April 15, 2026

Joseph J. Solomon, Jr.
Chair, House Corporations Committee
82 Smith Street
Providence, RI 02903

Dear Chair Solomon,

On behalf of ISO New England Inc. (ISO-NE), the independent system operator for the New England power system, I am writing regarding Rhode Island House Bill 7269, *Relating to Public Utilities & Carriers – Portable Solar Generation Devices*. We respectfully request additional clarity in the legislation to ensure continued reliability of the regional electric grid.

As drafted, H7269 would permit the deployment of portable solar generation devices that could operate as "load reducers." When such devices offset on-site consumption, they effectively mask actual load on the electrical power system. While experience with portable solar generation devices in the United States remains limited, operation may introduce reliability challenges for the electric power system. If these devices were to trip offline while the underlying load remains connected, the system could experience a sudden and unexpected increase in demand. Such imbalances create uncertainty in forecasting for system operators, and pose a potential reliability concern for the electrical grid.

More critically, if such a trip is triggered by a disturbance on the transmission system, the resulting imbalance can exacerbate the severity of the disturbance itself. Sudden, uncoordinated loss of behind-the-meter generation during system events is a known reliability risk that national standards have been designed to address. Ensuring that all grid-connected solar devices — including portable devices — respond appropriately during system

disturbances is essential to maintaining a stable and resilient electric grid in Rhode Island and across New England.

The bill references the need for compliance with Underwriters Laboratories (UL) or similar testing requirements. To fully address the concerns above, ISO-NE recommends that the Committee take into consideration requiring compliance with **UL 1741 or its successor requirements** and the **latest version of Institute of Electrical and Electronics Engineers (IEEE) 1547**. These standards contain the necessary performance and interoperability requirements to ensure distributed energy resources ride through system disturbances and operate in a manner compatible with electric system needs. Currently, all rooftop and larger photovoltaic installations interconnecting to the grid must meet these standards; applying them consistently to portable solar devices would help maintain system reliability and avoid unintended consequences.

As the entity responsible for ensuring reliable electric system operations across New England, ISO-NE values the opportunity to provide additional information or technical support as the Committee considers H7269. As the state continues to guide the development of energy policy, proactively addressing potential reliability issues before emerging technologies are widely deployed is both prudent and consistent with Rhode Island's thoughtful approach to grid modernization.

We appreciate your careful consideration of the broader impacts of new technologies and resources on the region's power system, and your continued leadership as Rhode Island advances its clean energy goals.

Thank you,

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