

19th November 2025

Electricity Authority
PO Box 10041
Wellington 6142
By E-Mail: connection.feedback@ea.govt.nz

Re: Submission on Maximising benefits from local generation – Consultation Paper

Counties Energy (CEL) welcomes the opportunity to comment on the Electricity Authority's (EA's) consultation on the maximising benefits from local generation consultation paper. We support the intent of the proposed changes and offer the following comments:

CEL currently does not apply a default export limit. However, where a customer requests export capacity beyond what the existing network allows, options are made available to the customer. We support allowing Distributors to apply lower export limits only where genuine network constraints exist, provided this is consistent with a standardised assessment approach.

CEL supports allowing customers to install systems sized for their potential future self-consumption requirements, provided they comply with the export limits in place at the time of installation. This approach offers flexibility for customers while ensuring network safety and managing congestion.

Publishing export limits and methodologies is supported to improve clarity and transparency for all stakeholders.

Applications on our network are currently assessed in compliance with AS/NZS 4777.2:2020 inverter performance standard and support its continued use.

Thank you for the opportunity to provide feedback on the consultation paper – Maximising benefits from local generation. CEL supports the intent of the proposed changes that enhance flexibility, transparency and network safety. We look forward to engaging with the EA and its relevant team(s) further as it develops this work. CEL would be happy to discuss any aspect of this submission further if required.

Yours Sincerely,

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Network Projects Co-Ordinator



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