



## South African Photovoltaic Industry Association

### SAPVIA- Distributed Generation WG Agenda

**Date: 02 December 2025**

**Time: 11:00-13:00**

**Chairperson: Oliver Johnston**

#### **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>	Oliver Johnston (OJ)	<b>Attendees:</b> Jigisha Mandalia (JM) DeVillers Botha (DB) Hennie Hanekom (HH) Seth Bulkin (SB) Davin Chown (DC) Kiran Sewparsad (KS) Mandisa Mkhize (MM) Boitumelo Mvundle (BM) Phemelo Mitchell (PM) Layla Smith (LS) Ross Solomons (RS) Elsie Zwennis (EZ) Dr Rethabile Melamu (RM) Sim Khuluse (SK) Sinethemba Mnguni (SM) Zimkita Bilibana (ZB)
<b>Note taker:</b>	Thabang Molai (TM)	

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></p> <ul style="list-style-type: none"> <li>• Dermott Murphy (DM)</li> </ul> <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>GeoTerra Image Presentation</b></p> <ul style="list-style-type: none"> <li>• RS Ross provided an overview of GTI's current work and the purpose of the data they produce.</li> <li>• The purpose of the presentation is to provide an updated view of solar installation mapping across the country—including rooftop solar systems, freestanding installations, and larger-scale solar developments—and to highlight trends observed since earlier iterations of the mapping exercise.</li> <li>• GTI specialises in the creation of spatial datasets used across multiple sectors.</li> <li>• Their aim is to provide accurate, user-friendly, decision-support data rather than conduct research or policy interpretation.</li> <li>• GTI provides the solar uptake dataset to support SAPVIA and its members in understanding installation patterns, assessing growth over time and identifying geographic differences in uptake</li> <li>• The dataset provides an overview of national rooftop solar installations, freestanding residential and commercial systems, and larger solar infrastructure.</li> <li>• For more detailed information, please refer to the presentation attached to this email, and for any further questions or clarification, you may contact Ross using the contact details provided.</li> </ul>	Ross S
3.	<b>Workstreams</b>	
	<p><b>3.1 Embedded Projects</b></p> <p><b>3.1.1 PPA White Paper</b></p> <ul style="list-style-type: none"> <li>• OJ highlighted that the draft PPA White Paper has now been completed and requested one more circulation of the document to members to review.</li> <li>• ZB confirmed that the paper has been open for comments for some time, and SAPVIA intends to close inputs by Friday, 5th so that the paper can be formally published.</li> </ul> <p><b>3.1.2 Observations on Project Approvals by Eskom</b></p> <ul style="list-style-type: none"> <li>• OJ raised a concern regarding increasing rejections of embedded generation project applications by Eskom.</li> </ul>	<b>Claude P - Lead</b> Agreepa M Avesh P Boitumelo M Hennie H Jeandre Z Mandisa M Martin K Tanya J Jacques B

	<ul style="list-style-type: none"> <li>• Eskom appears to be rejecting embedded and behind-the-meter projects on the basis of grid capacity constraints.</li> <li>• Noted that grid capacity constraints should not directly impact behind-the-meter projects, although these projects may still influence the wider grid.</li> <li>• There is a potential legal question around whether Eskom is permitted to reject embedded applications on these grounds.</li> <li>• This trend is becoming more common and should be monitored.</li> <li>• RM asked for clarity on whether Eskom's rejections are solely motivated by grid constraints.</li> <li>• Noted that some members have reported similar cases and SAPVIA will continue to monitor incoming feedback.</li> <li>• OJ confirmed that Eskom explicitly cites grid constraints when rejecting applications.</li> <li>• This may not align fully with current regulatory requirements, and further examination is needed.</li> <li>• OJ added that it would be important to observe whether the Grid Access Unit raises or recognises similar issues.</li> </ul>	
	<p><b>3.2 Wheeled Projects</b></p> <p><b>3.2.1 Municipal Wheeling Frameworks</b></p> <ul style="list-style-type: none"> <li>• OJ provided an update on recent engagements with GreenCape, specifically Johan, who is actively involved in discussions with Eskom and various municipalities regarding traditional wheeling and virtual wheeling.</li> <li>• A significant update relates to a legal opinion that has been circulated regarding Eskom's policy on wheeling rebates.</li> <li>• The legal opinion suggests that Eskom's current position—disallowing wheeling rebates to municipalities that are not in good financial standing—is not legally valid.</li> <li>• Eskom is currently developing its own internal legal opinion or response.</li> <li>• This matter specifically impacts traditional wheeling, including for municipalities that already have functional or emerging wheeling frameworks such as City of Ekurhuleni, Nelson Mandela Bay and City of Cape Town</li> <li>• If Eskom aligns with the legal opinion, it would allow municipalities to receive wheeling rebates regardless of financial standing, marking a major milestone in</li> </ul>	<p><b>Oliver J - Lead</b></p> <p>Avesh P</p> <p>Awie B</p> <p>Basetsana M</p> <p>Jacques B</p> <p>Jigisha M</p> <p>Mandisa M</p> <p>Levi T</p> <p>Jeandre Z</p> <p>Julian D</p> <p>Fortune N</p> <p>Dermott M</p> <p>Wessel W</p> <p>Mike B</p>

	<p>expanding access to wheeling into key metros and significantly opening opportunities for industry participation and project development.</p> <ul style="list-style-type: none"> <li>• A response from Eskom is anticipated before the end of the year.</li> <li>• OJ committed to reaching out to Johan (GreenCape) early next year to confirm Eskom's final position, and updating the committee once clearer information is available.</li> </ul> <p><b>3.2.2 Virtual Wheeling frameworks</b></p> <ul style="list-style-type: none"> <li>• OJ provided an update on the reconciliation methodology that Eskom plans to use for virtual wheeling.</li> <li>• The issue raised previously relates to Eskom's proposed account-by-account reconciliation sequence, where each customer account within a portfolio must have its peak, standard, and off-peak consumption fully allocated before the next account can be included.</li> <li>• This becomes problematic because many customers have large off-peak loads, which solar PV typically cannot fully supply, and if solar cannot cover 100% of the off-peak allocation, Eskom may block the next account from participating in the reconciliation.</li> <li>• This approach has been widely questioned by industry stakeholders, and discussions remain ongoing, with the issue still unresolved.</li> <li>• The sector is awaiting Eskom's first actual reconciliation for Vodacom, expected on 5 December.</li> <li>• This reconciliation is anticipated to provide clarity on Eskom's practical application of its method and offer insight into how allocations, matching, and consumption balancing will work in practice.</li> <li>• Eskom recently updated its website to indicate that virtual wheeling is now only available to LV (Low Voltage) customers.</li> <li>• Earlier communication (around 6–8 months ago) indicated that LV, MV, and HV customers would all be eligible.</li> <li>• The shift to LV-only represents a significant restriction, limiting who can participate in virtual wheeling.</li> </ul> <p><b>3.2.3 Tariff Structure &amp; Reconciliation</b></p> <ul style="list-style-type: none"> <li>• OJ reported that Eskom is reviewing generator use-of-system (GUoS) charges, having drafted a proposal to</li> </ul>	
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	<p>increase them, which has been submitted to NERSA and is currently awaiting consideration.</p> <ul style="list-style-type: none"> <li>• No public documents have been released yet.</li> <li>• The anticipated increase in GUoS charges would raise the cost of wheeled power, impacting project economics.</li> <li>• Eskom is exploring a broader structural change to its tariff design, involving a significant increase in fixed charges for electricity supply and a corresponding reduction in variable (energy) charges.</li> <li>• While not specific to wheeling, this move is understood as part of Eskom's strategy to improve revenue stability and increase competitiveness under the SAWEM market structure through stronger alignment with market-based pricing.</li> <li>• JM added that Eskom has also submitted changes to NERSA regarding generator connection charges.</li> <li>• This relates to loss factors and associated costs.</li> <li>• Proposed increases would vary depending on the project's location.</li> <li>• The changes are expected to further impact project feasibility, especially in constrained or remote grid areas.</li> </ul>	
	<p><b>3.3 Regulations and Policy</b></p> <p><b>3.3.1 Policy tracker</b></p> <ul style="list-style-type: none"> <li>• JM requested that the SAPVIA team continue maintaining the policy tracker, ensuring all relevant regulatory updates are recorded and shared with the committee.</li> </ul> <p><b>3.3.2 IRP</b></p> <ul style="list-style-type: none"> <li>• The IRP was approved in October.</li> <li>• It sets a guideline of 900 MW of distributed generation per annum for the foreseeable future.</li> <li>• This figure serves as a guideline rather than a strict cap, as actual allocations will depend on grid capacity constraints, market opportunities and other practical restrictions or regulatory considerations</li> </ul> <p><b>3.3.3 Congestion curtailment approval</b></p> <ul style="list-style-type: none"> <li>• JM noted that the congestion curtailment framework has been approved.</li> <li>• The approved capacity allocation is lower than initially expected.</li> </ul>	<p><b>Jigisha M - Lead</b>  DeVilliers B  Oliver J  Jeandre Z  Wessel W</p>

	<ul style="list-style-type: none"> <li>• Eskom has issued a clarification note outlining how congestion curtailment allocations will be implemented.</li> <li>• Allocation will be governed by Eskom's grid rules, specifically the IGCAR framework.</li> </ul> <p><b>3.3.4 NERSA consultation on IGCAR</b></p> <ul style="list-style-type: none"> <li>• JM reported that NERSA approved the Grid Access Rules last week.</li> <li>• The rules have not yet been made public, as they still need to be gazetted.</li> <li>• Publication is expected within the next week or two.</li> <li>• Once gazetted, the Grid Access Rules will directly impact IGCAR, Eskom's framework for allocating grid access, and influence how grid capacity is prioritised and managed going forward.</li> </ul> <p><b>3.3.5 Trading Rules</b></p> <ul style="list-style-type: none"> <li>• JM noted that NERSA has released the Trading Rules.</li> <li>• Public comments are due by 16 January.</li> <li>• Members were requested to submit any comments via SAPVIA, which will collate and submit consolidated inputs</li> <li>• Given the timing over the holiday period, SAPVIA may request an extension to the comment period, and members will be informed if an extension is granted.</li> </ul> <p><b>3.3.6 Transmission Regulations</b></p> <ul style="list-style-type: none"> <li>• JM noted that the Transmission Regulations have recently been approved.</li> <li>• These regulations support the rollout of Independent Transmission Projects, which are being managed through the IPP Office.</li> </ul> <p><b>3.3.7 GCCA</b></p> <ul style="list-style-type: none"> <li>• JM noted that Eskom's annual GCCA was released in October.</li> <li>• The GCCA is closely linked to congestion curtailment mechanisms and available grid capacity</li> <li>• No major changes were identified compared to the previous release.</li> <li>• It was further noted that there may be no Transmission Development Plan (TDP) update this year.</li> </ul>	
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	<ul style="list-style-type: none"> <li>• This is due to its alignment with the IRP, with the next update now expected in 2026.</li> </ul>	
	<p><b>3.4 Technical</b></p> <p>4.4.1 Grid Code Compliance for Embedded Generation Projects – Regulatory and Technical Avenue.</p> <ul style="list-style-type: none"> <li>• OJ provided a summary of work currently being led by Dermot in his absence.</li> <li>• Dermot has been working on a white paper for CATB projects, focusing on grid code compliance.</li> <li>• The current grid code requirements for projects over 1MW mandate a full SCADA system, adding complexity and cost.</li> <li>• Questions were raised regarding whether the level of detail required by full SCADA systems is necessary, what tangible operational benefits are actually gained, and whether a lighter, more pragmatic technical solution could achieve the same objectives.</li> <li>• The initial version of the white paper is available for review. Interested parties are encouraged to add comments.</li> </ul>	<p><b>Dermot M - Lead</b></p> <p>Basetsana M Hennie H Jigisha M Julian D</p>
4.	<p><b>Any Other Matters</b></p> <ul style="list-style-type: none"> <li>• RM expressed gratitude to the Chair and deputy chairs for steering the working group and thanked workstream chairs, deputy chairs, and members for their commitment and contributions.</li> <li>• Noted that participation is voluntary and acknowledged the effort and hours contributed by all members.</li> <li>• Wished members a restful December holiday and encouraged a return in the new year with renewed energy.</li> <li>• Invited members to provide feedback on areas where the Secretariat can provide more effective support, noting that interventions to increase participation will be introduced next year.</li> <li>• Highlighted that this is one of the most effective working groups and emphasized the goal of elevating outputs in the new year.</li> <li>• OJ echoed the thanks and appreciation for the contributions of all members, particularly stream leads including Jigisha, Dermot, and Claude, and reinforced the importance of their collective impact on the sector.</li> </ul>	

5.	<b>Closure</b> <p>With a vote of thanks to all members for their contributions and engagement throughout the meeting, the Chair formally closed the meeting.</p> <p><b>Next Meeting: February 2026</b></p>	<b>Chairperson</b>
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### **Action Items**

No:	Actions	By Whom
1.	Reshare the Draft PPA White Paper with members for final comments. Deadline: 05 December 2025	<b>Zimkita B</b>
2.	Share the GTI presentation with Zimkita Bilibana for circulation to all meeting attendees.	<b>Ross S</b>
3.	Follow up on Eskom's position regarding wheeling rebates to municipalities and assess potential impact on access to wheeling in key metros.	<b>Oliver J</b>
4.	Share the initial draft White Paper (Grid Code compliance for Cat B systems) with members for inputs and comments.	<b>Lead – Dermott M</b>