
Definition of small business Code amendment proposal

From Raewyn Solomon [REDACTED]
Date Fri 21/11/2025 12:40 PM
To TaskForce <TaskForce@ea.govt.nz>

 1 attachment (55 KB)
Electricity Authority Taumutu Submission 21Nov025.docx;

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Kia ora

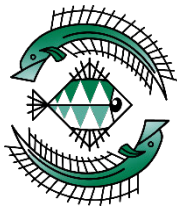
Please find attached a submission on behalf of Taumutu Rūnanga Ltd representing the hapū of Ngāi Te Ruahikihiki ki Taumutu – one of the 5 primary hapū of Ngāi Tahu.

My Taumutu work days are Mondays, Tuesdays and Wednesdays and will reply to emails on these days - ka pai for your patience.



Kairuruku Kaupapa
[REDACTED]

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Taumutu
Rūnanga Limited

Taumutu Rūnanga Ltd

Waea:
Īmēra:

Submission from Te Pā o Moki, Te Taumutu Rūnanga

TO: taskforce@ea.govt.nz

SUBJECT: Definition of small business Code amendment proposal

Kia ora Task Force Team,

My name is Raewyn Solomon and I'm writing on behalf of **Te Pā o Moki Marae, Taumutu Rūnanga Ltd in Canterbury**.

For us at Te Pā o Moki, the ability to generate and store our own energy is about more than just saving money—it's about **energy mana Motuhake, Rangatiratanga, Kaitiakitanga** and **Manaakitanga community hub** for our whānau. We are actively moving forward with plans to purchase a solar and battery system, having recently received a number of quotes from which we are pursuing an install in the next year.

I agree with the Authority's 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.

However, I do not agree with the Task Force's limit on what constitutes a small business.

The 45kVA connection limit or 45kW maximum generation capacity limit would restrict many small businesses and organisations, like schools, **marae**, farms and community groups from accessing peak distribution export tariffs.

Many of the community organisations and businesses that would be excluded from accessing the peak distribution export tariff would not be well-placed to negotiate this directly with their distributor. They would simply miss out.

As a small marae with limited financial resources, our time is stretched managing facilities, events, and community support. **We simply do not have the technical expertise or the administrative capacity to engage in complex negotiations with our local Electricity Distribution Business (EDB)** to secure a fair peak export rate. Imposing this limit guarantees that we miss out, despite making a valuable investment that benefits the entire network.

The peak export tariff will provide a fair incentive for customers to include battery storage with investment in distributed generation like solar. 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. For example, marae and schools with rooftop solar and

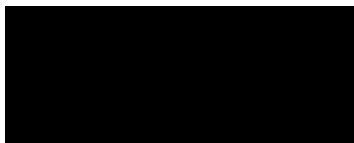
batteries can act as local hubs for the community in a power outage. With an increase in extreme weather events this will be increasingly important to provide backup options for communication, EV charging and other community needs until power is restored.

These 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.

The ability to receive a fair price for injecting power back into the grid at peak times is a crucial financial incentive that significantly improves the **payback period** for the solar and battery system we are planning. Without this protection, the financial decision becomes much harder, jeopardizing our investment and denying our community the resilience and cost savings we desperately need.

Ngā mihi



Kairuruku Kaupapa