

Appendix B Format for submissions

Maximising benefits from local generation

Submitter	Merryn Hedley and Terry Webb
Submitter's organisation	

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?	We strongly support this proposal. Even on 16 Nov in Wellington we reach maximum export (5kW) at 10 am and this continued to 5pm. We installed a system that would give us useful generation in winter, not realising we would be so curtailed in exporting in Spring, Summer and Autumn.
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?	Support the proposal because without this, default export limits could be lowered without any transparent reason.
Q3. There are requirements for distributors in Proposal A1. Which of these do you support, or not support, and why?	We do not support this as it appears to contradict what is clarified in Q2
Q4. What are your views on the proposal for industry to develop an export limits assessment methodology?	We do not support this as it appears to contradict what is clarified in Q2
Q5. What would you do differently in Proposal A1, if anything?	It is unclear to us why a lines company would need to have a lower than 10kW limit given the current small uptake of small-scale DG
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?	
Q8. What would you do differently in Proposal A2, if anything?	
Q9. Do you have any concerns about the Authority citing the Australian disconnection settings for inverters when high voltage is sustained?	
Q10. Do you have any concerns about the Authority requiring the latest version of the inverter performance standard for Part 1A applications?	
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?	
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?	
Q16. Do you consider the transitional arrangements workable regarding requirements and timeframes? If not, what arrangements would you prefer?	
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?	Yes
Q19. What are your views on the Authority's estimate of costs of lost benefits from a 5kW export limit?	
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?	