
RE: Maximising benefits from local electricity generation

From Ben Statham [REDACTED]

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To Connection Feedback <connection.feedback@ea.govt.nz>

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- I support the Electricity Authority proposals to improve export limits for small-scale distributed generation (DG) by:
 - setting a minimum default 10kW export limit (with allowance to transparently set lower limits where appropriate based on an industry-developed assessment methodology) for small scale distributed generation connections (up to 10kW capacity),
 - setting default voltage response settings for inverters (using Australian setting) and allowing for distributors to set different settings where appropriate.
- I support the Electricity Authority proposals to improve export limits for large-scale distributed generation (DG) by:
 - mandating distributors to use a transparently industry-developed bespoke export limits assessment method to set export limits for larger DG
 - Mandating the use of the latest inverter performance standard for low voltage DG
- Making sure the way bespoke export limits are set for many small businesses, community groups, farms and households who want to install more than 10kW of solar is really important to get right, so that unnecessary limits are not placed on the scale of their solar and battery installations. This critical group of customers installing mid size solar are typically not resourced to engage in the connection process with distributors in the same way that the large utility scale distributed solar and battery firms are. Therefore it's important that the proposed assessment method that distributors use is transparent, fair and its use is monitored by the Electricity Authority to ensure it is not used to unnecessarily limit distributed generation.
- Allowing for distributors to set lower default limits than 10kW where appropriate using a transparent industry-developed export limits assessment methodology, might be needed in specific situations but it should be the exception and not used as a way for EDBs to avoid improving network management approaches to support more customer solar investment and continuing to impose arbitrary unnecessary export limits. Electricity Authority scrutiny should be applied here, to monitor use.
- Currently, there are arbitrary restrictions on the amount of power those with rooftop solar and batteries connected to distribution networks can export to the grid. Higher export limits should speed up distributed generation (eg rooftop solar) and battery adoption rates because the payback period will be reduced and there will be an incentive to install bigger systems. This will increase savings for homeowners and also help bring down the price of electricity for everyone on the network.
- I support the Electricity Authority proposal to prohibit distributors from imposing any limits on the nameplate capacity of installed distributed generation. Limiting how much solar customers install for their own use is unnecessary and does not maximise benefits to customers. Larger solar systems can be designed

to provide optimal supply and battery storage, and exports back to the grid via the inverter are limited so they don't breach required export limits. This point is vital, the only component that an EDB should be able to regulate is the size of the export to grid, not the size of any system component.

Best regards

Ben Statham