

Submission on Proposed Changes to Distributed Generation Export Limits

Electricity Authority – Distribution Code Review

Ian Bell
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1. Introduction

Thank you for the opportunity to provide feedback on the Electricity Authority's proposed rule changes relating to export limits for distributed generation (DG). I am writing in strong support of the Authority's proposal to adopt a default **10kW export limit** for small-scale generation, along with the introduction of a standardised assessment method for any limits set below this threshold.

These changes are timely, practical, and essential to unlocking the full value of residential and small-scale renewable energy generation in New Zealand.

2. General Support for the Proposal

I support the Authority's assessment that current export limits—commonly set at **5kW**—are inconsistent across networks, outdated, and create unnecessary barriers for households and businesses wanting to contribute clean energy to local communities.

Increasing the default export limit to **10kW** will:

- enable greater utilisation of the rapidly growing amount of rooftop solar and small-scale renewable generation
- reduce wasted generation (curtailment)
- improve the economic return for households who have invested in solar
- encourage the installation of larger, more future-proof systems
- support wider decarbonisation and energy resilience goals at the lowest cost

One lines company has already successfully moved to a 10kW limit, demonstrating that the change is both achievable and beneficial.

3. Importance of Clear, Consistent National Rules

Under current rules, lines companies have broad discretion to set export limits without a standardised methodology. This results in:

- different limits in neighbouring regions
- uncertainty for consumers and installers
- potential under-investment in distributed generation
- inefficient use of available network capacity

I strongly support the Authority's proposal to require lines companies to use a **consistent, industry-developed assessment method** when proposing export limits below 10kW. This will ensure transparency, fairness, and evidence-based engineering decisions.

A standardised approach for larger generators (e.g., solar and wind farms) is also essential to ensure efficient development and connection of medium-scale renewables.

4. Benefits to Households, Communities, and the National Grid

The proposed changes will deliver widespread benefits, including:

For households and small businesses

- Better returns on solar investments
- Ability to install systems sized for both self-consumption and export
- Increased incentive to adopt batteries and smart energy technologies

For local communities

- More resilient networks through decentralised generation
- Local renewable energy supporting peak demand periods
- Improved energy affordability in the long term

For the national electricity system

- Reduced pressure on transmission and large-scale generation
- More efficient use of renewable energy
- Greater progress toward national emissions reduction goals

These outcomes align strongly with the Authority's mandate to promote efficient operation of the electricity industry for the long-term benefit of consumers.

5. Conclusion

The proposed increase to a 10kW default export limit, along with a standardised method for setting lower limits, is a practical and overdue step that will significantly improve the efficiency, fairness, and future preparedness of New Zealand's electricity distribution system.

I fully support the Authority's proposals and encourage their timely adoption.

Thank you for considering this submission.

Ian Bell
Private Individual consumer
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