Appendix B Format for submissions

Maximising benefits from local generation

Submitter	Nathan Collis
Submitter's organisation	

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 think setting a default 10 kW export limit for Part 1A applications is a smart move—it's enough to make local generation worthwhile for most homes and small businesses, but not so much that it'll cause headaches for the network. It's a clear, simple rule that should help everyone know where they stand. It also Helps build NZ's decentralised grid, reducing transmission costs and loading on the drid.
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?	It makes sense that distributors shouldn't be able to limit the nameplate capacity unless it's over 10 kW. This keeps things fair and stops unnecessary restrictions, letting people get the most out of their systems without jumping through extra hoops.
Q3. There are requirements for distributors in Proposal A1. Which of these do you support, or not support, and why?	I support most of the requirements for distributors in Proposal A1, especially those that make the process more transparent and predictable. Anything that cuts down on red tape and makes it easier for people to connect their generation is a win in my book.
Q4. What are your views on the proposal for industry to develop an export limits assessment methodology?	Having an industry-developed export limits assessment methodology for above 10KW is a good idea—it means decisions are based on solid, consistent criteria rather than guesswork or local quirks. It should help build trust and keep things fair across the board.

Q5. What would you do differently in Proposal A1, if anything?	If I could tweak Proposal A1, I'd maybe look at ways to make the application process even simpler, like more online tools or clearer guidance for applicants. Otherwise, it's heading in the right direction.
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?	Honestly, I think the 2016 inverter installation standard is still perfectly sufficient for most Part 1A applications. It's well-established, widely understood, and covers all the key safety and performance requirements. Unless there's a really compelling reason to jump to the 2024 version, sticking with 2016 keeps things simple and avoids unnecessary costs or confusion for installers and customers.
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?	Matching New Zealand's volt-watt and volt-var settings to Australia's seems logical, especially if it helps with harmonisation and makes life easier for manufacturers and installers. As long as it doesn't cause any local issues, I'm all for it.
Q8. What would you do differently in Proposal A2, if anything?	I don't support using dynamic export limits for connections under 10 kW. For smaller systems, a fixed limit is much simpler and avoids unnecessary complexity—dynamic limits just add confusion and extra admin for installers and customers without much real benefit at this scale.
Q9. Do you have any concerns about the Authority citing the Australian disconnection settings for inverters when high voltage is sustained?	I don't have major concerns about citing the Australian disconnection settings for inverters during sustained high voltage, as long as the settings are proven to work well and don't cause unnecessary shutdowns for Kiwi users.
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	Again I don't support bespoke export limits under 10KW.

2 applications, they must do so using the industry developed assessment methodology?	If distributors are setting bespoke export limits for Part 2 applications, using the industry assessment methodology is the way to go. It keeps things consistent and transparent, which is important for fairness.
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?	The requirements for distributors' documentation sound sensible—clear records mean everyone knows how decisions are made and can check if things are done properly. It's just good practice.
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?	Yes, it's fair that applicants can dispute export limits for Part 2 applications. There should be a straightforward, transparent process—maybe something like an independent review or appeal panel.
Q14. What would you do differently in Proposal B, if anything?	Looks Good
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?	Requiring the AS/NZS 4777.2:2020 standard for low voltage DG applications makes sense—it's a modern, widely accepted standard that should help with safety and compatibility.
Q16. Do you consider the transitional arrangements workable regarding requirements and timeframes? If not, what arrangements would you prefer?	The transitional arrangements seem workable as long as there's clear communication and reasonable timeframes. If anything, I'd suggest a bit more flexibility for edge cases or unexpected delays.
Q17. What are your views on the objective of the proposed amendments?	The objective of the proposed amendments is solid—making local generation easier and safer is good for everyone, and it helps move us towards a more sustainable energy future.
Q18. Do you agree the benefits of the proposed amendments outweigh their costs? If not, why not?	I reckon the benefits of the proposed amendments outweigh the costs, especially in terms of long-term reliability, safety, and encouraging more local generation. Any upfront costs should pay off over time.

Q19. What are your views on the Authority's estimate of costs of lost benefits from a 5kW export limit?	The Authority's estimate of costs from a 5 kW export limit seems realistic—lower limits mean less benefit for generators and consumers, so bumping it up to 10 kW is a better deal for everyone. Definitely conservative in a lot of situations
Q20. Are there costs or benefits to any parties (eg, distributors, DG owners, consumers, other industry stakeholders) not identified that need to be considered?	consumers could benefit from more choice and better returns, which isn't always highlighted.
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	I agree the proposed Code amendments are preferable to other options—they're practical, fair, and support the industry's move towards more distributed generation, which fits the statutory objectives well.
Q22. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	From what I can see, the proposed amendments comply with section 32(1) of the Act—they're clear, targeted, and seem to be in the public interest.
Q23. Do you have any comments on the drafting of the proposed amendment?	