

# **Climate Justice Taranaki Submission to the Electricity Authority**

## **Consultation: Requiring distributors to pay a rebate when consumers supply electricity at peak times: definition of a small business**

21st November 2025

1. Founded in 2010 and incorporated in 2015, Climate Justice Taranaki (CJT) is dedicated to environmental sustainability, social justice and inter-generational equity - our collective ethical responsibility to current and future generations, human and non-human. Our vision is underpinned by Te Tiriti o Waitangi, the founding document of government in Aotearoa New Zealand. Composed of a broad range of people with varied expertise and life experiences, CJT has engaged with the government at all levels on numerous matters.
2. CJT is strongly supportive of the Electricity Authority's requirement on electricity distribution businesses (lines companies) to offer rebates to households, small businesses and other small-scaled distributed generators for supplying power to the network at peak times. This adds much needed incentives to invest in distributed renewable energy generation and storage which helps to build local resilience, reduce demands and costs of network infrastructure, and accelerate our transition away from fossil fuel dependence.
3. However, the proposed 45kVA connection limit or 45kW maximum generation capacity limit is too low and would act as a barrier against organisations like schools, marae, papakainga, some rural properties and community groups accessing peak distribution export tariffs. This is grossly unfair and would discourage investment in distributed renewable energy generation and storage that is much needed for the reasons mentioned above.
4. Based in Taranaki, a few of our members involved in the Ara Ake Community Energy Activator program had the opportunity to visit a marae and a public school. Both have installed a solar panel system greater than 45kW, the marae also has batteries. The proposed limit would disqualify them from accessing the peak distribution export tariff while neither is able to negotiate a fair deal directly with the power companies. On the contrary, if they can access peak power rebate, they would be incentivised to invest further in energy generation and storage. The school would export substantial amount of electricity and ease peak demands on the grid, during school holidays and when their pool is not running.
5. CJT recommends raising the proposed default export limit to 1MW to benefit small to mid-sized distributed generators. This would also align with the Powerco connection categories: small (up to 10kW), medium (10kW up to 1MW) and utility (1MW and above) scale generation<sup>1</sup>.
6. CJT would like to see additional measures to support community energy storage, trading and sharing. Along with effective demand management, maximize self-use of locally generated electricity, build resilience and reduce the demand on the grid and the associated costs on network infrastructure.

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<sup>1</sup> [https://www.powerco.co.nz/-/media/project/powerco/powerco-documents/get-connected/utility-scale-generation/utility-scale-document\\_final.pdf](https://www.powerco.co.nz/-/media/project/powerco/powerco-documents/get-connected/utility-scale-generation/utility-scale-document_final.pdf)