

Appendix B Format for submissions

Maximising benefits from local generation

Submitter	Ian Gunn
Submitter's organisation	Low Carbon Kapiti

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?	<p>Low Carbon Kapiti strongly supports the Electricity Authority Te Mana Hiko's (Authority) aim to remove unnecessary barriers to stimulate efficient investment in distributed generation to maximise the benefits for all New Zealanders.</p> <p>Currently, there are arbitrary restrictions on the amount of power those with rooftop solar and batteries connected to distribution networks can export to the grid. Higher export limits will speed up the roll out of distributed generation (eg, rooftop solar) and battery adoption rates because the payback period will be reduced.</p> <p>This change will also incentivise bigger systems to be installed. This will increase savings for homeowners and also substantially lower the price of electricity for everyone on the network compared to dirty, expensive options such as gas.</p>
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?	<p>Low Carbon Kapiti supports the Electricity Authority's proposal to prohibit distributors from imposing any limits on the nameplate capacity of installed distributed generation. Limiting how much solar customers install for their own use is unnecessary and does not maximise benefits to customers. Larger solar systems can be designed to provide optimal supply and battery storage, and exports back to the grid via the inverter are limited so they don't breach required export limits.</p>
Q3. There are requirements for distributors in Proposal A1.	<p>Low Carbon Kapiti strongly supports the requirements set out in 5.28.</p>

Which of these do you support, or not support, and why?	
Q4. What are your views on the proposal for industry to develop an export limits assessment methodology?	<p>Making sure the way bespoke export limits are set for many small businesses, community groups such as retirement villages, farms and households who have the potential to install more than 10kW of solar it is really important to get this right, so that unnecessary limits are not placed on the scale of their solar and battery installations.</p> <p>This critical group of customers installing mid size solar are typically not resourced to engage in the connection process with distributors in the same way that the large utility scale distributed solar and battery firms are. Therefore it's important that any proposed assessment method developed by industry is transparent, fair and its use is monitored by the Electricity Authority to ensure it is not used to unnecessarily limit distributed generation.</p> <p>The Electricity Authority needs to monitor use. This will allow for distributors to set lower default limits than 10kW where appropriate using an industry-developed export limits assessment methodology. While this might be needed in specific situations, it should not be used as a way for EDBs to avoid improving network management approaches to support more customer solar investment.</p>
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?	Low Carbon Kapiti supports the use of the latest standards. It seems odd to use any that are out of date.

<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>Low Carbon Kapiti supports setting default voltage response settings for inverters (using Australian setting) and allowing for distributors to set different settings where appropriate.</p>
<p>Q8. What would you do differently in Proposal A2, if anything?</p>	<p>-</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 concerns.</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 concerns.</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>Low Carbon Kapiti supports mandating lines companies to use an industry-developed bespoke export limits assessment method to set export limits for larger DG but there should be room for well researched challenges to this to be considered.</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>The way 5.96 is written suggests limits be set by the standard formulae with any different limit being lower. Instead, it should be written to enable for higher limits to be tested beyond what might be found using the BELAM.</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>Low Carbon Kapiti supports those applying for higher limits being able to provide their own modelling from an appropriately qualified expert.</p>
<p>Q14. What would you do differently in Proposal B, if anything?</p>	
<p>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?</p>	<p>Low Carbon Kapiti supports this proposal.</p>
<p>Q16. Do you consider the transitional arrangements workable regarding requirements and timeframes? If not, what arrangements would you prefer?</p>	<p>Low Carbon Kapiti supports a rapid and thorough transition to the new arrangements. We want our community to get on with installing bigger PV systems.</p>
<p>Q17. What are your views on the objective of the proposed amendments?</p>	<p>Low Carbon Kapiti supports the objectives.</p>
<p>Q18. Do you agree the benefits of the proposed amendments outweigh their costs? If not, why not?</p>	<p>Yes. Households and businesses should not have the benefits of their systems unnecessarily limited.</p>
<p>Q19. What are your views on the Authority's estimate of costs of lost benefits from a 5kW export limit?</p>	<p>Low Carbon Kapiti's view is that the analysis is incomplete, in that it doesn't consider how people have installed smaller systems then they otherwise might have because of current low export limits. The numbers for average and new system size seem to be inconsistently applied in</p>

	<p>the calculations and the payments for export appear to be on the low side. Many of our members have solar and get higher export rates than your example. It also doesn't take into account that many people want to put solar up as a step in getting their homes off gas. The savings related to getting off gas should be considered including the health benefits of doing so.</p>
<p>Q20. Are there costs or benefits to any parties (eg, distributors, DG owners, consumers, other industry stakeholders) not identified that need to be considered?</p>	<p>Low Carbon Kapiti is a big supporter of building community resilience, especially in anticipation of earthquakes and climate driven storms. There are massive benefits to communities from having more and more solar that can work in an off-grid mode backed up by batteries in an emergency.</p>
<p>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 15 of the Electricity Industry Act 2010</p>	<p>Low Carbon Kapiti supports the proposed changes over the alternatives. After all, if the industry was getting on with modifying how it does things to enable greater solar capacity, there'd be no need for the Authority to be bringing these proposals forward.</p>
<p>Q22. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?</p>	<p>Yes</p>
<p>Q23. Do you have any comments on the drafting of the proposed amendment?</p>	<p>No</p>