

Export limits - Consultation Response

From Juliet Tainui Hernandez [REDACTED]

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To Connection Feedback <connection.feedback@ea.govt.nz>

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Kia ora,

My name is Juliet Tainui-Hernandez. This consultation response is made in my personal capacity as a director and adviser working across financial services, sustainability, and Māori economic development.

I support the Electricity Authority Te Mana Hiko's proposals to enable more efficient and equitable uptake of distributed generation (DG) and to maximise system-wide benefits.

Support for Proposed Reforms

DG provides clear public benefits:

- emissions reduction and peak-demand support
- increased resilience during climate-related disruption
- lower household energy costs and wider access to clean-energy technologies

Inconsistent export limits and varied connection processes currently constrain DG investment, impose unnecessary uncertainty and cost on households and small enterprises, and slow national progress on decarbonisation and supply security.

The Authority's proposals to introduce clearer standards, greater transparency, and consistent methodologies are well-founded and timely.

Export Limits and Consumer Participation

Higher export limits materially improve investment payback periods — especially given the short duration of green-finance products — and enable more households to participate in the energy transition. As consumers become active contributors to system resilience and renewable supply, regulatory settings should support, not restrict, that participation.

Evidence-based, published export limits will reduce regional inequity, lift consumer confidence, and ensure certain communities are not disadvantaged by opaque or overly conservative constraints.

System Readiness

With expanded voltage tolerances, improved inverter performance standards, and enhanced network visibility, the system should be technically ready for higher export capacity. Policy settings should reflect this readiness to avoid unnecessary barriers to DG deployment.

Recommendations

I support the Authority's proposals, in particular:

1. **A default 10 kW export limit**, with lower limits permitted only where justified by an industry-developed assessment methodology.

2. **Mandatory adoption of current inverter voltage-response standards** consistent with Australian settings.
3. **Publication of export-limit settings** by all distributors.
4. **A mandatory methodology for assessing export limits above 10 kW**, ensuring fair treatment of marae, farms, small businesses, and community organisations.

A consistent national framework, transparent methodologies, and modern technical standards will reduce over-conservatism, improve investment signals, and unlock low-cost, consumer-led generation at scale. This will reduce system-wide costs, defer network investment, strengthen energy security, and accelerate Aotearoa's transition to a resilient, affordable, low-emissions electricity system.

Nāku iti noa, nā

Juliet Tainui-Hernandez

Ngāi Tahu, Te Whakatōhea