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Rhode Island Energy™
a PPL company

April 14, 2026

The Honorable V. Susan Sosnowski
Chairwoman, Senate Environment and Agriculture Committee
Rhode Island State House
Providence, Rhode Island 02908

RE: S-2359 & S-2658 – Relating to Public Utilities & Carriers – Portable Solar Generation Devices

Dear Chairwoman Sosnowski:

On behalf of Rhode Island Energy, I write regarding S-2359 and S-2658, which address the use of portable solar generation units with a maximum output of 1,200 watts. **While our Company is not opposed to "plug-in solar," we do have concerns about their potential impact on grid safety and reliability, as well as the safety of our workforce.** As these systems become more prevalent in the marketplace, policymakers should ensure that equipment sold and/or installed in the state complies with all applicable safety standards.

Rhode Island Energy provides essential energy services to more than 770,000 customers across the state through the delivery of electricity and natural gas. Our team of 1,300+ union and non-union employees is dedicated to helping Rhode Island customers and communities thrive, while supporting the transition to a cleaner energy future in a safe, reliable, and affordable manner.

It is Rhode Island Energy's understanding that legislation pertaining to "plug-in solar" or "balcony solar" is being considered in more than two dozen states. **It is critical that legislation pertaining to these systems contain appropriate guardrails to limit harmful impacts to grid reliability and utility worker safety.** As the use of these systems is still nascent in the U.S., the state would benefit from examining best practices as they are developed and implemented in other jurisdictions.

We appreciate that the bill sponsors have included language requiring "plug-in solar" systems to meet "the standards of the most recent version of the National Electrical Code" and to be "certified by Underwriters Laboratories or an equivalent nationally recognized testing laboratory." **Respectfully, we recommend that the legislation go further to require such systems to be "tested and certified by Underwriters Laboratories 1741 requirements or by an equivalent nationally recognized testing laboratory."** UL 1741 is the standard for safety that governs the testing and certification of inverters to ensure they can safely connect to and operate with the electric power system (EPS), and ensures the inverter automatically disconnects upon loss of grid power.

Also, in S-2359 (page 8, line 32), **we respectfully recommend that the words "…and utility technical requirements" be struck from the bill.** The utility's technical requirements include the Company's Electric Service Bulletins (ESB). More specifically, ESB 750 and 756 are the electrical specifications and technical standards for connecting to the EPS for state-jurisdictional projects (750 covers load connections and 756 covers distributed energy resource (DER) connections). Their purpose is to set forth rules meant to be used in conjunction with applicable tariff(s) and code to ensure any connection to the EPS operates properly to protect the safety and interest of our customers and others served by the EPS; inclusion would help ensure uniformity across all connections. For instance, ESB 750 11.0 would guard against back feeding during a power outage (which creates

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serious risks for our equipment and workforce) and ESB 756 specifies that inverter technology must be UL 1741.

In addition, **policymakers should consider limiting the number of systems each customer can install to two (2) per premise to avoid any unintended reverse power flow or "back feed" to the EPS.** This will help ensure that safety and reliability of the system are maintained while still allowing the customer to "plug in" without Company review, i.e., maintain the stated exemptions in S-2359 on pages 8 and 9.

Respectfully, as these bills are debated, the Committee and sponsors may also wish to consider the following:

- In Virginia, a similar law (HB-395) considers the impact of "plug-in solar" devices on landlord-tenant relationships; H-7269 does not address these matters.

- Virginia also recognizes local zoning authority by requiring such devices comply with height and setback requirements, and historic and architectural standards; H-7269 does not address these matters.

Finally, we note our appreciation to the sponsors for their inclusion of language stating that electric distribution companies cannot be held "liable for any damage or injury caused by a portable solar generation device."

Thank you for your attention to this matter.

Respectfully,

Nicholas S. Ucci
Director of Government Affairs

CC: The Honorable Members of the Senate Environment and Agriculture Committee
The Honorable Jessica de la Cruz, Minority Leader, Rhode Island Senate
The Honorable Bridget Valverde, Rhode Island Senate