
Definition of small business Code amendment proposal

From David Boyd [REDACTED]
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To TaskForce <TaskForce@ea.govt.nz>

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My name is David Boyd and I am the founder shareholder of a company called Foot Science International in Christchurch. Our business is 44 years old and is based on manufacturing an orthotic insole called Formthotics that my partner and I invented. The product is distributed and sold in 65 countries around the world.

We have very recently completed installing a 145kW solar array on the roof of our manufacturing business in Christchurch. Our investment was made after carefully researching all the current rules and accepted practices at the time. Our company exports approximately 95% of our production of orthotic insoles for medical markets in 65 countries. Our position on responsible long-term sustainability is a very important part of our brand position, reputation, and competitive position. Having a solar array that can provide 100% of our power for the whole manufacturing process is really important and the ability to export any surplus at a reasonable rate was an important part of our calculations for the investment. We are not a large power generator so why treat us as one? We want to stick to what we are really good at: manufacturing a high value product that is highly sought after in export markets: we don't want to have to waste time trying to negotiate a rate for our surplus power.

I do not support the 45kVA connection limit or 45kW maximum generation capacity limit as it would restrict many small and medium sized businesses and organisations, like manufacturers, schools, marae, farms and community groups from accessing peak distribution export tariffs.

These unnecessary limits on who receives peak distribution export tariffs would be a step in the wrong direction and a missed opportunity to support customers to invest in a more flexible, affordable, sustainable and resilient local energy supply.

If the Authority wishes to create a limit it should be set to include all customers with up to 1MW of generation capacity. This is a sensible level that includes local community organisations and businesses who are not well-placed to negotiate a fair deal, but would exclude utility generators and very large industrials who would be well-placed to negotiate their own contracts.

Yours sincerely,

David Boyd



David Boyd
Director



www.formthotics.com

26 Dakota Crescent, Wigram, Christchurch, 8042, New Zealand

PO Box 7337, Sydenham, Christchurch 8240,

New Zealand

