

Feedback on the “Definition of small business Code amendment proposal”

In the attention of the Te Mana Hiki Electricity Authority.

My name is Hunor Csomortani, an associate member of St Heliers Presbyterian Church from Auckland. Our church installed a solar system in 2025, and as a member who helped commission this, got more insight into the economics of operating it.

The below is my personal observation and, due to time constraints, was not endorsed by the St Heliers Presbyterian Churches Council or the Church’s Minister.

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.

I also **see the need to clarify the Code** to make it clear what is meant by “small business consumers”.

I want to bring to the Authority's attention that mandating rebates only for business consumers with a connection capacity of 45kVA or less would exclude a fair number of Churches, schools and community centers, who often operated with larger connection capacities, but who do not operate systems large enough to supply power in meaningful quantities, and so they are not in a position to bargain meaningful rebates on their own.

For example: The primary motivation to install a solar system at St Helier Church and Community Centre was to increase resilience: both to make energy costs more predictable and to serve as an emergency centre for our community. The church and community centre has a yearly energy consumption of around 50MWh, and the solar system installed is planned to feed 12MWh/year in the grid, while the connection capacity is above the proposed 45kVA limit.

We experienced some difficulties in our ability to bargain for better rebates for electricity supplied to the grid when looking for a new electricity provider after the solar system was installed. Having a fair rebate mandated by the Code would help us, but the current proposal to limit this to connection capacities under 45kVA would exclude consumers like us.

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.

Kind regards,
Hunor Csomortani