
Definition of small business Code amendment proposal

From Chris Stewart [REDACTED]
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To TaskForce <TaskForce@ea.govt.nz>

[REDACTED]

My name is Chris Stewart, and I am a dairy farmer from Southland. I, like many others, am excited by the potential of better empowering consumers who are fundamentally reshaping our energy future.

We have recently installed a solar and battery system on our farm which is really positive in a number of ways. It gives us a level of resilience as shown by accompanying article from the recent storms in southland. It also is positive from a cost containment perspective as we are currently using 50% less imported power than prior and we hope for that to improve as we get the system streamlined and fit for purpose. Through the high energy demand of winter we are not needing the generation or storage potential of our system as we are not milking for 10 weeks from the beginning of June through till mid August. This asset should be able to be used rather than excluded as it is over the 45kva limit. Our system has a 100 kW inverter and 200kW storage. As we and a lot of other dairy farms are at the end of grid lines having this capacity should have value and be included in the proposal. Being able to sell this generating and storage potential will certainly help in the viability of others making this investment decision. I am however a farmer and I don't have the time nor the skill set to negotiate with large generators to guarantee I get a fair deal when trying to sell what we have when it should be of high value.

I agree with the stated aim of encouraging customers to supply power to the network when it's needed and rewarding them when the power they supply at peak times benefits the network. Incentivising storage alongside solar investment for all customers through a peak distribution export tariff which provides a fair payment that reflects the long run cost of avoided network investment would increase benefits to all customers.

However, I **do not agree** with the Task Force's limit on what constitutes a small business.

The 45kVA connection limit or 45kW maximum generation capacity limit would restrict many small businesses and organisations, like schools, marae, farms and community groups from accessing peak distribution export tariffs.

These unnecessary limits on who receives peak distribution export tariffs would be a step in the wrong direction and a missed opportunity to support customers to invest in a more flexible, affordable, sustainable and resilient local energy supply.

If the Authority wishes to create a limit it should be set to include all customers with up to 1MW of generation capacity. This is a sensible level that includes local community organisations and businesses who are not well-placed to negotiate for a fair deal, but would exclude utility generators and large industrial customers.

I would be more than happy to be contacted to discuss how our system helped us through the recent outage in Southland through the high wind event. My contact is Cris Stewart [REDACTED] ph [REDACTED]

Link to recent article from Farming magazine [https://www.farmersweekly.co.nz/technology/solar-kept-milk-flowing-in-southland blackout/](https://www.farmersweekly.co.nz/technology/solar-kept-milk-flowing-in-southland-blackout/)