
Subject: Re: Plug-in Generation Consultation – Attachment – Clarification of Certification, Output Limits and Safety Features

From [REDACTED] <[REDACTED]>
Date Tue 2026-10-06 5:15 PM
To Connection Feedback <connection.feedback@ea.govt.nz>

Thank you for your confirmation of submission regarding the consultation on plug-in generation (balcony solar).

Please find attached a short clarification statement.

In particular, we want to clarify product certification, output limits, and safety features to provide assurance that any product we would supply would keep the New Zealand public safe and complies with all relevant regulations, including the Electricity Industry Participation Code, AS/NZS 4777.2, AS/NZS 3000, and WorkSafe NZ / Energy Safety requirements.

We are happy to provide test reports, Declarations of Conformity, or sample units on request.

Thank you again for the opportunity to contribute.

Kind regards,

[REDACTED]
[REDACTED]
[REDACTED]

On Mon, 5 Oct 2026, 02:15 Connection Feedback, <connection.feedback@ea.govt.nz> wrote:

Kia ora [REDACTED] and thank you for your submission, which we'll consider alongside others received.

Ngā mihi

Louise

Network Policy Team

**ELECTRICITY
AUTHORITY**
TE MANA HIKO 

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ELECTRICITY AUTHORITY CONSULTATION SUBMISSION

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

Deadline: 5pm Tuesday 6 October 2026

Submitted: 4 October 2026

From: [REDACTED]

Contact: [REDACTED]

Location: [REDACTED] Intending NZ operation - e.g. Christchurch

Interest: Private individual - future importer/reseller wanting to on-sell ground mount, balcony rail, wall/facade kits

Mount types of interest: Ground, Balcony Rail, Wall / Facade, Flat Roof, Pitched Roof

1. INTRODUCTION

I am writing as a private individual intending to import and on-sell certified plug-in solar kits in New Zealand once the current WorkSafe prohibition is lifted.

I support the legalisation of plug-in solar in New Zealand, as recommended by the Ministry for Regulation in its July 2025 report "Review of Portable Plug-in Solar Regulatory Barriers".

My interest is to operate as a future importer/reseller supplying affordable, compliant DIY kits (ground-mount, balcony-rail, and wall/facade) to households, renters, and small businesses who cannot access traditional rooftop solar.

This submission is made as a private individual, not on behalf of a lines company, retailer, or large generator.

2. RESPONSES TO ELECTRICITY AUTHORITY QUESTIONS

Q1: Should plug-in generation be enabled in New Zealand? Yes - with clear product certification and output limits.

I support enabling plug-in generation up to an 800W AC export limit at the wall socket (with up to 1200W PV input), consistent with the German Balkonkraftwerk model and emerging UK guidance. This limit is safe for standard domestic circuits, proportionate to risk, and proven at scale (>1.5m installations in Germany).

Plug-in solar should be defined as: Micro-inverter(s) certified to AS/NZS 4777.2:2020 (or equivalent EU VDE-AR-N 4105 / VDE V 0126-1-1 with local testing) with anti-islanding protection mandatory, Total AC output $\leq 800\text{W}$ per dedicated final sub-circuit / plug, connected via standard 10A socket with no modifications, Sold as a complete kit with plug, cable, mounting, and user instructions

Q2: Network impacts and connection process - I support a simple notification to the lines company, not a full connection application, and no fee.

Proposed process: 1. Customer buys certified kit from approved supplier list 2. Customer notifies lines company via single national portal within 5 working days of install - one form, <2 minutes, free 3. Lines company records ICP + kit serial/micro-inverter ID

Q3: Consumer information and safety - I support mandatory clear labelling, an EECA-approved product list, and anti-islanding as non-negotiable. Requirements should include NZ-specific label, central public list of compliant kits, automatic disconnection <2 seconds on grid loss, ban on non-compliant imports.

Q4: Export arrangements and commercial impact - I support fair export treatment with no penalty and no extra lines charges. At minimum, no penalty for small export. Preferably, access to same buy-back rate as other <10kW distributed generation.

Q5: Registration and compliance - Registration burden should sit with supplier/importer, not end customer. Supplier registers batch, customer notification is simple confirmation. One national standard, not 29 lines company rules.

Q6: Practical issues - Seeking clarity on certification pathway, timeline, scope of permissible kits (ground, balcony-rail hook/lattice/semi-enclosed/concrete, wall/facade, flat roof, pitched roof), definition clarity, insurance and tenancy guidance.

3. ADVANTAGES STATEMENT - Affordable entry to solar for renters (<\$1500 kit vs \$12k+ rooftop), faster uptake of renewables, small business opportunity, reduced energy hardship (~\$200-350/year per 800W kit), no subsidy required.

4. DECLARATION - I confirm this submission is made as a private individual with prospective commercial interest. No current sales until compliant pathway confirmed. Consent to publish with redaction if required.

Supplementary: Supports enabling plug-in solar with 800W AC / 1200W PV, simple free notification, supplier-batch registration, one national standard. Overseas submitter based [REDACTED] intending NZ operation. Consultation link: <https://www.ea.govt.nz/projects/all/net-work-connections/consultation/exploring-plug-in-generation-and-code-improvements-for-export-limits-and-connection-processes/>

Thank you for considering this submission.

Outlook

Consultation on plug-in solar

From [REDACTED] <[REDACTED]>
Date Sun 2026-10-04 1:57 PM
To Connection Feedback <connection.feedback@ea.govt.nz>

Kia ora Electricity Authority team,

I am writing to make a brief submission on the consultation regarding plug-in generation.

I strongly support enabling small plug-in solar systems in Aotearoa | New Zealand. A simple, scalable framework could substantially increase residential solar generation while keeping both household costs and the wider economic cost of deployment low.

I would like to suggest that the rules distinguish between connection types rather than applying a single export limit to every installation. For example:

- standard household GPO: up to 1 kW
- GPO on a dedicated circuit: up to 2 kW
- dedicated generation outlet on a suitable circuit: up to 3 kW
- three-phase connections: limits applied per phase rather than per house

I propose that limits like these would apply to the maximum AC output of the inverter, rather than to the installed PV panel capacity. This would allow some oversizing of the PV array while keeping the maximum grid injection unchanged.

I think that dedicated generation outlets should be considered explicitly. Special energy sockets for plug-in solar are permitted in Germany, with the relevant standards including DIN VDE V 0628-1. They could provide a practical way to allow higher output through a purpose-designed connection rather than a conventional household socket.

In my opinion, three-phase installations should also be treated separately. A limit per phase would be more technically appropriate than a single limit for the entire property. For example, 2 kW per phase would permit up to 6 kW of plug-in generation while keeping the current on each phase below 9 A.

My impression is that the current discussion focuses mainly on plug-in generation through ordinary household sockets. I encourage the EA to include dedicated generation outlets and higher limits for three-phase connections explicitly. This would create a straightforward framework for more effective residential systems without requiring every installation to be treated as a conventional fixed solar installation.

Ngā mihi,

[REDACTED]

[REDACTED]

Outlook

about rooftop solar

From [REDACTED]
Date Sat 2026-09-19 9:53 AM
To Connection Feedback <connection.feedback@ea.govt.nz>

Dear Electricity Authority,

I am writing as a New Zealand residential electricity consumer to provide feedback on the proposed changes relating to plug-in generation and small-scale distributed generation.

I strongly support the development of a clear and practical regulatory framework that would allow safe, compliant plug-in solar generation, including balcony solar systems, to be used by New Zealand households.

Small plug-in solar systems could provide an affordable way for households that cannot install conventional rooftop solar — including renters, apartment residents and homeowners with unsuitable roofs — to participate in renewable energy generation.

I believe New Zealand should consider allowing small plug-in solar systems, for example systems in the range of 600–800 watts, provided that they use certified equipment and meet appropriate electrical safety requirements. In the future, higher-capacity systems could also be considered where appropriate safeguards are in place.

Any permitted system should, in my view, include requirements such as:

- Certified and approved inverters suitable for the New Zealand electricity network.
- Effective anti-islanding protection.
- Appropriate electrical protection and RCD requirements.
- Clearly defined limits on power export to the grid.
- A simple registration or notification process where required.
- Clear installation and operating instructions for consumers.
- Appropriate product certification so consumers can easily identify compliant equipment.

I would also encourage the Authority to consider how New Zealand can benefit from the increasingly competitive international solar equipment market. Affordable solar panels, microinverters and battery systems are widely available internationally. If imported products meet New Zealand's required safety and technical standards, consumers should be able to access them without unnecessary regulatory barriers.

The cost of conventional solar installation can be a significant barrier for ordinary households. A properly regulated plug-in solar option could provide a much lower-cost entry point and allow more New Zealand households to reduce their electricity consumption from the grid.

I also believe that clear rules are important for the development of a local market. Manufacturers, importers, electricians and installers need to know what technical standards will apply before

investing in compliant products and services.

I therefore encourage the Electricity Authority and other relevant government agencies to establish a clear pathway for the legal use of plug-in solar generation in New Zealand, while maintaining appropriate electrical and network safety standards.

Finally, I would appreciate it if the Authority could provide a clear indication of the expected timeline for the next stages of this work, including when consumers might realistically be able to purchase and legally use compliant plug-in solar systems.

Thank you for considering my submission.

Kind regards,

A solid black rectangular box used to redact the signature of the sender.

Residential electricity consumer