



AN ALLETE COMPANY

May 11, 2026

VIA E-FILING

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of a Commission Investigation on Grid and
Customer Security Issues Related to Public Display or
Access to Electric Distribution Grid Data
Docket No. E999/CI-20-800
REPLY COMMENTS

Dear Ms. Bergman:

Minnesota Power (or, the “Company”) respectfully submits the following Reply Comments in the above referenced proceeding. The Company appreciates the dialogue provided through Initial Comments in response to the Minnesota Public Utilities Commission’s (“Commission”) Notice of Comment Period (“Notice”) and the opportunity to provide Reply Comments.

I. BACKGROUND

On March 31, 2026, the Commission issued a Notice of Comment Period to Docket No. E999/CI-20-800 in response to Converge Strategies, LLC (“Converge”) report titled, *“Recommendations for a Grid Data Sharing Framework”* (“Study”) filed on March 4, 2026. Several interested parties submitted Initial Comments on April 30, 2026. The Company’s Reply Comments are in response to these Initial Comments.

II. DISCUSSION

The Company appreciates the collaborative nature and perspectives offered by parties in the Initial Comments. However, the Company finds that several of the proposed modifications risk undermining the core security objectives of the Grid Data Sharing Framework. The Company maintains that a successful framework must prioritize the practical realities of grid security and reliability when considering increased data sharing.

The Company has reviewed comments from interested parties and remains concerned about the proposals to grant the Grid Security Working Group (“GSWG”) adjudicative

authority over informal data disputes. As the Company previously stated in Initial Comments, the Minnesota Power believes the GSWG was initially established as a multi-stakeholder advisory group focused on broad policy development, not a quasi-adjudicative group designed for informal complaint resolution. The Company certainly understands parties' recommendations and the administrative efficiencies of the proposed solution. However, the Company maintains its recommendation that the Consumer Affairs Office ("CAO") should be the sole adjudicative body for any complaint.

Minnesota Power also maintains that 90 days is the optimal intermediation timeline, particularly during high-volume periods or when it is required to handle complex data requests. While two months may be workable, the Company believes 90 days is the optimal solution to provide the necessary time for vetting, scoping meetings, and data sanitization.

Finally, the Company maintains its recommendation of a cost-causation model for data fulfillment to ensure ratepayers are not subsidizing requests related to specific commercial interests.

III. CONCLUSION

The Company believes the Converge Report serves as a foundation for enhancing grid security to the ultimate benefit of all customers. The Company also thanks the workgroup participants, interested parties, and Converge for their valuable time and resources invested in developing this record. Although party preferences differ on the mechanics of the implementation of this framework, the Company believes the dialogue in this docket reflects a shared commitment to the innovation, safety, and reliability of Minnesota's energy infrastructure.

If you have any questions regarding this filing, please contact me at 218-355-3016 or jgries@mnpower.com.

Date Submitted: May 11, 2026

Respectfully submitted,



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STATE OF MINNESOTA)
)ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

I, Tiana C. Heger of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 11th day of May, 2026, I electronically filed a true and correct copy of Minnesota Power’s Reply Comments in **Docket No. E999/CI-20-800** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on eDocket’s Official Service List for this Docket were served as requested.



Tiana C. Heger