



South African Photovoltaic Industry Association

**SAPVIA – Residential PV Working Group**

**Date: 17 April 2025**

**Time: 11:30 – 13:30**

**Chairperson: Patrick Narbel**

### **Declaration of Interest and Prevention of Anti-Competitive Behaviour**

Participants of all SAPVIA meetings agree not to engage in or discuss the following topics:

- **Price-Fixing** - current or future prices, pricing strategies, or price changes.
- **Market Division** - allocation of customers, suppliers, territories, or market shares. dividing markets by geographic areas or product lines.
- **Collusive Tendering** - bid-rigging, including agreements on who will submit bids or the terms of bids, information about tender processes or strategies.
- **Production and Supply Control** - agreements to limit or control production, supply, or distribution of products or services, capacity, production quotas, or inventory levels.
- **Boycotts**- agreements to boycott or refuse to deal with specific customers, suppliers, or competitors, collective actions against any market participant.
- **Information Sharing** - competitively sensitive information, including sales volumes, market shares, costs, marketing strategies, future business plans, research and development projects, or investment strategies.
- **Exclusionary Practices** - strategies to exclude competitors from the market or to create barriers to entry, exclusive dealing, tying arrangements, or predatory pricing.
- **Anti-Competitive Agreements**- discussions that could lead to anti-competitive agreements, whether formal or informal, conversations that could be interpreted as attempts to coordinate competitive behaviour.

<b>Facilitator</b>	Patrick Narbel (PN)	<b>Attendees:</b> Vincent Maposa (VM) Agreepa Neduvhuledza (AN) Tanya Jooste (TJ) Claude Peters (CP) Faure van Schalkwyk (FS) Tshegofatso Riba (TR) Zimkita Bilibana (ZB) Sinethemba Mnguni (SM)
<b>Note taker</b>	Thabang Molai (TM)	

## Minutes

1.	Opening	Chairperson
	<p><b>Welcome and Introduction</b> The chairperson welcomed everyone to the working group meeting and acknowledged attendees for making time to attend.</p> <p><b>Apologies</b> Magda Hamman Lizette Schoombie</p> <p><b>Agenda</b> The agenda was adopted with no amendments.</p> <p><b>Minutes</b> The minutes of the previous meeting were accepted as a true reflection of the meeting proceedings.</p>	
2.	Workstreams	
	<p><b>2.1 Tariffs Structure Review and Participation in Public Consultation</b></p> <p><b>2.1.1 Updates on COJ Tariff and East London - Desired Output</b></p> <ul style="list-style-type: none"> <li>• PN:</li> <li>• Provided an update on the latest developments regarding Eskom's tariff implementation, noting that Eskom's new tariff had been released and implemented. Following this, municipalities have issued their own budgets and tariff structures, showing notable differences from past years.</li> <li>• It was observed that while an overall increase of around 12.74% was expected (slightly lower for municipalities), several municipalities have instead opted to increase fixed charges while reducing variable tariffs.</li> <li>• City of Cape Town increased the fixed residential tariff by 30% and decreased the variable rate, affecting the competitiveness of solar solutions.</li> <li>• Durban maintained its existing structure.</li> <li>• Johannesburg introduced a push towards time-of-use tariffs similar to Eskom's.</li> <li>• Two municipalities were identified for concern: Johannesburg and East London.</li> </ul>	<p><b>Patrick N - Lead</b></p>

	<ul style="list-style-type: none"> <li>• In Johannesburg, a significant disparity exists between prepaid and postpaid customers. Prepaid customers pay a low fixed fee of R230 plus a variable fee. Postpaid customers pay a much higher fixed fee of R1,650 plus a variable fee.</li> <li>• Transitioning from prepaid to solar results in customers moving to a postpaid or time-of-use tariff, causing an immediate fixed fee increase of over R1,000, which negatively affects the attractiveness of solar solutions for prepaid customers.</li> <li>• PN explained that a draft position paper had been circulated ahead of the meeting, proposing a public release to highlight the disparity between prepaid and postpaid tariffs, explain the implications for different customer types and encourage the City of Johannesburg to reconsider the structure to reduce this discrepancy.</li> <li>• PN noted there is no objective justification for charging prepaid and postpaid customers differently at this scale. Comparative analysis showed that Johannesburg's postpaid customers pay significantly higher fixed charges than in other municipalities such as Tshwane, Cape Town, or Eskom direct.</li> <li>• The recommendation is for the City of Johannesburg to work towards eliminating the tariff disparity between prepaid and postpaid customers, while refraining from prescribing the exact adjustment mechanism.</li> <li>• PN opened the floor for comments on the draft release, aiming to align on the messaging before proceeding.</li> <li>• FS raised a clarifying question regarding whether the "postpaid" City of Johannesburg (CoJ) tariff applied to residential or commercial customers.</li> <li>• PN confirmed that the postpaid tariff referred to residential customers who could be potential solar adopters, not commercial customers. He explained that CoJ offers two prepaid categories (low and high users), but the focus was on high-use prepaid customers who are more likely to consider solar solutions.</li> <li>• FS noted that if these were approved tariffs, it implied NERSA had approved them, which raised concerns about their justification unless offset by lower energy costs elsewhere.</li> <li>• PN clarified that the tariffs are currently budgeted tariffs and have not yet been formally approved, which presents an opportunity to engage and advocate before final approval.</li> <li>• The intention to use the upcoming window (the next two weeks) to publicly comment and advocate for reducing or eliminating the tariff disparity.</li> </ul>	
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	<ul style="list-style-type: none"> <li>• VM suggested engaging directly with the City of Johannesburg (CoJ) municipality to understand their perspective before releasing the proposed position statement.</li> <li>• ZB confirmed that arranging a meeting with CoJ would be possible but flagged that scheduling might extend into the next two weeks given the upcoming short week.</li> <li>• PN recommended proceeding with both approaches, release the statement (framed as an opinion piece) to publicly share SAPVIA's perspective and influence the discussion and simultaneously work to secure a meeting with CoJ to engage directly and gain further insights.</li> <li>• CP agreed with positioning the release as an opinion, while pursuing a more formal engagement in the background.</li> <li>• The group expressed agreement with this approach.</li> <li>• PN confirmed that the statement would be refined to emphasize its opinion-based nature before release, while efforts would continue to arrange meetings with both CoJ and East London to discuss similar tariff issues.</li> </ul> <p><b>2.1.2 Advocacy Efforts - Partnerships and Collaboration (BUSA, EIUG)</b></p> <ul style="list-style-type: none"> <li>• PN:</li> <li>• Raised a query regarding any developments following the public comments process with NERSA and Eskom.</li> <li>• Noted that some groups were awaiting NERSA's final decision before determining further action.</li> <li>• Requested an update to assess whether SAPVIA should consider joining forces with these groups.</li> <li>• SM responded that, to date, there have been no engagements with stakeholders such as BUSA on the matter and expressed willingness to advance the conversation and suggested the Chair either open the floor for discussion or allow for feedback from members leading the initiative.</li> <li>• PN agreed and emphasized the importance of gathering more information from the stakeholders involved before bringing the matter back to the group for consideration.</li> <li>• SM confirmed he would take the lead in engaging with the relevant stakeholders and committed to providing feedback at the next meeting.</li> </ul>	
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	<p><b>2.2 Quality and Compliance installation</b></p> <p><b>2.2.1 Regulatory and Compliance Workshops &amp; PV Professionalization Steering Committee feedback</b></p> <ul style="list-style-type: none"> <li>• PN introduced the agenda item, highlighting that there is significant activity and evolving developments in regulatory and compliance matters, including potential new SANS regulations and emphasized the need for SAPVIA to play a leadership role in addressing challenges in the sector.</li> <li>• AM:</li> <li>• Outlined the objective of the initiative is to improve installation quality and compliance within the residential PV sector, ultimately restoring trust between end users and the industry.</li> <li>• Stressed the need for a formal, structured approach to achieving compliance and professionalism.</li> <li>• Ensuring that service providers/installers comply with relevant regulations in residential installations.</li> <li>• Promoting education and awareness among service providers and end users regarding acceptable standards, and helping consumers understand what to expect from installations.</li> <li>• Enhancing practitioner skills through collaboration with stakeholders such as PV GreenCard service providers.</li> <li>• Proposed approach is to establish a Regulatory and Compliance Workshop and a PV Professionalization Steering Committee as vehicles to drive change.</li> <li>• AM extended an invitation to FS to join the subcommittee, referencing Faure’s earlier contributions and expertise on regulatory matters.</li> <li>• FS confirmed willingness to assist where possible.</li> <li>• VM suggested engaging Tseke (Tshegofatso Riba) from WeTility, noting his expertise and relevance to the committee’s objectives.</li> <li>• TR expressed enthusiasm about the opportunity to contribute, while noting he is still reviewing the documentation to build full confidence in the topic.</li> <li>• AM welcomed TR involvement and confirmed that both TR and FS would be added to the subcommittee membership list. Noted that the subcommittee’s first meeting would focus on reviewing the topics and determining contributions and roles for each member.</li> </ul> <p><b>2.2.2 SANS Regulation Update</b></p> <ul style="list-style-type: none"> <li>• AM reported no major updates from the SANS regulations currently.</li> </ul>	<p><b>Agreepa M – Lead</b>  <b>Patrick N</b>  <b>Peter M</b>  <b>Magda H</b>  <b>Faure S</b>  <b>Tseke R</b></p>
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	<ul style="list-style-type: none"> <li>• Emphasized the need for the committee to assist stakeholders in staying updated on new regulations and changes.</li> <li>• Observed gaps in stakeholder awareness, where some continue to reference outdated regulations.</li> <li>• Proposed appointing a lead to monitor and highlight SANS regulation updates to stakeholders.</li> <li>• Nominated Faure van Schalkwyk (FS) to lead this effort, based on his experience</li> <li>• FS agreed to contribute insights based on his experience, acknowledging he is not on all SANS working groups.</li> <li>• The standard for solar PV wiring has been in development for over 10 years without publication.</li> <li>• Conflict exists between utilities and electricians over roles, requirements, and jurisdiction for grid-connected PV systems.</li> <li>• Electricians believe the current SANS standards are sufficient, while utilities argue that gaps remain, particularly regarding parallel generation.</li> <li>• This “infighting” between stakeholders has delayed finalization of the standard.</li> <li>• The current process is in what may be a final round of addressing comments from an industry expert.</li> <li>• FS doubts the target date (around June–July) for publication will be met, given historical delays.</li> <li>• Emphasized a need to focus on interim actions, since it could still take a year or more before a final standard is implemented and adopted in practice.</li> <li>• SABS is not fulfilling its role effectively, e.g., testing and certification of inverters has been outsourced to international labs and municipalities like City of Cape Town.</li> <li>• Suggested exploring formal adoption of NRS certification as a SANS standard to better align certification to local needs.</li> <li>• Noted a significant gap in awareness and understanding of IEC 60364, referenced in SANS 10142-1.</li> <li>• Many electricians are unaware of this reference and its PV requirements.</li> <li>• Few training programs cover it comprehensively.</li> <li>• Urged the committee to explore ways to bridge this knowledge gap among installers and electricians in the interim, rather than wait for the new standard’s adoption</li> </ul>	
	<p><b>2.2.3 Position Paper on CoC</b></p> <ul style="list-style-type: none"> <li>• AM:</li> </ul>	

	<ul style="list-style-type: none"> <li>• A sub-group meeting was previously held to discuss inconsistencies in how Certificates of Compliance (CoCs) are managed within solar installations.</li> <li>• Some solar installers perform installations without verifying the presence of the original electrical CoC, or do not request it at all.</li> <li>• Many end users misunderstand the role and importance of the CoC, often seeing it as just a formality for insurance, rather than a critical safety and regulatory document.</li> <li>• This lack of clarity and accountability has created gaps in liability and safety oversight.</li> <li>• There is confusion between the original CoC and the supplementary (or additional) CoC, especially regarding who is ultimately liable when issues arise.</li> <li>• The sub group proposed to develop an educational document or white paper to serve as SAPVIA's position and guidance on CoCs, that target at both end users and service providers.</li> <li>• To provide clarity and promote industry-wide understanding and voluntary adherence to best practices regarding CoCs.</li> <li>• Encourage professional and ethical behaviour among service providers.</li> <li>• Ultimately aim for market standardisation, and improved public awareness of the safety and compliance value of the CoC.</li> <li>• The purpose is not to enforce regulation, but to influence market practice through education and awareness.</li> <li>• Document drafting and review to be finalised around June/July.</li> <li>• ZB to share the draft document titled "South African Electrical COC" with members for review and comment.</li> <li>• SM:</li> <li>• Provided background on previous work by the SAPVIA Secretariat related to CoCs, primarily conducted in the previous financial year and led by De Wet.</li> <li>• The Secretariat facilitated in-person workshops aimed at SAPVIA members, which focused on CoC requirements and limitations.</li> <li>• These workshops also opened opportunities to discuss the PV GreenCard As-Built Report, particularly as it addresses the DC side of solar PV installations—an area not covered by the standard electrical CoC.</li> <li>• Suggested that the new SAPVIA CoC white paper should reference and integrate insights from these past initiatives, especially in highlighting gaps in the current CoC system, and the importance of the PV GreenCard documentation in complementing the CoC.</li> </ul>	
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	<ul style="list-style-type: none"> <li>SM offered to share previous workshop materials and insights to enrich the white paper.</li> </ul>	
<b>3.</b>	<p><b>Closure</b></p> <p>With a vote of thanks, the chairperson adjourned the meeting.</p> <p style="text-align: right;"><i>Next meeting: 19 June 2025</i></p>	<b>Chairperson</b>

### **Action Items**

<b>No:</b>	<b>Action</b>	<b>By Whom</b>
<b>1.</b>	<p>Members to review and provide feedback on the draft position paper on Johannesburg tariffs.</p> <p>Once aligned, proceed with releasing the statement.</p>	<b>PN/ZB</b>
<b>2.</b>	Engage with stakeholders (e.g., BUSA) and provide an update on the developments following the public comments process with NERSA and Eskom, at the next meeting.	<b>SM</b>
<b>3.</b>	<p>Circulate the draft CoC document for member feedback.</p> <p>Finalize the educational white paper by July 2025 for external publication and stakeholder engagement.</p>	<p><b>ZB</b></p> <p><b>AM</b></p>
<b>4.</b>	Share past workshop material and insights with AM for integration into the CoC white paper.	<b>SM</b>