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Electricity Authority
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MAXIMISING BENEFITS FROM LOCAL ELECTRICITY GENERATION

As General Manager Sustainability and Planning for Dunedin Airport, I welcome the opportunity to comment on the Electricity Authority's consultation on *Requiring distributors to pay a rebate when consumers supply electricity at peak times: definition of a small business*.

Like many others, we are excited by the potential to empower consumers who are reshaping New Zealand's energy future through investment in distributed generation such as rooftop solar and battery storage.

As a major regional gateway for the South Island, Dunedin Airport has a responsibility to operate efficiently, sustainably, and with resilience. Continued investment in rooftop solar and battery systems is central to reducing operating costs, meeting our decarbonisation goals, and ensuring we remain a reliable lifeline utility for our community during disruptions or emergencies.

The Importance of Enabling Distributed Generation

Arbitrary or overly conservative export limits directly constrain our ability to build the generation scale needed to support our operations and reduce pressure on the wider grid.

Expensive and time-consuming compliance processes to increase export caps on a project-by-project basis add unnecessary cost and complexity, discouraging investment in clean energy infrastructure.

Getting this regulatory framework right is therefore critical—not just for advancing national energy objectives, but for enabling essential infrastructure providers like Dunedin Airport to play our full role in building an efficient, sustainable, and resilient energy system that supports more affordable power for the wider community.

We support the Electricity Authority's aim to remove unnecessary barriers to efficient investment in distributed generation and to maximise the benefits it brings for all New Zealanders.

Support for the Authority's Proposals

We support the Electricity Authority's proposals to improve export limits for small and small-to-mid-scale distributed generation (DG) by:

- **Setting a default 10 kW export limit** (with allowance for lower limits where appropriate, based on an industry-developed assessment methodology) for small-scale DG connections (up to 10 kW capacity);
- **Setting default voltage response settings** for inverters (based on Australian standards) while allowing distributors to adjust where appropriate;
- **Mandating simple and permissive application processes** that minimise costs and delays for DG above 10 kW; and
- **Requiring distributors to use industry-developed export limit assessment methodologies** to determine export limits for DG above 10kW.

These measures will help accelerate adoption of rooftop solar and battery storage by improving project economics, reducing payback periods, and allowing appropriately sized systems.

We acknowledge that distributors may need to set lower export limits than 10 kW in some cases, provided this is justified by transparent, evidence-based assessments. However, such discretion must not become a mechanism to

avoid improving network management practices or investing in technologies that enable greater distributed generation.

Ensuring Fair and Transparent Assessment Processes

It is critical that the methodologies used to determine bespoke export limits are simple, transparent, fair, and consistently applied.

Small businesses, community organisations, farms, and households—who typically install small to mid-sized solar systems—are not resourced to engage with distributors in the same way as large-scale energy developers. For this reason, oversight by the Electricity Authority will be essential to ensure these assessment methodologies are applied equitably and are not used to unduly restrict investment.

Large-Scale Distributed Generation

We also support the Electricity Authority's proposals to improve export limits for larger-scale distributed generation by:

- Mandating the use of **industry-developed export limit assessment methodologies**; and
- Requiring the **latest inverter performance standards** for low-voltage DG.

Wider System Benefits

Higher export limits will deliver broad national benefits and enhance electricity system resilience. Distributed generation strengthens local energy resilience by reducing dependence on centralised generation and providing backup capability during outages—for example, maintaining essential transportation, communications and other basic community services.

New Zealand requires more generation capacity, and there is currently untapped potential in curtailed solar output from overly conservative export limits that could be supporting the grid—especially during dry years. Encouraging more solar installation benefits both consumers and the wider network through lower energy costs and improved system reliability.

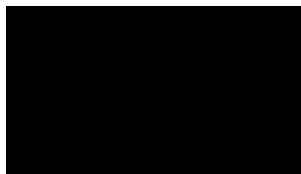
Conclusion

We strongly support the Electricity Authority's proposals to enable fairer and more efficient integration of distributed generation.

Improving export limits and streamlining approval processes will empower organisations like Dunedin Airport—and the communities we serve—to invest in renewable energy systems that reduce emissions, improve resilience, and contribute to lower electricity costs for all New Zealanders.

I would welcome the opportunity to **speak to this submission** if the consultation process allows.

Sincerely



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