



PROFESSIONAL FIRE FIGHTERS OF VERMONT

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S.202 - Portable Solar Energy Generating Devices

Testimony from the Professional Firefighters of Vermont on Vermont's adoption of these devices in the State.

These devices were originally designed for outdoor activities/recreation such as camping, emergency disaster power back-up and off-grid remote power. Designed to power nothing larger than a small appliance. This intended use has now transitioned to residential use and has generated some issues and concerns.

There are no "plug-in" or "balcony" PV panels/systems currently certified by UL Solutions, but there are some uncertified available. State legislators should not allow these systems in their states unless they are UL tested.

UL Solution Press Release. UL Solutions Debuts Testing and Certification Framework for Safer Plug-In Solar Across the United States.

UL Solutions has developed a white-paper to help educate AHJs on the unique hazards of plug-in photovoltaic (PIPV) systems and how they differ from traditional PV technology. You can download the white paper at:

www.ul.com/insights/safety-considerations-plug-photovoltaic-pipv-systems

Additionally, UL Solutions has added a new category for Plug-In Photovoltaic (PIPV) Equipment and Systems. The guide has additional information related to the application and installation of these systems.

Utah passed legislation that Vermont may want to reference. Regarding Utah HB340, there is a lot of misinformation about what the bill actually permits. HB340 requires the plug-in solar to be listed and comply with the current edition of the NEC. The bill only exempts plug-in solar systems that meet the definition in the bill from the interconnect requirements of the electric utility.

Here is a link to the bill:

<https://le.utah.gov/~2025/bills/static/HB0340.html>

The PFFV's concerns on Why Plug-in/Balcony PV Panels Are a Bad Idea for Vermont Residents

No UL Certification = Major Safety Risks:

- Zero plug-in or balcony solar systems are UL certified right now. UL Solutions just launched UL 3700 framework in 2026, but uncertified cheap imports flood markets. Vermont's harsh winters (ice, snow loads) + amateur installs = live wires, shocks, fires waiting to happen.

Unique Hazards Unaddressed:

- UL white-paper flags "touch safety" (grabbing prongs on live unplug), GFCI interference, and "breaker masking" (overloads hidden from panel, wiring melts).
- Balconies amplify: Wind gusts rip loose panels, kids/pets touch hazards. Rooftop pros handle this; DIY renters won't.

The PFFV would recommend that we follow Utah's Model - HB340, and mandate NEC/UL compliance, require UL 3700+ before legalization.

Uncertified = lawsuits, house fires, insurance nightmares.

While we realize this is emerging technology and may have a positive impact for some, there are nonetheless, serious safety concerns that need to be addressed.

Respectfully,
Christopher Dube, President
Professional Firefighters of Vermont