

Appendix B Format for submissions

Maximising benefits from local generation

Submitter	Ben Aynsley
Submitter's organisation	Westpower

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?	This is no change for Westpower
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?	The nameplate capacity does not concern the Network – more so the maximum export capability.
Q3. There are requirements for distributors in Proposal A1. Which of these do you support, or not support, and why?	
Q4. What are your views on the proposal for industry to develop an export limits assessment methodology?	This will assist smaller EDBs with less resources
Q5. What would you do differently in Proposal A1, if anything?	
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?	

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?	We believe this is ok in the transition, but NZ should maintain the ability to amend the settings in the future if required as opposed to being tied to Australia A. NZ already has settings in AS/NZS 4777.2 – these should be updated to reflect the new voltage limits. The work done by the EEA in the past may be able to be utilised. A submission should be made to Standards NZ to get the NZ settings updated in Inverter standards.
Q8. What would you do differently in Proposal A2, if anything?	Would not use Australia A settings as we believe the upper limit is too high and allows for V at the POS to be pushed above 253 V
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 - this is a good addition.
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?	This is ok
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?	
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?	

Q14. What would you do differently in Proposal B, if anything?	
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?	Yes this is a good addition.
Q16. Do you consider the transitional arrangements workable regarding requirements and timeframes? If not, what arrangements would you prefer?	Addition time for the industry to develop the ELAM and BELAM given the time of year would be beneficial. ~ 6 Months
Q17. What are your views on the objective of the proposed amendments?	
Q18. Do you agree the benefits of the proposed amendments outweigh their costs? If not, why not?	The benefits sit with the DG owner as opposed to the EDB. As the generation is intermittent and not present when needed most (Winter Peaks) it is unlikely to defer network upgrades. It does raise the question of who pays for the costly network upgrade if DG saturation is too high or does this risk fall with the connected ICP.
Q19. What are your views on the Authority's estimate of costs of lost benefits from a 5kW export limit?	There was never a set 5 kW export limit and many EDBs either did not have a published limit or used 10 kW already therefore we think the estimate is high.
Q20. Are there costs or benefits to any parties (eg, distributors, DG owners, consumers, other industry stakeholders) not identified that need to be considered?	
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	
Q22. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	
Q23. Do you have any comments on the drafting of the proposed amendment?	