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ERGANZ SUBMISSION ON PLUG-IN GENERATION AND CODE IMPROVEMENTS FOR EXPORT LIMITS AND CONNECTION PROCESSES

The Electricity Retailers' and Generators' Association of New Zealand ('ERGANZ') welcomes the opportunity to comment on the Electricity Authority's issues and consultation paper 'Exploring plug-in generation and Code improvements for export limits and connection processes', dated 8 September 2026.

ERGANZ is the industry association representing companies that generate and sell electricity to Kiwi households and businesses. Collectively, our members supply almost 90 percent of New Zealand's electricity. We work for a competitive, fair, and sustainable electricity market that benefits consumers.

Executive summary

ERGANZ supports electrification and greater uptake of distributed generation, and supports regulatory settings that make adoption easier for consumers. Plug-in generation gives renters, apartment residents and others who cannot install rooftop solar a low-cost route to self-generation. ERGANZ supports the Authority preparing the Code now so that, if WorkSafe's review permits plug-in generation, consumers face a simple, low-friction pathway rather than requirements designed for permanently-fixed systems.

ERGANZ makes four points on plug-in generation.

First, product safety and technical performance belong with WorkSafe, MBIE and standards bodies. ERGANZ supports the Authority's preference to keep plug-in standards out of the Code and encourages agencies to align with established international standards rather than develop bespoke New Zealand requirements.

Second, visibility should come from light-touch registration at the point of sale, not a Part 6 approval process. The Code cannot bind sellers, so the Authority needs to work with MBIE and EECA to place this obligation in product or safety regulation, with the information flowing into the existing registry under a distinct generation-type field.

Third, retailers are the natural interface for consumers who want to be paid for export or who move premises. They should not be the discovery mechanism for devices they do not supply, carry product education or safety obligations, or be held accountable for registry information they could not reasonably have known.

Fourth, treating unmeasured export as unaccounted for electricity (UFE) is acceptable only as a short-term position. Where registered plug-in generation has no import/export metering, its export should be deemed gifted automatically and settled using an approved estimation methodology, with no paperwork for the consumer. This keeps reconciliation accurate as uptake grows.

ERGANZ supports all five proposed Code clarifications. They give effect to the intent of the May 2026 export limit changes and stop distributors diverting small-scale applicants away from the 10kW default limit and the 10 business-day Part 1A process. ERGANZ suggests several drafting changes at Q41, most importantly that the static export limit option be mandatory under both Part 1 and Part 1A.

Response to questions on plug-in generation

Questions	Comments
Q1. Do you have any views on our characterisation of plug-in generation?	ERGANZ agrees with the characterisation. Plug-in generation widens access to self-generation for consumers who cannot install permanently-fixed DG, and the paper correctly treats it as DG captured by the Code once connected. ERGANZ supports a framework that is proportionate, technology-neutral and gives the average consumer a simple path to adoption. ERGANZ also agrees with the point at paragraph 4.107 that settling the framework before devices are widely installed is easier than imposing requirements afterwards.
Q2. What network performance requirements should apply to plug-in inverters in New Zealand, and why?	ERGANZ is not the appropriate party to prescribe inverter performance requirements. These should be set by WorkSafe, MBIE, Standards New Zealand and distributors, drawing on qualified engineering advice. ERGANZ agrees anti-islanding is a minimum requirement. Beyond that, ERGANZ encourages agencies to adopt or closely align with established international standards, such as the German and United Kingdom specifications cited in the paper. New Zealand is a small market, and bespoke requirements raise product costs and narrow consumer choice without clear benefit.
Q3. What do you think of the Authority excluding plug-in generation standards from the Code?	ERGANZ supports Option A. Product safety and technical compliance sit more naturally in the Electricity (Safety) Regulations, which reach manufacturers, importers and sellers. Citing the standards in the Code adds little when plug-in owners are unlikely to engage with it.

Questions	Comments
	The framework should also make clear that Code participants such as retailers have no role in determining whether a product they do not supply is safe or compliant.
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?	Agree. Without an installer acting for the consumer, a conventional DG application is disproportionate for a consumer-installed product and compliance is likely to be low. Information should be captured as close as possible to the point of sale.
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 full Part 6 application. ERGANZ supports a streamlined notification, captured primarily at the point of sale, with the consumer also required to notify their retailer. Distributor approval should apply only where a specific technical or network reason requires it, for example where a device would take an ICP above an approved export limit (see Q25).
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 or registration, for the reasons at Q4 and Q5. A regime similar to Germany's gives distributors and other parties visibility without asking ordinary consumers to navigate an approval process designed for professionally installed systems.
Q7. What information should be required if a registration or application for a plug-in generation unit is to be implemented?	Enough to identify the installation and the device: installation address and ICP, distributor, generation capacity, maximum inverter export rate, inverter make and model, and connection date. Purchaser contact details may be needed at the point of sale, but the registry should hold device information against the ICP, consistent with how it operates today. Product labelling requirements, as suggested at footnote 41, would make capacity data straightforward to capture. Each data item should earn its place, and collection, storage and access need to meet privacy and security requirements.
Q8. Would participants benefit from a registry that captures information about plug-in generation? Why, why not?	Yes. Distributors need visibility of aggregate plug-in capacity for network planning, retailers need it for customer offers and switching, and the Authority needs it to monitor uptake. Plug-in generation should be separately identifiable from permanently-fixed DG.

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Q9. Should the existing registry be used? Why, why not?	Yes. The existing registry is the logical source of industry information, and a separate register duplicates cost. ERGANZ recommends: • a new generation-type field or value that distinguishes plug-in generation from permanently-fixed DG, held against the ICP; • switching processes that carry plug-in information automatically, a process for gaining and losing traders to resolve inconsistent information, and confirmation that asking a customer about a device during a switch does not breach switch protected period requirements; • where a customer advises that a device is moving with them, removal from the old ICP and establishment at the new ICP from the move date. Portability means the registry will never be fully accurate, because customers will not always say whether a device has moved, stayed, been sold or been discarded. The framework should not hold a retailer responsible for information it could not reasonably have known.
Q10. Should entering information about plug-in generation be a requirement only after export has been identified at an ICP? Why, why not?	No. Registration should occur proactively, at or around the point of sale. Relying on detected export is incomplete, particularly at ICPs without advanced metering, where meters are not configured to record export, or where household load absorbs most generation.
Q11. Would the type of information able to be collected at point of sale be sufficient to meet industry needs? Why, why not?	Yes, provided capture is mandatory, sufficiently detailed and passed reliably into industry systems, with the information then available to the retailer and distributor. The Code cannot place obligations on sellers, so ERGANZ asks the Authority to work with MBIE and EECA to establish point-of-sale registration through product or safety regulation, with a defined data flow into the registry. The design needs to address sellers that do not comply, online and overseas purchases, onboarding and access to the data, and privacy and security.
Q12. Should the MEPs reverse power indicator be leveraged in identifying potential plug-in generation export? Why, why not?	Yes, as a secondary control. Reverse power notifications help identify unregistered generation, but they should not be the primary registration mechanism given limited coverage at non-advanced meters. Where a retailer learns of plug-in generation this way, its obligation should be to take reasonable steps to inform the customer and update records, with appropriate regulatory latitude given it had no earlier notice.

Questions	Comments
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?	Retailers hold the customer relationship and are the natural point of contact for customers who want to be paid for export or who move premises. ERGANZ does not support retailers carrying primary responsibility for discovering or registering devices. The seller should complete point-of-sale registration, the consumer should be obliged to notify their retailer, and all registration information should be available to the retailer.
Q14. Do you have any other suggestions on how consumers could be informed of Code requirements for plug-in generation?	The seller and product should carry primary responsibility. Clear information on the consumer's obligations and on export and metering options should accompany the product, so it reaches the consumer before connection. Government agencies, for example EECA, can support this with a single consumer information source. A retailer that later becomes aware of a device should not acquire a general product education or safety obligation as a result.
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 require compliant import/export metering and registration of the device, not a full Part 6 application. Where network approval is genuinely needed, for example at an ICP with an export limit, it should be obtained before the retailer installs import/export metering or activates an export arrangement. Retailers should retain discretion over whether, and on what terms, they offer buy-back for plug-in export, consistent with how buy-back operates for other DG.
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?	Primarily information accompanying the product at sale. Once a retailer becomes aware of plug-in generation, its role should be limited to confirming that it holds the information and advising the customer of the option to enable import/export metering, and any cost, if they want to be paid for export.
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. The seller or product supplier is best placed to do this at the point of sale, supported by general consumer information from government agencies. Retailers should not be required to deliver product or safety education for products they do not supply.
Q18. What issues do you see with more UFE in the	Unmeasured plug-in export reduces the accuracy and transparency of reconciliation. It can obscure genuine metering and data errors,

Questions	Comments
reconciliation system as a result of more export from plug-in generation?	complicate the reconciliation manager's quality checks and distributors' loss factor reviews, and weaken confidence in settlement data. UFE is also allocated across traders in proportion to their volumes, not to the trader whose customer generated the export. That creates a cross-subsidy unrelated to which retailers serve plug-in customers. The effect is small now but grows with uptake.
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?	In part. ERGANZ accepts UFE treatment is pragmatic for unregistered devices and while volumes remain small. It does not support known, registered plug-in generation remaining in UFE as an enduring setting. Where registered plug-in generation has no import/export metering, export should be deemed gifted by default and settled using an approved methodology that estimates export from registered device information. The Authority should set out now how and when this will apply, rather than waiting until UFE becomes a problem.
Q20. If gifting documentation were to be required by a plug-in generation consumer, how could this be facilitated?	Automatically. The consumer should not need to complete or approve gifting documentation. Deemed gifting should apply to all registered plug-in generation without compliant import/export metering, including where the consumer does not engage with their retailer, and continue until import/export metering is enabled. The requirements to be paid for export should be presented clearly to consumers at the point of sale, so that consumers understand them and retailers do not carry the burden of explaining them.
Q21. Are there other genuine issues identified by the reverse power indicator?	Yes. As paragraph 4.93 notes, the indicator also identifies unregistered permanently-fixed DG, metering faults and installation errors. These remain worth detecting, and the indicator should be retained as a 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?	No. The requirement should be retained and strengthened. MEPs should notify retailers within a defined period, for example five business days, using an agreed industry format. Where the reverse power relates to registered plug-in generation, the notification should say so, supported by the proposed registry field.
Q23. Is there a way for a MEP to filter out plug-in generation related reverse power indicators?	The objective should be to differentiate rather than remove. Matching reverse power events against the registry generation-type field would let retailers separate events explained

Questions	Comments
	by registered plug-in generation from unexplained events that need investigation.
Q24. Should Part 10 include an exclusion for requiring import/export metering for plug-in generation? Why, why not?	Yes. Plug-in generation should be able to operate without import/export metering where the consumer does not seek payment for export, with export settled through deemed gifting (Q19 and Q20). Payment should be available only once compliant import/export metering is enabled, and retailers should retain discretion over whether to pass on any metering cost.
Q25. Should Part 6 clarify requirements for a plug-in generation system being connected alongside approved permanently-fixed DG?	Yes. Plug-in generation should count towards the total export position at an ICP while connected, but be identified and managed separately from permanently-fixed DG because it can move between premises. Part 6 should make clear how a plug-in device interacts with an approved export limit, so consumers with rooftop solar know whether adding a device requires distributor engagement.
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, there should be a maximum. ERGANZ is not the appropriate party to set the technical limit, which should be informed by WorkSafe, distributors and engineering expertise, taking account of the 800W benchmark used internationally. The Code should reference the limit the standards set rather than create a separate one.
Q27. What sources of information could the Authority use to monitor uptake of plug-in generation and/or any issues that may arise?	Registry information, MEP reverse power notifications, export metering and buy-back data, existing retail market monitoring, and product import and sales data available to EECA and MBIE. The registry should be the primary industry dataset where possible.
Q28. Do you agree with our overall characterisation of the challenges of plug-in generation? Why, why not?	Broadly yes. The framework needs clearer treatment of product safety, registry information and responsibility, notification obligations, movement between ICPs, reverse power information, and metering and settlement for unmetered export.
Q29. Which of the challenges outlined in this paper present the most pressing issue for the Authority to address?	ERGANZ's priorities are: • registry fields and information flows, including point-of-sale capture; • resolution of safety and performance requirements by the appropriate safety and technical regulators; • a deemed gifting and settlement methodology for unmetered export.

Response to questions on the proposed Code changes

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.	Agree. At present the streamlined Part 1A process carries a 10kW default export limit and the more detailed Part 1 process does not. A consumer should not lose the default simply because their installation requires Part 1 assessment, and distributors should not be able to use COPS requirements to divert applicants into Part 1 and a lower limit. A lower limit should require a network study under either process.
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.	Agree. Distributors should not use approved inverter lists or COPS to mandate communicating inverters or flexible/dynamic limits ahead of the Authority's policy work. Distributors should retain the ability to impose equipment and operating requirements that are reasonably necessary for safety, power quality, network stability and reliability. ERGANZ supports the longer-term direction towards communicating, interoperable inverters. The value of consumer flexibility depends on retailers and aggregators, as well as distributors, being able to access it. That is a reason to settle protocols and interoperability nationally rather than through individual distributors' lists. Inverters installed now remain in service for many years, so ERGANZ encourages the Authority to hold to its nine-month timeframe for that work.
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.	Agree. The allowance is a pragmatic way to avoid repeated reassessments. Because it can lower export limits for current applicants, ERGANZ suggests distributors disclose when a network study relies on it, so its use can be monitored.
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?	Agree, as an interim measure. Actual uptake will vary by feeder, but that is not a reason to delay. The Authority can revisit the figure as uptake data improves and through its work on congestion management and export allocation.

Questions	Comments
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.	Agree. Eligible applicants should have access to the streamlined Part 1A pathway, with Part 1 available where appropriate. A distributor should not be able to prevent access to the pathway the Code provides for an installation, and informal 'fast-track' processes are not a substitute for Part 1A.
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.	Agree. Part 1A should operate within its 10 business-day timeframe, and distributors should not extend it for their own processing reasons. Equally, distributors should not be penalised for periods where an applicant has not provided required information, remedied a deficiency, paid a relevant fee or arranged required access.
Q36. Do you agree with the objectives of the proposed amendments? If not, why not?	Agree. ERGANZ supports consistent export limit treatment, customer choice subject to legitimate network requirements, efficient network assessment, and clear and efficient application pathways.
Q37. Do you agree the benefits of the proposed amendments outweigh their costs?	Broadly yes. ERGANZ has not identified retailer costs that would alter its support and defers to distributors on implementation costs, which appear modest and largely administrative.
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?	ERGANZ has no quantified evidence to provide and no further comment on the qualitative assessment.
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	Agree. The existing Part 1A timeframe has not prevented extended processing times, which shows guidance alone is unlikely to change distributor practice.

Questions	Comments
the Electricity Industry Act 2010.	
Q40. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	Agree. ERGANZ has no further comment.
Q41. Do you have any comments on the drafting of the proposed amendments?	Clause 6.3A(3)(c)(iii). 'Under Part 1 or Part 1A, or both' can be read as allowing a distributor to offer the static option under one process only, which recreates the diversion problem Proposal 1 addresses. It should read 'under Part 1 and Part 1A'.

Conclusion

ERGANZ thanks the Authority for the opportunity to comment on this paper.

If there are any outstanding questions or a need for further follow-up, please let me know.

Yours sincerely,

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