
Definition of small business Code amendment proposal

From Toni Anne Glover [REDACTED]
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To TaskForce <TaskForce@ea.govt.nz>

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Kia ora,

My name is Toni Glover, and I am the co-owner of Kinloch Wilderness Retreat, a small, family-run lodge and restaurant in rural Glenorchy. Please accept my apologies for this slightly late submission, I've been working close to 80 hours a week running the lodge and managing a very busy kitchen alongside caring for our team and guests. My husband has also just become the Mayor of Queenstown, which adds another layer of pressure on our family during an extremely demanding time.

I'm writing because this consultation deeply affects us, and many others like us, in rural Aotearoa.

Why This Matters to Small Rural Businesses

Despite our size, we have invested heavily in solar and battery systems to build resilience, lower costs, and reduce our environmental footprint. As a remote business, power stability is essential — and local generation isn't just beneficial for us, it benefits our neighbours and community. Our batteries help smooth peak load, and when we export at peak, we reduce costs for the wider network.

We are exactly the kind of business New Zealand should be empowering.

However, the proposed 45kVA / 45kW cut-off would classify us — and many schools, marae, farms, and rural operators — as “big businesses”, excluding us from the fair peak export tariff the Electricity Authority has rightly said is needed to ensure equity and system-wide benefits.

We are emphatically not a big business. We do not have any “negotiating power” with a monopoly electricity distributor. We are not resourced, staffed, or structured like a large corporate. We would simply miss out — as would the wider community that benefits from our exports.

New Zealand Runs on Small Businesses

Small family businesses like ours are the backbone of Aotearoa. We keep rural communities alive, create jobs, host visitors, and act as hubs during severe weather events. We shouldn't be penalised simply for participating in the solution.

Local generation and BESS (battery energy storage systems) are exactly what New Zealand needs to build a resilient grid in an era of climate-driven volatility. The rules should encourage this — not discourage it.

Our Experience With the Network

I can assure you we would not be in a position to negotiate a fair export rate. Like many rural businesses, we have had difficulty even getting basic responsiveness at times. The idea that small rural operators have commercial bargaining power equal to large industrials is simply incorrect.

The Authority's own intention to protect those without negotiating power should apply to us fully.

Peak Exports Benefit Everyone

The peak export tariff is not a subsidy. It simply reflects the actual avoided cost that our exports provide:

- We help reduce peak load
- We help reduce the need for costly network upgrades
- We help lower bills for all customers
- We provide resilience in outages, which is increasingly critical with extreme weather
- We can act as a community hub in emergencies

Schools, marae, farms, tourism operators, and rural lodges all have the potential to play this role. Excluding them at 45kW is a missed opportunity and is misaligned with the Authority's stated goals.

A far more reasonable limit is up to 1MW of generation and storage, which would include genuine small and community organisations and exclude true utility-scale generators.

My Position and Request

I strongly support the goal of encouraging customers to export power to the network at peak times and rewarding them fairly based on the true long-run marginal cost they help avoid.

However, I do not support the proposed 45kVA / 45kW definition of a "small business".

This limit is:

- Far too low
- Exclusionary
- Misaligned with real-world business capability
- Unfair to rural communities
- A barrier to resilience and local energy security

I respectfully ask the Authority to revise the limit to include customers with generation and storage up to 1MW, ensuring that genuine rural small businesses, schools, marae, and farms receive fair treatment.

This will strengthen our communities, support local resilience, reduce system costs, and help us all transition to a cleaner, smarter energy future.

Thank you for considering this submission, and again, apologies for the slight lateness. This issue is deeply important to our family and our small rural business, and I appreciate your time.

Ngā mihi nui,

Toni Glover

Owner | Kinloch Wilderness Retreat

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