

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?	SEANZ broadly agrees, but the characterisation should be more ambitious. Plug-in generation is not simply a niche form of DG; it is a potentially important democratisation of solar. It can give renters, apartment residents and households unable to justify a conventional rooftop system access to self-generation. The regulatory objective should therefore be to enable safe, simple and low-cost uptake, not to replicate the compliance architecture designed for permanently wired systems. The Authority itself identifies lower bills and wider system benefits from additional low-cost local generation. Those benefits should be given substantial weight.
Q2. What network performance requirements should apply to plug-in inverters in New Zealand, and why?	Network performance requirements should be proportionate to the very small capacity and risk of these devices. SEANZ supports requirements for anti-islanding, appropriate voltage/frequency disconnection, power quality and safe cessation of export, but they should be specified through a fit-for-purpose plug-in product/performance standard rather than importing every requirement applying to permanently fixed DG. A nationally consistent maximum capacity and inverter settings should apply. EDB-specific technical requirements should be avoided
Q3. What do you think of the Authority excluding plug-in generation standards from the Code?	SEANZ supports keeping detailed plug-in product and safety standards outside the Code, provided the Code clearly requires compliance with the nationally recognised standard. The Code should regulate the network relationship; product and electrical safety standards should sit in the regulatory instruments best equipped to maintain them. This also avoids repeatedly amending the Code as technology develops. What is essential is one national standard and no scope for 28 different distributor interpretations.
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. Expecting a consumer buying a small plug-in product to understand and complete a conventional Part 6 application is unrealistic and would undermine the central benefit of the technology: simplicity. Compliance regimes that ordinary consumers are unlikely to understand or follow are poor regulation. The process should be designed around how consumers will actually purchase and use these products.
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?	Not a conventional application. SEANZ supports a simple notification/registration requirement for compliant plug-in generation above any de minimis threshold, but not case-by-case distributor approval. If a device complies with the national product/performance standard and capacity limit, connection

	should be permitted as of right. Requiring approval would add cost and friction disproportionate to the network risk.
Q6. If a form of Part 6-type application process should be implemented for plug-in generation, do you see that is a notification/registration, or an application that requires distributor approval? Why?	Notification/registration, not distributor approval. Registration should be digital, free, take only a few minutes and ideally be capable of being completed at point of sale or through a retailer interface. A compliant device within the national capacity limit should not be subject to distributor discretion. Approval should only be relevant to installations outside the standard plug-in envelope.
Q7. What information should be required if a registration or application for a plug-in generation unit is to be implemented?	Only information genuinely needed for network visibility and consumer protection should be collected: ICP/address, device make/model, rated AC output, inverter identifier/certification, date connected, whether a battery is incorporated, and consumer contact details where necessary. The process should not demand technical information an ordinary consumer cannot reasonably obtain. Product data should preferably populate automatically from a product database or QR code.
Q8. Would participants benefit from a registry that captures information about plug-in generation? Why, why not?	Yes, provided it is simple and useful. Visibility of aggregate plug-in generation will assist networks, retailers, the Authority and flexibility providers as uptake grows. But registration must not become a barrier to entry. The purpose should be visibility and system planning, not permission-seeking for small compliant devices.
Q9. Should the existing registry be used? Why, why not?	Yes. Creating a parallel national registry would add duplication and cost. The existing Electricity Registry should be adapted with a simple plug-in generation field/data set, while the customer-facing registration interface should be much simpler than the underlying industry system.
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 detected is reactive, incomplete and potentially confusing. Registration should occur when a compliant device is connected, ideally through point-of-sale or retailer-assisted notification. Reverse-power detection should be a backstop to identify unregistered systems, not the primary registration mechanism.
Q11. Would the type of information able to be collected at point of sale be sufficient to meet industry needs? Why, why not?	Potentially, if product information can be linked to the ICP when the device is actually connected. Point-of-sale information alone will not identify where a portable device is ultimately used, and devices may later move. A very light customer confirmation of ICP/address is therefore still required. Product specifications should be pre-populated rather than re-entered by consumers.
Q12. Should the MEPs reverse power indicator be leveraged in identifying potential plug-in generation export? Why, why not?	Yes, but only as a backstop. A reverse-power indicator can identify possible unregistered generation, but it is not specific to plug-in generation and should not automatically trigger enforcement or costly processes. It should prompt a simple customer contact and an opportunity to register or correct the record.
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 have the established customer relationship and are generally better placed than EDBs to provide a simple customer interface. However, the preferred solution is a nationally standardised digital process that retailers can integrate into, rather than 30-plus different retailer processes or 28 EDB processes. Information should flow automatically to the Registry and relevant distributor.
Q14. Do you have any other suggestions on how consumers could be informed of Code requirements for plug-in generation?	Use point-of-sale information, QR-code registration, retailer websites/apps, a single national information page, clear packaging labels and simple guidance supplied with every compliant product. The message should be concise: capacity limit, safe-use requirements, registration requirement, potential to export, and how to receive payment if desired. Consumers should not need to interpret Part 6 themselves.

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?	SEANZ supports notification/registration before a consumer receives payment for export, but not a discretionary Part 6 approval process for a compliant plug-in device. Payment is a useful incentive to register. Requiring full distributor approval would impose disproportionate transaction costs on very small export volumes and could discourage legitimate uptake.
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?	Retailers should notify customers when export is detected and explain: that their meter has recorded reverse flow; that plug-in generation may be the cause; how to register the device; whether their meter can measure export; available export payment options; and any relevant safety/compliance obligations. The communication should be informative rather than threatening.
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 told clearly at point of sale that even a system intended for self-consumption may export. Retailers and suppliers should share the education role, supported by a single Authority/EECA national information resource. The obligation should not fall solely on EDBs, with whom most consumers have no direct relationship.
Q18. What issues do you see with more UFE in the reconciliation system as a result of more export from plug-in generation?	At low levels of uptake, the additional UFE is likely to be very small and should not be used to justify costly metering or administrative requirements. The Authority should monitor aggregate volumes and revisit the treatment only if evidence shows material reconciliation impacts. Regulation should be proportionate to demonstrated harm, not hypothetical scale.
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?	Yes. For small unmeasured export volumes, treating the electricity as UFE without formal gifting documentation is pragmatic and proportionate. Requiring paperwork for incidental export worth only a small amount would be an obvious case of compliance cost exceeding benefit. If plug-in generation becomes material, the Authority can review thresholds and reconciliation treatment using actual evidence.
Q20. If gifting documentation were to be required by a plug-in generation consumer, how could this be facilitated?	If documentation is ultimately required, it should be incorporated into the same one-step digital registration process and require no separate form. A simple consumer acknowledgement should be sufficient. SEANZ does not support creating a second administrative pathway for incidental export.
Q21. Are there other genuine issues identified by the reverse power indicator?	Yes. Reverse power can also indicate metering configuration issues, wiring/installation faults or other generation not recorded in industry systems. That is why the indicator should remain a diagnostic flag rather than being treated as proof of unauthorised plug-in generation.
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 notification should be retained but modernised. As plug-in generation grows, raw reverse-power alerts could become noisy. MEPs and retailers should be able to distinguish registered generation and suppress repetitive alerts while preserving notifications that may indicate genuine metering or installation problems.
Q23. Is there a way for a MEP to filter out plug-in generation related reverse power indicators?	Potentially, by matching reverse-power events against Registry information, known export-enabled ICPs, event duration/magnitude and meter configuration. The Authority should work with MEPs on a standard filtering approach. It should avoid requiring each MEP to invent a different methodology.
Q24. Should Part 10 include an exclusion for requiring import/export metering for plug-in generation? Why, why not?	Yes, for compliant plug-in generation below the nationally specified capacity threshold where the consumer does not seek payment for export. Mandatory import/export metering would often cost more than the value of incidental export and would materially undermine the economics of plug-in generation. Consumers seeking payment should have appropriate metering or an approved alternative measurement method.

Q25. Should Part 6 clarify requirements for a plug-in generation system being connected alongside approved permanently-fixed DG?	Yes. The Code should make clear how plug-in capacity interacts with permanently fixed DG and the applicable aggregate capacity/export limit. The rule should be simple and nationally consistent. A consumer should not inadvertently breach an approval merely by adding a small compliant plug-in device.
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)?	Yes, a clear national capacity limit is preferable to distributor-by-distributor limits. It should align with the plug-in product/safety standard and international evidence, and be reviewed as experience develops. Any limit should relate to actual network/export risk and should not prevent innovation such as compliant export-limited devices.
Q27. What sources of information could the Authority use to monitor uptake of plug-in generation and/or any issues that may arise?	The Authority should use Registry data, retailer/MEP information, supplier/importer sales data, product registrations, reverse-power indicators, EDB power-quality data and consumer complaint/safety data. Uptake and any adverse impacts should be published periodically. Evidence should drive future tightening or relaxation of requirements.
Q28. Do you agree with our overall characterisation of the challenges of plug-in generation? Why, why not?	Broadly yes, but the paper risks allowing the administrative complexity of the existing electricity system to define the solution. Plug-in generation is valuable precisely because it can be simple, portable and low cost. The regulatory framework should start with that proposition and add only requirements justified by demonstrable safety or real network risks.
Q29. Which of the challenges outlined in this paper present the most pressing issue for the Authority to address?	The most pressing issue is establishing a clear, nationally consistent, proportionate pathway before products enter the market: one product/performance standard, one capacity rule and one simple registration process. The worst outcome would be legalisation followed by 28 different distributor requirements, complex Part 6 applications, mandatory meter upgrades and uncertainty over export. That would regulate away much of the consumer benefit before the market begins.