

6 October 2026

Electricity Authority
Level 7, AON Centre
1 Willis Street
Wellington

Vector Limited
110 Carlton Gore Road
PO Box 99882
Newmarket
Auckland 1149
+64 9 978 7788 / vector.co.nz

By email: connection.feedback@ea.govt.nz

Exploring plug-in generation and Code improvements for export limits and connection processes - Issues and consultation paper

Vector welcomes the opportunity to comment on the Electricity Authority's consultation paper, *Exploring plug-in generation and Code improvements for export limits and connection processes*. No part of this submission is confidential, and Vector is happy for it to be published.

Vector wholeheartedly supports the Authority's objective of enabling greater participation in distributed generation while maintaining network safety and reliability. We also acknowledge that the Authority is developing further policy on flexible and dynamic export limits with the first issues and consultation paper expected to be released for public comment by mid-2027.

Our submission focuses on the proposed changes affecting static export limits and communicating inverters. We remain concerned that these changes would reinforce an interim static-export framework, with no end date in mind, before the Authority has determined its preferred long-term approach.

Our responses to specific questions on issues regarding plug-in generation and DG-related Code changes are set out in Appendix A and B respectively.

Regulatory sequencing

Vector was disappointed that the Authority proceeded with static export limits despite the strong support and evidence submitted in favour of flexible export arrangements by numerous submitters. The Authority's April 2026 decision paper itself recognised "*...that dynamic or flexible export limits will ultimately provide the most benefits as regards export levels while maintaining safe and effective network operations. Further, they support equity by limits being linked to dynamic export capacity irrespective of when a connection application is made.*"

The Authority nevertheless adopted a combined framework in which flexible or dynamic limits operate alongside a static 10 kW default. The current consultation now proposes further amendments to clarify and extend that framework, including extending the static default to Part 1

applications and preventing distributors from requiring communicating smart inverters or dynamic export arrangements.

The need to amend these provisions so soon after their introduction indicates that the interaction between static limits, flexible limits, inverter capability and the Part 1 and Part 1A pathways was not fully considered before the initial amendments were made. This highlights the risk inherent in the Authority making changes to proposed Code drafting after consultation, and before finalisation, without another round of testing with industry. Repeated changes to the same Code provisions within a short period is far from best regulatory practice.

The proposed changes are also difficult to reconcile with the Authority's planned policy work on enabling dynamic and flexible export limits. Given widespread support for their implementation, Vector considers the Authority should accelerate and complete that work before making further enduring changes that favour static export arrangements or protect continued installation of non-communicating inverters. Otherwise, the Authority is likely to require a *third* round of changes to the same piece of Code once its future policy work is complete. Our preferred approach is therefore for the Authority to defer the relevant amendments until it has determined the enduring framework for dynamic export limits and smart inverters.

If the Authority proceeds now, the amendments should be explicitly temporary. The relevant provisions should include a sunset date (we suggest 1 July 2027) linked to completion of the Authority's future policy work. This would preserve consumer options in the short term without embedding arrangements that the Authority may soon need to revisit.

Vector continues to prefer early adoption of dynamic export limits

Vector retains its strong preference for dynamic export limits supported by communicating smart inverters. Introducing dynamic limits only after available hosting capacity has been allocated to selected consumers creates a marked difference between consumer groups. Early adopters may retain an unrestricted 10 kW static allocation, while later consumers face dynamic curtailment, lower limits or potentially no export capability. This is not in the long-term benefit of all consumers, just those fortunate enough to be one of the earlier adopters.

A dynamic-first approach, with binding rules that prevent export limits being varied until an export limit assessment methodology (ELAM) identifies a distributed generation constraint, would operate in the same way as the proposed static-first approach up to the point that a constraint arises. The difference emerges only if or once the ELAM identifies a constraint. In other words, there is no practical difference for a customer whether they have a dynamic or static limit, unless ELAM identifies a constraint.

Under a dynamic-first approach, the distributor could manage the constraint fairly across all connections contributing to it. Under the proposed static-first approach, existing customers whose exports have created the constraint could retain their static limits, while later connecting customers bear the full impact through lower limits or curtailment, and even, potentially the costs of resolving

the constraint through network augmentation (if allowable under the DG pricing principles). This would entrench first-mover advantage and allocate scarce hosting capacity less equitably, likely resulting in reduced total solar investment across the industry. Our evidence shows that, with over 97% of applicants since May receiving a dynamic limit, solar investment is unlikely to be inhibited under a dynamic-first approach.

The Authority's regulatory assessment should compare the long-term outcomes of dynamic-first and static-first pathways. This should include total exported energy, equitable access to hosting capacity, network utilisation, future retrofit costs and the likely pressure for network augmentation.

A practical pathway to flex-ready connections

Vector considers there is a practical pathway that preserves near-term consumer choice while avoiding the permanent allocation of scarce network hosting capacity to first movers.

To minimise potential inequity between existing and future DG connections, by 1 July 2027 EDBs should have Code backing to mandate "flex-readiness" for all new DG connections.

"Readiness" must be standardised nationally and must not materially increase costs to connecting consumers. Conditions will include:

- standardised customer contracts for dynamic connections;
- uniform device standards;
- device connectivity post installation;
- accompanying clearly-defined service targets (e.g. minimum % of daylight hours not curtailed per year);
- full transparency of service levels delivered, and
- the consequences of failing to meet those targets.

While many EDBs will not actually have the capability to manage those connections dynamically, as per the Code those that can will not be permitted to begin to curtail exports from those connections except when and where deemed necessary under ELAM / BELAM assessments. In practice, this means, for the vast majority of DG customers, their dynamic export limit will be equivalent to a fixed limit, for the vast majority of the time.

Static limits without flex readiness must still be available to consumers, but these limits may be set commensurately lower (e.g. 2-2.5 kW, as the EDB deems fit).

This approach would preserve meaningful consumer choice. A customer could select a flex-ready connection with access to the higher standard export limit, subject to future ELAM or BELAM-based management, or select a lower static limit without flex-readiness. It would avoid requiring all customers to be dynamically controlled from the outset, while ensuring that new equipment does not permanently remove the option of fair and efficient dynamic management when network constraints emerge.

The Authority should accelerate the move to dynamic exports and dynamic operating envelopes

Smart inverters, dynamic export limits and operating envelopes can unlock more existing network capacity, enable more solar and batteries to connect, and manage constraints only when and where they actually occur. Dynamic exports are an essential enabler of long-term, sustainable investment in rooftop solar, in particular, and fairness for all DG investors irrespective of when their solar was installed.

This transition should be accelerated through clear, nationally consistent rules covering interoperability, communications and how dynamic constraints are applied. In parallel, the Authority and the sector need to advance the appropriate governance and accountability framework for dynamic congestion management and the development of accompanying commercial mechanisms that can inform customer choice.

We must preserve optionality for future implementation of dynamic exports

From today, any new inverter-connected distributed energy resource, including solar generation and battery energy storage systems, must be capable of secure remote monitoring and control through an open, recognised or otherwise interoperable communications interface.

EDBs must have the ability to mandate this functionality, as a bottom line. With the customer's consent, an installation with this capability can be upgraded from a static to dynamic limit in time, or it could retain a static limit in perpetuity – a preservation of consumer choice. The upgrade option is simply not possible with a non-smart inverter.

In practice, the capability may be provided directly by the device, through an on-site gateway, or through a manufacturer or third-party cloud platform.

At a minimum, the system must enable an appropriately authorised party to implement control functions necessary for dynamic export limits.

The proposed 1 July 2027 framework would give effect to this principle by linking flex-readiness to access to the higher standard export limit, while retaining a commensurately lower non-flex-ready static option.

Communicating inverters provide benefits beyond dynamic exports

The case for flex-readiness is not limited to the equitable allocation of hosting capacity. Communicating equipment also preserves important technical and system capabilities over the operating life of the installation.

Communicating smart inverters do more than enable dynamic export limits. They allow required voltage, frequency and protection settings to be checked remotely. They also allow settings to be updated if technical standards or system requirements change. With non-communicating inverters, distributors must generally rely on installation information or seek to infer behaviour from other network data. Correcting an incorrect or outdated setting requires physical access to the inverter.

This is particularly relevant where regulatory settings and network conditions continue to evolve. Equipment installed now may remain in service for many years. Requiring new equipment to have suitable communications capability preserves the ability to respond to future changes without costly retrofit programmes.

Communicating inverters may also support future power-system security measures. At high levels of rooftop solar penetration, periods of very low operational demand can create system-security risks when the system operator may require a last-resort ability to temporarily restrict distributed generation.

The New South Wales Government's Emergency Backstop Mechanism illustrates this issue. The mechanism is expected to commence in late 2026 as a last-resort response to minimum system load conditions. New and upgrading solar systems will progressively be required to use CSIP-AUS-compliant equipment and complete a connectivity test confirming communication with Ausgrid's utility server.

New Zealand may not need an equivalent mechanism in the immediate future. However, continued installation of non-communicating inverters means fewer devices will be capable of responding if such measures are needed during their operating lives.

The Authority should therefore assess smart-inverter capability over the expected operating life of the equipment, not solely against the requirements of today.

Static restrictions should be a time-limited transition mechanism while we progress dynamic management

Adding a hypothetical 10% future DG allowance is a backward-looking approach: it further constrains static export limits to try to make them work. While such conservatism is necessary in a paradigm of static limits, it could ration capacity today for generation that may never eventuate. The direction should instead be toward dynamic management of actual network constraints, while using forecasts for network planning rather than restricting current customers.

The Code should preserve future options

Vector supports a nationally consistent and interoperable framework. We agree that communications protocols, cybersecurity, governance and consumer protections must be properly

considered. To that end, Vector and other distributors are working with SEANZ on standardising dynamic export limits implementation.

Vector recommends that the Authority:

- defer the proposed restrictions on communicating-inverter and dynamic-export requirements until its future policy work is complete;
- provide Code backing for EDBs to require flex-readiness for all new DG connections from 1 July 2027;
- develop an integrated framework covering dynamic operating envelopes, communications standards, interoperability, cybersecurity, consumer protections, governance and emergency power-system controls;
- allow capable distributors to continue adopting communicating smart inverters and dynamic limits while the national framework is developed;
- undertake a comparative cost-benefit assessment of static-first and dynamic-first approaches, including long-term consumer and system outcomes; and
- if the amendments proceed now, make the provisions supporting static limits and non-communicating inverters explicitly transitional and subject to a defined sunset date.

Conclusion

Vector wholeheartedly supports the Authority's objective of enabling greater distributed generation and improving consumer outcomes. However, the current proposals risk embedding interim arrangements before the Authority has determined its long-term policy for dynamic export limits and communicating smart inverters.

Dynamic export limits offer a fairer and more efficient way to allocate network hosting capacity. Communicating smart inverters also preserve important future capabilities, including remote verification and updating of settings and potential participation in emergency power-system controls.

The preferred approach is to complete the Authority's future policy work before extending the current static-export framework. If the Authority nevertheless proceeds, the relevant amendments should operate on a transitional basis and expire or be formally reconsidered once the enduring framework has been determined.

Vector considers that, by 1 July 2027 at the latest, EDBs should have Code backing to require nationally standardised flex-readiness for new DG connections seeking access to the higher standard export limit. Export should be curtailed only when and where justified through ELAM or

BELAM. Consumers should retain a non-flex-ready static option, but EDBs should be permitted to set it at a commensurately lower level.

Vector would welcome the opportunity to meet with the Authority and share its experience implementing flexible export limits and collaborating with industry participants.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'J. Tipping'.

James Tipping

GM Market Strategy / Regulation

Appendix A: Questions on issues regarding plug-in generation

Questions	Comments
Q1. Do you have any views on our characterisation of plug-in generation?	Broadly agree. Plug-in generation is distinct from permanently installed distributed generation, but it can still export into the network affecting network safety, visibility and operation. The definition should be technology-neutral and clearly distinguish plug-in generation from permanently connected generation and non-exporting consumer equipment.
Q2. What network performance requirements should apply to plug-in inverters in New Zealand, and why?	Plug-in inverters should meet appropriate inverter safety and network performance standards, including requirements relating to voltage, frequency, protection, anti-islanding, power quality and export capability. Requirements should be nationally consistent and proportionate to the scale and risk of the installation.
Q3. What do you think of the Authority excluding plug-in generation standards from the Code?	Vector does not support relying solely on voluntary standards or manufacturer claims. The Code should establish the obligation to comply with an approved standard, particularly where a device can export onto the network affecting the safety of others, while detailed technical requirements could sit in an incorporated standard or other instrument that can be updated more readily than the Code.
Q4. Do you agree that in the absence of a professional intermediary, it will be challenging to obtain a Part 6-type application from a plug-in generation consumer? Why, why not?	Yes. A conventional Part 6 application may be disproportionate and difficult for consumers purchasing plug-in equipment without an installer or other professional intermediary. Any process should therefore be simple, digital and supported by clear point-of-sale information.
Q5. For a consumer to connect plug-in generation to their premises, should some form of Part 6-type application process be required? Why, why not?	Yes, some form of notification or registration should be required. Distributors need visibility of generation connected to their networks, including its location, capacity and technical characteristics. However, a full conventional

	Part 6 application may not be proportionate for compliant, low-capacity plug-in generation.
Q6. If a form of Part 6-type application process should be implemented for plug-in generation, do you see that is a notification/registration, or an application that requires distributor approval? Why?	A streamlined notification or registration process is likely to be appropriate for equipment that meets an approved standard and remains within prescribed capacity and export limits. Distributor approval should be required where those conditions are not met, multiple generation systems are installed at an ICP, or identified network conditions require further assessment.
Q7. What information should be required if a registration or application for a plug-in generation unit is to be implemented?	Information should include the ICP, equipment make and model, rated generation and export capacity, inverter standard and certification, communications capability, installation or commissioning date, and confirmation that the equipment complies with applicable safety and network performance requirements.
Q8. Would participants benefit from a registry that captures information about plug-in generation? Why, why not?	Yes. A registry could give distributors and other authorised participants better visibility of the location and capacity of plug-in generation. This would support network planning, safety assessments and monitoring of aggregate effects. Information requirements should remain proportionate and avoid unnecessary duplication.
Q9. Should the existing registry be used? Why, why not?	Preferably, provided the existing registry can capture the necessary information and make it available to distributors and other authorised parties. Enhancing an existing industry system is likely to be preferable to establishing a separate register, subject to suitable data quality, access and governance arrangements.
Q10. Should entering information about plug-in generation be a requirement only after export has been identified at an ICP? Why, why not?	No. Registration should occur when the equipment is connected or commissioned, rather than only after export is detected. Detection after the event would provide incomplete and delayed network visibility and may not reliably identify the equipment causing the export. Following up with a property owner to request registration after

	generation is detected will be less successful than registration at the point of purchase or installation.
Q11. Would the type of information able to be collected at point of sale be sufficient to meet industry needs? Why, why not?	Point-of-sale information could support the process but is unlikely to be sufficient by itself. The seller may know the equipment specifications but may not know the ICP where it is ultimately installed, whether it has been commissioned, or whether other generation is already present. A connection or commissioning step is also required.
Q12. Should the MEPs reverse power indicator be leveraged in identifying potential plug-in generation export? Why, why not?	The MEP reverse power indicator should be used only as a last-resort mechanism for identifying potential plug-in generation, where registration or notification processes have not provided the required information. It is a reactive indicator and does not reliably identify the equipment responsible for the export. The primary approach should be registration at connection or commissioning.
Q13. Do you agree there is merit in considering whether retailers should be the primary customer interface for plug-in generation registration/notification? Why, why not?	Yes. Retailers are likely to be the most appropriate primary customer interface because they have the direct relationship with consumers and know when customers move into or out of a property. This places them in a good position to support registration information remaining associated with the correct customer and ICP. A retailer is also the party who would pay for any generation injected, and they could require registration of DG as a pre-requisite to paying for any generation from a property. Any retailer-led process should ensure complete and timely information is provided to the relevant distributor so it retains visibility of plug-in generation connected to its network. There will be an ongoing challenge with people moving and maintaining accurate records of plug-in generation on site via the registry, given the generation can readily be transferred from one property to another.

Q14. Do you have any other suggestions on how consumers could be informed of Code requirements for plug-in generation?	Requirements should be communicated through point-of-sale disclosures, product packaging, manufacturer instructions and a simple Authority-hosted information page. Consumers should be clearly told whether registration or approval is required, the applicable capacity and export limits, and any restrictions where permanently installed generation is already present.
Q15. Should an ability for plug-in generation consumers to receive payment for export be predicated by some form of Part 6 application and approval process? Why, why not?	No comment.
Q16. What measures could be implemented to inform consumers of electricity export at their ICP that is potentially associated with plug-in generation, and what information should this include?	Consumers could be notified where export is detected at an ICP for which no generation is registered. The notification should explain that export has been detected, identify relevant registration or approval requirements, and direct the consumer to clear information on safety, network and metering obligations.
Q17. Should consumers be proactively informed of the potential for plug-in generation to export to a network. If so, which party is best placed to undertake this education role?	Yes. Consumers should be informed before purchase that plug-in generation may export and may be subject to registration, technical and metering requirements. Manufacturers and sellers are best placed to provide point-of-sale information, supported by nationally consistent material from the Authority and relevant information from distributors.
Q18. What issues do you see with more UFE in the reconciliation system as a result of more export from plug-in generation?	No comment.
Q19. Do you agree with our view that plug-in generation export with no measurement enabled can be treated as UFE in reconciliation processes, with no need for formal gifting documentation? Would your view change as plug-in generation increases?	No comment.
Q20. If gifting documentation were to be required by a plug-in generation consumer, how could this be facilitated?	No comment.

Q21. Are there other genuine issues identified by the reverse power indicator?	From a distributor perspective, reverse power may indicate unregistered generation, incorrect equipment configuration, generation connected outside an approved arrangement, or an installation requiring further investigation. It should be treated as an indicator rather than conclusive evidence of plug-in generation.
Q22. Should the requirement on the MEP to notify the retailer via a reverse power indicator be reconsidered, if more plug-in generation is used? Why, why not?	Yes. The MEP should check a reverse power indicator against the plug-in generation registry before notifying the retailer. A notification should be required only where the export is not explained by registered generation at the ICP.
Q23. Is there a way for a MEP to filter out plug-in generation related reverse power indicators?	Yes. The MEP should be able to filter reverse power indicators by checking them against registered generation at the ICP. Indicators consistent with registered generation should not require further reporting. Only unexplained export, where no corresponding generation is registered, should be notified for investigation.
Q24. Should Part 10 include an exclusion for requiring import/export metering for plug-in generation? Why, why not?	No comment. Any exclusion should not undermine the distributor's visibility of generation connected to its network or prevent accurate identification of material export.
Q25. Should Part 6 clarify requirements for a plug-in generation system being connected alongside approved permanently-fixed DG?	Yes. The Code should clarify whether capacities and export limits are assessed individually or in aggregate, and whether a further notification or approval is required. The combined system should not be able to exceed the approved export limit or bypass technical requirements applying to permanently installed generation.
Q26. Should the Code clarify limits on the amount of plug-in generation capacity that can be connected at an ICP (noting any standards developed may define limits)?	Yes. Nationally-consistent limits would provide clarity for consumers, sellers and distributors. Limits should consider aggregate generation at the ICP, including permanently installed generation and multiple plug-in units, and should align with the applicable technical standard and connection pathway. Plug-in generation should not be used to circumvent

	an export limit or other connection requirement applying at the ICP.
Q27. What sources of information could the Authority use to monitor uptake of plug-in generation and/or any issues that may arise?	Relevant sources could include registration information, distributor connection and incident data, product sales information, consumer enquiries, reported safety events and aggregated reverse-power information. Any monitoring framework should clearly allocate responsibilities and avoid duplicate reporting.
Q28. Do you agree with our overall characterisation of the challenges of plug-in generation? Why, why not?	Broadly yes. The principal distributor concerns are limited visibility of connected equipment, compliance with network performance requirements, aggregation with other generation at an ICP, and the possibility of unapproved or incorrectly configured export. These issues should be addressed through proportionate national standards and a simple registration framework. There are additional concerns, which would be addressed through WorkSafe or other safety bodies, regarding the safety of plug-in generation and the wiring found in the various generations of New Zealand homes.
Q29. Which of the challenges outlined in this paper present the most pressing issue for the Authority to address?	The most pressing issues are establishing mandatory technical and safety requirements, gaining visibility of where plug-in generation is connected, and clarifying how it interacts with permanently installed generation and ICP-level export limits. These foundations should be addressed before plug-in generation reaches material scale.

Appendix B: Questions on distributed generation-related Code change proposals

Questions	Comments
Q30. Do you agree the Code should be amended so the 10kW default export limit also applies to Part 1 applications? Please explain your views.	No, not as an enduring requirement. The Authority must complete its work on dynamic and flexible export limits before it considers whether extending the static 10 kW framework would be appropriate. If the amendment proceeds now, it should be an explicitly transitional measure with a sunset date, suggested as early 2028.
Q31. Do you agree the Code should be amended so that distributors cannot limit their approved inverter lists to only communicating smart inverters or use their COPS to mandate smart inverters or flexible/dynamic export limits? Please explain your views.	No. The Code should instead support a nationally consistent flex-readiness framework. By 1 July 2027, EDBs should have Code backing to require flex-readiness for new DG connections, based on nationally standardised device, connectivity, interoperability, contractual and service-level requirements. Consumers should retain the option of a non-flex-ready static connection, but distributors should be permitted to apply a commensurately lower static export limit. Until that framework is established, distributors should retain the ability to require communicating smart inverters and dynamic export arrangements.
Q32. Do you agree the Code should be amended to allow distributors to 'build in' an extra 10% DG penetration when doing a network study, that may lead to parts of networks qualifying for export limits below 10kW? Please explain your views.	Adding a hypothetical 10% allowance further constrains static export limits to accommodate generation that may never eventuate. Such a move would only be appropriate in a paradigm of static-only exports. Forecasts should inform network planning, while actual constraints should be managed dynamically when and where they arise.
Q33. Do you agree that a 10% allowance (as an interim measure) reduces the need for frequent network assessment. If not, what alternative level of allowance or approach should the Authority consider and why?	No. Vector does not support an alternative fixed allowance. The preferred approach is dynamic management supported by an ELAM, with binding rules preventing limits from being reduced unless an identified DG constraint exists. If a fixed allowance is adopted, it should be transitional and

	reviewed when the Authority completes its dynamic-export work.
Q34. Do you agree the Code should be amended to explicitly require distributors to offer both Part 1A and Part 1 DG application processes? Please explain your views.	Vector does not oppose clarifying that both application pathways must be available. However, this should not restrict a distributor's ability to apply appropriate technical requirements, including 'flex-readiness' – for example, communicating-inverter and dynamic-export requirements, where justified.
Q35. Do you agree the Code should be amended to make it clear distributors cannot extend timeframes for Part 1A applications, but should not be penalised by the time taken by the applicant to remedy a deficient application? Please explain your views.	Yes. Applicant time taken to remedy an incomplete or deficient application should not count against the distributor's processing timeframe. The final drafting should clearly identify when an application is complete and when the processing clock starts, stops and resumes. Distributors should be able to extend timeframes in the rare case where field validation is required of network data for assessing the application.
Q36. Do you agree with the objectives of the proposed amendments? If not, why not?	Vector supports the overall objective of enabling greater distributed generation while maintaining network safety and reliability. However, it does not support achieving that objective by entrenching static export limits or preventing distributors from requiring communicating inverters and dynamic export arrangements. There is near universal agreement that enabling first-movers to benefit from enduring static export limits risks creating inequity and is demonstrably not in the interests of all consumers, especially if they cannot easily be converted to dynamic limits.
Q37. Do you agree the benefits of the proposed amendments outweigh their costs?	No, not on the assessment presented. The assessment does not adequately account for the long-term costs of a static-first approach, including inequitable access to hosting capacity, reduced exports by later applicants, less appeal for future investors (whose export will be deprioritised relative to existing exporters), future equipment retrofits and potential pressure for network augmentation.

Q38. Do you have any feedback on the Authority's assessment of the costs and benefits and the balancing of these as set out in this paper, including any evidence of quantified costs and benefits?	The assessment should compare static-first and dynamic-first pathways over the expected operating life of the equipment. It should consider total exported energy, equitable access to hosting capacity, investment attractiveness for second movers, network utilisation, future retrofit costs, network augmentation pressure and future power-system security requirements. Vector's experience of more than 97% of applicants since May receiving a dynamic limit, indicates that a dynamic-first approach is highly unlikely to inhibit solar investment.
Q39. Do you agree the proposed amendments are preferable to the other options? If you disagree, please explain your preferred option in terms consistent with the Authority's statutory objective in section 15 of the Electricity Industry Act 2010.	No. Vector's preferred option is a nationally consistent flex-readiness framework under which, by 1 July 2027, EDBs have Code backing to require flex-readiness for new DG connections seeking access to the higher standard export limit. Dynamic curtailment should occur only when, where and to the extent justified by an ELAM or BELAM assessment. Consumers should retain a non-flex-ready static option, but EDBs should be permitted to set that limit commensurately lower. If the current amendments proceed before that framework is established, they should be transitional and subject to a defined sunset date.
Q40. Do you agree the Authority's proposed amendments comply with section 32(1) of the Act?	Vector is not satisfied that compliance has been demonstrated. The assessment should more fully consider dynamic-first alternatives and the long-term costs and benefits identified in this submission before the Authority reaches a conclusion under section 32(1). The Authority must consider the reduced appeal for investment in solar once available headroom has been utilised and dynamic connections are the only connections possible.
Q41. Do you have any comments on the drafting of the proposed amendments?	The drafting should not prevent distributors from requiring communicating smart inverters or dynamic export arrangements where technically justified. If the proposed static-limit

and non-communicating-inverter provisions proceed, they should include a clear sunset date and review mechanism linked to completion of the Authority's future policy work.