



March 18, 2026

Dear House Committee on Energy and Digital Infrastructure members,

I am a graduate student at Vermont Law and Graduate School. I am writing on behalf of the Institute for Energy and the Environment's Energy Clinic in regard to S.202 - An act relating to portable solar energy generation devices. First and foremost, I would like to express our support for the goals of this bill. Vermont has the chance to be a leader on portable solar which can, in an incremental way, increase energy reliability and independence for residents.

This bill was initially proposed as a mechanism for ensuring small-scale portable solar systems would not have to file a registration with the PUC. It has also brought to light a few questions relating to consumer safety and protecting consumers from misleading marketing. Based on the [White Paper published by UL Solutions](#), the [UL 3700 standard](#) itself, and a [report by the Clean Energy States Alliance](#) (CESA), there are a few areas of concern we recommend that the Committee discuss before passing out this bill. I am aware that Ken Boyce of UL Solutions will be testifying tomorrow, Thursday, March 19th. Given his expertise, these may be questions to raise during his time.

- Under S.202 and the Utah law, the UL requirement only applies to systems totaling 1,200 watts or less and, under S.202, only if they want to avoid having to register with the PUC. For safety reasons, should the UL 3700 certification requirements apply to all portable solar systems?
- Do you know if most or all of the plug-in solar products currently on the market meet the voltage requirement to meet UL 3700 certification standards? Is that something we should be concerned with if the Vermont UL requirement only applies to consumers with systems 1,200 watts or less, and are seeking to avoid PUC registration?
- We have seen plug-in solar and battery storage systems on the market which claim to reliably prevent feedback to the grid while in operational mode. In other words, they claim the system can be used as a backup during a grid outage. Do you think these systems will require any additional certification or will UL 3700 be sufficient to cover those as well?
- How long do you think it will be before a portable solar system will be able to comply with the certification requirements? What specific required components of these systems do not yet exist (e.g. the safety plug), or may exist, but do not yet have UL certification? How long do you think it will take to develop these components?

Some of the existing plug-in solar devices on the market claim to have UL certification, when in fact only certain components of the device are certified. For example, a current [advertisement for EcoFlow](#) prominently claims to be “**UL 1741 Certified, IEEE 1541 Certified, full system validation for electrical safety...**”.

- Do you believe customers will be aware of which plug-in solar systems they can buy that will meet the state requirements?
- Given that the portable solar market will most likely be targeted primarily to residences, do you think OSHA will quickly adopt UL 3700 for all portable solar and will the threat of OSHA enforcement be sufficient to ensure only UL certified products will be sold in Vermont and elsewhere? Or would it be more effective if the Vermont legislature required all portable solar sold in Vermont to be UL certified? (This could be a good question for the Attorney General’s office as well). [The Clean Energy States Alliance](#) (CESA) suggests legislatures should consider whether vendors should be required to register or be pre-approved to ensure vendors are selling safe and effective products (page 19).

Finally, I would like to raise two questions regarding consumer protection and education.

- Are there specific consumer protections you might want to put in place, or direct the Attorney General’s office to put in place, to prevent false advertising? [CESA](#) expressly raises the issues of claims of false savings or safety (page 18).
- The law specifies that customers may have multiple devices with a maximum combined capacity of 1,200 watts. Some plug-in solar devices on the market exceed that capacity. Do you believe customers will be aware of the threshold, especially if they own multiple smaller devices?

Thank you very much for your time and consideration. I’d like to reiterate our support for this effort. We raise these issues not to erect roadblocks, but to ensure the devices pose no major safety risks for consumers or electrical workers. We hope that these issues are easily remedied and are happy to answer any further questions or speak to the Committee.

Respectfully,

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