

Appendix B Format for submissions

Maximising benefits from local generation

Submitter	Gajan Shivanandan
Submitter's organisation	N/A

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?	I support this as a default.
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?	I support this.
Q3. There are requirements for distributors in Proposal A1. Which of these do you support, or not support, and why?	Support these including the proposed timeframe to undertake process development to support > 10kW limits (where required).
Q4. What are your views on the proposal for industry to develop an export limits assessment methodology?	No Comment
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?	No concerns.

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 support this. It will also increase significantly to market the available inverters and present end user-savings. This will probably also be beneficial in the eventual bringing to market of V2G, so a harmonised approach is best and avoid the NZ - small market barriers.
Q8. What would you do differently in Proposal A2, if anything?	No concerns
Q9. Do you have any concerns about the Authority citing the Australian disconnection settings for inverters when high voltage is sustained?	No concerns
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?	No views.
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?	Support this – seems fair and logical.
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.

Q14. What would you do differently in Proposal B, if anything?	No changes at this stage – it might be a case of testing the market, and then undertaking a review (in 2-3 years) on whether this is increased time to approve applications or increased costs significantly to applicants/distributors (itself become a barrier).
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?	No comment
Q16. Do you consider the transitional arrangements workable regarding requirements and timeframes? If not, what arrangements would you prefer?	No comment
Q17. What are your views on the objective of the proposed amendments?	Supportive
Q18. Do you agree the benefits of the proposed amendments outweigh their costs? If not, why not?	Yes – if not on the conservative side.
Q19. What are your views on the Authority's estimate of costs of lost benefits from a 5kW export limit?	Generally conservative, but good enough to highlight the system level benefits of the proposed changes.
Q20. Are there costs or benefits to any parties (eg, distributors, DG owners, consumers, other industry stakeholders) not identified that need to be considered?	
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	Yes

main statutory objective in section 15 of the Electricity Industry Act 2010	
Q22. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	Support these.
Q23. Do you have any comments on the drafting of the proposed amendment?	No.