

Appendix B Format for submissions

Maximising benefits from local generation

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| Submitter | John Mansell |
| Submitter's organisation | Consumer/local producer |

Please send your submission to connection.feedback@ea.govt.nz by **5pm, Wednesday 19 November 2025**

| Questions | Comments |
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| Q1. What are your views on the proposal to set a default 10kW export limit for Part 1A applications? | Strongly in favour. Ideally would be coupled with stronger incentives for greater uptake of distributed generation to reduce dependence on centralized generation. |
| 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? | Broadly in favour – actual export power seems a much better metric to assess than potential export power given most distributed generating systems will utilise at least some of the locally generated power. |
| Q3. There are requirements for distributors in Proposal A1. Which of these do you support, or not support, and why? | Support all of 5.28(a) – (e). |
| Q4. What are your views on the proposal for industry to develop an export limits assessment methodology? | Agree that harmonisation of assessment methodology is required across all distributors, not least to enable flexibility of DG producers' choice in distributor. |
| 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? | None – though it's not clear to me how many DG systems this would exclude which would otherwise be perfectly capable of safely exporting more than 5kW. |

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| <p>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?</p> | <p>Yes.</p> |
| <p>Q8. What would you do differently in Proposal A2, if anything?</p> | |
| <p>Q9. Do you have any concerns about the Authority citing the Australian disconnection settings for inverters when high voltage is sustained?</p> | <p>No</p> |
| <p>Q10. Do you have any concerns about the Authority requiring the latest version of the inverter performance standard for Part 1A applications?</p> | <p>No</p> |
| <p>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?</p> | <p>Agreed. See response to Q4 above for just one justification.</p> |
| <p>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?</p> | <p>They seem reasonable.</p> |
| <p>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?</p> | <p>Yes – a right of reply seems essential. A panel set by the EC and industry stakeholders having a review mandate would seem appropriate.</p> |

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| Q14. What would you do differently in Proposal B, if anything? | Nothing – seems reasonable. |
| 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? | - |
| Q16. Do you consider the transitional arrangements workable regarding requirements and timeframes? If not, what arrangements would you prefer? | - |
| Q17. What are your views on the objective of the proposed amendments? | Should support increased uptake of DG systems and reduce risk to grid. |
| Q18. Do you agree the benefits of the proposed amendments outweigh their costs? If not, why not? | Yes. Improved resilience alone supports increased DG limits. |
| Q19. What are your views on the Authority's estimate of costs of lost benefits from a 5kW export limit? | As acknowledged, they are in my view very conservative. Note also that a purely financial assessment of cost does not account for other costs (including environmental and missed opportunity costs) associated with spilled energy. |
| Q20. Are there costs or benefits to any parties (eg, distributors, DG owners, consumers, other industry stakeholders) not identified that need to be considered? | Possibility of distributor level storage of excess, currently spilled, generation, with attendant possibility to reduce reliance on non-green energy sources. |
| 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 | Yes |

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| 15 of the Electricity Industry Act 2010 | |
| Q22. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act? | - |
| Q23. Do you have any comments on the drafting of the proposed amendment? | No – seems well drafted. |