



Maximising benefits from local electricity generation

From Stuart Wakefield [REDACTED]

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

[REDACTED]
Hi,

Thanks for the opportunity to provide feedback. For context I live in kapiti and have a 3 phase, grid tied 9kw solar system, currently with no battery. My house and car are all electrified so we self consume what we can, export the rest and offset loads such as ev charging to cheaper night tariffs.

On your proposals my feedback is as follows:

- 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 really 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's 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 use.
- 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 there will be an incentive to install bigger systems. This will increase savings for homeowners and also help bring down the price of electricity for everyone on the network.

While not part of your proposals, a small but meaningful change for people in my situation would also be to change to net metering across all phases. As my loads are mostly single phase and uneven across phases I can be exporting on 2 phases but importing on the remaining at a much higher tariff than what I earn as a feed in tariff, so even if across all 3 phases I am net exporting, this doesn't offset the cost due to tariff differences between import and export. The only way to avoid this currently would be to make an additional costly investment in batteries and hybrid inverters, but net metering could solve this with regulatory change and simple software updates to smart meters. This would create more of an incentive for people to uptake grid tied solar with no real downside to distribution companies that I can see.

Thanks
 Stuart Wakefield