

# Submission on the Electricity Authority Consultation: Limiting Access to Distribution Peak-Export Tariffs

Prepared by: **Tom Wheatley**  
Independent Solar Developer, Nelson

Thank you for the opportunity to provide feedback on the proposal to restrict eligibility for distribution peak-export tariffs to customers with a connection capacity below 45 kVA. I oppose this threshold because it unnecessarily excludes small commercial solar farms such as my own 600 kW project in Atawhai, Nelson, which has already been approved for connection at 11 kV by Network Tasman. The proposed cap will materially distort incentives, reduce investment, and limit the availability of local clean generation in regions where it is most needed.

1. The 45 kVA threshold is arbitrary and misaligned with modern distributed generation The proposed 45 kVA limit may have been sensible when distributed generation was primarily small rooftop PV. Today, however, commercially viable small solar farms in the 300–1,000 kW range are increasingly important contributors to local resilience, emissions reduction, and peak support. A threshold of only 45 kVA excludes virtually all meaningful DG investment. I recommend lifting the limit to at least **1 MVA**, which aligns far better with the scale of modern small solar installations.

2. Nelson-Tasman lacks local generation, making small solar farms essential My region has minimal embedded generation and long radial lines serving both residential consumers and critical infrastructure. During faults, storms, earthquakes, and civil emergencies, having local solar generation materially improves resilience. A 45 kVA cap discourages precisely the type of mid-scale DG that could strengthen the region's ability to withstand and recover from disasters. My 600 kW farm, for example, provides daytime support and reduces strain on the Stoke GXP during high-load events.

3. The proposal contradicts the Authority's goals for flexibility, decarbonisation, and efficient investment Peak-export tariffs are fundamentally a flexibility signal. Excluding mid-scale DG from responding to this signal undermines: **Efficient market signals** that encourage export during peaks; **Investment in distribution-connected renewable generation** at the scale that can meaningfully shift peak supply; **Consumer participation** in delivering grid support services. A 1 MVA threshold would allow small developers to participate while still maintaining network manageability and avoiding large-scale generation being subsidised through a tariff intended for distribution-level incentives.

4. The 45 kVA limit disadvantages independent developers Large incumbent generators already enjoy economies of scale and transmission access. The proposed limit would prevent independent developers from accessing even basic distribution-level incentives. Small, regionally embedded solar farms like mine operate at modest scale, bear development and compliance costs directly, and provide generation exactly where it reduces network load. Excluding such projects from peak-export tariffs is inconsistent with competitive neutrality and efficient market design.

5. Recommended changes I propose: Replacing the 45 kVA threshold with a **1 MVA eligibility threshold** for peak-export tariffs; Allowing distributors to apply engineering judgement or hosting-capacity assessments where necessary; Ensuring the framework encourages new embedded generation in weak or underserved regions. This adjustment would unlock investment in small solar farms nationwide while preserving the intent of the tariff structure.

Conclusion I strongly support the principle of peak-export tariffs, but their effectiveness will be severely limited if access is restricted to only very small installations. A more future-proof threshold of 1 MVA better reflects current technology, supports regional resilience, and enables independent developers to contribute clean, flexible generation where it is most needed. Thank you for considering this submission.

**Tom Wheatley**  
Independent Solar Developer  
Nelson, New Zealand