South African Photovoltaic Industry Association

SAPVIA - Grid Access WG Meeting Agenda
Date: 15 August 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.

Facilitator:	Zayd Vawda (ZV)	***Attendees:*** Wayne Smith (WS) Callum Sey (CS) DeVilliers Botha (DB) Phoka Tlali (PT) Alecia Pienaar (AP) Naniki Nzuza (NN) Thabiso Tjatjie (TT) Ross Train (RT) Elmairi Husselmann (EH) Joe Harding (JH) Clinton Van der Westhuizen (CW) Gordon Kernick (GK) Naidu Lushen (NL) Basetsana Molefyane (BM) Herold Mathebula (HM) Jaco Jordaan (JJ) Jasper Dick (JD) Khetho Ramalata (KR) Nichol Luttig (NL) Thando Kunene (TK) Dr Gerhard Botha (GB) Sinethemba Mnguni (SM) Zimkita Bilibana (ZB)
Note taker:	Thabang Molai (TM)	

Agenda

1.	**Opening**	**Chairperson**
	Welcome and Introduction The chairperson welcomed everyone to the working group meeting and acknowledged attendees for making time to attend. **Apologies** No apologies received. **Agenda** The agenda was adopted with no amendments.	

	Minutes The minutes of the previous meeting were accepted as a true reflection of the meeting proceedings.	
2.	**Nersa Approval of Congestion Curtailment** • WS: • NERSA has issued a ruling on congestion curtailment, dated either 29 April or early May. • However, NTCSA has not yet implemented the congestion/curtailment framework. • There appear to be interdependencies with related processes, including GCCA and IGCAR. • AP confirmed that there were no further updates available at this stage.	Wayne S Alecia P
3.	**Industry-RETEC Collaboration** **EMT Validation** • TT: • No direct updates from RETEC but highlighted a recurring challenge in the industry. • Many IPPs and responsible parties have a limited understanding of EMT validation requirements. • This knowledge gap may be contributing significantly to delays and persistent challenges. • Proposed the creation of a consultation hub within SAPVIA to focus specifically on EMT validation issues, enabling direct support and knowledge-sharing. • Suggested preparing a short background presentation to outline the EMT validation problem and its impact on the industry. • Recommended that the presentation be circulated before the next meeting to assist stakeholders currently facing issues. • ZV supported the suggestion, noting that clarifying knowledge gaps would help address industry challenges. • TT agreed to take the lead in preparing an explainer presentation for circulation. • NN: • Provided an update on discussions within GCAC regarding EMT compliance.	 Yaaseen A Thabiso T

	• GCAC had tabled this matter earlier in the year, awaiting NERSA's decision on proposals presented by RETEC. This relates to the EMT exemptions, which lapsed in December 2024. • NERSA expressed concern that many developers appear not to be taking sufficient steps towards compliance. Some developers have not communicated progress or intentions, creating uncertainty across the industry. • It was noted that there is a lack of industry-wide understanding of EMT requirements and expectations. • From SAPVIA's side, engagements have been held with consultants to better clarify obligations and implications. • The proposal is to raise this matter with RETEC, potentially through an IET session or other structured engagement, with the goal of ensuring a coordinated industry response and movement towards compliance.	
4.	**SAPVIA Member_ Information Sharing** **IGCAR** • SM presented a brief overview of SAPVIA's contributions at the Nersa public hearings on the draft Grid Capacity Allocation Rules, held on 8 August. • SAPVIA made a submission on 29 July, representing the views of its members, which were collated through various channels, including email and an online format. • ZV: • SAPVIA now has a second opportunity to provide input ("second bite at the apple") through NERSA's follow-up processes, specifically on IGCAR-related questions. • The Grid Access Unit has reached out directly to industry associations, including SAPVIA, via Dr. Melamu, with support from Zayd, Wayne, and Sinethemba. • SAPVIA will therefore continue to engage through both written inputs and one-on-one discussions with Seetsele. • Members are strongly encouraged to resubmit their earlier inputs (if already made to NERSA) to reinforce SAPVIA's position.	Sinethemba M

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Working Group Deliverables

5.1 Concept note on “Can embedded projects wheel it’s excess energy?”

- CS and WS:
- The concept note compares the costs, savings, and returns of a wheeled PV project versus an embedded PV project, from both the IPP perspective and the client perspective (e.g., mining or large industrial users).
- Key assumptions include comparison based on a 60 MW peak site, with consistent assumptions on financing, lender due diligence, and plant construction costs. Main differences modelled - grid connection costs and development costs
- Embedded projects are generally cheaper on grid connection and development, since they may not require extensive new infrastructure (e.g., large substations or additional transmission lines).
- IPP returns: Higher for embedded projects at equivalent PPA rates. A wheeled project would require an increase of 15–17c/kWh in PPA rate to achieve comparable returns.
- Client savings: Wheeled site -R40 million/year. Embedded site - R70 million/year.
- Practical constraint: Many mining/industrial clients lack sufficient land to host large, embedded projects.
- Suggested hybrid approach: Build embedded projects to the extent land is available, and supplement with wheeled energy to meet full demand.
- The intention is for the working group to issue an opinion piece on these findings, with possible outputs including a white paper, formal presentation, or workshop later in the year.

5.2 IPPO Engagement (Workshop)

- ZV:
- The Chair informed members that SAPVIA has been in regular contact with the IPP Office.
- The IPP Office has invited Dr Melamu to a meeting in the next week or two to provide industry feedback on the REIPP, with a particular focus on possible reforms.
- Members are encouraged to provide practical input, limited to solar PV, highlighting what aspects of the REIPP

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	programme work well, what challenges exist, and recommendations for improvement. • Members are encouraged to submit inputs to Zimkita Bilibana (ZB) via email and ZB will consolidate inputs ahead of SAPVIA's engagement with the IPP Office. • The Chair emphasised that this is an important opportunity for industry to influence the design of upcoming REIPP rounds.	
6.	**Industry updates:**	
	6.1 Feedback: 2025 SA Renewable Energy Grid Survey Participation • ZV: • Reminded members that the SAREGS Survey 2025 was launched in July, with the deadline initially set for 5 August, but extended to 15 August 2025 (midnight) due to strong industry interest. • Members who have not yet contributed were urged to do so. • Preliminary feedback from Ronald Marais indicated a strong level of participation, suggesting that grid capacity applications remain active despite challenges such as IGCAR processes and curtailment considerations. • The survey is expected to yield valuable insights, including: Geographic distribution of applications. Technology mix (PV, hybrid, ancillary services, wheeling, etc.). Trends in capacity allocation. • NTCSA will begin data analysis from 1 September 2025, with results expected in 4–5 weeks. • A results presentation is anticipated in early October 2025. The session will be open to both members and the broader industry. • Survey findings will inform refinement of the Transmission Development Plan (TDP), with Ronald Marais intending to publish the updated TDP before year-end. • Thanked members for their contributions and emphasised that this initiative positions the Working Group as a key influencer in shaping the TDP.	Zayd V Sinethemba M

	6.2 GCAC Update • DB: • One of the NECOM task team's key findings is the gap in the current grid code framework. • Existing codes cover transmission/distribution loads and large-scale IPPs. • However, there is no dedicated grid code for embedded/mixed systems (systems that supply onsite load with occasional export). • The task team has therefore proposed the development of a new grid code for embedded/mixed systems to ease compliance hurdles without compromising safety. address the perception that "zero-export" systems are exempt from grid access processes (as seen in examples like the City of Cape Town) and ensure that even systems designed for zero or minimal export are properly registered and managed. • Initial thinking was to apply a "zero-export" principle, but feedback from Eskom Distribution, municipalities, and technical engineers suggested a more flexible approach. • Proposal - Allow limited export capacity (up to 5 MW), enabling larger plants (e.g., 10 MW with 5 MW onsite load + 5 MW export) to be regulated under the proposed embedded generation code. • Stressed that the development, approval, and adoption of such a new grid code will take several years. In the meantime, current advisory work on grid code amendments remains relevant and complementary. • Current task team report is in draft form (3 pages) and reflects these findings. Once finalized, it will be shared through the appropriate structures. • NN: • Provided an update on discussions regarding 0 MW export (behind-the-meter) plants, originally presented in the May meeting. • Points of contention remain regarding expectations for compliance, particularly from Eskom, on power quality and SCADA integration. These areas still require further investigation. • The system operator highlighted that up to 6 GW of energy is entering the system from these embedded behind-the-meter installations, creating significant system impacts, including frequency variations and reactive power influence • RETEC emphasized the need for enhanced compliance measures to manage these impacts.	Naniki N/Sicelo N/ Dr Gerhard B

	• SAPVIA is expected to provide amendment documentation addressing these concerns. • Consideration for a dedicated IET session may be required to further discuss compliance and grid integration issues. • Multiple units behind the meter may necessitate compliance being assessed at the Point of Assessment rather than per individual unit. • Deliberations are ongoing regarding how compliance will be executed and by whom. • Other discussions included general challenges developers face with low-voltage systems and broader compliance matters. • Both 0 MW export plants and EMT compliance remain open items requiring further industry input and deliberation.	
7.	**Closure** With a vote of thanks, the chairperson formally closed the meeting. ***Next meeting: 21 November 2025***	**Chairperson**

Action Items:

No:	Action	By Whom
1.	Share the latest draft (GCAC proposal) of the report once it's finalized.	**DeVillers B**
2.	Provide comments on the amended rules (IGCAR applications) through the online form https://sapvia.co.za/sapvia-comment-on-igcar/ or by email to Sinethemba Mnguni (sinethemba@sapvia.co.za). SAPVIA to drive the discussions with the Grid Access Unit (Seetsele), incorporating member inputs.	**All Members** **RM,SM,ZV,WS**
3.	Prepare a short explainer presentation on EMT validation challenges and circulate it to members ahead of the next meeting.	**Thabiso T**
4.	Send inputs on REIPP program reform to Zimkita via email. zimkita@sapvia.co.za.	**Zimkita B**