

## Appendix B Format for submissions

### Maximising benefits from local generation

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| <b>Submitter</b>         | <b>Gareth Williams, Manager Innovation Pathways</b> |
| Submitter's organisation | <b>SEANZ</b>                                        |

Please send your submission to [connection.feedback@ea.govt.nz](mailto:connection.feedback@ea.govt.nz) by **5pm, Wednesday 19 November 2025**

| Questions                                                                                                                                                         | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| Q1. What are your views on the proposal to set a default 10kW export limit for Part 1A applications?                                                              | <p>We believe that this is appropriate. The increase in the max voltage level together with the hosting capacity of the majority of the distribution network means that 10kW is appropriate. Clarification is required for the following scenarios however:</p> <ul style="list-style-type: none"> <li>• Multiphase properties (is it 10kW per phase?)</li> <li>• Secondary networks (multiple properties behind a single network connection point – is it 10kW per property?)</li> </ul>                                                                                                                   |
| 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? | <p>This statement seems at odds with 3.11. It should be the export capacity that determines whether part 1A can be used – not the nameplate capacity ? As per the example a 20kW inverter with a 10kW export limit would still qualify for part 1A application. (possibly this is an error in the question and the last part of the sentence should read... unless the export capacity exceeds 10kW)</p> <p>We would also seek to prevent EDB's from setting nameplate capacity limits at all. e.g. One EDB has set a 10kW nameplate capacity limit (20kW for 3 phase) for any residential application.</p> |
| Q3. There are requirements for distributors in Proposal A1. Which of these do you support, or not support, and why?                                               | <p>The proposals seem appropriate. We also suggest that EDB's need roadmaps to improve the visibility of their networks to increase understanding of hosting capacity for DER and to implement platforms to support dynamic operating envelopes to only restrict export when needed based on actual network conditions. While this may fall into ComCom territory</p>                                                                                                                                                                                                                                       |

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|                                                                                                                                                                                                | regarding Asset Management plans / DPP settings, there needs to be coordination on this issue.                                                                                                                                                                                    |
| Q4. What are your views on the proposal for industry to develop an export limits assessment methodology?                                                                                       | Absolutely agree. Consistency and transparency is key. If there are limits on an EDBs understanding of their LV network then the default should be to assume no export limit should apply. i.e. export limits can only be applied if network data validates that there should be. |
| Q5. What would you do differently in Proposal A1, if anything?                                                                                                                                 | Nil                                                                                                                                                                                                                                                                               |
| 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?                                     | No concerns                                                                                                                                                                                                                                                                       |
| 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? | Yes, we agree with this.                                                                                                                                                                                                                                                          |
| Q8. What would you do differently in Proposal A2, if anything?                                                                                                                                 | Nil                                                                                                                                                                                                                                                                               |
| Q9. Do you have any concerns about the Authority citing the Australian disconnection settings for inverters when high voltage is sustained?                                                    | No concerns                                                                                                                                                                                                                                                                       |
| Q10. Do you have any concerns about the Authority requiring the latest version of the inverter performance standard for Part 1A applications?                                                  | No concerns                                                                                                                                                                                                                                                                       |
| 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?       | Agree – again, consistency and transparency is key.                                                                                                                                                                                                                               |

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| Q12. What are your views on the several requirements that must be adhered to regarding the distributors' documentation (see paragraph <b>Error! Reference source not found.</b> ) relating to setting export limits under Part 2? | Yes this appropriate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 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?                                 | The use of a standard methodology should help reduce disputes, but regardless, yes an applicant should be able to challenge a decision. To be consistent with cost recovery for processing the original application, any external costs incurred by the applicant to prepare the case for the challenge should be payable by the distributor if their original assessment is proven incorrect. There should be a standard mediation process – e.g. UDL, if the parties cannot agree through good faith discussions |
| Q14. What would you do differently in Proposal B, if anything?                                                                                                                                                                    | Nil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 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?                                                  | Agree                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Q16. Do you consider the transitional arrangements workable regarding requirements and timeframes? If not, what arrangements would you prefer?                                                                                    | Generally agree with the following exceptions:.<br>Clause 6.6 – it would be preferable for all distributors to use AS4777 volt response settings – not bespoke, which are difficult to manage since requires customised profiles on each inverter – better to be able to select from a standard library of settings.                                                                                                                                                                                               |
| Q17. What are your views on the objective of the proposed amendments?                                                                                                                                                             | Agree with objectives                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Q18. Do you agree the benefits of the proposed amendments outweigh their costs? If not, why not?                                                                                                                                  | Yes agree                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Q19. What are your views on the Authority's estimate of costs of                                                                                                                                                                  | Likely underestimate since many customers have chosen to undersize their systems – or use a 5kW                                                                                                                                                                                                                                                                                                                                                                                                                    |

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| lost benefits from a 5kW export limit?                                                                                                                                                                                                                         | inverter - due to the 5kW export limit. (Having said that, the maths in the calculation doesn't seem valid – since uses the current average array size to estimate the lost value per system and then applies the same \$ amount to smaller size systems) |
| Q20. Are there costs or benefits to any parties (eg, distributors, DG owners, consumers, other industry stakeholders) not identified that need to be considered?                                                                                               | No view                                                                                                                                                                                                                                                   |
| 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 | Agree                                                                                                                                                                                                                                                     |
| Q22. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?                                                                                                                                                                    | Agree                                                                                                                                                                                                                                                     |
| Q23. Do you have any comments on the drafting of the proposed amendment?                                                                                                                                                                                       | No view                                                                                                                                                                                                                                                   |