

Appendix B Format for submissions

Submitter

Nu'uli'itia Andrew Redwood

Executive Summary

Although I don't agree with distributors being required to pay negative charges for injection during peak times. I instead think that retailers should instead be required to pay more for injection during peak Vs other times, as the benefits of peak time injection accrue to retailers, generators, and the national grid. Instead of solely to distributors. I am answering the questions in this consultation within the scope of the questions.

Questions	Comments
Q1. Do you agree with the issues that we have identified in meeting the policy intent to target small business consumers? Why or why not?	Mostly agree. However what about consumers with more than 1 connection on the same property? EG a dairy farm. Which might have a connection for the farmhouse, connection for the milking shed, connection for the water pump. As each connection might be less than 45KVA, but in total more than 45KVA.
Q2. Do you agree that applying the negative charge to business consumers below a given connection capacity, and limiting eligibility to distributed generation below that same level, will best achieve the original policy intent? Why or why not?	Agree. As any installation with more generation capacity than its connection capacity is highly unlikely to be a small business etc.
Q3. Are both limits required, or could the policy intent be achieved through just one of the proposed limits? Please explain your reasoning.	Need both limits. As inverters that actively manage load as well as export already exist. Meaning that not limiting generation capacity would allow some potentially very large systems to "sneak through".
Q4. Do you agree with our assessment of the proposed threshold for connection capacity? Why or why not? Would you prefer an alternative threshold? Why?	Mostly agree. Although consider increasing it slightly to 50KVA. As due to the proposal to increase allowable LV network voltages, that also increases the amount of power able to be delivered through a connection. There will likely be instances of smart meter data showing connections running at slightly more than their official capacity. As wires, fuses, etc are rated in Amps. Therefore

	<p>more voltage at the same amps = more KVA. There are also lots of 3 phase residential properties that are around 45KVA, due to having 60A per phase capacity. And some lines companies require 3 phase for some or all new residential connections. Any limit less than 45KVA risks excluding those connections.</p>
<p>Q5. Do you agree with our assessment of the proposed threshold for DG, and that this should apply based on the maximum deliverable generation capacity? Why or why not?</p>	<p>Agree. As a limit lower than the chosen connection capacity limit risks putting unnecessary restrictions on system design. And might cause administrative problems with older systems, that only have their generation capacity recorded in the ICP database. Which might have a different export capacity.</p>
<p>Q6. Do you agree with the objective of the proposed amendment? If not, why not?</p>	<p>Agree.</p>
<p>Q7. Do you agree the benefits of the proposed amendment outweigh the costs?</p>	<p>Agree.</p>
<p>Q8. Do you agree with our assessment of the alternatives? Please explain your reasoning.</p>	<p>Agree. As excluding all business consumers would create problems for home based businesses. Are those ICPs residential or business?</p>
<p>Q9. Are there other options or thresholds we should consider to better align the Code with the original policy intent?</p>	<p>None that I can think of.</p>
<p>Q10. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.</p>	<p>Mostly agree. Apart from what I have already said above.</p>