

3 December 2019

Submissions
Electricity Authority

Nova Energy Limited
PO Box 10141, Wellington 6140
www.novaenergy.co.nz

By email: Part6hosting.submissions@ea.govt.nz

Re: Consultation Paper - Integrating hosting capacity into small-scale distributed generation connections

Nova generally supports the proposed changes but recommends the proposal be amended to require the optional modes on inverters to be set on the equipment if they are available.

Please feel free to contact me if you wish to discuss our views further.

Yours sincerely



Paul Baker

Commercial & Regulatory Manager

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Nova submission

Consultation Paper - Integrating hosting capacity into small-scale distributed generation connections

Q No.	Question	Response
1.	Do you agree the issues identified by the Authority? If not, why not?	Nova agrees with the issues presented.
2.	Do you agree with the proposals identified by the Authority? If not, why not?	<p>It is unclear if all inverter manufacturers allow the optional volt response modes to be set in the inverter, or if they only apply the mandatory settings in order to comply with AS4777.2:2015.</p> <p>If the latter:</p> <p>a) then it is possible they supply inverters that meet AS4777.2:2015 but do not meet the requirements under Part 1A. This places an undue burden on distributors to assess applications for inverters that are currently suitable under Part 1A using the Part 1 processes.</p> <p>b) This may restrict the customers' choices in respect of inverters that meet the standard.</p> <p>Nova recommends that the proposal is amended to require that the optional voltage response modes be set, if available, in order to meet Part 1A.</p>
3.	Do you agree with the objectives of the proposed amendment? If not, why not?	Agree.
4.	Do you agree the benefits of the proposed amendment outweigh its costs? If you don't agree, please explain your reasons.	Agree, provided the proposal does not restrict competition for the supply of inverters in New Zealand to a small number of manufacturers.

Q No.	Question	Response
5.	Do you agree the proposed amendment is 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.	No comment
6.	Do you agree the Authority's proposed amendment complies with section 32(1) of the Act? If you don't agree, please explain your reasons.	No comment
7.	Do you agree with the drafting of the proposed amendment? If not, why not?	See comment at item 2.