Appendix B Format for submissions

Maximising benefits from local generation

Submitter	Mike Foot
Submitter's organisation	**Compare Power Companies- Power comparison Company and private solar customer**

Please send your submission to connection.feedback@ea.govt.nz by **5pm, Wednesday 19 November 2025**

Questions	Comments
Q1. What are your views on the proposal to set a default 10kW export limit for Part 1A applications?	The old default limits were set many years ago, and don't reflect modern solar system (Distributed Generation) sizes. The current limit has not kept up with technology changes and improvements and does not capture all the available energy/power that modern DG systems produce. We have a very low solar adoption rate (1-2% penetration) and in comparison to other countries we really do not encourage solar production with a 5 kw export limit. If the volume to distinguish a high user from a low user is 9,000 kw in the south, and with the current export limit, we are asking site owners to install 5kw or less so 50% or less of dg, for if you install more, it is highly likely your production will be throttled in summer and that is likely to be happening now. To produce 7,000 kwh annually you need 5.8 kw of solar dg north facing, more if east west orientation, and both scenarios will have export throttling with a 5 kw export limit. That is lost investment opportunity and pushes out the solar DG payback. Having a 10 kw export limit by default will encourage average solar customers so that they know that the energy they produce will be captured and can be used for the system ROI.
Q2. What are your views on the Code clarifying that a distributor	This simplifies the process and for the majority of installations will streamline it so that systems will

cannot limit the nameplate capacity of a Part 1A application, unless the capacity exceeds 10kW?	produce more energy/power and assist the network overall.
Q3. There are requirements for distributors in Proposal A1. Which of these do you support, or not support, and why?	
Q4. What are your views on the proposal for industry to develop an export limits assessment methodology?	If export limits are not mandated, then there will be an imbalance between networks, for already some networks have a 10kw low voltage export limit. As technology evolves, processes and limit applications, assessments need to be universal so that training can be consistent throughout Aotearoa and installers can move districts where the work is and there is consistency.
Q5. What would you do differently in Proposal A1, if anything?	Nothing different suggested
Q6. What concerns, if any, do you have about requiring the 2024, rather than 2016, version of the inverter installation standard for Part 1A applications?	
Q7. Do you support amending the New Zealand volt-watt and volt-var settings to match the Australian values for Part 1A applications - why or why not – what do you think are the implications?	The Australians have adopted solar far sooner and in great depth, and have already fixed the pitfalls , and have a working system. I do not see any downsides.
Q8. What would you do differently in Proposal A2, if anything?	Nothing suggested
Q9. Do you have any concerns about the Authority citing the Australian disconnection settings for inverters when high voltage is sustained?	No
Q10. Do you have any concerns about the Authority requiring the	No

latest version of the inverter performance standard for Part 1A applications?	
Q11. What are your views on the proposal that where distributors set bespoke export limits for Part 2 applications, they must do so using the industry developed assessment methodology?	Setting standards means that bespoke limits need to be justified, using known and accepted practises
Q12. What are your views on the several requirements that must be adhered to regarding the distributors' documentation (see paragraph 5.96) relating to setting export limits under Part 2?	Nil
Q13. Do you agree it is fair and appropriate that where distributors set export limits for Part 2 applications, applicants can dispute the limit? If so, what sort of process should that entail?	Absolutely. An independent disputes process means that participants need to justify decisions and can have their findings critiqued by knowledgeable individuals or arbiter.
Q14. What would you do differently in Proposal B, if anything?	Nil
Q15. What are your thoughts on requiring the inverter performance standard (AS/NZS 4777.2:2020 incorporating Amendments 1 and 2) for low voltage DG applications in New Zealand?	
Q16. Do you consider the transitional arrangements workable regarding requirements and timeframes? If not, what arrangements would you prefer?	They look workable
Q17. What are your views on the objective of the proposed amendments?	Fantastic. They are designed around adapting archaic regulations to fit todays solar and

Q18. Do you agree the benefits of the proposed amendments outweigh their costs? If not, why not?	All regulatory change requires some degree of cost, however it is for the greater good that they are necessary. The easier the process is, the more sites will consider solar as a viable option to feed power into the grid at all times including peak times. By throttling limits, it makes the installations less viable and pushes out the " payback period"
Q19. What are your views on the Authority's estimate of costs of lost benefits from a 5kW export limit?	The estimates are fair given from what I am seeing from my very own system. Because of the export limit throttling, there is a considerable amount of "lost energy" potential that the grid and consumers could be benefiting from but right now they are not.
Q20. Are there costs or benefits to any parties (eg, distributors, DG owners, consumers, other industry stakeholders) not identified that need to be considered?	Some consumers are purposely undersizing installations based on old archaic export limits so are not benefiting from lowering installation costs to cover their load. The cost of installations are from equipment needed to be on the roof typically. Its costly to get the installer back to increase the load.
Q21. Do you agree the proposed Code amendments are preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's main statutory objective in section 15 of the Electricity Industry Act 2010	I agree with the changes and streamlining process.
Q22. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	Yes
Q23. Do you have any comments on the drafting of the proposed amendment?	