Appendix B Format for submissions

Maximising benefits from local generation

Submitter	Paul Sharp
Submitter's organisation	**Future Energy**

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?	A national standard approach would provide clarity for industry participants, and customers alike. Completely agree that a standard approach for assessing export limitations would be fair, instead of seemingly arbitrary limitations experienced in some DG application cases.
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?	From an export perspective I can agree that the inverter nameplate should not be of concern, as long as the export limit (as well as the inverter protection settings) is adhered to. The only other thought on this is mitigating network load draw spikes, due to sudden reduction in solar irradiance, i.e. multiple localised households requiring grid draw due to sudden cloud cover. However, increased battery penetration would offset this risk.
Q3. There are requirements for distributors in Proposal A1. Which of these do you support, or not support, and why?	I would support any requirement for national process standardisation. I would be wary of requirements for costly EDB upgrades. The ultimate goal would be to provide solutions that benefit all participants, without placing burdens on specific entities.
Q4. What are your views on the proposal for industry to develop an export limits assessment methodology?	Completely agree that standardisation helps all participants, and potentially could lead to automation of the assessment process. Currently there are different experiences depending on the EDB. The

	assessment methodology would have to allow account for localised network risk factors though.
Q5. What would you do differently in Proposal A1, if anything?	The proposals seem fair and balanced. No change suggestions required.
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?	I have no concerns. Increased inverter grid protection settings should provide greater confidence in distributed generation.
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?	Completely support this, especially as the voltage tolerances have expanded to +/-10%. Implications: considering that there are multiple layers of network protection built into accredited inverters, the main implications would be on the DG owners, due to potential inverter curtailment, rather than the local network. However, the previous mentioned alignment with Australia_A should result in curtailment only in exceptional cases.
Q8. What would you do differently in Proposal A2, if anything?	None. There appears to be EDB accountability built into the proposed changes, that implies fairness for all participants.
Q9. Do you have any concerns about the Authority citing the Australian disconnection settings for inverters when high voltage is sustained?	No. The Volt-Watt settings should reduce the inverter output to building baseload. Therefore supply voltage theoretically should not be increased by the inverter due to export, indicating there is a supply issue to resolve independently.
Q10. Do you have any concerns about the Authority requiring the latest version of the inverter performance standard for Part 1A applications?	No concerns.
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?	Again, a standardised process would benefit all participants. Clarity as to the process would build confidence in system designers and end customers to proceed with projects. Having said that, to date we have not encountered export limitations with Part 2 applications.

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?	I think this is fair and reasonable.
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?	A dispute process would be fair and appropriate. If the BELAM process is adhered to I would suggest the cost would be on the applicant.
Q14. What would you do differently in Proposal B, if anything?	No suggestions.
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?	To my mind this is the purpose of a standard. If the EDB's have confidence in the inverter network protection capabilities, then all participants have a common framework to align to, and will benefit accordingly. There will be legacy equipment on the network which will not conform to the standard, but in relatively low numbers, and eventually these will be replaced with compliant inverters as they fail.
Q16. Do you consider the transitional arrangements workable regarding requirements and timeframes? If not, what arrangements would you prefer?	Regarding implementation of the inverter standards, I see no issue with this. Regarding the ELAM/BELAM implementation, I support a fixed deadline of a proposed method supplied to the EDB's.
Q17. What are your views on the objective of the proposed amendments?	Whilst the ideal of competition is valid, my view is one of cooperation of all participants in a fair and balanced energy ecosystem. There are technologies in play today that support the consumer, EDB's, and generators, without requiring costly network upgrades. The current issue here is scale. The stated objectives would encourage increased participation, thus increasing scale, and effectiveness of participation.
Q18. Do you agree the benefits of the proposed amendments	Mostly yes. Increased electricity supply will not in itself lead to lower consumer electricity costs if there are additional infrastructure and generation costs

outweigh their costs? If not, why not?	increases. A coordinated approach has to be encouraged to balance the benefits to all participants, so that they are all seen as part of the solution, as opposed to certain participants being seen (sometimes unfairly) as part of the problem.
Q19. What are your views on the Authority's estimate of costs of lost benefits from a 5kW export limit?	Our approach with our customers is to avoid stating the purpose of a solar generation system as an export revenue generator, and instead focus on how to use the generated energy more effectively. However, where export could used effectively on the local network, export curtailment is, as outlined, simply wasted. The calculations are valid enough to illustrate the point of wasted returns for the consumer, but it would be also beneficial to illustrate local network gains based on ACOT (as mentioned in paragraphs 7.14 & 7.15).
Q20. Are there costs or benefits to any parties (eg, distributors, DG owners, consumers, other industry stakeholders) not identified that need to be considered?	Retailer revenue may be impacted, but they should be flexible enough to size operations accordingly.
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	Completely agree.
Q22. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	Yes, I support the tenets of developing the DG industry, supply reliability, and competition for the purpose of lowering as far as possible overall consumer energy pricing.
Q23. Do you have any comments on the drafting of the proposed amendment?	Any referencing/encouraging to/of localised energy storage will provide stability and ease concerns around the negative perceptions of distributed generation. Encouragement at this stage, whereby

	solar ICP penetration is relatively low, will reap benefits to all participants, and enhance grid stability.