



**SAPVIA - Grid Access WG Meeting Agenda**

**Date: 21 February 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)
		Lischa Gerstle (LG)
		Thabiso Tjatjie (TT)
		De Wet Taljaard (DT)
		Nyasha Horonga (NH)
		Herold Mathebula (HM)
		Kabelo Ngulube (KN)
		Naniki Nzuza (NN)
		Barret de Willers (BW)
		Sicelo Cele (SC)
		Eugene E (EE)
		Angelique A (AA)
		Elmairi H (EH)
		Carla Carr (CC)
		Callum S (CS)
		Joe Harding (JH)
		Grant Berndsen (GB)
		Ross Train (RT)
		Sinethemba Mnguni (SM)
		Pamela Gama (PG)
		Zimkita Bilibana (ZB)

### Agenda

<b>1.</b>	<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> No apologies noted.</p> <p><b>Agenda</b> The agenda was adopted with no amendments.</p>	

	<b>Minutes</b> The minutes of the previous meeting were accepted as a true reflection of the meeting proceedings.	
2.	<b>Transmission IPPs</b> <ul style="list-style-type: none"> <li>• DT shared an update on the Request for Information (RFI) sent out on December 11th, with a closing date of February 28th.</li> <li>• The IPP Office is managing the RFI process.</li> <li>• DT encouraged members to provide feedback and information, noting that SAPVIA won't have a joint position.</li> <li>• ZV emphasized the importance of providing comments and questions, as the RFI will shape the Transmission Development Plan (TDP).</li> <li>• NN mentioned an RFP from DBSA/IPPO for technical studies on collector stations, with a briefing session on February 25th and a closing date of March 14th.</li> </ul>	De Wet T
3.	<b>Clarity on Grid Capacity Allocation Rules</b> <ul style="list-style-type: none"> <li>• ZV:</li> <li>• Provided updates on industry engagements regarding IGCAR, specifically through NECOM and the Energy Council.</li> <li>• Eskom is seeking to codify the original IGCAR rules, now referred to as the Batching Generation Connection Framework. This includes two key objectives: <ul style="list-style-type: none"> <li>• Codification of the original IGCAR rules.</li> <li>• Implementation of the batching or gated process for generation connection.</li> </ul> </li> <li>• Concerns were raised about Eskom's approach, particularly the lack of industry input and consultation. Eskom maintains that it has the prerogative to amend IGCAR without industry engagement.</li> <li>• The industry, however, believes it retains the right to submit rule change applications to NERSA.</li> <li>• Clarification of the form and structure of guarantees required pre- and post-BQ (Budget Quote) to address lender concerns.</li> <li>• Limiting Eskom's ability to revoke grid allocations without just cause and softening of development milestone requirements.</li> </ul>	Hjalmar R Schalk L Barret W Regina W Joubert M Lischa G

	<ul style="list-style-type: none"> <li>• Expanding the applicability of rules to traders and integrators, and improving transparency of processes, including the establishment of a formal queuing process.</li> <li>• Ensuring reciprocal obligations — if Eskom fails to meet its timelines, there should be consequences.</li> <li>• Requesting that failure to meet performance obligations be clearly written and fairly applied.</li> <li>• The industry, through Energy Council structures and NECOM, is consolidating its position into 12 key points for engagement with Eskom.</li> <li>• Members were invited to engage directly with ZV should they wish to provide any additional input for consideration.</li> <li>• NH:</li> <li>• There are renewable energy projects technically ready for construction.</li> <li>• But they're blocked by upstream network constraints (from as far back as 2013 commitments).</li> <li>• Current Eskom tariff rules only allow IPPs (Independent Power Producers) to recover costs up to shared grid infrastructure — upstream costs are unrecoverable.</li> <li>• Eskom's grid access processes (like BQ/ACO) don't accommodate these long-term dependency cases, forcing developers to wait indefinitely or risk their grid connection offer lapsing before they can build.</li> <li>• ZV:</li> <li>• No current provision or rule exists to deal with this.</li> <li>• Eskom and the working groups are first tackling broader or common issues before addressing niche cases like this.</li> <li>• Suggested that NH raise it in upcoming Grid Access Workshops directly with Eskom representatives.</li> <li>• Possible future discussion item if similar cases emerge from others.</li> </ul>	
<b>4.</b>	<b>Applications Above 132 kV Transmission for Direct Access</b> <ul style="list-style-type: none"> <li>• DT:</li> <li>• No significant progress to report but noted that this remains a standing item in the SAREGs and will be carried into the 2025 update.</li> <li>• Current efforts involve collecting data on project voltage-level preferences to inform the TDP) and broader strategic planning.</li> <li>• NH:</li> </ul>	

	<ul style="list-style-type: none"> <li>• No new updates but suggested that the RFP from DBSA (regarding technical studies for collector stations) may be relevant.</li> <li>• The direction seems to support a shift toward shared collector substations, potentially impacting on how direct access is approached.</li> <li>• NN:</li> <li>• Explained that the DBSA RFP and Eskom’s recent “gated connection” approach aim to move away from individual IPP direct transmission connections.</li> <li>• This new model supports clustered access via collector substations, which could improve efficiency in planning and integration while reducing bespoke connection studies.</li> <li>• Clarified that while intentions are apparent, Eskom has not issued a formal position on discontinuing direct access options.</li> <li>• ZV proposed removing this item from future agendas unless someone actively drives it forward.</li> <li>• NH agreed with the suggestion.</li> <li>• The group remains open to revisiting the topic should progress be made or new information become available.</li> </ul>	
5.	<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>• DT:</li> <li>• Provided an update on efforts to address understaffing within Eskom’s distribution grid access units.</li> <li>• Engagements have been initiated with Eskom Distribution, specifically with contacts from the original Renewable Energy Task Team that contributed to the interim grid capacity allocation rules toward the end of 2023.</li> <li>• Drawing from the success experienced with Eskom Transmission teams (such as through the SAREGS initiative), the intention is to foster similar collaboration with the distribution side.</li> <li>• Outlined proposals to highlight and advocate for addressing understaffing within the distribution grid access units. Explore opportunities to leverage private sector support for capacity building, referencing previous successful external funding examples, such as the GIZ-funded market code work. Conduct a grid access-focused</li> </ul>	De Wet T

	<p>survey, which would include questions on current capacity challenges and the potential for private sector involvement to assist with staffing and resources.</p> <ul style="list-style-type: none"> <li>• These efforts are still in the early stages, and outcomes remain uncertain.</li> <li>• Committed to providing further feedback to the working group as developments unfold.</li> </ul>	
<b>6.</b>	<p><b>Reimbursement for Electricity Fed into the Grid</b></p> <ul style="list-style-type: none"> <li>• NH provided context, noting that there has been limited progress on this issue internally due to a lack of a contractual clause allowing for reimbursement claims.</li> <li>• Sola Group had intended to engage other IPPs facing similar challenges to approach this matter collectively, rather than as an individual developer.</li> <li>• It was noted that Catherine (from Sola Group) had initially driven this initiative but has been unavailable to progress it further. No industry-wide engagements or communications have taken place yet.</li> <li>• ZV suggested that NH check back with Catherine and consider raising the matter formally at the next working group meeting.</li> <li>• It was further proposed that this could be adopted as a formal Working Group initiative, which would give it more industry weight and visibility.</li> <li>• NH agreed and indicated willingness to engage further if other IPPs were interested in participating, noting that Mainstream had been contacted but there had been no further discussions.</li> <li>• DT highlighted that should the initiative lead to any form of litigation, SAPVIA's Governing Committee would need to be consulted regarding the Association's role and position.</li> <li>• SAPVIA's mandate is lobbying and advocacy, not litigation.</li> <li>• Any industry action that moves towards legal proceedings would need to be carefully considered in terms of SAPVIA's involvement.</li> </ul>	<p>Sebastian H &amp; Nyasha - Lead De Wet T Phoka T Ian B Hjalmar R Schalk L Barret W Regina W Joubert M</p>
<b>7.</b>	<p><b>Curtailement of wheeling projects</b></p> <ul style="list-style-type: none"> <li>• NH provided an update on engagements with Eskom regarding curtailement of wheeling projects, following the formation of a volunteer group to explore this issue.</li> </ul>	NH

	<ul style="list-style-type: none"> <li>• Sola Group engaged with Eskom, including a visit to the Eskom Control Centre to better understand curtailment practices and processes.</li> <li>• It was noted that currently, there is no provision for compensation to private IPPs in the event of curtailment.</li> <li>• However, Eskom indicated that until such compensation mechanisms are in place, wheeling projects should not be curtailed, except in worst-case scenarios where the grid is severely strained.</li> <li>• It was highlighted that it is the responsibility of IPPs to proactively engage with their respective Eskom regional control centres to avoid unnecessary curtailment.</li> <li>• ZV shared that while the initial curtailment regime was set at 10%, Eskom's National Transmission Company (NTC) is investigating the possibility of reducing this to 7.5%.</li> <li>• This is still under review and not yet confirmed, but investigations are ongoing.</li> <li>• Given the progress made and clarity received from Eskom, it was agreed that this item can be removed from the agenda for now, unless further developments warrant its return.</li> </ul>	
8.	<p><b>Industry updates:</b></p> <p><b>8.1 Feedback: 2025 SA Renewable Energy Grid Survey Participation</b></p> <ul style="list-style-type: none"> <li>• ZV:</li> <li>• The sub-working group has already started engagements with Eskom representatives (Ronald Marais, etc).</li> <li>• This survey is planned to become an annual exercise, allowing industry to feed into Eskom's planning process regularly.</li> <li>• Previous surveys directly influenced Eskom's TDP.</li> <li>• Data helped Eskom understand regional grid demand, technology types, and capacity needs.</li> <li>• New feedback loop enables direct industry-to-Eskom communication (planners actually read the comments).</li> <li>• The working group encouraged wider participation from industry players to ensure a comprehensive dataset.</li> <li>• The survey is expected to be launched in April or May, with a six-week window for submissions.</li> </ul>	<p>Zayd V DT Dr Gerhard B</p>

## **8.2 Feedback: SAWEM – Market code launch and industry feedback**

- DT reported that the team had reached out to the Market Code team, but there was no new update.
- A final workshop scheduled for November last year did not take place, and no feedback has been received yet.
- It was agreed to remove this item from the working group's agenda, as it's not core to the group's focus. Updates will be shared through normal communication channels when available.

## **8.3 Grid Code Compliance Comments**

- NN provided an update regarding industry engagement on grid code compliance challenges.
- Following Dr. Gerhard's submission concerning the impact of small-scale projects on the grid code, further inputs were noted from the South African Wind Energy Association (SAWEA) Asset Working Group.
- Consultations have been ongoing primarily with industry consultants to gather input on challenges experienced with grid code compliance.
- The objective is to collate industry feedback and present consolidated issues to the Grid Code Advisory Committee (GCAC) and RETEC for alignment and resolution.
- A specific current issue highlighted is the validation of Electromagnetic Transient (EMT) models, which has become a significant concern within the industry.
- Dr. Gerhard's submission, which focused on facilities under 5 MW, was previously set aside for future discussions with RETEC but remains relevant.
- Emphasized the need for broader industry contributions, particularly from the solar PV sector, as most feedback to date has come from the wind sector.
- Members were encouraged to submit any PV-specific grid code compliance issues for inclusion in the upcoming discussions with RETEC and related stakeholders.
- SC noted that although the process began in 2023, progress has been slow, with little concrete feedback received to date. He stressed the need for clear timelines and faster action to ensure meaningful engagement with RETEC.
- NN agreed, acknowledging that while this delay has allowed for more issues to surface, it is important to



accelerate the process. Many of the compliance challenges stem from older projects (e.g., Bid Window 1) now entering periods requiring six-yearly retesting, making the resolution of outstanding issues increasingly urgent.

#### **8.4 GCAC Update**

- NN provided feedback from recent GCAC (Grid Code Advisory Committee) and RETEC discussions,
- Concerns have been raised regarding legacy projects where ownership changes from one IPP (Independent Power Producer) to another.
- During six-yearly recertification processes, issues such as missing data and challenges with OEMs (Original Equipment Manufacturers) have emerged.
- RETEC emphasized that due diligence must be conducted by new owners to ensure all necessary project data is obtained to avoid future non-compliance risks.
- Discussions are underway in GCAC to amend the preamble to the grid code as part of the Generation Code Review.
- Efforts are being made to amalgamate various codes into a single, unified code.
- No immediate input from industry is required at this stage; this update was provided for information purposes only.
- RETEC raised concerns regarding the increasing number of extension requests from projects without tangible evidence of progress.
- Members were reminded that future extension submissions should be accompanied by proof of activities undertaken since the previous extension was granted.
- There was significant deliberation around EMT (Electromagnetic Transient) model validation compliance.
- A generic exemption for EMT validation expired in December 2024.
- As of late November 2024, only approximately 11 IPPs had achieved compliance, while around 56 plants had not communicated their intentions or progress.
- RETEC proposed:
- IPPs should submit unvalidated EMT models within three months (i.e., by March 2025).
- Plants should ensure that meter specifications are properly set to record relevant faults.
- Fault event data must be submitted to RETEC to confirm compliance with specifications.

- Although this has not been formally communicated yet, members were urged to prepare for imminent official communications and compliance requirements.
- SC suggested that industry could benefit from learning from plants that have already successfully achieved EMT compliance.
- Proposals included:
- Engaging RETEC to draft a concept note outlining the EMT validation process and requirements.
- Encouraging collaboration between IPPs and consultants who have completed the process successfully to promote clarity across the sector.
- NN noted that RETEC was not supportive of hosting a webinar but was open to direct engagements to clarify any misunderstandings without formal public sessions.
- WS raised an important point regarding the complexity of EMT validation compliance, that fault capture is often not straightforward and depends heavily on the nature of the fault.
- There is inconsistency in the readiness and capability of NSPs across different provinces—some are more equipped than others.
- Highlighted that proving compliance can be tedious and difficult under these circumstances.
- NN agreed, noting that consultants had similarly flagged challenges in working with various NSPs during previous engagements, and suggested that these issues be included in the planned engagement discussions with RETEC.
- YA noted EMT model validation has historically been a contentious and disorganized process within RETEC.
- Many IPPs either failed to submit models or submitted incorrect models.
- There was no formal process when he was at RETEC, and a structured engagement could now help both sides.
- Resource constraints at RETEC, including the departure of key technical staff, had contributed to delays and difficulties in evaluations.
- YA expressed interest in participating in a working group to help formalize industry engagement with RETEC.
- NN and ZV supported YA's involvement, emphasizing the value of his RETEC experience in bridging industry and RETEC expectations.

	<ul style="list-style-type: none"> <li>• ZV further proposed formally setting up an initiative under the Working Group to coordinate industry input, by setting up structured meetings to identify problems from both the IPP and RETEC sides and propose solutions collaboratively.</li> <li>• YA emphasized the need to combine his experience with insights from current industry experts to structure a framework for engagement. The intention is to start the process of drafting a structured approach for industry-RETEC collaboration.</li> <li>• TT shared that his company successfully completed EMT validation and offered to contribute to the process.</li> <li>• ZV proposed YA and TT as potential co-leads for this initiative.</li> </ul>	
<b>12.</b>	<p><b>Any Other Matters</b></p> <p><b>12.1</b> Concept note on “Can embedded projects wheel it's excess energy?”</p> <ul style="list-style-type: none"> <li>• WS:</li> <li>• Highlighted the complexities arising from recent changes in the tariff code, particularly in relation to a 40 MW PV plant and the economics of wheeling energy to an off-taker.</li> <li>• Emphasized the need to unpack the technical and economic implications of these changes, particularly in the context of a techecomonics study.</li> <li>• Discussed the necessity of reviewing wheeling amendments and billing rules to assess what makes sense for the specific off-taker.</li> <li>• Suggested comparing the pros and cons of embedded generation versus wheeling energy.</li> <li>• Proposed drafting a concept note that could be developed into a formal paper or presented at a workshop or webinar.</li> <li>• Noted that the topic is more commercial and regulatory in nature, with some technical aspects, and invited volunteers to assist in developing the concept note.</li> <li>• W and ZV encouraged attendees to volunteer to contribute to the concept note.</li> <li>• ZV emphasized the value of the project, stating it would be beneficial not only for individual power producers (IPPs) but also for the broader community.</li> </ul>	All WS

	<ul style="list-style-type: none"> <li>• GB shared critical challenges faced with Eskom grid access for embedded projects, especially projects above 1 MW, up to 20–30 MW.</li> <li>• Eskom applying blanket rules across projects regardless of size or export intention.</li> <li>• Access being denied or made contingent on costly grid upgrades, even when all power is for self-consumption.</li> <li>• Embedded projects subject to the same requirements as large wheeled projects, making smaller projects unviable.</li> <li>• DT identified two distinct areas:</li> <li>• Grid access and connection rules — best placed within the Grid Access Working Group.</li> <li>• Grid code compliance requirements— to be handled post-commissioning, potentially through Dr Gerhard's stream.</li> <li>• The issue was recognized as a "grey area" between commercial and utility-scale projects, needing tailored treatment.</li> <li>• DT proposed that this item be in both Grid Access and Distributed Generation Working Groups, to keep pressure from both ends to ensure coordinated response and visibility.</li> <li>• ZV confirmed the group would include it as a standing item and monitor traction in both forums.</li> <li>• If unresolved in DG, this group will take the lead to push the issue forward.</li> <li>• GB offered to assist with embedded projects being able to wheel excess energy across the grid.</li> <li>• WS expressed hope that the concept note would be completed by the next working group meeting.</li> <li>• ZV confirmed that updates would be provided in the next meeting.</li> </ul>	
<b>13.</b>	<p><b>Closure</b></p> <p>With a vote of thanks, the chairperson formally closed the meeting.</p> <p style="text-align: right;"><i>Next meeting: 16 May2025</i></p>	<b>Chairperson</b>

**Action Items:**

No:	Action	By Whom
1.	Draft a framework for industry engagement with RETEC.	YA
2.	Follow up with Catherine on the ( <b>Reimbursement for Electricity Fed into the Grid</b> ) initiative.	NH