To the Electricity Authority – Te Mana Hiko

My name is James Scott, and I am a community-focused resident of Lower Hutt. Like many New Zealanders, I am excited by the potential for consumers to play a more active role in reshaping our energy future through investment in distributed generation such as rooftop solar and battery storage.

I am motivated by the desire to accelerate our transition to lower-emissions energy, reduce the overall cost of electricity, and ensure the benefits of these changes are shared fairly across our communities.

I strongly support the Authority's aim of removing unnecessary barriers to efficient investment in distributed generation (DG) and maximising the value it delivers for all New Zealanders.

The problem: current export limits are arbitrary and unnecessarily restrictive

At present, many households and businesses face arbitrary export restrictions that limit the amount of solar generation they may export to the grid. These restrictions slow down the adoption of rooftop solar and battery systems by lengthening payback periods and discouraging customers from investing in appropriately sized systems.

The rooftop solar on my own house can generate up to 10kW much of which would be available for export during the day as our household energy consumption is not great. I would like my local community to be able to benefit from my investment in this local generation capability.

Increasing export limits will encourage more people like me to invest in solar and storage, improve the economics of these systems, and ultimately support downward pressure on electricity prices for all consumers connected to the distribution network.

This increased investment from ordinary people and community groups will enable greater support for people in our community who are not currently in a position to benefit from the lower costs and reduced network pressure arising from local generation. The result will be stronger and more resilient communities.

Support for the Authority's proposals

I support the Electricity Authority's proposed reforms to improve export limits for small-scale DG by:

- **Setting a default export limit of 10 kW** (with distributors able to apply lower limits only where justified using an industry-developed assessment methodology).

- **Setting default voltage-response inverter settings**, aligned with Australian standards, while allowing distributors to apply alternative settings where appropriate.

I also support the proposals to improve export limit assessments for larger DG connections by:

- **Requiring distributors to use a transparent, industry-developed bespoke export limits assessment method** for systems above 10 kW.
- **Mandating the use of the most up-to-date inverter performance standard** for low-voltage DG installations.

Fairness and transparency for mid-scale distributed generation

It is critical that the bespoke assessment method used by distributors is transparent, fair, and subject to ongoing monitoring by the Authority. Many mid-scale DG customers—small businesses, community organisations, farms, and households installing more than 10 kW of solar—do not have the resources or technical expertise to engage in complex network assessment processes in the same way that utility-scale developers can.

This group is essential to delivering community-level energy resilience and emissions reduction but is especially vulnerable to opaque or overly conservative export assessments. Oversight from the Electricity Authority is important to ensure that distributors do not use bespoke assessment methods to continue applying unnecessary export constraints.

Ensuring distributors cannot use "lower default limits" to avoid network improvement

Allowing distributors to set lower default limits than 10 kW where justified may occasionally be necessary. However, this flexibility must not become a mechanism for avoiding investment in smarter network management practices or continued reliance on outdated export constraints.

I encourage the Authority to apply oversight and scrutiny to the application of lower limits and to require distributors to demonstrate that they are actively improving their networks to accommodate increasing customer-owned generation.

Benefits for consumers, communities, and the national electricity system

Higher export limits will bring widespread benefits to New Zealanders. Distributed generation strengthens local energy resilience by reducing reliance on centralised generation and the transmission network. Rooftop solar paired with batteries also provides backup during outages, supporting essential communications, EV charging, refrigeration, and other basic needs.

New Zealand urgently needs new renewable generation, and we know that a significant amount of potential rooftop solar energy is currently being

curtailed due to network-imposed export constraints. Enabling the installation of larger systems will help reduce costs for homeowners and for all consumers on the network through avoided generation and transmission costs.

Increasing export limits is a practical and low-cost step toward unlocking this potential.

Sincerely,
James Scott