Organisation:		Drive	Electric
Date:	19	November	2025
Contact: Kirsten Corson			

Re: Consultation on Maximising Benefits from Local Electricity Generation – Export Limits for Vehicle-to-Grid Technology

I am writing on behalf of Drive Electric in response to the Electricity Authority's consultation paper on maximising benefits from local electricity generation, dated 8 October 2025.

BACKGROUND

Drive Electric is New Zealand's leading not-for-profit organisation championing electric vehicle adoption and transport decarbonisation. We operate on three core pillars—Advocacy, Education, and Connection—bringing together businesses and individuals across the EV ecosystem including manufacturers, fleet operators, charging infrastructure providers, and electricity networks.

Vehicle-to-Grid (V2G) technology represents a crucial element of New Zealand's energy transition. V2G enables electric vehicles to not only draw power from the grid but also export electricity back to the network during peak demand periods. This bidirectional capability offers significant benefits including reduced network upgrade costs, improved grid stability, and additional revenue streams for EV owners and fleet operators.

OUR POSITION

Drive Electric strongly supports the intent of the Authority's proposals to maximise benefits from distributed generation through more efficient export limits. We particularly welcome the focus on removing unnecessary barriers to investment and the comprehensive analysis demonstrating the economic costs of overly restrictive export limits.

However, we respectfully submit that **the proposed 10kW default export limit should be increased to 12kW** to properly accommodate Vehicle-to-Grid technology and maximise the economic benefits from transport electrification.

ISSUE OF CONCERN

Standard V2G chargers in New Zealand operate at 11kW. This is not an edge case—it is the standard specification for single-phase bidirectional EV chargers currently available in the New Zealand market.

The proposed 10kW default export limit would therefore:

- Force most V2G installations to artificially limit their export capacity to 10kW, wasting available capability, or
- Require applicants to use the slower, more complex application processes instead of the streamlined pathway

This creates an unintended barrier to V2G adoption precisely when New Zealand needs to encourage this technology to support both transport decarbonisation and grid stability.

WHY THIS MATTERS

Economic Benefits

The Authority's own analysis estimates that 5kW export limits cost approximately $4.23 million annually in lost revenue to distributed generation owners. A 10kW limit for 11kW V2G chargers creates a similar constraint, reducing the economic viability of V2G investments for both households and businesses.

Transport Decarbonisation

V2G is fundamental to successful fleet electrification. Our members—including fleet operators managing New Zealand's transition to electric transport—consistently identify V2G as enabling:

- More cost-effective EV ownership through electricity export revenue

- Grid stability services that benefit all consumers
- Enhanced energy resilience for businesses and communities
- Alignment with climate objectives through increased renewable energy utilisation

Regulatory settings should facilitate, not constrain, technologies that support New Zealand's decarbonisation commitments.

Network Benefits

V2G offers advantages for distributors managing network constraints:

- Dispatchable capacity that can be controlled and scheduled
- Peak demand management without requiring physical infrastructure upgrades
- Improved load factors and network utilisation
- Greater flexibility than intermittent generation sources

A 12kW default limit would enable these benefits whilst maintaining the Authority's proposed safeguards, including distributor ability to set lower limits where network assessments justify this.

OUR RECOMMENDATION

Increase the default export limit from 10kW to 12kW.

This modification:

- **Accommodates real-world technology**: Aligns with standard 11kW V2G charger specifications
- **Maximises economic benefits**: Enables full utilisation of V2G capacity, improving investment returns
- **Supports policy objectives**: Facilitates transport decarbonisation and grid modernisation
- **Future-proofs regulation**: Provides appropriate headroom as technology and system sizes continue to grow

The Authority notes (paragraph 5.20) that it considers 10kW "a practical current limit" but expects distributors to evolve their approach as "network capacity and technology will evolve along a continuum to allow higher exports in future." We submit that setting the default at 12kW now—rather than requiring revision after creating barriers to current V2G technology—better serves the Authority's stated objectives.

CONCLUSION

We strongly support the consultation's intent to maximise benefits from local electricity generation. The move towards evidence-based export limits is crucial for New Zealand's energy transition and transport electrification.

Our key recommendation is straightforward: increase the default export limit from 10kW to 12kW to accommodate standard V2G technology. This modification

maintains all the benefits of the Authority's proposals whilst removing an unintended barrier to transport decarbonisation.

We would welcome the opportunity to discuss this matter further and provide additional technical information regarding V2G deployment in New Zealand.

Thank you for considering this important matter.

Yours sincerely,

[redacted]

Chair

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