

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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Organisation	My Mini Solar Ltd (MyMiniSolar), Nelson

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. The 10kW default should not depend on which application pathway an applicant is directed into. Consistent treatment across Part 1 and Part 1A removes an incentive to divert applicants away from the default and gives consumers predictable outcomes.
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.	Yes, strongly. Mandating communicating smart inverters before distributors can use them would add cost and lock in particular technologies and protocols, without a matching benefit to consumers. This matters for plug-in generation too: many current microinverters have app connectivity but do not support CSIP-AUS or a comparable network protocol. Any future move to communicating inverters should come through the Authority's planned national policy work, with consistent requirements across networks, not network by network through approved inverter lists or connection and operation standards.
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.	
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?	
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.	Yes. The streamlined Part 1A process is only useful if applicants can actually use it. An explicit obligation removes ambiguity and supports consistent treatment of consumers across networks.
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.	Yes. A 10 business day process should mean 10 business days. Stopping the clock while a distributor waits for missing information from the applicant is a fair balance and keeps the incentive on both parties to act promptly.
Q36. Do you agree with the objectives of the proposed amendments? If not, why not?	
Q37. Do you agree the benefits of the proposed amendments outweigh their costs?	
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?	
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.	
Q40. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	
Q41. Do you have any comments on the drafting of the proposed amendments?	