

19 December 2025

Hon Heather Roy  
Chair  
Security and Reliability Council (SRC)

*By email: [heatherjroy@gmail.com](mailto:heatherjroy@gmail.com)*

Dear Heather,

**Re: SRC advice from its 23 October meeting**

Thank you for your letter of 10 November 2025. The Electricity Authority Te Mana Hiko (Authority) Board considered the SRC's advice at its 18 December 2025 meeting. This response reflects that consideration.

**Apply scrutiny to generation build critical paths and continue to mature generation pipeline information**

We note the SRC's continued encouragement to improve generation pipeline information. Improvements to the pipeline, such as understanding build critical paths, are important and will take some time to develop to ensure the information is reliable.

In the meantime, we continue to collect other insights to enhance generation pipeline information. This includes information about the status of both generation and load projects. Earlier this year, we conducted a survey on barriers to investment. We intend to repeat this survey annually. Insights from the survey can be found on our [barriers to developing new electricity generation dashboard](#).

We have [recently consulted](#) on proposals to improve visibility of distributed generation (DG) and load in the pipeline. We are also collecting more information on application processes through our [network connections work](#). The Code amendments covered by the decision paper will, amongst other things, require distributors to publish a network connections pipeline for large distribution generation ( $\geq 300\text{kW}$  export) and large load ( $\geq 500\text{kVA}$ ) applications.

**Recognising the role of electrical standards**

The Authority has proposed the [latest inverter standards become mandatory for low voltage DG connections](#). This proposal, if adopted, will align New Zealand with Australia and ensure DG connections meet best practice requirements. DG installations will operate more predictably, consistently and safely, thereby reducing system risk. Additionally, the Authority has recommended distributors and the solar industry work together to update the settings in existing inverters, further reducing risk. We intend to make decisions on the proposal in March 2026.

The inverter standards above are the only technical DG standards cited in the Code, and they apply only for certain applications. The Code enables each distributor to set its own technical standards for DG. However, a recent [review](#) of these standards found these could be improved. The Authority is involved with, and supports, the current work by industry (led by the EEA) to raise the quality of these standards.

The Authority supports an extension of EECA's powers to regulate standards for product smartness. Smart products that can respond to price, congestion, power quality and other

signals, are beneficial for an efficient and reliable electricity system. Without a population of smart products, distributors will need to spend more money on maintaining and extending their distribution networks, locking in long term cost increases for consumers.

The Authority intends to start a dialogue with the sector on 'flexible export limits' in 2026. Flexible export limits would support more efficient, secure and resilient networks, but require the installation of smarter inverters. We will work with EECA on this, seeking feedback on how our agencies could support the sector to implement this approach.

### **Closely monitor the integration of EV charging and V2G opportunities**

The [Electricity Registry](#) keeps a record of distributed generation in New Zealand, which includes V2G installations. However, it doesn't capture consumer loads 'behind the meter', such as EV charging. The Authority has no current plans to review the scope of the Registry, although we may undertake this work at a future time.

As V2G is distributed generation, it must meet Code requirements to be installed. V2G can be installed under the current Code. However, adopting the latest technical inverter standards, as mentioned above, would further support V2G installations.

With regard to monitoring V2G progress via the Power Innovation Pathway (PIP), we note that the pathway does not monitor specific innovations. We only monitor innovators who have engaged with us. However, two of our enhanced regulatory support projects – the [Counties DSO trial](#) and the [Queenstown Electrification Accelerator](#) are trialling V2G. We are working closely alongside these projects and will update the [case studies on our website](#) with insights from these trials.

### **System Operator performance**

The SRC's recommendations for System Operator performance were considered by the Authority's [Market Operations Committee](#) at its 24 November meeting. Like the SRC, the Committee recognises the System Operator's high performance with day-to-day system operations. The Committee also supports the SRC's recommendation for an independent assessment of the System Operator's performance each contract period and considers an independent overseas consultant would be well suited to perform such a review.

The Committee would like to see the System Operator focus on the strategic nature of its service to meet growing demands and challenges. The Committee is also concerned to ensure that the System Operator operates impartially, particularly when making decisions that affect the grid owner, of which it forms a part.

The SRC's recommendations have been incorporated into the annual review of the System Operator's performance for 2024/25.

Thanks again for the SRC's advice. And, finally, I would like to thank you personally for your service over the period that I have been chair. It has been an absolute privilege and a pleasure working with you and I wish you and all the SRC all the best for the future. The Board highly values the important role SRC plays in contributing to the Authority's work.

Yours sincerely,



Anna Kominik  
Chair  
Electricity Authority Te Mana Hiko