Appendix B Format for submissions

Maximising benefits from local generation

Submitter	Christian Judge
Submitter's organisation	**Electrify Kapiti**

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?	Do it. From Electrify Kapiti's direct experience in advising householders the current default 5kW limit for residential connections is leading to some putting off going ahead with solar PVs and leaving thousands of dollars in savings on the table.
Q2. What are your views on the Code clarifying that a distributor cannot limit the nameplate capacity of a Part 1A application, unless the capacity exceeds 10kW?	It should be up to the those investing in the system to size it. Export limits are set by inverter size and settings.
Q3. There are requirements for distributors in Proposal A1. Which of these do you support, or not support, and why?	EK supports proposals 5.20 to set a default export limit of 10kW for Part 1A applications noting that this should be progressed to being able to set higher, dynamic, limits. Great care should be taken to ensure that any arbitrary 10 kW export limit does not become the default and that the Code require amendments to allow for higher, dynamic limits. 10 kW should be a floor.
Q4. What are your views on the proposal for industry to develop an export limits assessment methodology?	While this is a good idea, safeguards must be put in place requiring this work to be enabling in nature with regard to the outcomes the Authority wants to see. It cannot be used by the sector as a way of avoiding any responsibility to actually allow higher and dynamic export limits.
Q5. What would you do differently in Proposal A1, if anything?	-

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?	My concern would be that including the 2016 limits for new applications would set Aotearoa up as a dumping ground for old inverters that lack the functionality that would enable households to more fully participate in the market. This is a bit like how the dismantling of light vehicle emissions standards have turned Aotearoa into a dumping ground for vehicles that are illegal in other OECD countries because they are so inefficient and dirty.
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?	Yes, EK supports this. The implications should be to enable greater adoption of CEC approved equipment in Aotearoa and the avoidance of the time and cost involved in developing and applying an alternative, likely lower, standard.
Q8. What would you do differently in Proposal A2, if anything?	-
Q9. Do you have any concerns about the Authority citing the Australian disconnection settings for inverters when high voltage is sustained?	No. This seems to be a tried and tested methodology that supports hight rooftop solar penetration across many Australian DSNOs.
Q10. Do you have any concerns about the Authority requiring the latest version of the inverter performance standard for Part 1A applications?	No. This should encourage the uptake of the latest inverters by householders instead of leaving them stranded with equipment with limited functionality to be interoperable with products and services enabled by the more up to data standards.
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?	On the one hand, having a standardised methodology across to motu allows larger project developers to have greater certainty around the consentability of their proposals. On the other hand, the use of a standardised process may limit innovation. There should be scope in the Code to allow for developers to apply for an exemption where it can be shown that system quality can be maintained.
Q12. What are your views on the several requirements that must be adhered to regarding the distributors' documentation (see	This seems like and approach that could facilitate what I have outlined in the answer to Q11 above.

paragraph 5.96) relating to setting export limits under Part 2?	
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?	Yes. It would be reasonable for developers to provide evidence where a deviation from the limits would allow for system quality to be maintained.
Q14. What would you do differently in Proposal B, if anything?	
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?	This should be adopted to avoid duplication and to allow for a far greater number of CEC approved devices to be available in Aotearoa, noting that it can apply to DER including BESS and V2G EVSEs. Again, there is no need to reinvent the wheel.
Q16. Do you consider the transitional arrangements workable regarding requirements and timeframes? If not, what arrangements would you prefer?	Yes. The sooner Aotearoa adopts improved voltage limits, connection approval methodologies and more modern and responsive inverters, the better.
Q17. What are your views on the objective of the proposed amendments?	These are both sound. It is EK's experience that householders can be put off investing in solar PV and BESS by low export caps, more so in anticipation of V2G.
Q18. Do you agree the benefits of the proposed amendments outweigh their costs? If not, why not?	Yes. See also Answer 20. Beware those that only talk about costs to themselves while ignoring the benefits to others and Aotearoa as a whole.
Q19. What are your views on the Authority's estimate of costs of lost benefits from a 5kW export limit?	EK's view is that this a low-ball estimate because it doesn't take into account the panels that weren't put on the roof in the first place that may well otherwise have been. For example, EECA states that a panel to inverter ratio of 1.2 to 1 is common, or that systems artificially cluster around 6 kW (you site average system size of 5.3 kW) for the sake of a 5kW export limit. The

	worked example assumes 7.92 kW and, with a 5kW inverter, a ratio of 1.58 to 1. In the case where a 10 kW limit is put in place, it is much more likely that systems greater than 5.3 to 7.92 kW will be installed. So, the opportunity cost is not what's spilled at the moment, but the panels that aren't installed because of the 5 kW limit. Also, my retailer pays 17c/kWh for export outside the peaks, and 40c/kWh within. These actual tariffs make a massive difference to the low-ball numbers modelled. Likewise, when considering export limits, payments of 40c/kwh for export are a great incentive for the uptake of BESS and V2G that would be enabled by your Part 1 and 2 proposals.
Q20. Are there costs or benefits to any parties (eg, distributors, DG owners, consumers, other industry stakeholders) not identified that need to be considered?	Yes. An accelerated uptake of DER has already been modelled and priced in both Transpower's Whakamana i Te Mauri Hiko and Boston Consulting's The Future is Electric reports in terms of billions of dollars of avoidable investment in transmission and distribution infrastructure. These avoidable costs otherwise fall on all energy consumers. Likewise, the accelerated uptake of DER, to match Australian levels, would go a long way to being able to avoid extremely costly investments in the likes of LNG which would have the effect of indexing electricity costs to spot LNG prices instead of the lowest cost electricity known in the modern age from wind and solar firmed by BESS, fully discounted hydro assets and geothermal. And with Australian levels of rooftop solar production, we too could have a duck curve and negative pricing and so much surplus electricity that everybody could get three hours for free. So, yeah, free power or high-cost LNG. This shouldn't be a tough choice.
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	Yes. It's understandable that EDBs are conservative and like to maintain the status quo and are happy to be locked into existing path dependencies. However, the proposed changes and their impact, if the Australian experience is to be repeated without the need to lean some of the hard lessons already learnt over there, it will be much better for everyone.

	Steps should be taken by regulators to challenge maintenance of the status quo that seek to ignore the Code changes proposed.
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?	No