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Exploring plug-in generation and Code improvements for export limits and connection processes

Meridian Energy welcomes the opportunity to provide feedback on the Electricity Authority's consultation on plug-in generation.

Meridian supports a proportionate regulatory and compliance regime for plug-in generation. We therefore favour a practical approach, which focuses on addressing genuine safety and network risks while avoiding unnecessary barriers to adoption, and the effectiveness of which is not predicated on the need for significant consumer action or engagement (which may not always occur in practice). Plug-in generation potentially offers real benefit to consumers and barriers should be as low as reasonably possible so that consumers are best enabled to take advantage of those benefits.

The Authority's approach should minimise reliance on consumer participation with Code requirements, while leveraging existing processes to manage risks. The Registry, with well-designed modifications, could be used to maintain a register of known plug-in generation units. Retailers are likely to be the most natural point of contact for consumers who want to be paid for export, but can also act as a secondary source of information on registration / compliance requirements. Reverse power indicators appear to offer a means of identifying plug-in generation export which will allow retailers to follow up on evidence of potential usage of unregistered plug-in generation. However, retailers are unlikely to be able to "pick up" the use of plug-in generation by other means. Usage information is likely to be a poor indicator, and plug-in generation that does not create a reverse power indicator flag (i.e. because its output stays below usage at the ICP, or because the ICP does not have a smart meter) will go unflagged.

The most significant opportunity to provide consumers with information and education is likely to be at the initial point of purchase of plug-in generation. Meridian considers that plug-

in generation products should be accompanied by appropriate warnings and materials, and referrals to online resources for more information, and that the Authority should work alongside MBIE and EECA to develop these. Whilst such information may not be seen by buyers of second hand / resold plug-in generation products, Meridian considers the need for increased public awareness of consumer-obligations to be most acute in the short term.

Responses to consultation questions

Questions	Comments
Questions on issues regarding plug-in generation	
Q1. Do you have any views on our characterisation of plug-in generation?	Meridian agrees with the Authority's characterisation of plug-in generation.
Q2. What network performance requirements should apply to plug-in inverters in New Zealand, and why?	Meridian would defer to other submitters for the performance requirements, but agrees with the Authority that anti-islanding controls are required and that lessons from overseas experiences like that of Germany will be relevant. It is not likely to be in New Zealand's interests to develop non-standard performance requirements – aligning with international examples will best ensure consumers have maximum access to choice of products. Meridian assumes that appropriate inverter performance requirements are best set by WorkSafe, MBIE, and Standards New Zealand, with input from EDBs.
Q3. What do you think of the Authority excluding plug-in generation standards from the Code?	Meridian agrees with the Authority's reasoning for this – that a Code citation is not required if the ESRs set out technical standards and requirements, and that relevant consumers are unlikely to consult the Code in any event.
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, Meridian's sense is that a Part 6 style application would be challenging for many consumers who would otherwise seek to utilise plug in generation, and would act as a barrier to use.

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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?	We are inclined towards a streamlined notification process with escalation to distributor approval possible (if the device would breach an export limit at the ICP, for example). Consumers should be encouraged to notify their retailers of plug-in generation – perhaps by materials included with the product or made available at point of purchase.
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?	As per answer to Q5 above – Meridian does not have strong views on this but tends to support a notification/registration process with escalation to EDB approval possible.
Q7. What information should be required if a registration or application for a plug-in generation unit is to be implemented?	Meridian considers that if registration is required, it should relate to information which can be provided at the time of purchase or initial use and is not especially likely to go out of date, such as: capacity, make, model, manufacture date, contact details for the consumer registered against the relevant plug-in DG.
Q8. Would participants benefit from a registry that captures information about plug-in generation? Why, why not?	In theory, yes. Having information available to participants could help with network planning (EDBs), customer experience (retailers), and monitoring of broader uptake of plug-in generation (EA and industry more generally). We agree with the Authority that compliance may be low in practice with registration requirements (especially if updates are required on moving address, etc). It should be understood that information on the registry will be prone to inaccuracies and we do not think participants should be responsible for this.
Q9. Should the existing registry be used? Why, why not?	Meridian considers this to be sensible.
Q10. Should entering information about plug-in generation be a requirement only after export has been identified at an ICP? Why, why not?	Ideally registration should be cast as widely as possible – i.e. devices are registered at the point of purchase regardless of whether they are likely to result in export.
Q11. Would the type of information able to be collected at point of sale be sufficient to meet industry needs? Why, why not?	Our sense is that this information is likely to be the most accurate and reduce the need for relying on consumer compliance. If there is a way to link initial owners to particular DG

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	products, this could ameliorate issues caused by faulty DG items / allow for more successful product recall.
Q12. Should the MEPs reverse power indicator be leveraged in identifying potential plug-in generation export? Why, why not?	This seems the most certain way of identifying the (unregistered, if applicable) use of plug-in generation by consumers and it is reasonable for any unexpected export to be followed up on with the customer (whether this is from plug-in generation or another source). Changes in consumer usage patterns alone could be due to a large variety of factors and result in significant action taken in relation to false positives (for example, consumers buying more efficient appliances, turning off spa pools, etc). However, the reverse power indicator has its own gaps – it will not flag generation which stays below usage at the ICP, and it requires an advanced meter.
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?	We agree that retailers will be the natural point of contact for consumers in relation to plug-in generation and have opportunities to engage with consumers around plug-in generation in relation to consumers moving house, signing-up with the retailer, and setting up payment for export. However, retailers should not carry regulatory responsibility for ensuring that plug-in generation is discovered and registered as retailers do not have meaningful control over this.
Q14. Do you have any other suggestions on how consumers could be informed of Code requirements for plug-in generation?	Getting information in front of consumers at point of purchase may be an effective avenue. Warnings and/or pamphlets could be included in product packaging as part of product standards.
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?	If some form of Part 6 application process is to be required for the use of plug-in DG, then predicated payment for export on such approval appears to be a sensible means of incentivising compliance. As with other DG, retailers should have discretion around buy-back offers.
Q16. What measures could be implemented to inform consumers of electricity export at their ICP	If retailers, via MEPs, are picking up export of electricity that may be associated with

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that is potentially associated with plug-in generation, and what information should this include?	plug-in DG, the relevant consumer associated with that ICP could be sent a standard information pack by their retailer. This could include, for example: - the fact that export has been detected at their ICP - the need to inform their retailer of any plug-in DG - what registration / Part 6 requirements the consumer needs to comply with - how the customer can be paid for their export of electricity - relevant safety information.
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?	Meridian considers that it would be most effective for this information to be made clear to consumers at the point of purchase of plug-in generation. Whilst retailers could have a role in informing consumers on where they can find generic information (e.g. published by EECA or a similar entity), they are unlikely to be well suited for education on specific products.
Q18. What issues do you see with more UFE in the reconciliation system as a result of more export from plug-in generation?	Increased UFE would reduce the accuracy of reconciliation and obscure other relevant processes like metering errors or loss factor reviews.
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?	This is pragmatic and low friction in the short term but may not be an appropriate long-term solution. The development of a deemed gifting process may be appropriate.
Q20. If gifting documentation were to be required by a plug-in generation consumer, how could this be facilitated?	Some form of deemed / automatic process seems appropriate. The fact that deemed gifting could occur if the consumer has not set themselves up to be paid for export could be made clear as part of product labelling information / pamphlet materials included at the point of purchase.
Q21. Are there other genuine issues identified by the reverse power indicator?	The indicator infrequently identifies other issues such as electrical work at the ICP triggering unexpected reverse power, metering faults and errors, and unregistered permanently-fixed DG. These issues should all also receive follow up.

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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?	We are anticipating that the reverse power indicator will be the major avenue for detecting the use of plug-in DG and therefore the main way of getting information on both compliance requirements and being paid for export in front of customers. If the reverse power indicator is serving this function, then there are presumably serious drawbacks to removing the requirement to notify the retailer of a reverse power event.
Q23. Is there a way for a MEP to filter out plug-in generation related reverse power indicators?	If plug-in generation was noted on the registry then presumably participants could assume that a reverse power indicator was associated with that generation. However initial events should still be notified to the retailer to enable follow up with the consumer.
Q24. Should Part 10 include an exclusion for requiring import/export metering for plug-in generation? Why, why not?	No specific comment.
Q25. Should Part 6 clarify requirements for a plug-in generation system being connected alongside approved permanently-fixed DG?	This seems sensible.
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)?	This seems sensible.
Q27. What sources of information could the Authority use to monitor uptake of plug-in generation and/or any issues that may arise?	No specific comment. Monitoring naturally depends on what information is being collected and by whom – whether as part of a formal registry, Part 6 style application requirements, or MEP / retailer monitoring of export.
Q28. Do you agree with our overall characterisation of the challenges of plug-in generation? Why, why not?	Yes.
Q29. Which of the challenges outlined in this paper present the most pressing issue for the Authority to address?	No specific comment.
Questions on distributed generation-related Code change proposals	
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.	Meridian does not have concerns with the Authority's proposal on this issue.

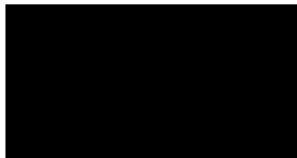
Questions	Comments
Q31. Do you agree the Code should be amended so that distributors cannot limit their approved inverter lists to only communicating smart inverters or use their COPS to mandate smart inverters or flexible/dynamic export limits? Please explain your views.	Meridian agrees with the Authority's assessment of this issue.
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.	No specific comment.
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?	No specific comment.
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.	No specific comment.
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.	Meridian agrees with the Authority's assessment of this issue.
Q36. Do you agree with the objectives of the proposed amendments? If not, why not?	Yes.
Q37. Do you agree the benefits of the proposed amendments outweigh their costs?	Yes.
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?	Meridian agrees with the Authority's 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 the Electricity Industry Act 2010.	Yes.
Q40. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	Yes.

Questions	Comments
Q41. Do you have any comments on the drafting of the proposed amendments?	No specific comments.

Concluding comments

Nothing in this submission is commercially sensitive.

Nāku noa, nā



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