

**Public Service Department Comments on S.202 Portable Solar  
TJ Poor, Director of Regulated Utility Planning  
Before House Energy and Digital Infrastructure Committee 3.18.26**

My testimony today will describe the Department’s current position with S.202 as passed by the Senate. In general, the Senate modified its introduced bill to incorporate the Department’s original comments. Safety and Consumer protections, including affordability, have been paramount in the Department’s consideration of the bill.

The Department continues to support S.202. I will offer two additional language suggestions here that did not make it into the bill that I hope are non-controversial.

I do want to make some observations on the cost to consumers.

**Safety**

I am not an expert on safety, so I will let Mr. Desrochers from the Department of Public Safety, and the utilities primarily speak to safety. I bring it up here because it is paramount.

- **Compliance with Underwriters Laboratories 3700 listing is a critical component of the bill that we support.**
  - o UL Solutions released a [white paper](#) in December 2025 on “plug-in photovoltaics” (PIPV) and they have now completed an Outline of Investigation (UL3700). They concluded that “special risk mitigation requirements are necessary to allow the safe use of PIPV products. In the absence of these special measures, PIPV can present **electric shock hazards and fire hazards to consumers**, potentially defeating protective technologies required for public protection without any awareness that the previous protection has been compromised. Allowing PIPV to be plugged into any existing branch circuit with no mitigation for the above concerns is not supported by UL Solutions. There are potential engineered solutions that can be applied and will be necessary to promote safe use of PIPV products”
  
- My understanding is that utilities are following me and can testify to any concerns they have with safety to their line workers. I defer to them on these aspects.

**Structure**

Portable solar will offset real-time consumption at the variable retail rate. This makes perfect sense – in other words a customer can reduce its behind the meter consumption.

The bill allows for generation to be exported, but similar to Utah's structure, upon which I understand this legislation was modeled, is intended to not allow for compensation of exported generation. We agree with this feature. The bill very clearly indicates that portable solar energy generation devices are not eligible for net metering.

I have one suggested edit to the bill to make it more clear. On page 2, line 16, there is reference to "Excess generation fed back into the grid". "Excess generation" is a defined term in net metering – and represents generation from a net metered facility in a month that exceeds the consumption for that month. It is a billing feature of net metering, and only exists for net metering customers, which the bill clearly does not allow. I suggest striking that phrase and substituting it with "generation exported to the grid".

### **Observations Cost to Consumers**

- These products are currently expensive – although it represents an option for renters, it is an expensive one.
- A 1.2kW system might produce roughly 1,000kWh per year (10% capacity factor –  $1.2\text{kW} * 8760 \text{ hours} * 10\% = 1051\text{kWh}$ ). At \$0.20/kWh of credit, that is about \$210 per year.
- Ms. Stryker of Brightsaver noted \$3/watt – let's say those costs drop by 1/3 – that is still a significant up-front cost of \$2400 ( $\$2 * 1200 \text{ watts}$ ) and a 11-12-year payback. We should all just be clear in discussing this appliance and proposed legislation that **it is not a solution for low-income Vermonters.**
- For now, at least, this is a measure for those who can afford it. That is OK as long as the bill continues to have the features that it does:
  - o There are no state or ratepayer subsidies for the technology (which currently there aren't); and
  - o Similar to the Utah structure, Generation that is exported is not compensated

### **Consumer Protection**

- I agree with a **Clean Energy States Alliance publication** that notes "as a new product, states may want to promulgate consumer protection requirements, such as for claims about savings, regulations, and safety. To encourage safe installations, clear guidelines, educational, and how-to materials would need to be developed." <https://www.cesa.org/resource-library/resource/plug-in-solar/>
- It may be worth inviting the Attorney General's Office in for their opinion on this.
- Observe that with a 100% Renewable or Clean Energy Standard, this measure has no impact on greenhouse gas emissions. People may be willing to invest for climate

reasons, but they will be making no impact to Vermont's progress toward Greenhouse Gas emissions as measured by its Greenhouse Gas Inventory.

### **Conclusion**

**The Department can continue to support S.202, so long as safety concerns are met, issues around exported generation are managed, and consumer protections are ensured.**