

17 September 2026

s 9(2)(a)

Your request

Thank you for your request to the Electricity Authority Te Mana Hiko (Authority), received on 13 August 2026, under the Official Information Act 1982 (Act) for the following information:

I request the following information held by the Electricity Authority relating to plug-in solar (also referred to as balcony solar, portable solar, or plug-and-play photovoltaic systems), covering the period 1 January 2025 to the date of this request:

- 1. Any advice, analysis or briefing prepared by the Authority concerning plug-in solar systems, including any advice provided to the Ministry for Regulation, the Ministry of Business, Innovation and Employment, or a Minister.*
- 2. Any Authority documentation concerning the Electricity Industry Participation Code amendments identified in the Ministry for Regulation's solar sector review published on 30 July 2026, including any work programme, indicative timeline, or prioritisation of those amendments.*
- 3. Any analysis or assessment the Authority holds regarding how small-scale distributed generation exported to the grid is recorded by metering installations, including any information on the proportion of the installed metering fleet that does not separately record export, or that records export as consumption.*
- 4. Any assessment of whether plug-in solar systems would fall within the distributed generation connection requirements of Part 6 of the Code, or would require any exemption or amendment to those requirements.*
- 5. A schedule of meetings or correspondence between the Authority and external organisations specifically concerning plug-in solar, listing dates and the organisations involved.*

We subsequently worked with you to refine your request as of 23 August 2026 to the following:

- 1. Formal advice, analysis or briefing prepared by the Authority concerning plug-in solar systems, including any advice provided to the Ministry for Regulation, the Ministry of Business, Innovation and Employment, or a Minister.*

And...

- 3. Formal analysis or assessment the Authority holds regarding how small-scale distributed generation exported to the grid is recorded by metering installations, including any information on the proportion of the installed metering fleet that does not separately record export, or that records export as consumption.*

As the Authority attempted to clarify your request within 7 working days of your initial request, we advised you that the new timeframe to provide a response under the Act was 18 September 2026.

Our response

The Authority responds to your questions (as refined) in turn.

1. Formal advice, analysis or briefing prepared by the Authority concerning plug-in solar systems

The Authority has not prepared any formal advice, analysis or briefing concerning plug-in solar systems, nor provided any such advice, analysis or briefing to the Ministry for Regulation, the Ministry of Business, Innovation and Employment, nor a Minister. This part of your request is therefore refused under section 18(g) of the Act (information requested is not held).

2. Any Authority documentation concerning the Electricity Industry Participation Code (Code) amendments identified in the Ministry for Regulation's solar sector review published on 30 July 2026, including any work programme, indicative timeline, or prioritisation of those amendments

Some of the Code amendments referred to in the Ministry for Regulation's solar sector review have already been implemented through decisions made as part of the Network Connections Stage 1 and Stage 2A projects. Information on these decisions is publicly available on the Authority's website: [Network connections project \(stage one\) technical consultation | Our consultations | Our projects | Electricity Authority](#) and [Maximising benefits from local electricity generation | Our consultations | Our projects | Electricity Authority](#). The Network Services Technical group also has had a high level discussion relating to the review, which is included within its minutes, these are publicly available here [Network Services Technical Group | Electricity Authority](#).

The consultation on small-scale distributed generation application processes (Stage 2C of the Network Connections programme) is currently in development and we hope to release this publicly in the near future. As such, this part of your request is refused under section 18 (d) of the Act as it will soon be publicly available.

3. Formal analysis or assessment the Authority holds regarding how small-scale distributed generation exported to the grid is recorded by metering installations, including any information on the proportion of the installed metering fleet that does not separately record export, or that records export as consumption

The Authority gazetted a Code change to clarify metering requirements in 2020, with consideration of small-scale distributed generation metering located on page 29 of the Operational Review of Metering and Related Registry Processes consultation paper and page 17 of the decision paper located here: [Metering and related registry processes | Electricity Authority](#).

The New Zealand electricity market is designed so that all electricity flows are fully reconciled and settled on a gross basis.

The issue of net metering for either all connections or multi-phase connections is occasionally raised with the Authority. The point being made is gross metering is disadvantaging exporters because they are exporting at a lower rate than they are paying for consumption. By net metering, we understand this means netting off generation from consumption over time and only paying for the difference. For multi-phase net metering, in addition to netting off over time, this can also mean netting off instantaneously if exporting on one phase and consuming on the other phase(s).

Net metering does not reflect actual costs and value of electricity generation, and it can create inequities. The problem with net metering is that it obscures the electricity that is consumed (from the grid generator) and the full range of other services used by a consumer and makes it difficult to charge the appropriate costs for these services. Some services (such as reserves that support the power system's reliability) are built into the wholesale cost of electricity, and others (such as the cost of maintaining a grid connection) are partially charged for based on the amount of electricity consumed.

Some other jurisdictions have implemented net metering policies to incentivise the uptake of solar. However, many are unwinding their net metering policies due to the unintended consequences, such as not incentivising self-consumption.

Regarding the proportion of metering of the installed metering fleet that does not separately record export, or records export as consumption, the Authority does not hold this information. The Authority holds information on the total number of meters and the total number of installation control points (ICPs) with distributed generation. However, the Authority holds no record of the number of meters that are programmed to separately record export but are not enabled to do so because there is no generation installed. There are no meters that record export as consumption as that would be a defective metering installation and in breach of the Code.

4. Any assessment of whether plug-in solar systems would fall within the distributed generation connection requirements of Part 6 of the Code, or would require any exemption or amendment to those requirements

The Authority released a consultation paper on 8 September 2026 and is seeking views on how the Code should apply to plug-in generation if other regulators make changes enabling it. The closing date for submissions is 5.00pm 6 October 2026.

While plug-in generation is not currently permitted in New Zealand, the Government is reviewing that position, and the Authority wants to ensure its regulatory framework can support efficient uptake if the technology becomes available. The Authority is seeking feedback on matters such as network impacts, consumer information requirements, export arrangements, and whether additional measures such as device registration may be appropriate. The paper is available here: [Exploring plug-in generation and Code improvements for export limits and connection processes | Our consultations | Our projects | Electricity Authority](#)

5. A schedule of meetings or correspondence between the Authority and external organisations specifically concerning plug-in solar, listing dates and the organisations involved

The schedule requested is attached as Appendix 1. We used the terms 'Plug-in Solar' 'Balcony Solar' 'inverter-based energy systems' 'solar distributed generation', and 'AS/NSZ4777' 'AS/NZS3000' when scoping and reviewing meetings and correspondence that would fall in scope of your request.

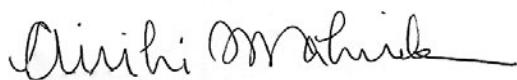
Release of information related to your request

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

As this information may be of interest to other members of the public, the Authority may proactively release a copy of this response on our website. All personal data, including your name and contact details, will be removed before publication.

If you'd like to discuss this response with us, please feel free to contact us by emailing oia@ea.govt.nz.

Nāku noa, nā,



Airihī Mahuika

GM Legal, Monitoring and Compliance

Appendix 1 - Schedule of Meetings and Correspondence

Date	Correspondence/ Event	Parties
26 May 25	Email Correspondence	EA; Rewiring Aotearoa
8 Aug 25	Email Correspondence	EA; MBIE
8 Aug 25 - 7 July 26	Email Correspondence	EA; MyMiniSolar
18 Aug – 13 Sept 25	Email Correspondence	EA; MyMiniSolar; Ara Ake
10 Sept 25	EEA Conference	-
18 & 22 Sept 25	Email Correspondence	EA; EECA; MBIE
3 Dec 25	Meeting with SEANZ	EA; SEANZ
15 Dec 25	Email Correspondence	EA; SEANZ
16 Mar – 4 June 26	Email Correspondence	EA; Tū Ma Rā; MfR
25 Mar 26	Meeting with Tū Ma Rā	EA; Tū Ma Rā
25 Mar 26	Email Correspondence	EA; EECA
7 Apr 26	Email Correspondence	EA; Ara Ake
7-8 Apr 26	Email Correspondence	EA; MBIE; Tū Ma Rā Energy
7-8 Apr 26	Email Correspondence	EA; EECA; Tū Ma Rā Energy
16 Apr 26	Email Correspondence	EA; MBIE
5 May 26	Email Correspondence	EA; WorkSafe
17-19 May 26	Electrify Queenstown Conference	-
23 May 26	Email Correspondence	EA; Rewiring Aotearoa
28 May 26	Email Correspondence	EA; EECA
30 June 26	Email Correspondence	EEA
22 June 26	Email Correspondence	EA; EECA; MBIE; WorkSafe
17 July 26	Email Correspondence	EA; EECA; MBIE; WorkSafe
21 July 26	Email Correspondence	EA; University of Canterbury
22 July 26	Email Correspondence	EA; EECA; MBIE; WorkSafe
29 July 26	Email Correspondence	EA; EECA; MBIE; WorkSafe
21 July - 13 Aug 26	Teams Messages – Inter-agency Group	EA; EECA; MBIE; WorkSafe

KEY:

EA – Electricity Authority Te Mana Hiko

EECA - Energy Efficiency & Conservation Authority

MBIE - Ministry of Business, Innovation and Employment Hikina Whakatutuki

SEANZ - Sustainable Energy Association of New Zealand

MfR – Ministry for Regulation