

19 November 2025



Submissions
Electricity Authority
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Via email: connection.feedback@ea.govt.nz

Maximising benefits from local electricity generation

Buller Electricity Limited (BEL) appreciates the opportunity to provide this submission on the Electricity Authority's (Authority) proposals to maximise the benefits from local electricity generation.

This submission addresses the four separate proposals below. Nothing in this submission is confidential.

A. Proposals to improve export limits for small-scale DG

A1: The Code sets a default 10kW export limit and allows for distributors to set lower limits where appropriate using an industry-developed export limits assessment methodology

Buller supports this proposal to set a default 10kW export limit for Part 1A connections and for distributors to also have discretion to set lower limits. There are no export constraints on Buller's network and additional injection from existing small-scale distributed generation is the lowest cost supply for other consumers on Buller's network.

We agree with the industry, including small-scale distributed generation stakeholders, developing an export limits assessment methodology that is to be adopted by all distributors. Consistency and the efficiencies of scale in developing these methodologies benefits all electricity consumers.

A2: The Code sets default voltage response settings for inverters (using Australian settings) and allows for distributors to set different settings where appropriate

Buller refers distributed generation investors to the Clean Energy Council for approved inverters – and these are approved to Australian standards. Buller requests the Authority ensure references to inverters throughout the Code are clear and consistent (and not contradictory).

B. Proposal to improve export limits for larger-scale DG

The Code mandates distributors use an industry-developed bespoke export limits assessment methodology when setting export limits for larger DG

Again, Buller agrees with the industry, including larger-scale distributed generation stakeholders, developing an export limits assessment methodology that is to be adopted by all distributors. Consistency and the efficiencies of scale in developing these methodologies benefits all electricity consumers.

Buller suggests distributors might better manage emerging network congestion by adopting / publishing a congestion management (curtailment) policy that is more dynamic than applying at

all times a blanket export limit threshold based on an industry developed export limits assessment methodology.

C. Proposal for all low voltage DG applications

The Code mandates use of the latest inverter performance standard for all low voltage DG applications

As stated above under Proposal A2, Buller refers distributed generation investors to the Clean Energy Council for approved inverters – and these are approved to Australian standards. Buller requests the Authority ensure references to inverters throughout the Code are clear and consistent (and not contradictory).

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