



Export limits

From Electrify Wānaka [REDACTED]

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To Connection Feedback <connection.feedback@ea.govt.nz>

[REDACTED]
Kia ora,

This submission is written on behalf of Electrify Wānaka.

Electrify Wānaka is one of the many community groups working alongside Rewiring Aotearoa towards the goal of reducing Aotearoa's emissions while improving the cost of living for our communities, the economy of the country through cheaper home grown energy and our health through cleaner air.

Rooftop solar is the key to all these benefits for the country and for the people of this country. If 80% of new zealand roofs were equipped with a 9KW solar system, we could generate 40% more electricity than we do today (1) and reap all the economic, social and environmental benefits that come alongside cheap, distributed and decarbonised renewable electricity.

A roof without solar is wasted space and the electricity authority needs to do everything in its power to support this transition.

We also want to specifically emphasise the importance of local generation systems in a world that will be increasingly affected by extreme weather events. Solar battery systems have been shown to be life savers for communities after Cyclone Gabrielle or more recently after the destructive winds we experienced last month. To have as many of these systems as possible is crucial for our resiliency.

These are the positive reasons why we need to support and accelerate the uptake of rooftop solar in the country.

But what if we don't increase our renewable electricity generation, what if we do not decarbonise and stay reliant on expensive and polluting imported fossil fuels.

The British Institute and Faculty of Actuaries, in its Planetary Solvency report, forecasts that we are currently heading towards a 25% drop in global GDP and 2 billion deaths by 2050 if we reach 2.5°C of warming (2). But the German associations of physics and of meteorology believe that we might actually be on track for 3°C of warming by 2050 (3), which would equate to a 50% drop in global GDP and 4 billion deaths according to the Planetary Solvency report.

To try and avoid the worse of what the climate collapse could cause, and to benefit from the many advantages of renewable electricity generation and specifically of rooftop solar generation, we support the Electricity Authority proposals to improve export limits for small-scale distributed generation (DG) by:

- setting a default 10kW export limit (with allowance to set lower limits where appropriate based on an industry-developed assessment methodology) for small scale distributed generation connections (up to 10kW capacity),
- setting default voltage response settings for inverters (using Australian setting) and allowing for distributors to set different settings where appropriate.

And we support the Electricity Authority proposals to improve export limits for large-scale distributed generation (DG) by:

- mandating distributors to use an industry-developed bespoke export limits assessment method to set export limits for larger DG
- Mandating the use of the latest inverter performance standard for low voltage DG

But making sure the way bespoke export limits are set for many small businesses, community groups, farms and households who want to install more than 10kW of solar is really important to get right, so that unnecessary limits are not placed on the scale of their solar and battery installations. This critical group of customers installing mid size solar are typically not resourced to engage in the connection process with distributors in the same way that the large utility scale distributed solar and battery firms are. Therefore it's important that the proposed assessment method that distributors use is transparent, fair and its use is monitored by the Electricity Authority to ensure it is not used to unnecessarily limit distributed generation.

Also, if allowing for distributors to set lower default limits than 10kW where appropriate using an industry-developed export limits assessment methodology, might be needed in specific situations, it should be discouraged and it should not be used as a way for EDBs to avoid improving network management approaches to support more customer solar investment and continuing to impose arbitrary unnecessary export limits. Electricity Authority scrutiny should be applied here, to monitor use.

Thank you for reading our submission.

Pierre Marasti

Electrify Wānaka

References:

(1)

<https://www.rewiring.nz/news/new-zealand-please-put-your-rooftops-to-work>

(2)

<https://actuaries.org.uk/news-and-media-releases/news-articles/2025/jan/16-jan-25-planetary-solvency-finding-our-balance-with-nature/>

(3)

<https://www.dpg-physik.de/veroeffentlichungen/publikationen/stellungnahmen-der-dpg/klima-energie/klimaufruf/stellungnahme>