

Appendix B Format for submissions

Maximising benefits from local generation

Submitter	John Leenman
Submitter's organisation	Hauraki Resilient Communities Trust Inc

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 the EA proposal to increase Export limits to 10kW. The current 5kW export limit disincentivises installation of larger domestic solar/battery systems thus limiting potential revenue (shorter payback times), increasing local resilience through DG, decreasing need for more poles/wires (future lines company costs)
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?	This makes sense and removes the current “arbitrary” 5kW limit
Q3. There are requirements for distributors in Proposal A1. Which of these do you support, or not support, and why?	I support all the proposed requirements as they standardise installation processes, offer more certainty to applicants and improve more efficient network operations.
Q4. What are your views on the proposal for industry to develop an export limits assessment methodology?	I would think this an essential tool, enabling standardisation and consistency across the segment.
Q5. What would you do differently in Proposal A1, if anything?	nothing
Q6. What concerns, if any, do you have about requiring the 2024, rather than 2016, version of the	I am not qualified to answer this

inverter installation standard for Part 1A applications?	
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?	I support standardising with the Australian values. The work have been done – no need to reinvent the wheel.
Q8. What would you do differently in Proposal A2, if anything?	This question is above my paygrade. It requires technical knowledge I don't possess.
Q9. Do you have any concerns about the Authority citing the Australian disconnection settings for inverters when high voltage is sustained?	Again, a technical question
Q10. Do you have any concerns about the Authority requiring the latest version of the inverter performance standard for Part 1A applications?	Ditto
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?	agree
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?	It's a no brainer that distributor documents meet national standards. Permitting local discretion to improve performance also seems a good move
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. Again national assessment procedures should be developed to ensure inconsistencies are avoided.

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?	Above my paygrade
Q16. Do you consider the transitional arrangements workable regarding requirements and timeframes? If not, what arrangements would you prefer?	This is an industry level question
Q17. What are your views on the objective of the proposed amendments?	I support the EA proposals improve export limits for small-scale installations and the improvement of export limits for large scale DG.
Q18. Do you agree the benefits of the proposed amendments outweigh their costs? If not, why not?	Yes. The benefits are well understood
Q19. What are your views on the Authority's estimate of costs of lost benefits from a 5kW export limit?	
Q20. Are there costs or benefits to any parties (eg, distributors, DG owners, consumers, other industry stakeholders) not identified that need to be considered?	Can't think of any
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	Agree

15 of the Electricity Industry Act 2010	
Q22. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	Can't comment
Q23. Do you have any comments on the drafting of the proposed amendment?	No