

Submission form (Plug-in generation)

Please email your submission to: connection.feedback@ea.govt.nz by 5pm, Tuesday 6 October 2026

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Responses to selected questions on issues regarding plug-in generation

Questions	Bluecurrent's comments
Q1. Do you have any views on our characterisation of plug-in generation?	Bluecurrent broadly agrees with the characterisation of plug-in generation in the Electricity Authority's (the Authority) combined issues and consultation paper. To further inform this workstream, future consultations by the Authority could provide practical lessons and insights into how the regulatory framework applies to plug-in generation in comparable overseas jurisdictions where it is permitted. We suggest that any further proposals on how the <i>Electricity Industry Participation Code</i> (the Code) should apply to plug-in generation, if permitted in New Zealand, be subject to stakeholder consultation.
Q3. What do you think of the Authority excluding plug-in generation standards from the Code?	We agree with the Authority's preferred option of excluding plug-in generation standards from the Code and instead set (technical) standards in the <i>Electricity Safety Regulations 2010</i>. We agree that the above approach is more appropriate as most plug-in generation owners are not expected to engage with the Code, unless they want to be paid for export. Plug-in generation owners who want to be paid for export will need to update their point of connection with their network to be 'export capable', and presumably with their retailer (where that is technically possible).

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Q6. If a form of Part 6-type application process should be implemented for plug-in generation, do you see that as a notification/registration, or an application that requires distributor approval? Why?	Should a Part 6-type application process be implemented for plug-in generation, whichever participant becomes aware of an application could play a role in advising the relevant retailer who then needs to ensure the appropriate metering is in place.
Q8. Would participants benefit from a registry that captures information about plug-in generation? Why, why not? Q9. Should the existing registry be used? Why, why not?	The value of a registry that captures information about plug-in generation may be highest at the earliest stages of market development. Its value, however, could diminish as more data becomes available to the market, i.e. as the network becomes smarter. The cost of developing a new/separate registry solely for this purpose should be assessed against benefits that could diminish over time. By design, plug-in systems are somewhat mobile. This will require customers to advise their retailer/network when they move their plug-in systems from one location to another, including moving across network jurisdictional boundaries. This will subsequently compel the retailer to advise the metering equipment provider (MEP) of such move. These processes will impose new costs on these parties.
Q12. Should the MEPs reverse power indicator be leveraged in identifying potential plug-in generation export? Why, why not? Q13. Do you agree there is merit in considering whether retailers should be the primary customer interface for plug-in generation registration/notification? Why, why not? Q14. Do you have any other suggestions on how consumers could be informed of Code requirements for plug-in generation? Q16. What measures could be implemented to inform consumers of electricity export at their ICP that is potentially associated with plug-in generation, and what information should this include? Q17. Should consumers be proactively informed of the potential for plug-in generation to export to a	Under the current framework, distributors are responsible for maintaining distributed generation (DG) information within the registry and notifying affected participants, including retailers and MEPs. While reverse power indicators (which MEPs capture) may assist in identifying potential export activity, they do not provide sufficient information to determine the type of generation arrangement or whether the appropriate network approval, registry, and DG processes have been completed. There are also a lot of false negatives with reverse power indicators due to poor power factors at the site or the presence of certain types of equipment. As such, identifying plug-in generation export is more appropriately undertaken by retailers and distributors, who are responsible for customer engagement and DG administration. Should an obligation to monitor and report all reverse power events for both permanent and temporary DG arrangements be introduced, we do not believe MEPs should be responsible for filtering alerts based on generation type. In our view, retailers (rather than MEPs) are best placed to perform this function. Unlike retailers, MEPs do not have direct/face-to-face commercial relationships with mass market

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network. If so, which party is best placed to undertake this education role?	customers, including DG owners. Similarly, identification of DG by an MEP should not be treated as a determination of the type of generation arrangement. Responsibility should remain with the retailer to engage with the (mass market) DG owner, understand the customer's relevant circumstances, distinguish between permanent DG and temporary or small-scale plug-in generation, and manage any associated registry processes. For the above reasons, we tend to agree there is merit in considering whether retailers should be the primary customer interface for any plug-in generation registration and notification. Should plug-in generation be permitted in New Zealand, the Authority and/or industry bodies could launch an educational programme to inform consumers of the potential for plug-in generation to export to a network. In addition to WorkSafe, the Authority may wish to engage with the Electrical Workers Registration Board (EWRB) for information dissemination. The EWRB could also help support consistent industry understanding and contribute to positive consumer outcomes. The Authority and/or EECA could also develop guidance for transitioning an existing ICP from a non-DG status to a DG-capable status when generation is identified retrospectively. The guidance could clearly set out the responsibilities of retailers, distributors, and MEPs under the Part 6 DG application framework. This is particularly important where Part 6 requirements may be optional or unclear, e.g. for smaller or temporary plug-in generation.
Q21. Are there other genuine issues identified by the reverse power indicator? Q22. Should the requirement on the MEP to notify the retailer via a reverse power indicator be reconsidered, if more plug-in generation is used? Why, why not? Q23. Is there a way for an MEP to filter out plug-in generation related reverse power indicators?	We suggest that the relevant agency/body and/or industry participants consider whether existing reverse power alarm thresholds remain fit-for-purpose for plug-in generation. This is particularly the case where low-level, intermittent, or single-phase exports may increase false positives, unnecessary notifications, and operational impacts for market participants. As indicated in our response to Q12 – Q17, while reverse power indicators (which MEPs capture) may assist in identifying potential export activity, they do not provide sufficient information to determine the type of generation arrangement. They also do not provide information whether the appropriate network

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	approval, registry, and DG processes have been completed. These determinations are more appropriately undertaken by retailers and distributors, who are responsible for customer engagement and DG administration. Under the current framework, distributors are responsible for maintaining DG information within the registry and notifying affected participants, including retailers and MEPs. Should the monitoring and reporting of reverse power events be introduced, covering both permanent and temporary generation arrangements, we do not believe MEPs should be responsible for filtering alerts based on generation type. Unlike retailers, MEPs do not have direct commercial/face-to-face relationships with mass market customers, including potential plug-in generation owners. Similarly, identification of DG by an MEP should not be treated as a determination of the type of generation arrangement. Responsibility should remain with the retailer to engage with the customer, understand the relevant circumstances, distinguish between permanent DG and temporary or small-scale plug-in generation, and manage any associated registry processes.
Q24. Should Part 10 include an exclusion for requiring import/export metering for plug-in generation? Why, why not?	We do not see the need for Part 10 of the Code to “include an exclusion for requiring import/export metering for plug-in generation”. Bluecurrent's smart meters are solar-capable. They are built to independently measure export and import flows when reconfigured to do so (which would require us to be notified, and a service order processed), and the retailer has advised which tariff configuration is required for the ICP. We note that Bluecurrent cannot choose to alter customer tariff configuration independently from retailers and network instructions (via the registry or any other method). Our smart meters are actively used as a foundational tool for integrating home solar systems, batteries, and electric vehicles across New Zealand and Australia. In relation to paragraph 4.96 of the combined issues and consultation paper, where a site has import/export-capable metering that is correctly configured to record import and export flows, the MEP should continue to record and provide the relevant metering data unless limited by technology or current capability. Once identified, import and export

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	channels should remain enabled, with data captured and supplied as required, rather than being switched on or off based on retailer or customer preference. This would help avoid unnecessary reconfiguration activity. There should also be consideration of any increase in tariff reconfiguration activity on existing import/export-capable installations, and a nominal charge should apply even when no physical metering upgrade/replacement is required.
Q25. Should Part 6 clarify requirements for a plug-in generation system being connected alongside approved permanently-fixed DG? Q26. Should the Code clarify limits on the amount of plug-in generation capacity that can be connected at an ICP (noting any standards developed may define limits)?	The Authority and/or EECA could develop guidance clarifying the requirements for a plug-in generation system being connected alongside approved permanently-fixed DG. The guidance could clearly set out the responsibilities of DG owners, retailers, distributors, and MEPs under Part 6 of the Code. This is particularly important where Part 6 requirements may be optional or unclear, e.g. for smaller or temporary plug-in generation. Distributors are best placed to comment on limits on the amount of plug-in generation capacity that can be connected at an ICP. This information should be made available to market participants.
Q28. Do you agree with our overall characterisation of the challenges of plug-in generation? Why, why not? Q29. Which of the challenges outlined in this paper present the most pressing issue for the Authority to address?	We broadly agree with the overall characterisation of the challenges of plug-in generation, as set out in the combined issues and consultation paper. We support a coordinated, multi-agency approach to developing regulatory frameworks and pathways for the potential introduction of plug-in generation. This would help identify regulatory gaps and overlaps, avoiding unnecessary administrative and compliance costs. Importantly, this would ensure the benefits of plug-in generation are unlocked for its owners and the electricity system cost-effectively, benefiting all electricity consumers and producers. In our view, a key challenge would be developing appropriate processes in identifying, measuring and using the data required for a more dynamic network. While the MEP may, in the normal course of business, identify indicators suggesting the presence of DG at an ICP, neither the MEP (nor its agents) are reasonably positioned, nor should they be expected, to assess or verify whether the installation has been approved, safely installed, certified, or complies with applicable DG standards, network requirements, or regulatory obligations. Any such assessment should remain the responsibility of the parties responsible for

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	the design, installation, approval, inspection, operation, and ongoing compliance of the DG system. We are happy to discuss with the Authority any aspects of our submission and other metering-related issues that may arise as this workstream progresses.