April 16, 2026

**Representative Kathleen James**
Chair, House Committee on Energy and Digital Infrastructure
115 State Street
Montpelier, VT 05633

Dear Chair James:

Thank you for the opportunity to follow up on ISO New England Inc.'s March 26, 2026 written testimony regarding Vermont Senate Bill S.202, *An act relating to portable solar energy generation devices*.

ISO New England has reviewed the April 14 testimony provided to the Legislature by Meghan Housewright, Global Government Affairs Lead, Safety and Security, UL Solutions, and Ken Boyce, Vice President, Principal Engineering, UL Solutions, concerning safety and performance standards applicable to portable solar energy generation devices. We appreciate UL Solutions' engagement and their perspective on the evolving standards landscape for these technologies.

After reviewing this testimony, ISO New England continues to respectfully recommend that the Legislature require portable solar energy generation devices that interconnect with the electric grid to comply with **UL 3700** and the **latest version of IEEE 1547**, consistent with requirements already applied to other forms of solar generation. These standards are specifically designed to address the grid performance and interoperability issues raised in our prior correspondence, including ride-through behavior and appropriate responses during system disturbances.

UL 3700 evaluates whether a device *has the safety and functional capabilities to support grid-interactive operation*, while IEEE 1547-2018 establishes the required settings and performance behavior *that must be enabled* to ensure reliable interaction with the electric grid, including voltage and frequency ride-through, reactive power capability, and coordinated

response to abnormal system conditions, as reflected in widely adopted default implementation profiles used by regional transmission and distribution utilities.

Together, they provide complementary protections that neither standard achieves on its own, with UL 3700 addressing device-level grid-interactive capability and IEEE 1547-2018 – when implemented using standardized default setting profiles – ensuring consistent and predictable performance across devices and operating conditions.

The Committee may consider inserting the draft language below – either as a new subsection or as clarification within the existing definitions:

> *A portable solar energy generation device shall be designed, tested, and certified to UL 3700; and installed and operated in accordance with IEEE 1547-2018 and any successor standard, using default performance and setting profiles consistent with those developed by regional transmission and distribution system operators.*

As discussed in our March 26 letter, devices that operate as load reducers can mask underlying electric demand. If such devices trip offline unexpectedly – particularly during transmission or distribution system events – the sudden reappearance of load can exacerbate reliability challenges and increase the severity of grid disturbances. Compliance with UL 3700 and IEEE 1547 helps mitigate these risks by ensuring predictable performance, coordinated behavior, and compatibility with electric system needs.

Applying these standards consistently across all solar technologies, including portable devices, would help avoid unintended reliability impacts while still supporting Vermont's policy objectives and continued leadership in clean energy innovation.

ISO New England appreciates the Legislature's careful consideration of this issue and stands ready to provide additional technical information or support as deliberations on S.202 continue.

Thank you for your time and continued collaboration.

Sincerely,

Sarah Adams

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