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## Definition of small business Code amendment proposal

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From Naomi Pocock [REDACTED]

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To TaskForce <TaskForce@ea.govt.nz>

[REDACTED]

Kia ora

I'm a solar panel & battery owner on a lifestyle property outside of Hamilton. I want the government to empower consumers to reshape our energy future. This is a fantastic opportunity for NZ to transition towards a future that will support generations of kiwis for decades to come, but the current proposal is substandard at best.

I agree that customers should be able to supply power to the network when it's needed and rewarded when their power benefits the network (peak times). Incentivising customers to invest in storage with their solar investment (with a peak distribution export tariff which provides a fair payment that reflects the long run cost of avoided network investment) benefits all customers. Combining local generation with battery storage not only reduces the need for network upgrades and reduces everyone's energy bills, it also provides local resilience by providing backup options for communication, EV charging and other community needs during extreme weather events.

However, the 45kVA connection limit or 45kW maximum generation capacity limit is unfair to small businesses / organisations, including schools, marae, farms and community groups as they will not be able to access the peak distribution export tariffs, and expecting them to negotiate with distributors themselves is inefficient and simply won't happen.

We should be incentivising farmers to invest in solar. Solar and batteries on farms is a win-win for farmers and the local community. It can provide a valuable revenue stream for farmers using very little land and help lower electricity system costs for local customers, providing more resilience and creating an opportunity for the roll out of on-farm public EV charging options and development of EV charging corridors in rural communities.

The 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.

Thank you for considering this feedback.

Dr Naomi Pocock



Director

[Alight Ltd](#)



Alight

Director STEM Curiosity Charity



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