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Clinic Re. S. 202 Portable Solar 1.21.26



There are benefits to portable solar – and companion battery storage - especially for renters.

There are significant limitations to portable solar in terms of size.

Biggest concerns: safety, and consumer education and protections -not just whether they should get exemptions

## Today's Overview

UL 3700 addresses safety concerns, including comprehensive labeling and manuals – but requires technology that does not exist – UL approved plugs/receptacles and bidirectional GFCI outlets..

S.202 safety standards apply only to part of the market - not larger systems or , potentially, systems with “zero-export” technology. These are exempt under §248(a)(2).



# Today's Overview Continued

§248 CPG requirement arguably doesn't apply to plug and play already as “site preparation for or construction “ is what triggers the need to secure a CPG. “Should it be amended for clarity?

What to do about multiple “devices?” Germany doesn’t cap devices, but does cap **total** watts.

S.202 puts the burden on consumers to determine if their product complies, rather than the manufacturer. Should manufacturers be allowed to sell non-compliant products in the state? Is it harder to enforce against individual consumers?

Should the AG’s office be given an explicit directive to develop marketing restrictions?



# What Can 1,200 Watts Continuous Solar \* /1 kWh Battery Capacity Power?

Refrigerator – energy efficient (300 watts):  
3.33 hours

Cell phone fast charger (20 watts) 50 hours

1/3 hp Sump pump (800 watts) 1.25 hours

Laptop (20-50 watts): all day

Water heater (10,000 watts): 6 minutes

LED Lightbulb (10 watts): 100 hours

Dishwasher (1,000 watts): 1 hour

*\* These are running watts for a typical appliance and do not account for surge*

*Primary sources:  
Snohomish,  
Washington PUD,  
Eco Flow, & Anker*

# For Comparison

A Tesla Powerwall has a 13.5 kWh capacity and a continuous output of 11.5 kW

vs.

UL 3700 maximum battery capacity of 1kWh and 1.2 kW output.





# UL Testing & Certification [LINK](#)

The screenshot shows the UL Testing & Certification website. At the top, there is a search bar with a magnifying glass icon, a welcome message "Welcome, Jenny! Help", and language and currency dropdowns set to "English" and "US Dollar". Below the header, a navigation bar includes "Resources", "Product Glossary", "Learn", and "Request a Quote". The main content area features the UL 3700 product page. It includes the UL logo, the title "UL 3700", a detailed description of the "UL LLC Outline of Investigation for Interactive Plug-In PV (PIPV) Equipment and Systems", and various metadata such as "UL Outline", "Edition 1", "Published Date: December 11, 2025", and "Scope". The price is listed as "USD \$225.00-\$998.00". A green "Purchase Options" button is prominently displayed, along with "Stop Receiving Alerts" and "About" buttons.

Welcome, Jenny! Help

English US Dollar

Resources Product Glossary Learn Request a Quote

**UL 3700**

**UL LLC Outline of Investigation for Interactive Plug-In PV (PIPV) Equipment and Systems**

UL Outline

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Edition 1

Published Date: December 11, 2025

Scope

USD \$225.00-\$998.00

Purchase Options

Stop Receiving Alerts

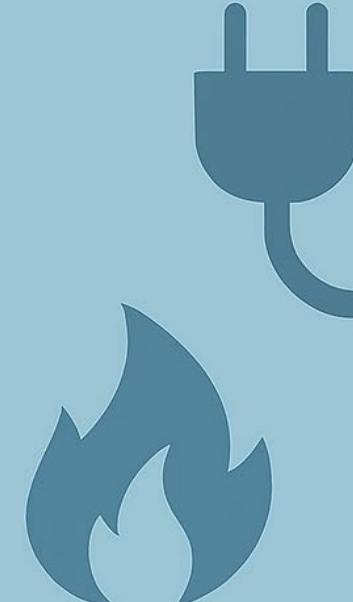
About

6



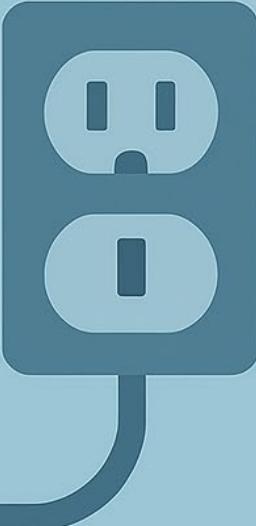
## Overcurrent Protection Challenges

Undetected overload,  
fire risk



**GFCI Compatibility**  
Unprotected circuits

**Touch Safety Hazards**  
Energized plug blades



- UL's 3 Main Safety Risks

# What About Larger Systems?



## 2kW Solar + 3kWh Battery | Plug-In Kit

**\$8,875.42**

Delivery Schedule: Please ask for lead times weeks



Pay with link

This smart plug&play solar and battery system includes everything you need to save on your electricity bill – and we're even throwing in an NEC Smart Breaker at no extra cost to you. Simply plug your devices into standard power outlets, connect to our App and watch your solar panels start producing free electricity. The battery system will communicate with your solar inverters and your PowerMeter to intelligently charge or discharge, as needed. No need for an interconnection agreement with your utility, so it's permission-free. This system will not back-feed power into the public grid.

### Included in the kit

10 x 200 Watt Bifacial Solar Panels | Up to 30% more output

10 x Solar Panel Mounts

5 x 350W Smart Inverter | IETL certified to UL 1742 and IEC 61438 Standards

# What about systems with zero-export or standalone inverters?

*Craftstrom ad: Our Power Meter measures the appliances power usage, enabling permit-free solar system operation by balancing solar production with consumption. It monitors your homes usage in real time.... Excess solar production is throttled on the inverter side or stored in the Smart Battery for night usage or outages.*

*CESA quoting Daniel Gerber, et al: We find plug-in DERs ... to have several viable market pathways today, including approaches that use zero-export technology to enable installation without an interconnection agreement.*

# Questions?