

Ofgem decision to Approve DCRP/MP/26/02: Proposed Amendment to facilitate Plug-in Microgeneration

Decision:	The Authority ¹ determines that this modification should be made ²
Target audience:	Distribution licensees, Distribution Code Review Panel, distribution network users and other interested parties
Date of publication:	11 August 2026
Implementation date:	As directed in the Decision Notice section

Background

The Department for Energy Security and Net Zero (DESNZ) recently issued a consultation on its proposals to enable the safe and legal use of Plug-in Solar Photovoltaic (PV) devices in the UK.³ In this consultation, DESNZ set out that existing product safety legislation prevents Plug-in Solar PV from being legally sold, supplied, or used in the UK at present. DESNZ therefore proposed necessary legislative amendments alongside a Plug-in Solar Device Interim Product Specification (Interim Product Specification) as an interim measure to enable market access in the short term whilst longer-term changes to relevant standards are considered. We note that DESNZ published their response to this consultation on 16 July 2026, confirming their intent to amend The Plugs and Sockets etc. (Safety) Regulations 1994 (PSSR) and Electricity Safety, Quality and Continuity Regulations 2002 (ESQCR) alongside the introduction of a final Interim Product Specification.

DESNZ also requested an amendment to Engineering Recommendation G98 to allow the connection of devices complying with the Interim Product Specification to connect to the low voltage network (LV network), resulting in this modification proposal.

Engineering Recommendation G98 (EREC G98) is an Annex 1 document of the Distribution Code which sets out the requirements for the connection of Fully Type Tested Micro-generators (up to and including 16A per phase) in parallel with public Low Voltage Distribution Networks. We note that the connection of non-type tested Micro-generators is not permitted. Traditional Micro-generators are fixed wire installations carried out by Competent Installers. Plug-in Solar PV devices are intended to be products that can be connected by a Customer using the Manufacturer's plug. The existing EREC G98

¹ References to the "Authority", "Ofgem", "we" and "our" are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work. This decision is made by or on behalf of GEMA.

² This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989.

³ [Plug-in solar: Regulatory amendment and interim product specification - GOV.UK](#)

arrangements therefore require amendment to be in accordance with DESNZ's Interim Product Specification and intended amendments to the PSSR and ESQCR regulations, and provide clear and proportionate requirements for Customers, Manufacturers, Installers and Distribution Network Operators (DNOs).

This modification proposal seeks to modify EREC G98 to facilitate the connection and operation of Plug-in Solar PV (complying with the Interim Product Specification), whilst maintaining appropriate requirements for **Electricity Distribution Network** safety, supply quality and operability only. The modification proposal does not address, and should not be taken as determining, wider issues relating to product legality, consumer protection, or electrical safety within premises. These matters are considered separately under other regulatory frameworks as set out in DESNZ's consultation and response to this consultation.

This modification proposal has been progressed ahead of these wider issues being resolved to ensure DNOs, via the Distribution Code, do not delay potential uptake of Plug-in Solar PV once DESNZ's proposed amendments to the PSSR and ESQCR come into force. Nothing in our decision is intended to suggest that consumers can use/install products which do not meet broader safety standards, which sit outside of our remit. It is for DNOs to comply with all legal and licence requirements as they apply within our regulatory framework. On that basis approval of this modification will only have effect to enable connections which meet those broader safety standards.

The modification proposal

DCRP/MP/26/02 was raised by the Energy Networks Association (the Proposer) on 1 April 2026 in line with DESNZ's request to facilitate the connection of Plug-in Solar PV devices complying with the Interim Product Specification to connect to the LV network. It was developed by the DCRP EREC G98 Plug-in Generation Workgroup.

DCRP/MP/26/02 proposes changes throughout EREC G98. In doing so, it:

- defines Plug-in Micro-generators, limiting their capacity to a Registered Capacity of 800W or less. This capacity limit is aligned to DESNZ's initiative and appears to be the maximum standard product capacity for Plug-in Solar PV products on the market in countries where they can be legally sold, such as Germany.
- references Plug-in Solar PV and Plug-in Electricity Storage as types of Plug-in Micro-Generators. We note that DESNZ's consultation sets out that their proposed regulatory updates do not cover other forms of Plug-in Micro-generators including battery storage systems. The inclusion of Plug-in Electricity Storage within this modification proposal is therefore in anticipation of DESNZ potentially making further regulatory amendments to facilitate their legal and safe use within the UK, after future analysis work into safety and technical standards is undertaken. Plug-in Electricity

Storage devices will therefore remain prohibited from being sold, supplied, or used in the UK once DESNZ's current proposals are implemented.

- limits the connection of Plug-in Micro-generators to one per Customer Installation (effectively one per household). We note that DESNZ's Interim Product Specification permits one device per final circuit, though states that the G98 requirements take precedence.
- sets out that Plug-in Micro-generators are permitted to connect and operate alongside other permanently wired Micro-generators provided the aggregate Registered Capacity of all Micro-generators in the Customer's Installation do not exceed G98's existing 16 A per phase limit. Above this limit, Engineering Recommendation G99 requirements apply.⁴
- confirms that Plug-in Micro-generators must comply with the relevant technical requirements of EREC G98, including Type Testing requirements, subject to the specific practical exemptions. These exemptions relate to existing EREC G98 installation requirements that are not applicable to Plug-in Micro-generators, including installers' competencies, provision of a photograph of the cut-out, requirements related to the wiring, labelling and isolation of the plant, and functional checks on loss of mains protection. It also clarifies that any such exemptions do not remove any requirements for Customer's Installations (wiring within a property) to conform with BS 7671⁵ or any other applicable legal, safety or product requirements.
- requires and introduces a mechanism for customers to notify DNOs of the installation or decommissioning of a Plug-in Micro-generator.

A DCRP/MP/26/02 public consultation was issued on 5 June 2026 and closed on 30 June 2026, receiving twelve responses generally supportive of the proposal. The workgroup reviewed the responses with post-consultation changes limited to clarifications, simplified customer facing forms, implementation arrangements and minor editorial amendments and did not materially alter the proposal. The following concerns, which we address in the 'Reasons for our decision' section of this document, were also raised:

- the National Energy System Operator (NESO) expressed concern regarding the aggregate impact on system operation of high Plug-in Solar PV deployment recommending deployment monitoring to ensure any issues are mitigated in a timely manner.
- a number of respondents stressed the importance of clear customer guidance to inform customers of the compatibility of their home's electrical system, clear installation guidance to support safe installation, and clarity regarding other customer

⁴ Engineering Recommendation G99 sets the requirements for connecting all Power Generating Modules that are not in scope of EREC G99 (i.e. above 16 A per phase) in parallel with public distribution networks.

⁵ BS 7671 is known as the IET Wiring Regulations and set the national standard for electrical installations in the UK. <https://electrical.theiet.org/bs-7671-18th-edition-wiring-regulations/>

responsibilities e.g. implications on home insurance, to inform their decision to purchase a Plug-in Solar PV device.

The Proposer considers that the modification better facilitates Distribution Code Objectives (a), (b) and (d), and has neutral impact on all other objectives.⁶ They consider the modification proposal provides a clear route for Plug-in Micro-generator connection and operation, while maintaining EREC G98 requirements and supporting DNO visibility.

Distribution Code Review Panel (DCRP)⁷ comments and licensee recommendation

The proposed EREC G98 drafting and the Final Modification Report (FMR)⁸ were circulated to the DCRP EREC G98 Plug-in Generation Workgroup and DCRP members on 10 July 2026. By correspondence on 15 July 2026 the Workgroup endorsed the final drafting, and the DCRP approved the proposed amendments to EREC G98 Issue 2 Amendment 1, recommending that the modification proposal be submitted to the Authority for approval.

Our decision

We have considered the issues raised by the modification proposal and in the FMR dated 16 July 2026. We have considered and taken account of the responses to the consultation on the modification proposal which are included in the FMR. We have concluded that:

- implementation of the modification proposal will better facilitate the achievement of Distribution Code Objectives (a), (b) and (d), and will have neutral impact on all other objectives
- approving the modification is consistent with our principal objective and statutory duties⁹

Reasons for our decision

We consider this modification proposal will better facilitate Distribution Code objectives (a), (b) and (d), and has a neutral impact on the other applicable objectives.

(a) permit the development, maintenance, and operation of an efficient, co-ordinated, and economical system for the distribution of electricity

⁶ As set out in Standard Condition SLC 21.4 of the Electricity Distribution Licence available at: [Licences and licence conditions | Ofgem](#)

⁷ The DCRP is established in accordance with SLC 21 of the Electricity Distribution Licence.

⁸ Distribution Code proposals, final reports and representations can be viewed at: [Current Areas of Work and Consultations](#)

⁹ The Authority's statutory duties are wider than matters which the Panel and licensees must take into consideration and are largely provided for in statute, principally in this case the Electricity Act 1989.

We consider that the distribution system cannot be considered efficient and co-ordinated unless it permits the connection of devices which have been subject to a legislative and/or regulatory process to make them available to consumers, such as Plug-in Solar PV devices when DESNZ's proposed amendments to the PSSR and ESQCR come into force. In our view, the modification proposal provides a clear and proportionate framework for the connection and operation of type-tested Plug-in Micro-generators (noting this applies to Plug-in Solar PV only at time of this decision). It retains appropriate G98 technical requirements to ensure network safety, power quality and operability. We therefore consider this modification proposal better facilitates this Distribution Code Objective.

DNOs consider that individual Plug-in Micro-generators will have limited network impact due to their capacity, however, acknowledge that widespread deployment would have cumulative implications on networks. We agree that such network impacts are better mitigated by limiting customers to the connection of a single Plug-in Micro-generator per Customer Installation (domestic premises), relative to DESNZ's Interim Product Specification allowing one device per final circuit. We note that where Plug-in Solar PV devices are widely adopted, for example in Germany, customers are limited to 800W of inverter capacity. Therefore, the proposed device limitation is aligned to wider international practice.

As mentioned earlier, we note that in response to the DCRP/MP/26/02 public consultation, NESO expressed concern around system operability issues associated with widespread Plug-in Solar PV adoption, recommending market monitoring to better mitigate emerging issues. A Plug-in Solar PV safety study commissioned by DESNZ also recommends DESNZ deploy market and deployment monitoring to identify emerging risks, including potential unregistered devices.¹⁰ We understand that DESNZ are progressing with this recommendation and aim to share applicable data with DNOs and NESO as applicable to ensure that the cumulative network impact is accurately considered. The cumulative network impact will be kept under review using available registration and notification information, and further action considered if necessary. We require DNOs to engage in this process as requested by NESO.

The modification proposal requires customers to notify their DNO of installation or decommissioning of a Plug-in Micro-generator and has introduced simplified G98 forms to facilitate this. DNOs ability to forecast demand is critical to facilitate efficient network planning and will be in part impacted by their visibility of Plug-in Micro-generators (noting that DESNZ's proposals will only facilitate Plug-in Solar PV), therefore the notification process should be as consumer friendly as possible to best encourage notification. A Plug-in Solar PV electrical safety study commissioned by DESNZ recommends that notification arrangements for Plug-in Solar PV should be proportionate to the consumer deployment model as opposed

¹⁰ [Plug-in solar electrical safety study - GOV.UK](#)

to Installer notifications as per existing G98 requirements. We note that the ENA are developing a digital consumer-facing notification journey based on the ENA Connect Direct platform, the platform used by Installers to notify and provide relevant data of residential Low Carbon Technology connections to DNOs, to facilitate simpler consumer friendly notification for Plug-in Solar PV. We consider these matters will better facilitate customer notifications relative to the existing G98 forms, therefore better facilitating the development of an efficient and co-ordinated distribution system.

The modification proposal also provides relief from existing G98 requirements relating to installation by a Competent Installer, allowing Plug-in Microgenerators to be installed by consumers. Safe installation and operation of the devices is therefore dependant on consumers adhering to applicable guidance. We consider limiting customers to the connection of a single Plug-in Micro-generator per Customer Installation (domestic premises) better ensures such guidance is adhered to, for example by removing the requirement for customers to verify that individual devices are connected to different final circuits within the property.

We consider the risk of network impacts associated with high rates of adoption are adequately mitigated by limiting customers to the connection of a single Plug-in Micro-generator per Customer Installation (domestic premises) due to the small scale nature of the devices. We consider the risks associated with a lack of DNO visibility due to unregistered devices are adequately mitigated via the proposed simplified consumer friendly notification route, as well as DESNZ's commitment to market monitoring and sharing of relevant data. We therefore consider this modification proposal will better facilitate the development of an efficient and co-ordinated distribution system and ensures that the intended changes to the regulations are reflected to provide clear and proportionate requirements for Customers, Manufacturers, Installers and Distribution Network Operators (DNOs), better facilitating this Distribution Code Objective.

We consider the risks associated with unregistered devices to be mitigated through DESNZ monitoring, and the network impact of to be minimised by the small scale nature of the devices, and one per property limitation. In our view, the modification proposal provides a clear and proportionate framework for the connection and operation of type-tested Plug-in Micro-generators (noting this applies to Plug-in Solar PV only at time of this decision), we therefore consider this modification proposal better facilitates this Distribution Code Objective.

(b) facilitate competition in the generation and supply of electricity

The modification facilitates a simplified route for the connection of Plug-in Micro-generators (noting that DESNZ's proposals will only facilitate Plug-in Solar PV), thereby facilitating their

entry to market. By facilitating the installation of additional generation capacity, we consider this modification facilitates competition in the generation of electricity. We note that the proposal limits customers to the connection of a single Plug-in Micro-generator per Customer Installation (domestic premises), however as set out above we consider there to be valid reasons for this limitation. We therefore consider it better facilitates this Distribution Code Objective.

(d) promote efficiency in the implementation and administration of the Distribution Code

We acknowledge that permitting the connection of Plug-in Solar PV may complicate implementation and administration of the Distribution Code relative to the existing baseline where connection of such devices are not permitted. However, we consider this is superseded by our views against Distribution Code Objective (a). An efficient and coordinated distribution system should permit the connection of devices which have been subject to a legislative and/or regulatory process to make them available to consumers, in this case Plug-in Solar PV as determined by DESNZ. We consider that this modification proposal facilitates the connection of Plug-in Solar PV efficiently via the introduction of simplified forms and customer notifications, proportionate to the Customer installed nature of Plug-in Micro-generators. We also note that the ENA propose to facilitate simpler, digital consumer friendly notifications based on the ENA Connect Direct Platform.

Therefore, on balance, we consider this modification proposal better facilitates this Distribution Code Objective.

Ofgem's principal objective and statutory duties

We consider that approving the modification is consistent with our principal objective and statutory duties. We note that, whilst DESNZ's proposals aim to facilitate the legal sale and use of Plug-in Solar PV devices in the UK, it does not remove responsibilities associated with their installation and use. Nothing in this decision impacts on the ability for consumers to decide whether or not to use the devices. Consumers remain responsible for ensuring compliance with the applicable requirements relating to installation safety and for considering any consequential impacts, including on insurance arrangements, landlord or building-owner permissions, and any other property-specific obligations that may apply. We consider it important that consumers are made aware other responsibilities may arise and are provided with clear information before installation. We therefore welcome the Government's intention to publish further consumer guidance to be available when the proposed legislative amendments come into force. We strongly encourage consumers to take account of that guidance before purchasing or installing a Plug-in Solar PV device.

Applying our statutory duties, we keep matters under review and would consider any specific further proposals to facilitate Distribution Code objectives.

Decision notice

In accordance with SLC 21.10 of the Electricity Distribution Licence, the Authority hereby directs that the modification to the Distribution Code set out in the Final Report to the Authority of 16 July 2026 be made. We direct the modification be implemented when the legislative amendments to The Plugs and Sockets etc. (Safety) Regulations 1994 (PSSR) and Electricity Safety, Quality and Continuity Regulations 2002 (ESQCR), as set out in DESNZ's consultation, come into force.

Shilen Shah

Head of Strategic Planning, Codes and Standards

Signed on behalf of the Authority and authorised for that purpose