Appendix B Format for submissions

Maximising benefits from local generation

Submitter	Tony Daamen
Submitter's organisation	**Powerco customer with solar installed**

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?	We have 13.2 kW of solar installed feeding two phases with no battery storage as we envisage being able to employ one or both of our EVs in a V2H capacity in the near future. For the 8.2 kW inverter on one phase I look forward to our export limit being raised to 10 kW which will solve the throttling losses we currently suffer.
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?	The nameplate capacity should be the deciding factor in allowing DG consent.
Q3. There are requirements for distributors in Proposal A1. Which of these do you support, or not support, and why?	Don't assume Australian grid voltages are the case for NZ domestic grid situations.
Q4. What are your views on the proposal for industry to develop an export limits assessment methodology?	It seems to be the assumption that NZ lines companies are supplying electricity at 230V nominal. In our experience this is not the case. Our own supply logged by our inverter at the feed in point is indicative of 240V nominal and is also highly variable with voltages observed ranging from 221V to 247V. To elaborate our solar installer measured 247V on the phase we recently installed our second (5 kW) inverter on prior to any export occurring. We had previously changed our home's consumption from this phase to the other into our property as slightly lower

	voltages had previously been observed on the second phase. The 221V observation was towards the end of an 8 hour EV charging event (11:00pm-7:00am) when 7 kW was being drawn by the EVSE. Observed voltage during the charging duration was ~224V typically but a further drop occurred presumably as dairy farming activities ramped up in our area. We are bound by inverter parameters based on 230V +/- 6% which significantly inhibits our inverter's generation rate and therefore our export quantities. We are being handicapped by 10V even before the voltage fluctuations we have impact us even further. The grid voltages we frequently experience result in our inverters stepping back their generation rates if not shutting down momentarily which has a negative effect on both our generation and the quanities we are exporting. We also have concerns of what effects the parameter changes to 230V +/-10% (i.e up to 253V) will have on our home's supply and that of our neighbours. The discussion document seems to be assuming that existing grid voltages are in line with those of Australia which purposely reduced from 240V to 230V to better cope with DG inputs there. Based on our observations we have yet to see New Zealand grid supply adopt this change. The 'background' grid voltages we are observing are almost totally within +/- 5V of 240V. Additionally the performance of voltage regulation of grid supply for us at least is woefully inadequate and I would suggest that this must be addressed in order that the proposed regulatory changes avoid damage to grid infrastructure and domestic appliances. As the new inverter voltage parameters have now become current and Powerco have increased their phase caps to 10 kW we will be having relevant adjustments made to our solar installation in the coming days so our concerns will be proven, or not, in the near future, as they will be for very many other DG owners I suspect.
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?	