



27 February 2026

Dear Sir/Madam,

Citizens Advice welcomes the opportunity to respond to ENA's consultation on the *Proposed Amendment to facilitate Plug-in Micro-generation*. We are the statutory consumer advocate for energy consumers in Great Britain. This response is not confidential and may be published on your website.

Having reviewed the proposal, we set out our feedback below.

Question 1: Do you agree with the proposed amendment to EREC G98 to facilitate the connection and operation of Plug-in Micro-generators? If not, please explain why.

In general, we agree with the proposed amendment to EREC G98 and support efforts to make it easier for consumers to adopt plug-in micro-generators. However, we have concerns about how potential consumer risks will be mitigated in practice. In particular, there are still questions about whether plug-in micro-generators are suitable for older household electrical installations, the potential cost of any electrical checks or upgrades that may be needed, how insurance and liability would be handled if something goes wrong, and how consumers will be informed about these risks and any installation or registration requirements. These issues should be addressed through clear consumer information and simple installation and registration processes that do not place unnecessary burdens on consumers.

To address any potential risks, consumers considering buying plug-in solar should also be encouraged to check whether their home's electrical system is suitable before

Patron HRH The Princess Royal Chief Executive Dame Clare Moriarty

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England registered office: 3rd Floor, 1 Easton Street, London, WC1X0DW.

purchase, especially for those living in older properties, where the risk of incompatibility may be higher.

We also welcome the recommendations set out in the recent RAF013/2526 report on plug-in PV systems. The report highlights concerns about uneven product quality across the market, which could pose additional risks to consumers. We support its recommendation for a UK product specification to help address these differences and provide greater consistency and assurance for consumers.

Question 2: Do you agree with the proposed scope of the Plug-in Micro-generator connection route, including the 800 W or less threshold, the limit of one Plug-in Micro-generator at a Customer's Installation, and the requirement that the aggregate Registered Capacity of all Micro-generators forming the Micro-generating Plant does not exceed 16 A per phase? If not, please explain why.

We understand the rationale behind the proposed scope, particularly from a safety and network management perspective. However, the consultation would benefit from greater clarity on how these limits and requirements would be enforced in practice before we can fully support the proposal.

In particular, it is currently unclear how compliance with the "one Plug-in Micro-generator per Customer Installation" requirement would be monitored and enforced, and how network operators would identify whether the aggregate capacity across multiple micro-generators exceeds the proposed limits. The consultation also does not provide sufficient detail on what mechanisms or processes would be used to support this in practice.

Greater clarity on how these arrangements would be implemented would help stakeholders better evaluate whether the proposed limits are reasonable, practical, and achievable.

Question 3: Do you agree with the proposed technical requirements and practical exemptions for Plug-in Micro-generators, including the exemptions set out in Appendix 1, section A.1.2 and the use of Form B2 and Form D2? If not, please explain why.

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We do not intend to comment on the detailed technical aspects of this consultation question.

Question 4: Do you believe that this proposed modification better facilitates the applicable Distribution Code Objectives?

We broadly agree that the proposed modification could better facilitate the applicable Distribution Code Objective by helping the wider public adopt low-carbon technologies.

However, we do have some concerns about how widespread uptake of plug-in microgenerators may affect the day-to-day operation and management of local electricity networks. Challenges could arise if a large number of these microgenerators are connected to the grid in the same area, potentially creating local balancing and management issues. At this stage, it remains unclear how prepared the networks are to deal with these changes.

In our view, effective data collection, registration, and information-sharing arrangements will be needed for network companies to have sufficient visibility into these micro-generators and to manage the network efficiently.

Question 5: Do you have any other relevant comments?

As the statutory consumer advocate, we are concerned that some of the risks associated with the rollout of plug-in micro-generators could place a disproportionate burden on consumers.

A main concern lies in the suitability of existing home infrastructure. Older homes with legacy electrical installations were not designed to accommodate electricity flows from small scale generation devices. Without proper oversight, consumers could face electrical safety devices tripping. In addition to the safety risk, there is a potential unexpected requirement for electrical checks such as an Electrical Installation Condition Report (EICR) or an extensive wiring upgrade to use the technology safely. These expenses are not transparent at the point of purchase, leaving buyers unfairly exposed to costs that they might not expect. Therefore, clear and accessible information should be provided to consumers at the point of sale and during product set-up, so consumers can make informed decisions before purchasing these devices.

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To reduce the risk of incompatibility, consumers considering buying plug-in solar should be encouraged to check whether their home's electrical system is compatible before making a purchase. This is especially important for people living in older properties, where the risk is likely to be higher.

Installation is another area of concern. While plug-in micro-generators are intended to be simple to use, it is important that consumers receive clear guidance on the safe positioning, mounting, and use of these devices. Incorrect DIY installation or use could create safety risks for the consumer and their neighbours. This is particularly important when products are intended for installation by consumers rather than by qualified professionals. Manufacturers should therefore provide clear and accessible guidance on safe installation and use, so that responsibility for managing these risks does not fall solely on consumers.

There is also a need for clearer guidance for consumers on how installing plug-in solar panels may affect their home insurance. It remains unclear how self-installation could impact or even invalidate an existing policy. Consumers need clear and consistent information from insurers on any potential insurance implications before deciding to install plug-in solar, so they can make a fully informed choice.

We understand that network operators need visibility into plug-in micro-generators connected to the network to manage the grid safely and efficiently. As a result, some form of registration may be necessary. However, the registration process should not place unnecessary burdens on consumers. The administrative burden should be kept to a minimum. Responsibility for providing technical information should sit primarily with manufacturers. Consumers should be required only to complete a simple, user-friendly activation process, such as scanning a QR code and providing basic information. This would help network operators gain the visibility they need while reducing the burden on consumers.

The recent RAF013/2526 report on Plug-in PV Systems in the United Kingdom highlighted inconsistent product quality across the market. It recommends introducing a UK product specification to help address these differences. We support this recommendation. More consistent product standards would help give consumers greater confidence in the

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safety, quality and performance of plug-in micro-generation products. This would also help improve the overall consumer experience by making these products more reliable.

And finally, plug-in solar is not as simple as just plugging it in and using it. There are a number of potential risks, depending on the condition of the existing home's electrical system and how the product is used. For example, installing multiple devices on the same circuit could increase the risk of overload, equipment damage or even fire. Consumers need to be made aware of these risks and given clear guidance on safe use.

Best regards,

TungHing Sum

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