Appendix B   Format for submissions

Maximising benefits from local generation

Submitter	Matthew Oldham
Submitter's organisation	Home owner with solar

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 fully support the proposal. I invested $13,000 in a solar system on my roof that caps out at 5kw for 9 months of the year, (see attached graph of a typical day's generation showing the effect of the cap at my house), wasting the capacity I paid for. If this proposal does not go ahead and the 5kw cap remains, on my second house I will only put in a smaller, $9,000 array. I also take this opportunity to ask for: 1. regulating the amounts paid for Kw distributed from home solar back into the grid, 2. allowing electric vehicles to feed power back and forth (VTH) bidirectionally to houses with solar. This would reduce peak draw on the grid outside daylight hours and further enhance the payback of home solar.
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?	
Q3. There are requirements for distributors in Proposal A1. 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?	
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?	
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?	
Q8. What would you do differently in Proposal A2, if anything?	
Q9. Do you have any concerns about the Authority citing the Australian disconnection settings for inverters when high voltage is sustained?	
Q10. Do you have any concerns about the Authority requiring the latest version of the inverter performance standard for Part 1A applications?	
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?	
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?	
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?	
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?	
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?	
Q18. Do you agree the benefits of the proposed amendments outweigh their costs? If not, why not?	
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?	
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	
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?	