



Chairman: Ben Gibson,
Secretary: David Inch,

19 November 2025

Submissions
Electricity Authority
By email: connection.feedback@ea.govt.nz

Dear team,

Re: Maximising benefits from local electricity generation

The Independent Electricity Generators Association Inc. (IEGA) appreciates the opportunity to make this submission on the Electricity Authority's proposals to maximise the benefits from local generation.¹

As you know, IEGA members are either directly or indirectly associated with predominantly small-scale power schemes connected to local distribution networks – local generation - throughout New Zealand for the purpose of commercial electricity production. The IEGA therefore supports efforts by the Authority to “maximise the benefits of local generation”.

This submission focuses on Proposal B - to improve export limits for larger-scale DG.

The IEGA supports a Code amendment to mandate distributors use an industry-developed assessment methodology when setting export limits for individual larger DG – a bespoke export limit for generation connection applications under Part 2 of Part 6 of the Code.

Members' experience is that export limits imposed by individual distributors:

- can be conservative
- are altered/reduced after the generation plant is commissioned – impacting the financial viability of the site
- are often static rather than dynamic to network conditions.

The IEGA supports an industry developed export limits assessment methodology. This standard/single methodology would be applied consistently by distributors to different generation sites. The IEGA suggests the acronym 'bespoke export limits assessment methodology (BELAM)' uses the word 'bespoke' in a confusing way. The 'bespoke' aspect of the methodology must be that one generation site can have a different (bespoke) export limit from another generation site as a result of applying the standard single assessment methodology.

¹ The Committee has signed off this submission on behalf of members.

The IEGA suggests the methodology should prioritise the use of dynamic export limits (over static limits) if this results in a greater utilisation / more efficient use of generation and distribution assets – resulting in greater power flows and more competition in the wholesale market.

The IEGA submits distributed generation owners must be involved in development of this standard/single assessment methodology.²

The IEGA also supports the Authority's proposals³ to amend the Code so distributors must:

- i. provide the export limits analysis, using the BELAM, to the applicant
- ii. where the analysis has deviated from the BELAM, provide an explanation to the applicant
- iii. where viable, and unless the applicant agrees otherwise, provide the applicant with export limit options and their associated costs; and
- iv. applicants can dispute static and dynamic export limits for Part 2 applications.

Point iii, requiring export limit options, is particularly important – only with this information can generation investors make financial decisions to optimise output from the site.

Export limits on existing distributed generation

It appears the Authority's proposals only apply to analysis of connection of a new generation plant. The IEGA recommends the Authority clarify that the requirement to use a standard single export limit assessment methodology also applies when a distributor proposes to apply an export limit for the first time, or change an existing export limit, on an existing generation site.

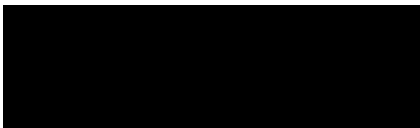
Curtailment policy

Distributors apply dynamic and static export limits in order to have some control over power flows on their network assets. The IEGA suggests a standard curtailment policy / approach across all distributors is also important for distributed generation investors.

Export limits might be reducing the need for curtailment, but we query whether a static limit for every hour of every day is better / more efficient than knowing specific generation technology will be curtailed in a particular order in the event that an issue arises on the network. The IEGA queries whether export limits and curtailment policy are alternatives or complementary instruments to manage generation injection on distribution networks. The IEGA requests the Authority prioritise work on developing a consistent principles-based curtailment policy to be used by all distributors.

We would welcome the opportunity to discuss this submission with you. Nothing in this submission is confidential.

Yours sincerely



Ben Gibson
Chair

² As per the Authority's stated preference in paragraph 5.94 of the consultation paper

³ See paragraphs 5.96 and 5.98 of the consultation paper