Outlook

Export limits

From Michael Anderson [redacted]
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To Connection Feedback <connection.feedback@ea.govt.nz>

[redacted]

To the Electricity Authority,

My name is Michael Anderson, I'm a resident in Christchurch, I work in sustainability and promote the benefits of electrification to residents, businesses and farmers in the broader Christchurch region.

I am genuinely excited by the transformation of the energy future that is inevitably coming in the months and years ahead. Distributed generation such as rooftop solar and battery storage (standalone and electric vehicles with V2G) have a huge potential for financial savings at a household level, while also supporting New Zealand's electricity grid. But it is important that the electricity system participants support this, but also that the financial benefits of doing so are appropriately shared with those who participate in or invest in solutions.

I agree with the Electricity Authority Te Mana Hiko aim to remove unnecessary barriers to more efficient investment in distributed generation and maximise the benefits it brings for all New Zealanders.

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 should speed up distributed generation (eg rooftop solar) and battery adoption rates because the payback period will be reduced and incentivise bigger systems to be installed. I have personal experience with this, when we installed solar panels on our house in 2023 - we sized our system so that our export volumes were not regularly constrained by the arbitrary 5kW single phase limit. Subsequently we installed a smaller system (6.6kW) than we would have otherwise if the export limit was not there.

I support the Electricity Authority proposals to improve export limits for small-scale distributed generation (DG) by:

- setting a default 10kW export limit (with allowance to set lower limits where appropriate based on an industry-developed assessment methodology) for small scale distributed generation connections (up to 10kW capacity),
- setting default voltage response settings for inverters (using Australian setting) and allowing for distributors to set different settings where appropriate.

I support the Electricity Authority proposals to improve export limits for large-scale distributed generation (DG) by:

- mandating distributors to use an industry-developed bespoke export limits assessment method to set export limits for larger DG

- mandating the use of the latest inverter performance standard for low voltage DG

Making sure the way bespoke export limits are set for many small businesses, community groups, farms and households who want to install more than 10kW of solar is important to get right, so that unnecessary limits are not placed on the scale of their solar and battery installations. 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 is important that the proposed assessment method that distributors use is transparent, fair and its use is monitored by the Electricity Authority to ensure it is not used to unnecessarily limit distributed generation**. Allowing for distributors to set lower default limits than 10kW where appropriate using an industry-developed export limits assessment methodology, might be needed in specific situations but it should not be used as a way for EDBs to avoid improving network management approaches to support more customer solar investment and continuing to impose arbitrary unnecessary export limits. **Electricity Authority scrutiny should be applied here, to monitor its application**.

Higher export limits will have widespread benefits for all New Zealanders and strengthen the resilience of the electricity supply. For example, distributed generation can increase the energy resilience of local communities by reducing reliance on electricity generated from centralised, grid-scale generation. Plus, solar and battery systems can provide essential back up if there is a power outage, providing power for essential communications, EV charging and basic needs.

New Zealand needs more electricity generation and we know there is currently spare solar energy being curtailed by the networks that could be helping, especially in a dry year. We want to encourage the largest possible solar systems because it reduces the costs for the homeowner and for everyone else on the network and higher export limits will help do that.

Regards,
Michael Anderson