

Submission form (DG-related Code changes)

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

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Questions on distributed generation-related Code change proposals

Questions	Comments
Q30. Do you agree the Code should be amended so the 10kW default export limit also applies to Part 1 applications? Please explain your views.	Yes. However, I consider a 10kW default export limit should be viewed as a minimum baseline rather than becoming an implicit upper limit for future policy settings. The Authority's objective should be to maximise the efficient integration of distributed generation while only imposing restrictions where a distributor can demonstrate, through a robust and transparent network assessment, that a lower limit is necessary. The consultation paper correctly identifies that distributed generation can reduce reliance on higher-cost generation, support local supply, defer network investment and lower electricity costs for consumers. In many rural areas, particularly across Canterbury, a 10kW export threshold does not reflect the practical scale of modern distributed generation installations. Solar PV systems associated with dairy farming operations and irrigation pumping commonly exceed 10kW, with installations in the 15kW to 50kW range being entirely reasonable given available roof space on milking sheds and associated farm buildings. Similar circumstances exist for commercial and lifestyle properties where sufficient generation area is available. The fundamental technical justification for limiting exports also requires greater transparency. Electricity distribution businesses design and maintain networks to accommodate periods of maximum demand, traditionally assuming power flows from a relatively small number of transmission supply points outward through the network to consumers. Distributed generation changes this paradigm by supplying a portion of local load directly, reducing the amount of power that must be transported across upstream network assets. Accordingly, the existence of distributed generation should not automatically be viewed as a network burden. In many circumstances it reduces network utilisation and delays the need for reinforcement. Where an EDB believes exports above 10kW cannot be accommodated, it should be required to clearly identify the specific technical constraint, whether that is voltage rise, thermal loading, protection limitations, power quality concerns or an upstream congestion issue. Generic assertions of potential over-production or hosting-capacity limitations are not sufficient justification for restrictive export limits. The proposed ELAM/BELAM framework requires identification of the actual binding constraint and emphasises efficient network utilisation, proportionality and transparency. Any export restriction should therefore be evidence-based, location-specific and capable of being independently understood and scrutinised by applicants. I am concerned that some of the assumptions underpinning export-limit methodologies may be disproportionately influenced by distributor preferences rather than consumer outcomes. The Authority should ensure export limits are not treated as a mechanism for preserving traditional network operating models or incumbent generation interests. Instead, regulatory settings should actively encourage distributed generation where it can be demonstrated that network security, safety and power quality can be maintained.

	The burden of proof should sit with distributors to demonstrate why higher export levels cannot be accommodated, rather than requiring consumers to justify why they should be allowed to export above an arbitrary threshold. Where constraints exist, flexible or dynamic export arrangements may be appropriate, but static limits should only be imposed where clearly supported by transparent engineering evidence.
Q31. Do you agree the Code should be amended so that distributors cannot limit their approved inverter lists to only communicating smart inverters or use their COPS to mandate smart inverters or flexible/dynamic export limits? Please explain your views.	I support the proposed amendment. At present there is insufficient evidence that distributors require mandatory communicating smart inverters or mandatory flexible/dynamic export arrangements across all distributed generation installations. Any requirement that effectively forces consumers to install particular communications technologies should only occur where there is a clearly demonstrated network need and where the benefits outweigh the additional costs imposed on consumers. The Authority's proposal appropriately preserves consumer choice while still allowing distributors to offer flexible and dynamic export solutions where these provide genuine network benefits. It also aligns with the principle that export restrictions and technical requirements should be proportionate to the actual network constraint being addressed. The consultation paper notes that distributors are generally able to support the current 10kW default export arrangements and that widespread implementation of dynamic export capability is not yet operationally mature across the sector. Technology neutrality is particularly important. Mandating specific communication capabilities or protocols at this stage risks locking New Zealand into technology, communications standards or vendor ecosystems before the Authority has completed its wider policy work on interoperability, communications protocols and flexibility markets. Premature mandates may reduce competition, limit innovation and increase costs for consumers without delivering corresponding benefits. There is also an important fairness consideration. Consumers should not be required to invest in communications capability to support services that may not yet be available in their region or where distributors do not yet have the operational systems in place to utilise those capabilities. Where a customer elects to operate with a static export limit, a compliant non-communicating inverter should remain a valid option. I do, however, recognise the potential long-term value of smart inverters and dynamic export management. As distributed generation penetration increases, communications-enabled devices may become an important enabler of higher hosting capacity, improved network utilisation and more efficient congestion management. I therefore support the Authority's intention to undertake further consultation on smart inverter requirements, communications standards and dynamic export frameworks before any future mandate is considered. Any future requirement for communications-enabled inverters should be based on: - Demonstrated net benefits to consumers. - Nationally consistent technical standards. - Interoperability across distributors and technology providers. - Clear governance and cybersecurity requirements. - Evidence that dynamic or flexible export services deliver better outcomes than conventional static export arrangements. Until that work is completed, consumers should retain the option of a compliant non-communicating inverter and a static export limit, with distributors retaining the ability to offer flexible or dynamic export arrangements where consumers choose to participate. In summary, I support the proposed amendment because it preserves consumer choice, promotes competition and technology neutrality, avoids premature technology lock-in, and ensures future smart inverter requirements are introduced only following a transparent, evidence-based assessment of costs and benefits. As a strategic point, I also challenge the implicit assumption held by some EDBs that dynamic export capability should become mandatory before they have demonstrated that their network is genuinely

	constrained. A customer-funded technology mandate should follow proven network need, not precede it.
Q32. Do you agree the Code should be amended to allow distributors to 'build in' an extra 10% DG penetration when doing a network study, that may lead to parts of networks qualifying for export limits below 10kW? Please explain your views.	I do not support the proposed amendment in its current form. While I acknowledge the Authority's objective of reducing the administrative burden associated with frequent network reassessments, the proposed 10% buffer risks introducing an artificial constraint on distributed generation that is not based on actual network conditions. The fundamental purpose of a network assessment should be to determine whether a technical constraint currently exists or can reasonably be demonstrated to exist. Export limits should be based on observable network capability, documented assumptions and identifiable engineering constraints such as voltage rise, thermal loading, protection limitations or upstream congestion. The proposed amendment instead permits export limits to be influenced by hypothetical future generation that may never eventuate. This shifts the assessment from one based on actual network capability to one based on speculative future scenarios. As a result, today's applicants may face reduced export limits to preserve capacity for future applicants who are not yet connected, have not submitted applications, and may never proceed. I am concerned this approach is inconsistent with the principles of efficient network utilisation and transparency contained within the proposed ELAM/BELAM framework. The framework states that export should not be unnecessarily restricted where technically feasible and that the basis for outcomes should be traceable and explainable. A blanket 10% allowance introduces a level of conservatism that may not reflect actual network conditions and may be difficult for applicants to independently verify. The proposal also risks undermining investment signals for distributed generation. Consumers and businesses investing in solar generation are doing so based on currently available network capacity. Reducing export opportunities today in anticipation of future growth reduces the economic case for investment and may discourage uptake of distributed generation despite the Authority recognising the system-wide benefits that local generation can provide. If distributors can demonstrate that a feeder is approaching a genuine hosting-capacity limit, then a reassessment should be undertaken and export limits adjusted based on actual network conditions. Modern AMI data, hosting-capacity analysis, flexible export arrangements and periodic feeder studies provide more robust mechanisms for managing network utilisation than applying a generic percentage allowance across all networks and circumstances. I am also concerned that a nationally applied 10% allowance appears arbitrary. The Authority has not provided evidence demonstrating why 10% is the appropriate value, nor why it accurately reflects expected uptake across different networks. Future distributed generation growth is likely to vary significantly between urban, rural and commercial areas. A single percentage applied nationally risks being both overly conservative in some areas and insufficient in others. If the Authority considers an interim mechanism necessary, any allowance should be: - justified by evidence; - transparently disclosed to applicants; - periodically reviewed; - applied only where reassessment frequency would otherwise create a demonstrable administrative burden; and - supported by publication of the underlying hosting-capacity methodology and assumptions. Ultimately, I consider export limits should continue to be based on actual network capability rather than hypothetical future demand for capacity. The burden of proof should remain with distributors to demonstrate why lower export limits are necessary, rather than allowing future uncertainty to reduce the export opportunities available to current applicants. In summary, I do not support the proposed 10% buffer because it risks unnecessarily constraining distributed generation, introduces an

	arbitrary and potentially non-transparent assumption into the assessment process, and weakens the link between export limits and actual network capability. The proposed amendment effectively asks today's distributed generation investors to bear the cost of preserving capacity for tomorrow's customers. I do not consider this an efficient or equitable basis for allocating network capacity.
Q33. Do you agree that a 10% allowance (as an interim measure) reduces the need for frequent network assessment. If not, what alternative level of allowance or approach should the Authority consider and why?	While a 10% allowance will likely reduce the frequency of network reassessments, administrative convenience alone does not justify reducing export opportunities for current distributed generation applicants. The proposed allowance effectively reserves network capacity for future distributed generation that may never eventuate. In doing so, it risks reducing the export capacity available to current consumers and businesses based on hypothetical future connections rather than actual network constraints. I am concerned this approach may unnecessarily restrict distributed generation investment and reduce the very benefits the Authority is seeking to promote, including lower electricity costs, deferred network investment and increased local generation. The issue being addressed is fundamentally an administrative one rather than an engineering one. Where an export limit is imposed, it should be based on an identified network constraint supported by transparent engineering evidence rather than a generic allowance applied across all networks. I do not consider there is sufficient evidence supporting a nationally consistent 10% figure. Future distributed generation uptake will vary significantly between urban, rural, commercial and agricultural networks. A fixed national percentage is therefore unlikely to accurately reflect future connections and may lead to either overly conservative or insufficient outcomes depending on location. Rather than applying a uniform 10% allowance, I recommend the Authority consider: - Periodic feeder-level hosting capacity assessments using actual connection growth data. - Greater use of AMI and time-series network data to identify genuine emerging constraints. - Publication of hosting capacity information to improve transparency for prospective applicants. - Targeted reassessment triggers based on actual growth in distributed generation penetration rather than arbitrary percentages. - Development of flexible and dynamic export frameworks that make more efficient use of existing network capacity where genuine constraints emerge. If the Authority considers some interim allowance is necessary, it should be evidence-based, transparent, reviewed regularly, and justified by network-specific conditions. Any allowance should be disclosed to applicants as a planning assumption rather than being treated as an engineering constraint. I consider the preferable long-term outcome is a regime where export limits are determined by actual network capability and identified constraints, with reassessments undertaken when measured conditions indicate this is required. This approach is more consistent with the ELAM/BELAM principles of transparency, efficient network utilisation and proportionate engineering assessment. In summary, I acknowledge that a 10% allowance may reduce assessment frequency but does not consider this alone justifies constraining current distributed generation. Network capacity should be allocated based on demonstrated network capability rather than speculative future demand, and more sophisticated hosting-capacity and congestion-management approaches should be prioritised instead. The objective should not be to minimise the number of network studies undertaken by distributors. The objective should be to maximise economically efficient distributed generation while maintaining network security and reliability. If additional network

	studies are required to achieve that outcome, that is an appropriate cost of operating a modern electricity network.
Q34. Do you agree the Code should be amended to explicitly require distributors to offer both Part 1A and Part 1 DG application processes? Please explain your views.	I support the proposed amendment. Applicants should have access to the full range of application pathways contemplated by the Code. Where a distributed generation proposal meets the eligibility requirements for the streamlined Part 1A process, applicants should be able to choose that pathway and receive the associated benefits of a simpler, lower-cost and faster approval process. Likewise, applicants whose circumstances require assessment under Part 1 should have clear access to that process. The Authority's consultation identifies evidence that not all distributors are explicitly offering both pathways, resulting in inconsistent practices across New Zealand. Such inconsistency undermines one of the principal objectives of the Code, namely providing a nationally consistent framework for connecting distributed generation. I consider transparency and informed choice to be important principles. Applicants should clearly understand: - which application pathways are available; - the eligibility criteria for each pathway; - expected timeframes; - likely costs; and - the implications for export limits and connection approvals. Without this clarity there is a risk that applicants may be directed toward more complex processes than necessary, increasing administrative costs and reducing the benefits available from distributed generation investment. This proposal is particularly important when considered alongside the Authority's proposed extension of the 10kW default export limit to both Part 1 and Part 1A applications. If both pathways are intended to provide equivalent access to export benefits unless genuine network constraints exist, then applicants should have confidence that distributors cannot influence outcomes simply by directing applicants into a particular process. I also consider that explicitly requiring distributors to offer both pathways will improve transparency, support competition among installers and suppliers, and provide greater consistency for applicants operating across multiple distribution areas. The implementation costs associated with this amendment are likely to be limited. Most distributors already operate processes equivalent to Part 1 and Part 1A, and the proposal primarily appears to clarify expectations rather than introduce materially new obligations. The resulting improvement in customer experience and regulatory consistency is likely to outweigh any minor administrative costs. In summary, I support the proposed amendment because it improves transparency, increases consistency across distributors, protects applicant choice, and helps ensure the Code operates as originally intended. The role of the Code should be to facilitate efficient connection of distributed generation, not create procedural barriers. Requiring all distributors to clearly offer both pathways will help ensure applicants receive the intended benefits of the regulatory framework irrespective of which distribution network they connect to.
Q35. Do you agree the Code should be amended to make it clear distributors cannot extend timeframes for Part 1A applications, but should not be penalised by the time taken by the applicant to remedy a deficient application? Please explain your views.	I support the proposed amendment. The Part 1A process was specifically designed to provide a streamlined, low-cost, and efficient pathway for small-scale distributed generation connections. The integrity of that process depends on distributors being required to meet the prescribed approval timeframes. Allowing discretionary extensions would undermine the purpose of the Part 1A process and reduce certainty for applicants. At the same time, it is reasonable that distributors are not penalised for delays that are outside their control. Where an application is incomplete, inaccurate, or awaiting payment of a legitimate fee, the distributor cannot reasonably be expected to make an informed approval decision. I therefore support the proposed clarification that the processing timeframe should pause while the applicant remedies deficiencies and recommence once a complete application has been resubmitted.

	This approach strikes an appropriate balance between applicant and distributor responsibilities. It preserves the intent of the 10-business-day Part 1A process while recognising that efficient processing depends on both parties meeting their obligations. I consider that transparency will be important to ensure the revised provisions operate effectively. Distributors should be required to clearly notify applicants: - the specific information that is missing or deficient; - the date on which the processing clock was paused; - the actions required to remedy the deficiency; and - the date on which the clock recommences once the information has been received. This will provide certainty for applicants and reduce the potential for disputes regarding application timeframes. I also agree that non-payment of a legitimately published application fee should be treated as an incomplete application. However, this should only apply where the fee requirements have been clearly communicated to the applicant at the outset of the process. More broadly, distributors should ensure their application processes, forms and guidance material minimise the likelihood of incomplete submissions. Digital application systems that validate information before submission may assist in reducing delays for both applicants and distributors. In summary, I support the proposed amendment because it preserves the streamlined intent of the Part 1A process, provides greater certainty for applicants, and fairly allocates responsibility for delays to the party best able to prevent them. The objective should be a process that is both efficient and fair. Applicants should receive timely decisions where they have provided complete information, while distributors should not be disadvantaged where delays arise from matters outside their control.
Q36. Do you agree with the objectives of the proposed amendments? If not, why not?	I generally agree with the Authority's objectives of improving the efficiency of distributed generation connection processes, increasing transparency, preserving consumer choice, and removing unnecessary barriers to distributed generation uptake. These objectives are consistent with promoting a more efficient electricity system and supporting greater participation in distributed generation. In particular, I support the objectives of: - Ensuring applicants have access to fair and consistent application processes. - Extending the benefits of the 10kW default export limit to all eligible small-scale distributed generation applicants. - Preserving consumer choice regarding inverter technology and export arrangements. - Improving consistency across distributors. - Reducing unnecessary administrative complexity within application processes. However, I do not fully support the objective relating to allowing distributors to incorporate an additional 10% distributed generation allowance when undertaking network studies. While I acknowledge the Authority's intention to reduce the frequency of network reassessments, the primary objective of export limit assessments should be to maximise economically efficient distributed generation while maintaining network security, power quality and safety. Administrative efficiency for distributors should be a secondary consideration rather than a basis for constraining export opportunities available to current applicants. I am concerned that incorporating hypothetical future distributed generation into present-day hosting-capacity assessments risks creating artificial constraints that are not supported by actual network conditions. The proposed ELAM/BELAM framework emphasises efficient network utilisation, transparency, identification of actual binding constraints, and avoiding unnecessary restrictions on export where technically feasible. Export limits should therefore be based on demonstrated network capability rather than assumed future uptake. I also encourage the Authority to place greater emphasis on the broader system benefits of distributed generation. Distributed generation can reduce demand on upstream networks, defer capital

	investment, improve network resilience, lower wholesale electricity costs and increase consumer participation in the electricity market. These benefits should remain a central consideration when assessing future export limit policy settings. Accordingly, I support most of the proposed objectives but recommends the Authority place greater emphasis on: - Maximising the efficient utilisation of existing network capacity. - Requiring evidence-based justification for export constraints. - Promoting distributed generation as a network-supporting resource rather than primarily a network constraint. Ensuring that administrative convenience does not unnecessarily limit economically efficient distributed generation investment. In summary, I agree with the majority of the Authority's objectives and supports the overall direction of the proposed amendments. However, I do not consider that preserving network capacity for hypothetical future generation should become an objective that overrides the efficient utilisation of network capacity by current applicants. Export constraints should remain evidence-based, transparent and founded on actual technical limitations rather than assumptions about future uptake. The success of these reforms should ultimately be measured not by how efficiently applications are processed, but by how effectively the framework enables economically efficient distributed generation to connect and contribute to New Zealand's electricity system while maintaining network integrity and consumer benefit.
Q37. Do you agree the benefits of the proposed amendments outweigh their costs?	I generally agree that the benefits of most of the proposed amendments outweigh their costs. The proposals relating to extending the 10kW default export limit to Part 1 applications, preserving consumer choice regarding inverter technology, ensuring access to both Part 1 and Part 1A application pathways, and clarifying application processing timeframes are likely to improve transparency, consistency and consumer access to distributed generation with relatively minor implementation costs for distributors. In particular, these proposals: - reduce unnecessary barriers to distributed generation uptake; - improve consistency of application processes across distributors; - provide greater certainty for applicants; - preserve technology neutrality and consumer choice; - support more efficient utilisation of existing network infrastructure; and - encourage investment in local generation that can benefit both individual consumers and the wider electricity system. However, I do not agree that the Authority has demonstrated a net benefit arising from Proposal 3, which would allow distributors to incorporate an additional 10% distributed generation allowance into export-limit assessments. While this proposal may reduce reassessment costs for distributors, those benefits are largely administrative in nature and may come at the expense of reduced export opportunities for current distributed generation investors. The consultation paper acknowledges that the proposal may result in lower export limits for applicants. I consider this is a material cost that may undermine investment in distributed generation and reduce associated network and system benefits. More broadly, I consider the Authority may be underestimating the long-term benefits associated with distributed generation. Increased distributed generation penetration can: - reduce reliance on higher-cost centralised generation; - reduce power flows across constrained network assets; - defer or avoid network reinforcement expenditure; - improve resilience through diversity of supply; and - increase consumer participation in the electricity market. These benefits are potentially significant and may outweigh many of the administrative concerns identified by distributors. Consequently, where there is uncertainty, policy settings should generally favour

	enabling distributed generation unless a clear technical constraint can be demonstrated. Accordingly, I support the Authority's conclusion that the majority of the proposed amendments are likely to deliver a net benefit. However, I do not consider sufficient evidence has been presented to conclude that the benefits of the proposed 10% future-penetration allowance outweigh its potential costs to distributed generation investors and consumers. In summary, I agree that the benefits of the proposed amendments outweigh their costs overall, but this conclusion is primarily driven by support for Proposals 1, 2, 4 and 5. I remain unconvinced that Proposal 3 delivers a net benefit and recommends the Authority reconsider this aspect of the package or provide stronger evidence supporting its inclusion. The greatest benefits identified in this consultation arise from reducing barriers to distributed generation, increasing transparency and preserving consumer choice. Regulatory changes that unnecessarily constrain export capacity risk reducing those benefits and should therefore be subject to a particularly high evidential threshold.
Q38. Do you have any feedback on the Authority's assessment of the costs and benefits and the balancing of these as set out in this paper, including any evidence of quantified costs and benefits?	I generally agree with the Authority's assessment that many of the proposed amendments will improve transparency, consumer choice and consistency of distributed generation connection processes. However, I consider the cost-benefit assessment places disproportionate emphasis on distributor administrative efficiency and does not fully account for the broader economic benefits of distributed generation. In particular, the assessment would benefit from greater recognition of the value distributed generation provides to the wider electricity system, including: - reducing reliance on marginal and higher-cost generation; - reducing power flows across transmission and distribution networks; - deferring or avoiding network reinforcement expenditure; - improving energy resilience through diversification of supply; - increasing consumer participation in energy markets; and - supporting New Zealand's broader electrification and decarbonisation objectives. I am concerned that some aspects of the consultation continue to frame distributed generation primarily as a source of network constraints rather than recognising the significant network benefits it can provide. Traditional network planning assumes power flows from a limited number of transmission supply points to consumers. Distributed generation changes this model by supplying load closer to where it is consumed, often reducing utilisation of upstream assets and creating opportunities to defer network investment. The consultation acknowledges this benefit, but it is not fully reflected in the assessment of costs and benefits. I am particularly concerned that the benefits attributed to Proposal 3, allowing distributors to incorporate an additional 10% distributed generation allowance in export limit assessments, appear to be largely administrative. While this proposal may reduce the frequency of reassessments undertaken by distributors, the consultation also recognises it may reduce export opportunities for current applicants. In my view, the potential forgone value of distributed generation investment, export revenue and local generation benefits has not been adequately quantified or assessed. The Authority also notes that quantified evidence is limited. While understandable, this should not result in administrative convenience being given greater weight than consumer and system benefits that are inherently more difficult to measure. I consider there is a risk that easily identifiable distributor costs are being assessed more thoroughly than the dispersed but potentially significant benefits of increased distributed generation uptake. I recommend that future analysis include: - estimates of deferred network investment attributable to increased distributed generation;

	- assessment of the impact of export limits on distributed generation project economics; - consideration of regional differences in distributed generation uptake, particularly in rural and agricultural areas; - evaluation of the network support value of medium-sized commercial and rural solar installations; and - assessment of the long-term consumer benefits arising from greater utilisation of distributed energy resources. I also consider the Authority should place greater weight on transparency and evidence. Where distributors seek export limits below the default threshold, the costs and benefits of those limits should be demonstrable and linked to identified network constraints. The ELAM/BELAM framework appropriately emphasises efficient network utilisation, transparency and identification of actual binding constraints, and these principles should remain central to the economic assessment of future policy proposals. In summary, I support much of the Authority's assessment but considers the economic and system-wide benefits of distributed generation are understated, while the benefits associated with reducing distributor administration may be overstated. Future policy decisions should place greater emphasis on enabling efficient distributed generation investment and ensuring export constraints are supported by transparent and evidence-based analysis. Where uncertainty exists, the Authority should be cautious about adopting policy settings that restrict distributed generation. The long-term costs of under-utilising distributed generation opportunities may significantly exceed the short-term administrative savings achieved by reducing network assessment activity.
Q39. Do you agree the proposed amendments are preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	I generally agree that the proposed amendments are preferable to the alternatives considered by the Authority, with the exception of the proposed 10% distributed generation allowance contained in Proposal 3. The proposed amendments relating to extending the 10kW default export limit to Part 1 applications, preserving consumer choice regarding inverter technology, requiring distributors to offer both Part 1 and Part 1A pathways, and clarifying Part 1A processing timeframes are preferable to maintaining the status quo or relying solely on guidance. These proposals provide greater regulatory certainty, improve consistency between distributors, and support more efficient participation in distributed generation markets. I particularly agree that formal Code amendments are preferable to guidance where the Authority has identified outcomes that are inconsistent with its original policy intent. Guidance alone would be unlikely to provide the certainty, consistency and enforceability required to deliver nationally consistent outcomes. However, I do not agree that the proposed 10% distributed generation allowance is preferable to the alternatives considered. The Authority's preferred option seeks to reduce the frequency of network reassessments by allowing distributors to effectively reserve a portion of network hosting capacity for anticipated future distributed generation. While this may reduce administrative effort, it introduces a speculative assumption into what should fundamentally be an evidence-based engineering assessment. Current applicants may receive lower export limits despite no present technical constraint existing on the network. I consider a preferable approach would be to continue assessing export capability based on demonstrated network conditions and actual hosting capacity, with reassessment occurring when measurable changes in distributed generation penetration, asset utilisation or network conditions justify further study. This alternative is more consistent with: - efficient utilisation of existing network assets; - transparency of network assessments; - evidence-based decision making; - technology neutrality; and - promoting the efficient operation of the electricity industry for the long-term benefit of consumers under section 15 of the Electricity Industry Act 2010.

	The proposed ELAM/BELAM framework already places significant emphasis on identifying actual binding constraints, proportionality of assessment effort, and avoiding unnecessary restrictions on export where technically feasible. I consider these principles provide a stronger basis for future network management than applying a generic national allowance for hypothetical future generation. The Authority also identifies future options such as flexible export arrangements, dynamic export limits, improved hosting-capacity information and more sophisticated congestion management frameworks. I consider these approaches are ultimately more likely to deliver efficient outcomes than reserving capacity through conservative assumptions. In summary, I agree that Proposals 1, 2, 4 and 5 are preferable to the alternatives considered and are likely to advance the Authority's statutory objective. However, I do not support Proposal 3 and considers a preferable approach is to base export limits on actual demonstrated network capability, supported by transparent reassessment triggers and future development of more sophisticated hosting-capacity and congestion-management tools. From a consumer-benefit perspective, network capacity should be allocated on the basis of demonstrated technical capability rather than reserved on the basis of hypothetical future demand. This approach is more consistent with efficient network utilisation, investment certainty, and the long-term interests of electricity consumers.
Q40. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	I generally agree that the proposed amendments are capable of complying with section 32(1) of the Electricity Industry Act 2010, particularly where they promote the efficient operation of the electricity industry for the long-term benefit of consumers. In my view, Proposals 1, 2, 4 and 5 are all broadly consistent with the statutory objective because they reduce unnecessary barriers to distributed generation, improve transparency and consistency, preserve consumer choice, and improve the efficiency of connection processes. These proposals are likely to support increased participation in distributed generation while maintaining appropriate distributor oversight and network protections. I particularly supports: - extending the 10kW default export limit to Part 1 applications; - maintaining consumer choice regarding inverter and export arrangements; - improving consistency of application processes across distributors; and - ensuring the Part 1A process operates as intended. Collectively, these measures should improve access to distributed generation and support more efficient utilisation of existing network infrastructure, which is consistent with the long-term interests of consumers. However, I am less convinced that Proposal 3, allowing distributors to incorporate an additional 10% distributed generation allowance when undertaking network studies, clearly advances the statutory objective. While the proposal may reduce distributor administration costs, the Authority has not demonstrated that those benefits outweigh the potential reduction in export opportunities available to current distributed generation investors. There is a risk the proposal could unnecessarily constrain economically efficient distributed generation by reserving network capacity for hypothetical future connections that may never occur. The proposed ELAM/BELAM framework emphasises: - efficient network utilisation; - transparency; - proportionality; and - avoiding unnecessary restrictions on export where technically feasible. I consider those principles better support the statutory objective when export limits are determined based on actual demonstrated network capability and identified constraints rather than future assumptions. More broadly, I consider compliance with section 32(1) should recognise both the costs and benefits of distributed generation.

	Distributed generation is not solely a source of network constraints. It can: - reduce network loading; - defer augmentation investment; - improve resilience; - increase competition and consumer participation; and - lower long-term electricity costs. Accordingly, amendments that facilitate efficient distributed generation deployment while maintaining network security are likely to better align with the statutory objective than amendments that introduce additional constraints without clear evidence of a corresponding consumer benefit. In summary, I generally agree that the proposed amendments are consistent with section 32(1) of the Act, particularly Proposals 1, 2, 4 and 5. However, I remain unconvinced that Proposal 3 has been sufficiently justified and recommends the Authority further evaluate whether reserving network capacity for future hypothetical distributed generation is consistent with promoting the efficient operation of the electricity industry for the long-term benefit of consumers. Section 32(1) requires consideration of the long-term benefit of consumers. In my view, this is best achieved through policy settings that maximise the efficient utilisation of existing network capacity, encourage economically efficient distributed generation investment, and require restrictions to be supported by transparent and evidence-based engineering analysis.
Q41. Do you have any comments on the drafting of the proposed amendments?	I generally support the intent of the proposed drafting. However, I consider several areas would benefit from further clarification to improve transparency, consistency of application and alignment with the underlying policy objectives. 1. Clarify evidential requirements for export limits below 10kW The proposed amendments continue to allow distributors to impose export limits below 10kW were supported by a network study. I support this principle; however, the Code should more explicitly require distributors to identify and communicate the specific binding constraint that justifies the reduced export limit. Applicants should be informed whether the limit arises from voltage rise, thermal loading, power quality concerns, protection limitations, upstream constraints, or another clearly defined technical issue. This would improve transparency and support consistency with the principles outlined within the ELAM/BELAM framework. 2. Greater transparency around network study assumptions Where distributors rely on assumptions in an ELAM or BELAM assessment, including any additional distributed generation allowance adopted under Proposal 3, the Code should require the key assumptions to be documented and available to applicants on request. I consider transparency is particularly important where assumptions materially affect export outcomes. The proposed ELAM/BELAM framework places significant emphasis on traceability and explainability, and the drafting should reinforce these principles. 3. Clarify treatment of future distributed generation allowances If the Authority proceeds with the proposed 10% distributed generation allowance, the Code should make clear: - whether the allowance is mandatory or discretionary; - how the allowance is to be applied; - how frequently supporting network studies must be reviewed; and - whether applicants must be informed that a future-generation allowance has influenced the outcome. Without this clarification there is potential for inconsistent application across distributors.

	4. Strengthen requirements for applicant communication The Authority's proposed ELAM/BELAM guidance appropriately focuses on communicating outcomes in plain language. I recommend consideration be given to requiring distributors to provide applicants with: - the approved export limit; - the reason for any reduction from the requested export level; - whether the limit is static, flexible or dynamic; and - any reassessment triggers. This information would help improve applicant understanding and reduce disputes. 5. Avoid unintended technology lock-in I support the proposed drafting that prevents distributors from mandating communicating inverters or dynamic export arrangements through approved inverter lists or COPS requirements. However, the Authority should ensure future amendments continue to maintain technology neutrality and avoid creating de facto preferences for particular communications protocols, vendors or technical solutions unless supported by clear consumer benefits. 6. Consider a requirement to publish hosting-capacity information As a longer-term enhancement, I encourage the Authority to consider requiring distributors to publish network hosting-capacity information where available. Improved visibility of network capability would help applicants make informed investment decisions and may reduce the volume of applications submitted into heavily constrained areas. This would also support the transparency objectives underpinning the broader network-connections reforms. Conclusion I support the overall intent of the drafting amendments. Our principal recommendation is that the final Code wording place greater emphasis on transparency, evidence-based decision making and the obligation for distributors to clearly explain the technical basis for any export restriction. In particular, I recommends that wherever an export limit below the default threshold is applied, distributors should be required to identify the binding network constraint, disclose any material assumptions relied upon, and demonstrate that the restriction is no more stringent than necessary to address the identified issue. The effectiveness of the new framework will ultimately depend not only on consistent engineering outcomes, but also on applicants being able to understand why those outcomes have been reached and how network capability has been assessed.
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