
Maximising benefits from local electricity generation

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

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Kia ora koutou,

I am Kristin D'Agostino and I'm a 47-year-old mother of two from Taranaki, I work full time remotely for the University of Auckland. I have caught the electrification bug, am a local volunteer for Community Energy Taranaki and currently involved in the Ara Ake/Powerco Community Energy Activator. I am very excited about the potential energy future which includes distributed generation like rooftop solar, and battery storage.

I am not originally from Taranaki which means I am terrified of the very real potential of a volcanic event. As a region we are not yet prepared to function as an energy island but we need to be. I think it is imperative that our region has a strong distributed energy strategy to allow for resilience in case of natural disaster or increasingly, climate disasters. (<https://newsroom.co.nz/2025/10/21/taranaki-eruption-poses-unique-threat-to-energy-security/>)

I am also excited to see the change happening in Australia, Pakistan, Uruguay and Costa Rica where clear incentives and cross-sector coordination have yielded strong results.

I agree with the Electricity Authority Te Mana Hiko (Authority) aim to remove unnecessary barriers to more efficient investment in distributed generation and maximise the benefits it brings for all New Zealanders.

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, roof top solar) and battery adoption rates because the payback period will be reduced and incentivise bigger systems to be installed. This will increase savings for homeowners and help bring down the price of electricity for everyone on the network.

I support the Electricity Authority proposals to improve export limits for small-scale distributed generation (DG) by:

- setting a default 10kW export limit (with allowance to 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 an 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 essential 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 an industry-developed export limits assessment methodology, might be needed in specific situations but it should not be 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.

Higher export limits will have widespread benefits for all New Zealanders and strengthen the resilience of the electricity supply. For example, distributed generation can increase the energy resilience of local communities by reducing reliance on electricity generated from centralised, grid-scale generation. Plus solar and battery systems can provide essential back up if there is a power outage, providing power for essential communications, EV charging and basic needs.

The country is screaming out for more generation, and we know there is currently spare solar energy being curtailed by the networks that could be helping, especially in a dry year. We want to encourage the biggest possible solar systems because it reduces the costs for the homeowner and for everyone else on the network and higher export limits will help do that.

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.

As a current participant in the Ara Ake/PowerCo Community Energy Activator, I would like to re-emphasise the need for further work on export limits for community projects generating in the 10 – 100kW range. We need a specific set of guidelines to ensure that community generation projects can connect to the grid and sell energy in a clear, fair, simple way.

I am currently working on a project for Taranaki wide Solar in Schools. As part of the research, we are attending a variety of site visits. We are seeing forward thinking communities who have setup solar installations on schools and marae. They are often generating large amounts of energy but not being fairly compensated (ie not receiving payment for electricity generation) or facing large crippling lines charges due to 'business designation'. While some of these may be technical/management continuity issues, it highlights the technical and legal vulnerability of community groups that EDBs and power companies are exploiting knowingly or otherwise. This risk is slowing solar projects by otherwise interested parties.

Thank you for your time and consideration, I look forward to an energetic future.

Kristin D'Agostino