

January 6, 2025

Will Seuffert
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Letter from the Minnesota Department of Commerce
Docket No. E999/CI-20-800

Dear Mr. Seuffert:

The Minnesota Department of Commerce (Department) respectfully submits this letter to the Minnesota Public Utilities Commission (Commission) in advance of the Agenda Meeting scheduled for January 16, 2025 in the above-referenced docket regarding a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data.¹

During the recent comment period which concluded on December 4, 2024, the Department and other parties recommended the Commission approve a standing workgroup to consider data sharing and security issues.² However, the Department did not explicitly request additional funding for specialized technical professional investigative services under Minn. Stat. § 216B.62, subd. 8.³ Accordingly, the Department respectfully requests that the following language be included in a Commission order:

The Commission requests that the Commissioner of Commerce seek authority from the Commissioner of Management and Budget to incur costs for specialty services to provide a recommendation on privacy and security in the Commission Investigation on grid data and security and to participate in related analysis and

¹ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Minnesota Public Utilities Commission, Notice of Commission Agenda Meeting, January 3, 2025, Docket No. E999/CI-20-800, (eDockets) [20251-213474-01](#).

² *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Department of Commerce, Reply Comments, December 4, 2024, Docket No. E999/CI-20-800, (eDockets) [202412-212679-01](#), at 9.

³ [Minn. Stat. § 216B.62, subd. 8 \(2009\)](#).

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Analyst assigned: Daniel Tikk

stakeholder engagement, and subsequently bill those expenses to Xcel pursuant to Minn. Stat. § 216B.62, subd. 8.

Funding of these services will be used to build upon the specialty services that have been provided to the Department previously, and it will inform the Department's continued work and recommendations in this proceeding.

The Department appreciates the Commission's consideration of this request and looks forward to answering any questions that the Commission may have at the agenda meeting.

Sincerely,

/s/ Peter Wyckoff, Ph.D.
Deputy Commissioner, Division of Energy Resources

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CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Letter**

Docket No. E999/CI-20-800

Dated this 6th day of **January 2025**

/s/Sharon Ferguson

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15	James	Canaday	james.canaday@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota St. St. Paul MN, 55101 United States	Electronic Service		No	20-800Official
16	Richard	Carter	rick.carter@lhbcorp.com			2780 Shadywood Rd Excelsior MN, 55331-9599 United States	Electronic Service		No	20-800Official
17	Brent	Christensen	brentc@mnta.org	Minnesota Telecom Alliance		1000 Westgate Drive, Ste 252 St. Paul MN, 55114 United States	Electronic Service		No	20-800Official
18	Andrew	Clearwater		Future of Privacy Forum		1400 I St NW Ste 450 Washington DC, 20005-6503 United States	Paper Service		No	20-800Official
19	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St. Louis MO, 63119-2044 United States	Electronic Service		No	20-800Official
20	Roger	Colton	roger@fsconline.com			34 Warwick Road Belmont MA, 02478 United States	Electronic Service		No	20-800Official
21	Sheri	Comer	sheri.comer@ftr.com	Frontier Communications Corporation		1500 MacCorkle Ave SE Charleston WV, 25396 United States	Electronic Service		No	20-800Official
22	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	20-800Official
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24	Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	20-800Official
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31	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	20-800Official
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39	Brenda	Kyle	bkyle@stpaulchamber.com	St. Paul Area Chamber of Commerce		401 N Robert Street Suite 150 St Paul MN, 55101 United States	Electronic Service		No	20-800Official
40	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	20-800Official
41	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	20-800Official
42	Todd	Liljenquist	todd.liljenquist@mmha.com	Minnesota Multi Housing Association (MHA)		1600 West 82nd Street, Suite 110 Minneapolis MN, 55431 United States	Electronic Service		No	20-800Official
43	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	20-800Official
44	Sarah	Marquardt	smarquardt@mcknight.org	The McKnight Foundation		710 S 2nd St Minneapolis MN, 55401 United States	Electronic Service		No	20-800Official
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46	Craig	McDonnell	craig.mcdonnell@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Road St. Paul MN, 55101 United States	Electronic Service		No	20-800Official
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49	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	20-800Official
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