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by Email: pluginsolarconsultation@energysecurity.gov.uk

Freiburg, den 20.7.2026

Subject: Plug-in solar Regulatory amendment and interim product specification

To whom it may concern

We are writing to you in response to your public inquiry and the publication of the "Plug-in Solar Device Interim Product Specification Version 2.0" of July 2026.¹

BalkonSolar e.V. is full of balcony solar enthusiasts from German-speaking countries with its roots in Freiburg (Germany). We are a registered non-profit with the purpose to enhance and promote the safe use of Plug-In-PV, consumer protection and economic cooperation.² We have been active in the promotion but also in the regulatory action around Plug-In-Pv in Germany since 2018 and also worked to achieve the legal right to Plug-In-PV for tenants and Co-Owners in 2024³. We are also active within the standards discussion in Germany and within the IEC and set the first world record in mass second life upcycling of solar panels.

With this message, we would like to express our satisfaction regarding the establishment of a planned new regulation for the installation of Plug-In Photovoltaic Systems up to 800W on buildings and their connection to the internal power grid of the owner. We believe nearly all home electricity customers in the UK can benefit from a speedy introduction of such systems.⁴

¹ <https://www.gov.uk/government/consultations/plugin-solar#full-publication-update-history>

² <https://balkon.solar/verein-2/>

³

<https://balkon.solar/news/2024/10/17/germany-grants-renters-the-right-to-install-solar-systems-on-balconies/>

⁴ <https://balkon.solar/news/2026/04/06/plugin-solar-for-uk/>

We calculate cost return scenarios between 5.4 years in the South-West of the UK and 10 years in places like Scotland, even with suboptimal conditions.⁵

We do not see any special risks with the use of such systems, as long as they stay within the threshold of 800 Watt limit for the inverter.

Safety studies done during the investigation for the German plug-in-pv standard, **did not find any significant safety issues, even in aged electrical installations**, as long as the upper limit of 800 Watts feed in limitation is observed.⁶

The study also tested an exaggerated and totally theoretical worst case scenario. Even under these circumstances, no significant risk could be found. 960 WP is an arbitrary number without any backing of studies or other safety data. The WIPANO Study concluded that 2000WP was safe under normal circumstances.

The German association of fire chiefs specifically states that **there is no added fire risk for the operation of plug-in-solar**.⁷ They simply recommend that you leave enough space for the ladder of the fire service if you install at the balcony, which is already part of the legal regulations for any installation on a balcony. If your balcony is the designated second emergency exit.

The BalkonSolar Verein can confidently state that despite the fact we have had plug-in-solar in Germany as a mass market thing, **there has been no case of a panel falling off the balcony or injuring any one**.⁸

However we would like to raise a couple of points, that we consider unnecessary burden potential consumers without any safety benefit.

On page 23 of the "Plug-in Solar Device Interim Product Specification Version 2.0" of July 2026 it states:

"All connectors shall fulfil the requirements of BS EN 62852 and shall be supplied with cables by the manufacturer. Only matching connector pairs from the same product family shall be used."

This regulation is almost directly copied and translated from the German DIN VDE V 0126-95.⁹ We have criticized this, as the DKE K 373, **the committee in charge of the**

⁵ <https://balkon.solar/news/2026/03/27/can-pluginpv-work-in-the-uk/>

⁶ See short report: <https://solar.htw-berlin.de/publikationen/kurzbericht-steckersolar-800-w/> and <https://publica-rest.fraunhofer.de/server/api/core/bitstreams/4afaa599-6918-4c65-8e1c-b45315373680/content>

⁷ Find information about fire protection and escape routes at:

<https://balkon.solar/news/2024/01/18/balkonsolar-und-anleitern-fluchtweg-und-feuerwehr/>

⁸ Well we must make one exception: In Mainz the CEO of the local housing company stood on a balcony, let himself be filmed by a drone and threw a solar panel off a balcony.

<https://balkon.solar/news/2025/10/20/offener-brief-zum-umgang-der-wohnbau-mainz-mit-steckersolar-geraeten/>

⁹ see: <https://balkon.solar/news/2025/11/22/what-does-the-new-german-plug-in-pv-norm-say/>

Plug-in-PV Norm has never been able to reproduce sources that point to any proven danger of the use of mechanically compatible solar connectors. The cited sources in for example manufacturer documentation from Stäubli are unobtainable or do not prove the claims made. Often they are linking to articles in popular magazines with unknown Datasource.¹⁰

Another example for such a citation is an article in the PV-Magazine. Here too the original study doesn't show what is concluded by Stäubli.¹¹

You also state on page 23 of the "Plug-in Solar Device Interim Product Specification Version 2.0" that: *"Y-connectors shall not be used."*

We see no safety benefit in the prohibition of Y-connectors as they enable consumers to use smaller panels and applications such as fence integrated solar or "Fensterkraftwerk" (translated "Window Solar")



Fence solar consisting of individual stripes.¹²

¹⁰ see our article and presentation about this:

<https://balkon.solar/news/2025/11/17/wie-gefaehrlich-ist-kreuzverbau/>

See

<https://www.staubli.com/content/dam/ecs/pictures/solar-photovoltaics/RE-Statement-PV-CrossConnection-ProductLiability-DE.pdf> the listed sources are unobtainable or do not prove the claims made.

¹¹

https://www.tuv.com/content-media-files/master-content/services/products/p06-solar/solar-downloadpage/solar-bankability_d1.1_d2.1_technical-risks-in-pv-projects.pdf

¹² Source:

<https://www.solarserver.de/2026/03/03/zaunsolaranlage-sunbooster-vertical-zur-3-phasigen-photovoltaik-anlage-erweitert/>



Fensterkraftwerk¹³

Such a prohibition does not bring more safety to the consumer but stops innovative technical solutions and innovation and therefore we ask you to remove it from the Product Specification.

We want to urge you **not to deviate too far from the legal and technical framework in Germany¹⁴** as the leading market for Plug-In-Solar, **as any substantially different regulation will drive up prices for consumers** and hinder adoption.

In our experience governments and interest groups can try to limit the adoption of plug-in-solar with extensive, cumbersome and difficult technical and legal regulations. Some potential customers will then not adopt plug-in-solar, other customers will simply ignore this and install their solar system as guerilla pv as there are financial gains in using it. It is therefore a better strategy to give consumers **simple and comprehensible rules** and **invest in consumer education**.

We acknowledge that the period for consultation has been closed, nevertheless we want to bring you this information to your attention.

¹³ , Source: <https://www.fensterkraftwerk.de/i/galerie>

¹⁴ for details see our FAQ page: <https://balkon.solar/news/2025/11/14/neue-steckersolar-norm/> and an english language summary: <https://balkon.solar/news/2025/11/22/what-does-the-new-german-plug-in-pv-norm-say/>

We are open to working with you for these goals and helping you, please feel free to contact us at any time. We could bring our longstanding expertise in running the leading German speaking non commercially affiliated consumer information website to the table.

Please acknowledge that you received this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sebastian Müller', with a long horizontal stroke extending to the right.

Sebastian Müller
Chair