

## Appendix B Format for submissions

Submitter	Low Carbon Kapiti
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Questions	Comments
Q1. Do you agree with the issues that we have identified in meeting the policy intent to target small business consumers? Why or why not?	There is an issue here, but our perspective is based on communities sharing solar and schools saving money.
Q2. Do you agree that applying the negative charge to business consumers below a given connection capacity, and limiting eligibility to distributed generation below that same level, will best achieve the original policy intent? Why or why not?	On the one hand, getting paid to export by the lines company is great. On the other, having that limited to 45 kW is not.
Q3. Are both limits required, or could the policy intent be achieved through just one of the proposed limits? Please explain your reasoning.	
Q4. Do you agree with our assessment of the proposed threshold for connection capacity? Why or why not? Would you prefer an alternative threshold? Why?	No. We want to make 2026 the year of solar sharing in Kapiti. This means finding host buildings for solar, such as schools and community buildings that can then be exported for those on low incomes and in rental properties to benefit from. It makes no sense to limit that to 45 kW.
Q5. Do you agree with our assessment of the proposed threshold for DG, and that this should apply based on the maximum deliverable generation capacity? Why or why not?	Why would you do that? This would lead to inverters being sized to 100% of the solar system instead of a 45 kW inverter being matched with, say 54 (120%) or 63 kW (140%) of panels. Oversizing panels compared to the inverter export limit allows for much greater usable generation over the year and much better payback.
Q6. Do you agree with the objective of the proposed amendment? If not, why not?	Yes.

Q7. Do you agree the benefits of the proposed amendment outweigh the costs?	Yes.
Q8. Do you agree with our assessment of the alternatives? Please explain your reasoning.	We want regulation that supports community solar so that people that can't afford their own systems or are in rental properties can benefit from lower cost electricity. People should be able to sort out greater export limits with their lines company and get the export rebates. There's a big difference between communities getting together to share the benefits of solar and help each other compared to for electricity companies attempting to maximize profit.
Q9. Are there other options or thresholds we should consider to better align the Code with the original policy intent?	Change the rules so exports match the maximum capacity of the lines to handle it on a case by case basis. Build in dynamic export control if that helps.
Q10. Do you agree the proposed amendment is preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objectives in section 15 of the Electricity Industry Act 2010.	Sort of. The problem is the setting of the limit too low.