

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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Questions on issues regarding plug-in generation

Questions	Comments
Q1. Do you have any views on our characterisation of plug-in generation?	We generally agree with the characterisation, provided it is clear that plug-in generation is portable/non-permanently fixed embedded generation purchased for use in New Zealand. The key distinction is that it may export energy without a traditional installation process, so requirements should focus on safe product approval, customer notification, metering capability, and operational visibility rather than treating reverse-energy detection as a safety control.
Q2. What network performance requirements should apply to plug-in inverters in New Zealand, and why?	Plug-in inverters should comply with applicable New Zealand safety and electrical requirements before supply, including confirmation from WorkSafe New Zealand and the relevant Electricity Regulations process. Reverse-energy events should be treated as operational notifications only and should not be relied on as safety devices. Any technical standard should also ensure that export energy can be detected and measured without netting import and export energy.
Q3. What do you think of the Authority excluding plug-in generation standards from the Code?	We support avoiding duplicate or conflicting Code obligations where product safety and inverter technical standards are better dealt with through the relevant safety and standards framework. However, the Code should still clearly address operational matters that affect market processes, including retailer notification, MEP metering requirements, registry updates, reverse-energy event handling, and distributor access to relevant distributed generation reads.
Q4. Do you agree that in the absence of a professional intermediary, it will be challenging to obtain a Part 6-type application from a plug-in generation consumer? Why, why not?	Yes. Without a professional intermediary, it is unlikely that all consumers will understand or complete a Part 6-type application process before using a plug-in generation unit. A simpler notification or registration pathway is more practical, supported by clear customer notices at point of sale and a retailer-led communication process.
Q5. For a consumer to connect plug-in generation to their premises, should some form of Part 6-type application process be required? Why, why not?	A full distributor approval process should not generally be required where the unit is not permanently fixed to the installation and has been approved as safe for purchase and use in New Zealand. A notification or registration process is preferable so that the retailer and MEP can confirm the metering installation can correctly detect and record export energy.
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?	We consider this should operate as notification/registration rather than distributor approval. The practical control point should be retailer notification to the MEP, followed by confirmation of whether the meter has an EG register available. If the register is available the registry EG status can be updated; if not, the meter

	should be reprogrammed or replaced before export energy is recorded and reflected in registry status.
Q7. What information should be required if a registration or application for a plug-in generation unit is to be implemented?	Minimum information should include the ICP, customer/retailer details, notification date, confirmation that the unit is plug-in and not permanently fixed, make/model or device identifier where available, rated capacity, evidence that the unit is approved for use in New Zealand, and whether export may occur. The retailer-to-MEP notification should also include the required metering outcome, timeframes, and any data fields needed to support registry updates.
Q8. Would participants benefit from a registry that captures information about plug-in generation? Why, why not?	Yes. Participants would benefit from registry visibility where EG capability is available at the metering installation. The registry should show when export can be appropriately measured, but it should not rely on distributor EG requirements as the primary control mechanism because those requirements can be transient and operationally difficult to manage consistently.
Q9. Should the existing registry be used? Why, why not?	Yes, the existing registry should be used for EG status where the metering installation has confirmed EG capability. Where an EG register is available, the EG status should change from N to Y. Where EG capability is not available, the meter should be reprogrammed or replaced before the registry is updated.
Q10. Should entering information about plug-in generation be a requirement only after export has been identified at an ICP? Why, why not?	No. Waiting until export is identified risks delayed metering correction and poor visibility. Information should be captured when the customer notifies the retailer of purchase, and reverse-energy events should provide a secondary operational trigger. This supports earlier retailer-to-MEP action and reduces the risk of unmeasured or incorrectly netted export.
Q11. Would the type of information able to be collected at point of sale be sufficient to meet industry needs? Why, why not?	Point-of-sale information would be useful but may not be sufficient on its own. It can provide device and customer notification information, but industry needs also include ICP-level confirmation, metering capability, EG register availability, retailer-to-MEP workflow data, and registry status. A point-of-sale notice should therefore be supported by retailer and MEP processes.
Q12. Should the MEPs reverse power indicator be leveraged in identifying potential plug-in generation export? Why, why not?	Yes. Reverse-power indicators should be leveraged as an operational trigger to identify potential export and prompt retailer/MEP action. However, they should not be treated as safety devices or as proof of compliant operation. For communicating AMI meters, reverse-energy events should be sent to the retailer. For non-communicating AMI meters, LCD indications and manual-read observations may assist where available.
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?	Yes. Retailers are well placed to be the primary customer interface because the proposed workflow relies on the customer notifying the retailer when a unit is purchased, and the retailer then notifying the MEP of the metering requirements. This provides a practical route for confirming EG register availability, arranging reprogramming or replacement if needed, and supporting registry updates.
Q14. Do you have any other suggestions on how consumers could be informed of Code requirements for plug-in generation?	Consumers should be informed through a mandatory notice included in the plug-in generation pack, supported by retailer website information and post-notification communications. The notice should explain that the customer must notify their retailer when the unit is purchased, that export may occur, and that the metering installation may need to be checked or changed so export is recorded correctly.
Q15. Should an ability for plug-in generation consumers to receive payment for export be predicated by some form of Part 6 application and approval process? Why, why not?	Payment for export should be predicated on export being measured appropriately rather than on a full Part 6 approval process for every plug-in unit. Before payment is enabled, the customer's metering should have an EG register or equivalent import/export measurement capability, the meter should not net

	import and export, and the registry status should reflect the confirmed metering capability.
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?	Consumers could be informed through retailer notifications triggered by either customer disclosure or reverse-energy events. The information should explain that export has been detected or may occur, that the customer should confirm any plug-in generation use, and that the meter may need an EG register, reprogramming, or replacement to ensure export is recorded correctly.
Q17. Should consumers be proactively informed of the potential for plug-in generation to export to a network. If so, which party is best placed to undertake this education role?	Yes. Consumers should be proactively informed because they may not realise that a plug-in unit can export to the network or affect metering and reconciliation. Retailers are best placed to provide customer-specific information, while suppliers should provide point-of-sale and in-pack notices confirming the need to notify the retailer.
Q18. What issues do you see with more UFE in the reconciliation system as a result of more export from plug-in generation?	If plug-in generation export is not measured correctly, UFE may increase and reconciliation accuracy may reduce. The effect may be small initially, but growth in plug-in generation could make unmeasured export material. Legacy NHH meters are a particular concern because exported generation may be deducted from consumption, added to a consumption register, or ignored entirely depending on meter behaviour.
Q19. Do you agree with our view that plug-in generation export with no measurement enabled can be treated as UFE in reconciliation processes, with no need for formal gifting documentation? Would your view change as plug-in generation increases?	We agree this may be a pragmatic interim treatment where export is not measured, but it should not become the long-term approach if plug-in generation uptake increases. Where export is detected or notified, the preferred response should be to enable appropriate import/export metering and registry updates rather than relying on UFE treatment.
Q20. If gifting documentation were to be required by a plug-in generation consumer, how could this be facilitated?	
Q21. Are there other genuine issues identified by the reverse power indicator?	Yes. A reverse-power indicator may identify metering configuration issues, unnotified embedded generation, or situations where the metering installation is not recording export appropriately. It is therefore useful as an operational signal, provided it is followed by retailer and MEP investigation rather than being treated as a safety control.
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?	The requirement should be retained and clarified rather than removed. If plug-in generation uptake increases, reverse-power notifications will become more important as a way to trigger retailer action and MEP review. The process should distinguish between operational notification, metering remediation, and safety obligations.
Q23. Is there a way for a MEP to filter out plug-in generation related reverse power indicators?	The meter can detect reverse energy, but it cannot determine whether it comes from plug-in generation or permanently connected generation.
Q24. Should Part 10 include an exclusion for requiring import/export metering for plug-in generation? Why, why not?	No. Part 10 should not include a broad exclusion from import/export metering for plug-in generation. Where export occurs, AMI meters should not net import and export energy, and export should be recorded through an EG register or equivalent capability. If the meter lacks this capability, it should be reprogrammed or replaced. Mandating smart meters should also be considered to remove the possibility of net metering from NHH meters.
Q25. Should Part 6 clarify requirements for a plug-in generation system being connected alongside approved permanently-fixed DG?	No. The relevant retailer, distributor, and MEP requirements have already been satisfied.
Q26. Should the Code clarify limits on the amount of plug-in generation capacity that	Yes. The Code or supporting standards should clarify capacity limits or the conditions under which plug-in generation may be

can be connected at an ICP (noting any standards developed may define limits)?	connected at an ICP. Any limit should align with safety approval, inverter performance requirements.
Q27. What sources of information could the Authority use to monitor uptake of plug-in generation and/or any issues that may arise?	Useful monitoring sources could include customer notifications to retailers, retailer-to-MEP notifications, and distributed generation meter reads where EG metering has been activated but no corresponding distributor DG details are recorded on the registry.
Q28. Do you agree with our overall characterisation of the challenges of plug-in generation? Why, why not?	We agree with the overall characterisation. The main challenges are not limited to connection approval; they include safe product supply, consumer awareness, retailer and MEP workflow, metering capability, registry accuracy, reverse-energy event handling, distributor visibility, and the treatment of legacy meters where export may not be measured accurately.
Q29. Which of the challenges outlined in this paper present the most pressing issue for the Authority to address?	The most pressing issues are ensuring plug-in units are approved as safe for New Zealand use, requiring consumers to notify retailers, ensuring meters do not net import and export energy, and creating a clear retailer-to-MEP process for EG register checks, meter reprogramming or replacement, registry updates, and delivery of distributed generation reads to distributors.