

B. **Format for submissions**

Maximising benefits from local generation

Submitter	Tim Hawker
Submitter's organisation	N/A (Residential generator)

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Please send your submission to connection.feedback@ea.govt.nz by **5pm, Wednesday 19 November 2025**

Questions	Comments
Q1. What are your views on the proposal to set a default 10kW export limit for Part 1A applications?	I am in favour. It would reduce unnecessary curtailment of renewable energy, and incentivise solar for more individuals.
Q2. What are your views on the Code clarifying that a distributor cannot limit the nameplate capacity of a Part 1A application, unless the capacity exceeds 10kW?	I am in favour. Inverters have various technology to ensure voltages stay within safe limits. They will shut down before there is a problem.
Q3. There are requirements for distributors in Proposal A1. Which of these do you support, or not support, and why?	I support all of Proposal A1.
Q4. What are your views on the proposal for industry to develop an export limits assessment methodology?	I am in favour. It will help ensure limits are only in place when needed, and help lines companies prioritise where investments for upgrades is needed.

Q5. What would you do differently in Proposal A1, if anything?	Ensure that lines companies must provide a simple way for sites with a 5kW limit to be upgraded to a 10kW limit, as long as their inverters support all necessary standards. This will help reduce existing unnecessary renewable curtailment. (Aurora have done this)
Q6. What concerns, if any, do you have about requiring the 2024, rather than 2016, version of the inverter installation standard for Part 1A applications?	None.
Q7. Do you support amending the New Zealand volt-watt and volt-var settings to match the Australian values for Part 1A applications - why or why not – what do you think are the implications?	Yes. It will help reduce electronic equipment cost by sharing similar standards with Australia.
Q8. What would you do differently in Proposal A2, if anything?	Nothing.
Q9. Do you have any concerns about the Authority citing the Australian disconnection settings for inverters when high voltage is sustained?	No.
Q10. Do you have any concerns about the Authority requiring the latest version of the inverter performance standard for Part 1A applications?	No.
Q11. What are your views on the proposal that where distributors set bespoke export limits for Part 2 applications, they must do so using the industry developed assessment methodology?	N/A (Only providing feedback on part 1A)

Q12. What are your views on the several requirements that must be adhered to regarding the distributors' documentation (see paragraph 5.96) relating to setting export limits under Part 2?	N/A
Q13. Do you agree it is fair and appropriate that where distributors set export limits for Part 2 applications, applicants can dispute the limit? If so, what sort of process should that entail?	N/A
Q14. What would you do differently in Proposal B, if anything?	N/A
Q15. What are your thoughts on requiring the inverter performance standard (AS/NZS 4777.2:2020 incorporating Amendments 1 and 2) for low voltage DG applications in New Zealand?	I am in favour. A note could be added to state that existing customers with inverters that do not have this standard available can use the prior standard with overridden voltage settings, and can export 10kW as long as their overridden settings are compliant with the new standard.
Q16. Do you consider the transitional arrangements workable regarding requirements and timeframes? If not, what arrangements would you prefer?	Yes.
Q17. What are your views on the objective of the proposed amendments?	I am in full agreement that policy should be used to help reduce unnecessary curtailment of renewable energy.
Q18. Do you agree the benefits of the proposed amendments outweigh their costs? If not, why not?	Yes, I agree.

Q19. What are your views on the Authority's estimate of costs of lost benefits from a 5kW export limit?	I am glad that there is a proposal from the EA to help reduce this unnecessary loss of renewable energy.
Q20. Are there costs or benefits to any parties (eg, distributors, DG owners, consumers, other industry stakeholders) not identified that need to be considered?	Existing customers that wish to update their unnecessary 5kW limit.
Q21. Do you agree the proposed Code amendments are preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's main statutory objective in section 15 of the Electricity Industry Act 2010	Yes, I agree.
Q22. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	Unknown.
Q23. Do you have any comments on the drafting of the proposed amendment?	Thank you to those involved. It was clear and easy to read.