausibly be built. It shows that formal authority sits with a small set of institutions, mainly the Cabinet, MoEW, EDL, and the parliamentary energy committee, while informal power runs through fuel importers, generator operators, politically connected contractors, and security networks that never appear on organograms. These overlapping structures help explain why successive reform plans, from Law 462 to the latest policy papers, have so often been delayed, emptied of substance, or selectively implemented. Any serious attempt at change has to start from this political economy, not from a neutral technical blueprint.

At the same time, the mapping does pick up movement that goes beyond rhetoric. There is now a broader recognition that the sector cannot continue on its current path. Actors in very different camps acknowledge the need for an operational regulator, credible metering and collections, disciplined loss reduction, and a workable framework for distributed renewables and new finance instruments. The appointment of ERA, the adoption of Law 318, the creation of a green investment facility, and a new political moment after the latest presidential and governmental milestones together created a window that simply did not exist a decade ago. The debate has shifted from whether reform is needed to which reforms, in what order, under whose control, and with what distribution of costs and benefits.

The party-mapping and stakeholder analysis also make it clear that reform will not come from a single, grand bargain that solves everything at once. Positions on the regulator, EDL's future, tariffs and subsidies, and market opening are too far apart for that. Instead, what emerges is a set of overlapping but distinct coalitions. A reformist group, including Kataeb, PSP, most of the change bloc, and parts of LF, is pushing for rapid implementation of Law 462, stronger regulatory powers, structural change at EDL, and full implementation of Law 318 with firm consumer protections. A conditional reform group around FPM and allied technocrats is open to regulation, private participation, and renewables in principle, but wants to revisit the legal framework, preserve strong ministerial and political control over key levers, and proceed cautiously. A supply-oriented group, mainly within Hezbollah and Amal, is keeping the focus on megawatts and fuel arrangements and remains wary of reforms that might weaken existing rents or expose opaque practices. Between these camps, a technocratic center leans toward donor-supported plans and accepts governance conditions, while constantly recalibrating what is politically survivable.

Given this landscape, the recommendation is to deliberately avoid a new wish list that ignores constraints.

In the short term, the priority is to use ERA's first year to create habits that will be hard to reverse later. This means setting clear, public procedures for licensing and basic tariff methodology, issuing an initial grid code for distributed renewables, and putting in place visible consumer protection tools that ordinary users and civil society can actually use. It also means treating EDL pilots as coalition-building platforms, not just technical experiments, to show in concrete areas that losses can fall, service can improve, and bills can become more predictable. Any tariff and subsidy measures in this phase have to be explicitly tied to protection for low-income users and critical public services, or they will not hold, politically or socially. Law 318 should come in early through projects that serve water establishments, health facilities, schools, and low-income neighborhoods, rather than through niche or purely commercial deals.

In the medium term, the report sketches a path from scattered pilots to a more organized model. EDL begins to reorganize around clearer functions, with distribution and retail increasingly handled through performance-based contracts and concession-style arrangements under regulatory oversight, while transmission and system operation stay public and strategic. ERA gradually consolidates its role, not through a single decisive decree, but through repeated, transparent use of its powers on licensing, market conduct, and pricing rules. Climate finance and a green investment facility support a pipeline of projects that have passed both bankability checks and basic equity tests, instead of emerging from one-off negotiations. Energy policy and social protection start to be designed together so that tariff and subsidy changes are systematically linked to targeted support, not patched after the fact.

Over the longer term, the objective is a sector in which roles and responsibilities are clear, independent oversight is routine, and core practices, such as publishing contracts, public consultations, and reporting performance, have become normal. In that horizon, EDL is not expected to do everything at once. It becomes a backbone grid owner and system operator that contracts with a mix of public and private actors for generation and distribution under transparent, rules-based frameworks. The regulator is no longer an aspiration on paper but an institution with a track record that actors have learned to respect and to challenge. Distributed renewables and new finance instruments are not privileges reserved for the well-connected; they are part of a wider strategy to narrow the gap in access to reliable and affordable power.

For ARI and its partners, this mapping is a starting point rather than an endpoint. It opens several concrete paths for future work. One that turns the energy justice lens used in this report into practical tools. That means translating questions such as "who gains, who pays, and who decides" into tariff formulas, connection rules, complaint procedures, and project selection criteria that can be embedded inside ministries, the regulator, and utilities. Another is to focus on decision-points highlighted here – ERA's first rulebooks, the design of EDL pilots, the selection of early Law 318 projects, and shaping the first green investment pipeline – as moments where cross-party and cross-sector alliances can actually be assembled. ARI is well placed to convene processes in which party advisors, municipal leaders, sector experts, civil society, and development partners confront disagreements and still arrive at specific, verifiable commitments.

A third strand is ongoing monitoring and learning. Once reforms move from paper to implementation, the key test is whether they change the daily reality of households, small businesses, and public service providers, and whether they shift incentives away from hidden rent-seeking and toward more disciplined, accountable behavior. ARI can help set up a light but credible monitoring system for the electricity sector that tracks service quality, affordability, procedural fairness, and the benefits and burdens of sharing. This evidence can feed into ERA, MoEW, Parliament, and public debate, and it can also support comparative learning with other countries in the region that face similar tensions between access, fiscal space, and climate goals.

Finally, the report underlines that electricity is not just an infrastructure problem. It is a test of Lebanon's social contract and, by extension, the wider region. Questions about who has reliable power, under what conditions, and with what say over the rules that govern it are questions about citizenship and governance, as much as they are about kilowatt hours. By grounding the analysis in real patterns of influence, interest, and dependency, and by linking recommendations to justice-oriented concerns without turning the text into a manifesto, the work suggests a way to approach energy reform that is both politically realistic and morally ambitious. It invites ARI and its partners to treat this framework as a base for the next phase of collaboration: focused, cumulative, and anchored in the daily experience of people who have lived with this electricity crisis for far too long.

Appendix A: Support Matrix

Party / Bloc	ERA activation / Law 462	EDL restructuring / Private role	Tariff / Subsidy reform	Law 318 / Distributed RE	PPPs / Privatization
FPM	(S) after amending Law 462 in line with its proposals (with strong conditions)	(S) more IPPs and PPPs, keeping tight ministerial and political control over EDL	(S) cost-reflective tariffs with higher supply and lower generator bills, and phased carefully	(S) Law 318 and DRE, pushing adjustments, and keeping central role for MoEW and national programs	(S) PPPs and partial project privatization, but not full EDL privatization (S)
Kataeb	(SS) rapid ERA activation under Law 462 with minimal rewriting	(SS) unbundling, decentralization, and EDZ-type models as references	(S) tariff reform tied to loss reduction, transparency, and social protection	(SS) Law 318 as a tool for wheeling, P2P, and municipal generation up to 10 MW	(SS) privatization and expanded PPPs, with better governance
PSP	(SS) standing up an independent ERA quickly under existing law.	(S) gradual unbundling with EDL focusing on backbone/grid and distribution via performance-based contracts	(S) cost-reflective tariffs linked to loss reduction and explicit protection for vulnerable users	(SS) Law 318 and fast-tracking municipal solar and storage PPPs	(S) PPPs and conditional privatization under clear rules and transparent procurement
Lebanese Forces	(SS) backing Law 462 and activating ERA, close to reformist camp	(S) favor significant restructuring and private participation with public oversight	(S) tariff reform framed within anti-corruption and loss-reduction efforts	(S) clear DRE and Law 318 framework, to diversify supply and discipline generators	(S) PPPs and wider private participation with strict procurement
Hezbollah	(N) accept Law 462 in principle but resists meaningful curbs to ministerial control	(O) prefer strong, centralized public model focused on new plants and fuel deals, wary of deep unbundling or privatization	(O) cautious toward donor-style tariff hikes; priority: keep electricity affordable for its base	(N) open to renewables, focus remains on large, state-linked 9projects not decentralized DRE under strong regulation	(N) accept selective PPPs that preserve existing leverage, skeptical of open markets
Amal	(N) as with Hezbollah: accepts Law 462 but low enthusiasm for strong ERA	(O) prefers public and political control over key assets, such as Zahrani	(O) focus on affordability with limited appetite for deep subsidy reform	(N) will not block renewables but does not champion Law 318 as a central tool	(N) Comfortable with specific PPPs under high local influence, but not broad privatization
Change bloc (e.g. Mneimneh and allies)	(SS) treat ERA under Law 462 as the missing anchor; push for fast, independent activation	(SS) unbundling, transparent governance, and regulated mixed public-private model	(S) tariff reform with transparency, enforcement, and targeted social protection	(SS) Law 318, with emphasis on decrees, ERA oversight, and equitable access	(S) privatization/PPPs; ERA sets prices, rules and guarantees public consultation
Technocratic center / Gov-aligned independents	(S) back ERA activation and Law 462, accepting amendments and phased implementation	(S) gradual EDL restructuring and greater private participation, within political red lines	(S) donor-linked tariff and subsidy reforms, with social measures	(S) Law 318 and DRE as part of climate-finance and fiscal-relief strategies	(S) PPPs, IPPs, and blended-finance schemes, less on full privatization

Note: Party positions by reform basket. Scale: Strongly Support (SS) / Support (S) / Neutral (N)/ Oppose (O) / Strongly Oppose (SO)

Appendix B: Color-Coded Support Matrix

Party / bloc	ERA activation / Law 462	EDL restructuring / Private role	Tariff / Subsidy reform	Law 318 /§ Distributed RE	PPPs / Privatization
FPM	support	support	support	support	support
Kataeb	strongly support	strongly support	support	strongly support	strongly support
PSP	strongly support	support	support	strongly support	support
Lebanese Forces	strongly support	support	support	support	support
Hezbollah	neutral	oppose	oppose	neutral	neutral
Amal	neutral	oppose	oppose	neutral	neutral
Change bloc	strongly support	strongly support	support	strongly support	support
Technocratic center / Gov-aligned	support	support	support	support	support

Note. Party positions by reform basket (single-word scale). These entries synthesize the positions set out in the main report and the party interview notes, reduced to a simple attitude scale for use in your Support Matrix and coalition analysis.

Scale: Strongly Support / Support / Neutral / Oppose / Strongly Oppose

Appendix C: Glossary of Laws and Decrees

Decree 16878 of 1964: Decree that established EDL as a state-owned, vertically integrated utility with a legal monopoly over generation, transmission, and distribution.

Law 462 of 2002: Framework law that created ERA and set out separating policymaking from regulation, including licensing, tariff-setting, and consumer protection.

Law 318 of 2023: Law on distributed renewable energy that establishes the framework for net metering, P2P renewable trading and related connectivity, metering, and settlement rules.

Appendix D: Mapping Criteria

Dimensions

Influence (1–5): formal authority over rules/budgets; gatekeeping power (agenda-setting, approvals); ability to condition finance or coordinate coalitions.

Interest (1–5): intensity/clarity of preferences; resource/time invested; frequency and salience of signaling (speeches, bills, official notes).

Use/Dependency (1–5): operational dependency on reliable power and reform outcomes (e.g., utilities, large consumers, financiers of sector upgrades).

Scoring Heuristics

5 (very high): decisive veto or enabling role; ownership of critical instruments (e.g., decrees, budgets, large facilities) or mission-critical dependency on outcomes.

3 (moderate): visible but partial levers; indirect agenda-setting; project-level dependency.

1 (low): minimal levers; episodic interest; marginal dependency.

Prioritization Logic

Manage closely: high influence and interest (often high use) – e.g., MoEW/EDL/Parliament committee leads; key donors; system-critical utilities.

Keep satisfied: high influence, lower interest/use – e.g., actors whose signoff matters but who are not engaged daily.

Keep informed: high interest/use, lower influence – e.g., consumer groups; municipal utilities.

Monitor: low on all three – e.g., peripheral associations with occasional relevance.

About the Arab Reform Initiative

The Arab Reform Initiative is an independent Arab think tank working with expert partners in the Middle East and North Africa and beyond to articulate a home-grown agenda for democratic change and social justice. It conducts research and policy analysis and provides a platform for inspirational voices based on the principles of diversity, impartiality, and gender equality.

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