

Consultation Response

Plug-in solar: Regulatory amendment and interim product specification

June 2026

Introduction

The Law Society of Scotland is the professional body for over 13,000 Scottish solicitors.

We are a regulator that sets and enforces standards for the solicitor profession which helps people in need and supports business in Scotland, the UK and overseas. We support solicitors and drive change to ensure Scotland has a strong, successful and diverse legal profession. We represent our members and wider society when speaking out on human rights and the rule of law. We also seek to influence changes to legislation and the operation of our justice system as part of our work towards a fairer and more just society.

Our Energy Law sub-committee welcomes the opportunity to consider and respond to the UK Government consultation: *Plug-in solar: Regulatory amendment and interim product specification*.¹ The sub-committee has the following comments to put forward for consideration.

General Comments

Whilst we have no comment on the technical proposals laid out in this consultation, we support the policy objective of a proportionate, enabling, and safe regulatory framework surrounding use and sale of plug-in solar microgenerators.

We consider that ensuring that the regulations provide appropriate consumer protection and are enforceable is of high importance.

We presume that the regulations will make compliance with interim product specification mandatory for manufacturers and that the regulations will be supported by clear guidance and information consumer. We would appreciate clarity from the UK Government on these points.

B. Interim Product Specification

1. Do you agree with the proposal to require manufacturer compliance with an interim product specification before a plug-in solar product can be placed on the market?

We have no specific comments.

¹ [Plug-in solar: Regulatory amendment and interim product specification - GOV.UK](https://www.gov.uk/consult/consultation/plug-in-solar-regulatory-amendment-and-interim-product-specification)

2. Do you agree with the proposal to use the same broad approach as the German standard (DIN VDE 0126-95) as a baseline, with amendments for the UK context, to support future international harmonisation?

We have no specific comments.

3. Are the engineering controls in the Interim Product Specification proportionate to the risks in deploying plug-in solar in the UK? If not, please outline anything that is missing or over-specified.

We have no specific comments.

4. Does the Interim Product Specification address all the points in the safety study commissioned by DESNZ? Please refer to the safety study results published alongside this consultation.

We have no specific comments.

5. Are there elements of existing technical standards quoted in the Interim Product Specification that are unsuitable for the UK context or not applicable to plug-in solar products? If yes, please set out any potential modifications.

We have no specific comments.

6. The electrical safety study showed plug-in solar was safe at a circuit level.

Should the Interim Product Specification limit the number of microinverters to one per household or one per household circuit?

We have no specific comments.

7. What risks or unintended consequences, if any, should be considered in implementing the Interim Specification?

We have no specific comments.

C. Consumer Protection and Market Issues

1. What information should be provided to consumers at the point of sale and prior to installation, including on safety, suitability of existing electrical circuits and protective devices, suitability of dwellings, and limitations of the product?

We have no specific comments.

2. Are there risks of misuse, misunderstanding, or unsafe adaptation that should be mitigated? If yes, please set out the settings in which these risks would be most relevant e.g. types of dwellings.

We have no specific comments.

D. Implementation and Timing

1. Is the proposed timeline for introducing the Interim Product Specification feasible? If not, why not?

We have no specific comments.

2. What support or guidance would help ensure timely and effective implementation of the Interim Product Specification?

We have no specific comments.

E. General

1. Are there any additional comments or evidence you would like to provide to inform the development of this framework?

We have no specific comments.





For further information, please contact:

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