



South African Photovoltaic Industry Association

**SAPVIA - Grid Access WG Meeting Agenda**

**Date: 16 May 2025**

**Time: 10:00-11:30**

**Chairperson: Zayd Vawda**

**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>	Zayd Vawda (ZV)	<b>Attendees:</b>
<b>Note taker:</b>	Thabang Molai (TM)	Wayne Smith (WS) Yaaseen Akhal (YA) Phoka Tlali (PT) Alecia Pienaar (AP) Eugene Zeelie (EZ) Wiehann van Zyl (WZ) Monique Beukes Daniels (MD) Gordon Kernick (GK) Schalk Loots (SL) Lischa Gerstle (LG) Thabiso Tjatjie (TT) Herold Mathebula (HM) Kabelo Ngulube (KN) Naidu Lushen (NL) Barret de Willers (BW) Shonese Bloy (SB) Eugene E (EE) Luka Van Der Merwe (LM) Angelique van Aswegen (AA) Elmairi H (EH) Carla Carr (CC) Callum Say (CS) Clinton Smith (CS) Clinton Van der Westhuizen (CW) Joe Harding (JH) Ross Train (RT) Vikash Ramphal (VR) Sakhile Ncgongwane (SN) Makgakga Moruta (MM) Gareth Burley (GB) Sinethemba Mnguni (SM) Zimkita Bilibana (ZB)

**Minutes**

1.	<b>Opening</b>	<b>Chairperson</b>
	<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>  Naniki Nzuza (NN)  Sicelo Cele (SC)  Dr Gerhard Botha (GB) – Early Departure</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.	<p><b>Update: The Grid Code Amendment for Embedded Projects</b></p> <ul style="list-style-type: none"> <li>• ZV:</li> <li>• Opened the floor to GB for an update on the proposed amendments.</li> <li>• Acknowledged GB's previous presentation at the last working group meeting and confirmed that SAPVIA had circulated the updated documents to both the Grid Code and SSEG working groups with a response deadline of the previous day.</li> <li>• GB:</li> <li>• Presented proposed amendments to the Distribution Code, Definitions, and RPP Code at the last working group meeting.</li> <li>• Inputs were incorporated from the NRS 097 Working Group and EIUG.</li> <li>• A major concern is the current lack of clarity in the RPP Code, which defines generator size only by maximum export capacity. This leads to confusion, especially in cases where large generators (e.g., 2MW or 20MW) are not intended to export power.</li> <li>• A clearer definition is proposed to guide compliance and planning processes better.</li> </ul>	Dr Gerhard B

	<ul style="list-style-type: none"> <li>• Provided on configurations involving a single transformer and generator point of connection.</li> <li>• Similar to provisions in the Battery Storage Facility Code, a new category (B1) is proposed to allow for relaxation of RMS and EMT model requirements and potential relaxation of SCADA requirements.</li> <li>• Cautioned that SCADA remains a contentious issue as municipalities require generator visibility, yet most municipalities currently lack functional SCADA systems.</li> <li>• No specific relaxation was proposed for reactive power limits. The main issue identified relates to the point of measurement—whether at the point of supply or generator connection. The proposal is to standardize this at the generator connection point.</li> <li>• WS raised a question regarding the theme of the proposed relaxations, specifically referencing SCADA, reactive power compensation, and other technical requirements.</li> <li>• GB responded that the primary focus is on the new B1 category and technical requirement relaxations. Regarding reactive power, he noted that no critical issues had been identified, but the location of testing remains a point of clarification.</li> <li>• ZV indicated that the working group should aim to finalize its position on supporting the proposed amendments. If no objections arise, a summary response can be sent to the GCC by Monday.</li> </ul>	
3.	<p><b>Addressing Understaffing in Grid Access Units and Distribution: Advocating for increased staffing levels with Eskom</b></p> <ul style="list-style-type: none"> <li>• SM:</li> <li>• Reported that SAPVIA met with the Grid Access Unit working group approximately a week ago.</li> <li>• The Grid Access Unit acknowledged understaffing issues and is working to increase capacity in their teams across five workstreams.</li> <li>• Although hiring is underway, progress may not be immediately visible in all units.</li> <li>• ZV noted this as a positive update, acknowledging SAPVIA's persistent efforts to address understaffing.</li> <li>• Next steps include maintaining pressure on the Grid Access Unit and exploring direct access for Rethabile to</li> </ul>	De Wet T

	<p>the head of Grid Access to address inconsistent rule application.</p> <ul style="list-style-type: none"> <li>• MD:</li> <li>• Sought clarity on Eskom's commitment to address understaffing in the Grid Access Unit.</li> <li>• Asked about tangible plans for assessing understaffing needs, staffing rollout, and timelines.</li> <li>• Expressed frustration with delays in the Northern Cape region, citing applications pending for over 14 months.</li> <li>• WZ:</li> <li>• Echoed the concern, citing issues in Worcester (Western Cape) where even MV connections experience significant delays. Attempts to escalate through normal channels often fail, with applicants being bounced back to the regional leads—causing circular and ineffective resolution paths.</li> <li>• Highlighted that Western Cape and Northern Cape face persistent issues and called for a centralized or independent escalation mechanism.</li> <li>• WS suggested that the delays might relate more to grid constraints in the Cape regions, rather than purely staffing shortages, noting that provinces like Limpopo and Northwest don't report the same problems.</li> <li>• MD responded, stating that while grid constraints may be a factor, Eskom's acceptance of payment and processing of applications contradicts a full constraint scenario. She reiterated the need for transparency from Eskom about what is driving the delays—be it constraints, resourcing, or reluctance to respond.</li> <li>• SL confirmed similar issues even with smaller-scale (&lt;1 MVA) projects, indicating the problem cuts across project sizes.</li> <li>• ZV suggested championing these issues in future engagements with Eskom. (Timelines for addressing understaffing and Method of escalation for pending applications and inconsistent rule applications).</li> <li>• The working group will aim to escalate one or two strategic issues at a time to drive focused impact, using the successful approach from the staffing matter as a template.</li> <li>• SM to engage Dr. Melamu and coordinate to attend the next working group meeting to provide feedback on her engagements with Seetsele.</li> </ul>	
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4.	<p><b>Nersa Approval of Congestion Curtailment</b></p> <ul style="list-style-type: none"> <li>WS informed the group that Nersa approved the application for congestion curtailment on May 9, affecting the Western Cape and Eastern Cape, with a potential unlock of up to 2.8GW.</li> <li>AP noted that while the framework was consulted on, the exact scope of the approved curtailment is unclear, and it's uncertain whether it will apply broadly or be limited to specific areas/substations.</li> <li>The group discussed the need for clarity on the scope and implications of the approval, with some members having received queries from clients.</li> <li>It was agreed to add this topic to the agenda for future updates, with WS and AP to report back on any developments.</li> <li>The group noted that Nersa's reasons for decision would be crucial in understanding the approved framework.</li> </ul>	
5.	<p><b>Reimbursement for Electricity Fed into the Grid</b></p> <ul style="list-style-type: none"> <li>ZV introduced the topic, noting it was championed by Nyasha from Sola Group.</li> <li>PT from Sola Group indicated there was no new feedback on this topic.</li> <li>ZV suggested leaving it on the agenda for another meeting and encouraged Nyasha to provide feedback next time, also recommended developing a concept note and potentially turning it into an initiative, given its importance to the wider business and potential for gaining support from other stakeholders.</li> <li>PT agreed to keep the topic on the agenda for further discussion.</li> </ul>	Sebastian H & Nyasha - Lead De Wet T Phoka T Ian B Hjalmar R Schalk L Barret W Regina W Joubert M
6.	<p><b>Industry-RETEC Collaboration</b></p> <ul style="list-style-type: none"> <li>YA:</li> <li>Secured a meeting with Retec scheduled for the following week to discuss collaboration on a framework.</li> <li>Requested to keep the item on the agenda pending outcomes from the Retec engagement.</li> <li>Aimed to clarify Retec's willingness to collaborate on the framework and address industry concerns.</li> </ul>	Yaaseen A Thabiso T Phoka T Wayne S Zayd V

	<ul style="list-style-type: none"> <li>• Committed to reporting back by the end of the following week with a way forward.</li> <li>• ZV:</li> <li>• Expressed strong support and highlighted growing industry complaints about delays in Retec approvals, including redundant queries on pre-approved inverters.</li> <li>• Stressed the urgency of improving communication channels with Retec.</li> <li>• Called for volunteers to join the workstream.</li> <li>• WS, ZV and PT offered support Phoka Tlali offered support.</li> </ul>	
7.	<p><b>SAPVIA Member_ Information Sharing</b></p> <p><b>7.1 Grid Code Compliance</b></p> <ul style="list-style-type: none"> <li>• GB:</li> <li>• A successful webinar was hosted in partnership with Bravoscan focusing on misapplication of NRS 097 by municipalities, inconsistent interpretation of compliance standards such as SANS 10142-1 and Impact on local manufacturers' ability to compete and scale</li> <li>• SAPVIA subsequently issued a position paper on the matter.</li> <li>• The event received positive feedback, affirming the need for better regulatory clarity and testing support.</li> <li>• Highlighted current challenges faced by local manufacturers of facing production slowdowns, market contraction, and lack of accessible test facilities.</li> <li>• Many are operating under short-term plans due to uncertainty and regulatory challenges.</li> <li>• Stressed collaboration with other SAPVIA working groups (e.g., Grid Access) to leverage synergies on NRS certification and grid compliance.</li> <li>• ZV proposed alignment with the Retec engagement team to address overlapping compliance issues.</li> </ul>	Gareth Burley (Manufacturing WG)
8.	<p><b>Working Group Deliverables</b></p> <p><b>8.1 Concept note on “Can embedded projects wheel it's excess energy?”</b></p> <ul style="list-style-type: none"> <li>• WS:</li> <li>• A concept note has been developed focused on the techno-economic comparison of embedded vs wheeled renewable energy facilities, particularly in mining contexts.</li> </ul>	Tshepo T - Lead Zayd V Joe H Dr Rethabile M Sinethemba M

	<ul style="list-style-type: none"> <li>• Concept note focuses on practical techno-economic exercise using real-life case studies.</li> <li>• Key considerations include tariff structures and impacts, right-sizing of facilities, and compliance with new regulatory requirements.</li> <li>• The document is ready for SAPVIA internal approval, after which the team will advance to full paper development.</li> <li>• QS asked if the concept note is based on economic feasibility, practical approval challenges, or both.</li> <li>• GB Clarified the note is practically focused, rooted in real-life examples, and includes updated figures based on retail tariff plan changes for improved accuracy.</li> <li>• ZV encouraged sharing preliminary results at the next meeting to accelerate adoption and champion the paper through the WG.</li> </ul>	Wayne S - Lead Grant B Zayd V
9.	<p><b>Industry Updates:</b></p> <p><b>9.1 Grid Capacity Allocation Rules – NECOM Update</b></p> <ul style="list-style-type: none"> <li>• ZV:</li> <li>• Provided a high-level update on SAPVIA's engagements through the Energy Council Working Groups, which feed into NECOM.</li> <li>• NECOM had mandated a special task team under the Presidency to lead the revision of IGCAR.</li> <li>• This process included participation from Eskom, NERSA, and other key stakeholders.</li> <li>• Despite several meetings, no tangible progress has been made.</li> <li>• One party (implied to be Eskom) has expressed strong resistance to revising IGCAR through a multi-stakeholder process, insisting that amendments fall under their sole mandate.</li> <li>• As a result, the task team has been unable to agree on terms of reference, and the revision process remains stalled.</li> <li>• No revised draft of IGCAR is available at this time.</li> <li>• Other NECOM Workstreams and SAPVIA Participation include: <ul style="list-style-type: none"> <li>• Curtailment: There were early discussions, but no concrete developments or outputs.</li> <li>• Gated Process (IGCAR Replacement): Originally championed by Eskom as a structured approach to grid</li> </ul> </li> </ul>	Zayd V Sinethemba M Dr Gerhard B/ Naniki N/Sicelo N

allocation. No updates or visible progress have been communicated.

- Grid Access Transparency & Speed: NECOM and SAPVIA are both advocating for improved processes, but the initiative appears stagnant with no date or plan for implementation.
- SAPVIA will continue to push issues via NECOM channels.
- Additionally, it will use direct engagements, such as invitations facilitated by Seetsele and Rethabile, to advocate independently outside of NECOM.
- GK and AP raised concerns regarding recent media references suggesting that an updated version of IGCAR may already exist or be in circulation. The article referred to a supposed update dated 12 March 2025, but unable to locate the document via Eskom or other official channels.
- ZV responded that, to his knowledge, no updated IGCAR has been formally released. He acknowledged the media references but cautioned that these may be based on old documents or internal versions\*not shared with industry.
- Requested that if anyone finds such a document, they should share it with the group.

## 9.2 Feedback: 2025 SA Renewable Energy Grid Survey

### Participation

- ZV:
- The working group has been revising the annual grid survey with Eskom since the beginning of the year.
- The survey questions have been finalized, and the website has been updated, but it's not live yet.
- An internal meeting with Eskom is scheduled for next week to finalize the survey.
- The 2025 Grid Survey is expected to be launched in early June, allowing industry stakeholders to input their pipeline projects anonymously.
- Eskom will use the survey results to revise their Transmission Development Plan (TDP) before the end of the year.
- The working group aims to present the survey results to the public in the next meeting.
- Requested that working group members encourage their companies and industry peers to participate in the survey, emphasizing its importance for grid development.

10.	<p><b>Any Other Matters</b></p> <p><b>10.1 CELs</b></p> <ul style="list-style-type: none"> <li>• YA:</li> <li>• Raised concerns about receiving Connection Enquiry Letters (CELs) with upstream dependencies on transmission side, resulting in expected connection dates of 2029/2030.</li> <li>• Asked how developers are managing this process, given the 120-day validity period of Budget Quotes (BQs) and the lengthy timelines before construction can commence.</li> <li>• WS noted that sometimes CELs also indicate curtailment, but YA clarified that the issue is with extended timelines across all technologies and regions.</li> <li>• YA discussed the challenges of accepting CELs with long connection dates while providing assurance to stakeholders, such as lenders and offtakers.</li> <li>• Suggested that the industry might need to adapt to a new reality where CELs with long connection dates become the norm and proposed that the working group could seek feedback from Grid Access Unit on this issue.</li> <li>• PT:</li> <li>• Suggested that developers are being left in limbo between Budget Quote (BQ) acceptance and construction due to long connection timelines.</li> <li>• Proposed that Eskom could facilitate this gap by developing a process to bridge it, potentially helping developers manage the lengthy timelines.</li> <li>• YA agreed, noting that individual inquiries to Grid Access Unit have not yielded clear answers, but a collective approach as a working group might be more effective.</li> <li>• ZV supported the idea, suggesting that it be added to the list of issues to discuss with Eskom, specifically with Seetsele.</li> <li>• The group agreed to pursue this topic further and potentially raise it in future discussions with Eskom.</li> <li>• MD asked about the 12-month validity period of Connection Enquiry Letters (CELs) and whether developers</li> </ul>	

	<p>have experienced resistance when submitting applications for Budget Quotes (BQs) due to lengthy requirements.</p> <ul style="list-style-type: none"> <li>• GK noted that developers need to submit IGCAR requirements within the CEL validity period, and that Eskom is strict about this timeline.</li> <li>• MD expressed concerns about the disconnect between CEL requirements and securing grid capacity for private off-takers, highlighting the challenge of assuring off-takers without an accepted CEL.</li> <li>• GK mentioned that having a Power Purchase Agreement (PPA) in place is essential, and that being "first ready" can help with grid allocation.</li> <li>• GB shared an anecdotal experience where Eskom rejected a submission due to not meeting the CEL expiry date, highlighting the importance of timing.</li> <li>• AP linked this discussion to earlier concerns about potential updates to IGCAR requirements, specifically regarding traders and pass-through requirements for off-takers.</li> </ul>	
<b>11.</b>	<p><b>Closure</b> With a vote of thanks, the chairperson formally closed the meeting.</p> <p><b><i>Next meeting: July 2025</i></b></p>	<b>Chairperson</b>

**Action Items:**

No:	Action	By Whom
1.	Draft a letter on behalf of the working group supporting the Grid Code proposal amendments.	<b>SM</b>
2.	<p>Coordinate a meeting with the Grid Access Unit (Seetsele), to table the following issues:</p> <ul style="list-style-type: none"> <li>• Timelines for addressing understaffing.</li> <li>• Method of escalation for pending applications.</li> <li>• Inconsistent rule application.</li> <li>• CEL timelines and BQ acceptance.</li> </ul>	<b>SM</b>