
Definition of small business Code amendment proposal

From CDC Trust [REDACTED]
Date Fri 21/11/2025 4:26 PM
To TaskForce <TaskForce@ea.govt.nz>

[REDACTED]

Kia ora,

Thank you for the opportunity to provide feedback on the above proposal.

We are concerned about the proposed 45 kVA or 45 kW limit. This low limit would exclude small customers such as schools, marae, community organisations, many farms and other small businesses who do not have the time, staff or technical expertise to negotiate a deal directly with their electricity distributor. This means that they could miss out on being paid fairly for peak exports.

We propose that the limit be set at 1 MW of generation capacity. This would include community organisations and small businesses that cannot negotiate fairly on their own, while still excluding large industrial and utility scale generators.

The cost of the electricity network makes up a large part of household power bills and is expected to be the main cause of future increases. Because much of this comes from rising distribution network costs, it is important to support options that reduce or avoid the need for more network investment.

Fair peak export payments will:

- Incentivise our local organisations and businesses to invest in renewable generation with storage.
- Reduce the need for costly network upgrades.
- Help control power bills.

Solar with storage increases local resilience:

- Marae, community buildings, and schools with rooftop solar and batteries can act as community hubs during power outages.
- Backup options become increasingly important for communication, EV charging and meeting basic community needs as extreme weather events increase.

Benefits for our rural communities:

- Solar and batteries on farms provide a useful income stream with minimal land use
- Improve resilience for nearby customers.
- Creates opportunities for on-farm public EV charging and development of rural EV charging corridors.

Allowing broader access to peak export tariffs will accelerate progress, encouraging investment in a more flexible, affordable, sustainable and resilient local energy supply. This is something very important to our community.

Thank you for considering this submission.

Ngā mihi nui

Marion Low

Trustee | Cromwell & Districts Community Trust

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