

# SAPVIA

South African Photovoltaic Industry Association

**SAPVIA – Residential PV Working Group**

**Date: 10 July 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>
<b>Note taker</b>	Thabang Molai (TM)	Vincent Maposa (VM)
		Agreepa Neduvhuledza (AN)
		Magda Hamman (MH)
		Jandre Du Preez (JP)
		Ian Hendrikse (IH)
		Zimkita Bilibana (ZB)
		Pamela Gama (PG)
		Ofentse Ntohla (ON)

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></p> <ul style="list-style-type: none"> <li>• Peter Mclean</li> <li>• Tshegofatso Riba Tseke – Late Arrival</li> </ul> <p><b>Agenda</b> The agenda was amended to include: 4.1 Price Forbes Webinar</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 SSEG</b></p> <p><b>2.1.1 Updates on tariff changes</b></p> <ul style="list-style-type: none"> <li>• PN:</li> <li>• Noted that tariff discussions typically become active only around municipal budget cycles or when Eskom introduces new tariff proposals.</li> <li>• Based on the recent NERSA-approved decisions, no new Eskom tariff proposals are expected for the next two years.</li> <li>• The current Eskom-approved tariffs are fixed for three years, including the present one.</li> <li>• That leaves two remaining tariff periods, which the group will continue to monitor.</li> <li>• Stressed the importance of direct engagement with municipalities, specifically City of Johannesburg, to address tariff disparities identified in earlier meetings.</li> <li>• The goal is to reduce inconsistencies and ensure fairer treatment of embedded generation customers over time.</li> <li>• Volunteered to lead engagement efforts with selected municipalities, particularly City Power Johannesburg, on behalf of the working group.</li> </ul>	<p><b>Patrick N – Lead</b> <b>Magda H</b></p>

	<ul style="list-style-type: none"> <li>• This engagement will take place under the SAPVIA banner</li> </ul>	
	<p><b>2.1.2 SSEG</b></p> <ul style="list-style-type: none"> <li>• PN:</li> <li>• Noted that while dialogue on SSEG registration has been limited in this forum, discussions have taken place in other platforms between himself, Magda, and a few stakeholders.</li> <li>• The aim is to tackle inconsistent and unclear SSEG registration processes across municipalities.</li> <li>• In some municipalities (e.g., City of Cape Town), the process is clear and efficient. However, in others, it remains unclear, slow, or overly complex.</li> <li>• Identified municipalities to engage with: <ul style="list-style-type: none"> <li>• - Tshwane</li> <li>• - City of Johannesburg</li> <li>• - eThekweni</li> <li>• - Eskom Direct</li> <li>• - Mangaung (added to the list by JP)</li> </ul> </li> <li>• Mangaung lack of feedback on SSEG registrations, lack of clarity between SSEG Residential and Commercial &amp; Industrial categories, and general uncertainty about tariffs.</li> <li>• Eskom Direct - System is functional but outdated and requires constant follow-up to get responses.</li> <li>• Proposed that engagements should be done formally through SAPVIA, not as individuals or companies, to provide an industry-wide voice.</li> <li>• Objective is not confrontational, but rather to collaborate with municipalities, raise awareness of current bottlenecks, and offer support to improve systems.</li> <li>• Leverage good examples like City of Cape Town's e-service portal, which delivers installation permissions in under 5 minutes, as benchmarks.</li> <li>• IH added that the group could support training or secondment models, similar to the telecoms sector, to help municipalities develop internal capabilities to handle SSEG efficiently.</li> <li>• PN proposed conducting an internal roundtable with stakeholders who have engaged the five identified municipalities. This will help map typical issues, challenges, and good practices before engaging the municipalities directly.</li> </ul>	

	<ul style="list-style-type: none"> <li>• Conduct survey among SAPVIA members and WG participants to gather case-specific SSEG registration challenges and successes.</li> <li>• Use the findings to set up structured engagements with each municipality.</li> <li>• ZB suggested hosting a workshop or knowledge-sharing forum with relevant municipalities to accelerate adoption of efficient SSEG processes and expose them to successful municipal systems (e.g., Cape Town model).</li> <li>• PN:</li> <li>• Supported the idea and proposed sequencing the engagement:</li> <li>• Phase 1: Survey + targeted engagements with 5 municipalities.</li> <li>• Phase 2: Workshop or forum based on lessons learned.</li> <li>• Recommended narrowing initial focus to systems below a certain threshold (e.g., below 350 kW), in line with Eskom classifications. This will allow for clearer alignment on SSEG processes manageable scope for pilot municipal engagement</li> </ul>	
	<p><b>2.2 Quality and Compliance installation</b></p> <p><b>2.2.1 Inverter and Battery Quality</b></p> <ul style="list-style-type: none"> <li>• AN:</li> <li>• Acknowledged that inverter and battery quality is a challenging issue due to the variety of standards and listing mechanisms used by different entities (e.g., City of Cape Town vs SAPVIA).</li> <li>• Proposed consolidating existing inverter and battery criteria from multiple platforms and any other available or public reference lists, by collecting the SAPVIA internal list and the City of Cape Town's list for cross-referencing and alignment. Identify overlaps, gaps, and discrepancies between the two.</li> <li>• Requested detailed documentation on SAPVIA's criteria and vetting process to inform the working group's review. Use this to address potential industry questions or criticisms. Be prepared to justify the selection and endorsement of any inverter/battery models in the final list.</li> <li>• ZB committed to consulting SAPVIA's technical team to confirm if an internal list exists and share what can be</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>  <b>Craig S</b></p>

	<p>disclosed with the Quality and Compliance Subcommittee for further review and inputs.</p> <p><b>2.2.2 Indoor installation and Installation quality</b></p> <ul style="list-style-type: none"> <li>• AN:</li> <li>• Raised the need to finalise the group's position on installations involving thatch and asbestos roofs, as previously agreed.</li> <li>• The working position is that installations should not proceed on these roof types due to safety and structural concerns.</li> <li>• PN:</li> <li>• Highlighted that an existing Department of Labour directive provides legal basis for prohibiting installations on asbestos roofs.</li> <li>• This makes it easier to justify and standardise exclusion.</li> <li>• Noted that while currently deemed unsuitable for installations due to fire risk and lack of structural support, there are technical innovations abroad (e.g., fireproof blankets, off-roof mounted structures anchored to walls) that may allow for future reconsideration.</li> <li>• Agreement that a short position paper should be drafted to record and formalize the current stance.</li> <li>• The group will also remain open to documenting feasible technical solutions where applicable.</li> <li>• Rather than releasing multiple separate position papers (e.g., on CoCs, roof types, indoor quality), ZB proposed compiling these topics into a public-facing guide.</li> <li>• PN:</li> <li>• Supported the idea, suggesting a modular format where chapters can be added over time.</li> <li>• The guide would serve as a practical resource for industry, installers, and the public on "How to Do PV in the Residential Sector".</li> <li>• All members supported the development of a single, evolving installation quality guide, incorporating, certificate of Compliance (CoC) requirements, restrictions and considerations for different roof structures and indoor installation quality and safety practices</li> <li>• AN will take the lead in re-engaging stakeholders via the Quality and Compliance Sub-Working Group to begin drafting and consolidating content for the guide.</li> </ul>	
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	<p><b>2.2.3 SANS Regulation Update</b></p> <ul style="list-style-type: none"> <li>• AN indicated that no substantive update could be provided on the SANS Regulations topic at this stage, as Faure was not present to give the expected input.</li> <li>• The item will be carried over to the next meeting* for a more comprehensive update.</li> <li>• ZB highlighted that the Manufacturing Working Group previously hosted a webinar on SANS regulations and is currently planning a follow-up webinar.</li> <li>• Recommended that this working group collaborate with the Manufacturing WG to avoid duplication and align efforts.</li> <li>• AN confirmed he had attended the initial webinar and agreed there's strong value in linking efforts. Proposed linking Faure, Gareth, and himself with the current subcommittee to discuss potential collaboration and consolidate efforts on SANS-related work.</li> </ul> <p><b>2.2.4 Position Paper on CoC</b></p> <ul style="list-style-type: none"> <li>• PN:</li> <li>• A dialogue had been held between WeTility and Go Solar regarding industry confusion around what constitutes a valid CoC.</li> <li>• A position paper is being developed collaboratively by Patrick Narbel, Craig, and Saker, with the intention to clarify industry standards and legal obligations.</li> <li>• Key Recommendations in Development:</li> <li>• 1. No Installation Without a Valid CoC</li> <li>• - A supplementary CoC is not valid unless it references an original CoC.</li> <li>• - The position paper aims to set out the legal framework supporting this requirement.</li> <li>• - Installers must either obtain a valid CoC for the existing infrastructure or issue a CoC that covers both the PV installation and the property as a whole.</li> <li>• 2. Installer Responsibility Where a CoC is Provided by the Client.</li> <li>• - If the customer provides a CoC and the installation site is not up to code, the installer still carries limited responsibilities for due diligence.</li> <li>• The group is working to define minimum required checks and clearly delimit installer liability.</li> </ul>	
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	<ul style="list-style-type: none"> <li>• The intent is to avoid vague expectations and provide clarity on the scope of responsibility while ensuring compliance and safety.</li> <li>• Once the recommendations are finalised, they will be benchmarked against existing SAPVIA guidelines to ensure consistency.</li> <li>• The group proposes to seek external expert review (via SAPVIA or another recognised body) to validate the recommendations.</li> <li>• Upon alignment and expert confirmation, the paper will be finalised and released as a formal position from the working group.</li> <li>• The group expressed support for this direction, and no objections were raised.</li> </ul>	
<b>3.</b>	<b>Working Group Deliverables</b>	
	<p><b>3.1 White Paper - Ensuring Fair Tariffs and Transparent Regulation for SSEG Customers</b></p> <ul style="list-style-type: none"> <li>• VM:</li> <li>• Reported limited progress since the last meeting due to competing commitments.</li> <li>• A preliminary wireframe of the white paper has been drafted.</li> <li>• Proposed a separate working session with Tanya to finalise content before circulating a draft to the wider group, with a hard deadline of next week.</li> <li>• Noted a need for clarification on whether to include perspectives from BUSA and other ongoing tariff-related discussions.</li> <li>• PN:</li> <li>• Reinforced the strategic importance of the white paper as the group's flagship contribution for the year.</li> <li>• Emphasized that the white paper should serve as evidence of the working group's value and be strong enough to influence municipal and regulatory stakeholders.</li> <li>• Encouraged members to contribute views, insights, and constructive suggestions on what's working and what's not in the current SSEG framework, and proposed solutions to improve fairness and transparency in SSEG tariffs.</li> <li>• All members were encouraged to provide constructive input and solutions-oriented feedback.</li> </ul>	<p><b>Vincent M – Lead</b></p> <p><b>Tanya J</b></p>

<b>4.</b>	<b>Any Other Matters</b>  <b>4.1 Price Forbes Webinar</b> <ul style="list-style-type: none"> <li>• ZB introduced a proposal received from Forbes, an insurance provider, to host a webinar in collaboration with SAPVIA.</li> <li>• The proposed webinar will focus on insurance and unique risks within the green economy, covering six key insurance principles, investor and client benefits, and relevant insurance covers.</li> <li>• PN expressed full support for the initiative and proposed that Agreepa lead the coordination from the working group side, given his background and expertise.</li> <li>• AN accepted the responsibility and confirmed receipt of the email shared by ZB. He committed to reviewing the proposed agenda and aligning with ZB on next steps.</li> <li>• ZB will take responsibility for coordinating the date and logistics for the webinar and will ensure it is open to the broader industry.</li> <li>• The group agreed to review and finalise the agenda, incorporating any additions from the working group, before proceeding.</li> <li>•</li> </ul>	<b>All</b>
<b>5.</b>	<b>Closure</b>  <p>With a vote of thanks, the chairperson adjourned the meeting.</p> <p style="text-align: right;"><i>Next meeting: 21 August 2025</i></p>	<b>Chairperson</b>

## Action Items

No:	Action	By Whom
1.	<p><b>White Paper - Ensuring Fair Tariffs and Transparent Regulation for SSEG Customers</b></p> <p>1.1 Set up a separate working session with Tanya to advance the white paper.</p> <p>1.2 Circulate the advanced draft paper to the group for comments and inputs. (18 July)</p>	<p><b>VM/TJ</b> <b>All Members</b></p>
2.	<p><b>Quality and Compliance installation</b></p> <p>2.1 Create a single guide for PV installation in residential spaces, including CoC, roof structure, and indoor installation best practices</p> <ul style="list-style-type: none"> <li>- Cross-check alignment with SAPVIA's existing guidance.</li> <li>- Identify external expert to review and validate recommendations.</li> <li>- Prepare guide for formal release after validation.</li> </ul>	<p><b>AM- Lead</b> <b>Sub committee</b></p>
3.	<p><b>Inverter and Battery Quality</b></p> <p>3.1 Confirm existence and share SAPVIA's current manufacturers list with the subcommittee.</p> <p>3.2 Submit revised list for GovCo approval and final publication once internal review is completed</p>	<p><b>ZB</b></p>
4.	<p><b>SANS Regulation Update</b></p> <p>4.1 Set up a joint call to between Agreepa, Faure and the manufacturing working group chairs align efforts and identify synergies on SANS regulation work.</p> <p>4.2 Follow up with Faure for a short-written statement on SANS regulation circulate to the group</p>	<p><b>ZB</b></p> <p><b>PN</b></p>

<b>5.</b>	<b>Updates on tariff changes</b>  5.1 Engage with City of Johannesburg and other relevant municipalities on tariff matters. Represent the group's and industry's interests via SAPVIA.	<b>PN</b>
<b>6.</b>	<b>SSEG</b>  6.1 Develop and circulate a short internal survey to map SSEG registration issues by municipality.  6.2 Schedule engagements with the five municipalities (CoJ, Tshwane, eThekweni, Eskom Direct, Mangaung).  6.3 Plan a workshop or forum to exchange experiences and best practices.	<b>PN</b>
<b>7.</b>	<b>The Price Forbes Webinar</b>  7.1 Work on the webinar. Review and confirm alignment on Forbes' draft webinar agenda.	<b>AN&amp; ZB</b>