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**Definition of a small business code amendment proposal.**

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**From** Marlon Johnson [REDACTED]  
**Date** Fri 21/11/2025 12:57 PM  
**To** TaskForce <TaskForce@ea.govt.nz>

[REDACTED]  
**To Whom it may concern,**

**Introduction**

Lightforce Solar is New Zealand's largest installer of rooftop solar systems. As a vertically integrated company, we manage the full lifecycle of solar deployment, including design, installation, maintenance, and customer support. This position provides us with comprehensive insight into the barriers and opportunities facing rooftop solar adoption nationwide.

**Current Context**

Rooftop solar is the most cost-effective form of electricity generation available in New Zealand. Despite this, uptake remains among the lowest across OECD countries. A key factor is the restrictive export limits imposed by electricity distribution businesses (EDBs). These limits prevent households, businesses, and communities from fully utilising their generation capacity, even when they are willing to invest their own capital.

**Technical Potential**

- Residential properties can typically generate up to 20 kW.
- Small businesses often require systems between 50–200 kW.
- Lightforce Solar is already delivering installations up to 1 MW for farms, marae, community centres, stadiums, and public facilities.

This demonstrates that rooftop systems exceeding current export limits are both technically feasible and economically viable.

**Infrastructure Challenges**

Decades of underinvestment have left distribution networks constrained, often described as “single-lane roads” within the electricity system. This lack of capacity is a primary reason New Zealand lags behind comparable countries such as Australia, despite having similar solar resources.

**Policy Recommendation**

We strongly advocate for an increase in the rooftop solar export limit to **1 MW**. This adjustment would:

- Align regulatory settings with existing technical capability.
- Incentivise EDBs to upgrade networks and expand capacity.
- Unlock distributed generation that strengthens national energy security.
- Enable communities to contribute directly to decarbonisation goals.

**Role of Battery Storage**

Battery adoption has accelerated rapidly, rising from 10% of our customers to 60% in recent years. This trend highlights the growing demand for resilience and grid stability. With appropriate support from EDBs, distributed storage can:

- Provide balancing services to the grid.
- Deliver financial certainty to system owners.
- Enhance community resilience and energy independence.

**Conclusion**

Increasing the rooftop solar export limit to 1 MW represents a practical, evidence-based reform that will drive investment, modernise distribution networks, and accelerate New Zealand's transition to a resilient, low-carbon energy system. Lightforce Solar urges EDBs and policymakers to adopt this change in the interests of households, businesses, and communities nationwide.

Kind regards,

Marlon



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**HAPPY, SUNNY HOLIDAYS**  
**FROM ALL OF US AT LIGHTFORCE SOLAR.**



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