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April 29, 2024

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
COMMISSION INQUIRY INTO PRIVACY POLICIES OF RATE-REGULATED
ENERGY UTILITIES
CITIZENS UTILITY BOARD PETITION TO ADOPT OPEN ACCESS DATA STANDARDS
DOCKET NOS. E,G999/CI-12-1344 AND E,G999/M-19-505

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in response to the December 1, 2023 NOTICE OF COMMENT PERIOD ON REFINEMENTS TO OPEN DATA ACCESS STANDARDS and the February 16, 2024 SECOND NOTICE OF EXTENDED COMMENT PERIOD of the Minnesota Public Utilities Commission in the above-referenced dockets.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Mustafa Adam at mustafa.k.adam@xcelenergy.com or me at bridget.dockter@xcelenergy.com or (612) 337-2096 if you have any questions regarding this filing.

Sincerely,

/s/

BRIDGET DOCKTER
MANAGER, POLICY AND OUTREACH

Enclosure
c: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF A COMMISSION
INQUIRY INTO PRIVACY POLICIES OF
RATE-REGULATED ENERGY UTILITIES

DOCKET NO. E,G999/CI-12-1344

IN THE MATTER OF A PETITION BY
CITIZENS UTILITY BOARD OF
MINNESOTA TO ADOPT OPEN ACCESS
DATA STANDARDS

DOCKET NO. E,G999/M-19-505

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in response to the December 1, 2023 NOTICE (NOTICE) OF COMMENT PERIOD ON REFINEMENTS TO OPEN DATA ACCESS STANDARDS and the February 16, 2024 SECOND NOTICE OF EXTENDED COMMENT PERIOD of the Minnesota Public Utilities Commission (Commission) in the above-referenced dockets.

The Notice requests input on “What actions should the Commission take regarding further refinement of the Open Data Access Standards (ODAS or Standards) policies on the release of anonymized Customer Energy Usage Data (CEUD).”

REPLY COMMENTS

I. BACKGROUND

Xcel Energy (the Company) appreciates the thoughtful work done by parties in this docket. Protecting our customers’ right to privacy is a core tenant of the services we provide. Comments in response to this Notice were filed by Xcel Energy, the Department of Commerce (Department), Minnesota Power, Ottertail Power,

Minnesota Energy Resources Corporation (MERC), and the Citizens Utility Board of Minnesota (CUB).

In general, the utilities cautioned against either using or expanding the use of anonymized data for risk of re-identification and resource needs. Xcel Energy respectfully submits these Reply Comments, addressing our positions on the use of anonymized data. Additionally, at this time we take no position on the 5 MW threshold exemption, provide minor recommended changes to the ODAS, and request the Commission clarify the application of PII in the ODAS as it relates to the State Data Breach Notification requirements.

The Commission's approved ODAS 2(C) provides that, "Notwithstanding section III.B, a utility may refuse to provide aggregated or anonymized CEUD when it reasonably believes that data release would create a security risk for the utility, its customer(s), or that public, or that the release would allow the third party to re-identify customers, violate the terms of the contract in 2(v) above, or otherwise use the data in violation of these standards." Xcel Energy does not provide anonymized data because we believe there is risk customers may be re-identified.

The Company submitted initial Comments in response to the Notice on February 16, 2024. Topic(s) addressed in those Comments included:

- What specific use-cases for anonymized CEUD could be used by the Commission to continue to incrementally apply the Standards while maintaining the balance between customer privacy and CEUD access?
- What modifications, if any, should be made to the anonymized data access contract requirements¹ set by ODAS section III.B.(2)(v)?
- What modifications, if any, should be made to the shortest allowable time interval for anonymized data set by ODAS section IV.A.?
 - Are utilities currently able to produce anonymized data sets using hour-long time intervals?
- What considerations should the Commission make regarding the application of the 15/15 anonymization screen to the shortest allowable time interval (currently one-hour intervals)?
 - Does each interval of time need to pass the 15/15 anonymization screen?
- Given the new customer exemptions added to the Standards at section III.E. by the Commission's August 1, 2023 Order, ² is it necessary for the Commission to continue to maintain its previous policy of exempting large commercial and industrial customers with peak demands of 5 MW or more from aggregated building-level and anonymized CEUD datasets?

- If so, what is the appropriate threshold for limiting the application of the Standards to commercial and industrial natural gas and electric customers for anonymized CEUD requests?
- Should the Commission consider making any technical corrections to the Standards?
- Are there other issues or concerns related to this matter?

II. RESPONSE TO COMMENTS

A. Lack of Utility Support for Anonymized CEUD

In its Comments, the Department of Commerce (Department), “recommends application of anonymized data for study and program design.” Although there are possible uses for Anonymized Data, the Company maintains the position set out in its Comments that it has not been able to identify additional use cases for anonymized CEUD *that maintain a proven balance between customer privacy and CEUD access*. The Department’s recommendation does not address this critical balance or how it might be achieved with its proposed use cases.

Xcel Energy has stated previously in the record that it does not support providing anonymized data and does not do so, because we believe there is not sufficient technical assurance that the current proposed framework will adequately protect customers’ anonymity as required by the Commission’s data privacy dockets. In order to adequately protect our customers, we continue to believe that a technical assessment of anonymized CEUD standards needs to be conducted by an expert in the field, and an objective basis established for assessing the risk of re-identification of customer data for a given scope and time interval.

Consistent with the Company’s position, Minnesota Power and Otter Tail Power (together with Xcel Energy, the utilities) broadly opposed expanding the use of anonymized data in its entirety. The utilities all recommended a technical risk assessment be completed prior to expanding the record on how anonymized data can be used by and provided to third parties.

B. Contract Concerns

The Company shares contract requirement concerns raised by Minnesota Power and Ottertail Power regarding the costs and oversight to manage contracts and, if necessary, enforce any breaches of contract referenced in the ODAS section III.B.(2)(v). Our position has always been that once data leaves our possession, it is not possible to enforce how a third party uses that data—even with a signed

application or contract. Instead, in the case of the release of private CEUD, utilities could only respond reactively, once the impacts of a breach of the ODAS has already occurred.

C. Tracking of Anonymized Data Request Costs in Rate Cases

In its Comments, the Department recommends that actual costs for each Anonymized Data request be born by the requestor. Again, the Company does not provide anonymized data to third parties. The Company does not oppose tracking costs associated with its compliance with the ODAS. However, to the extent that providing Anonymized Data becomes necessary for the Company, the Department's recommendation presents complicated issues that should first be considered and addressed. For example, the quantity and frequency of requests for Anonymized Data is likely to evolve with the ODAS. This means that even with the cost recovery of Anonymized Data requests as supported by the Department and CUB, it is not clear how the Company could budget for such requests and/or ensure sufficient resources to respond to such requests, which may ebb and flow. Further, depending on the scale of the requests and requirements placed on this process, internal IT system enhancements may need to be developed, especially if other reporting elements are included, such as reporting intervals and/or our recommended privacy screens at every reporting interval. Such IT system enhancements are capital projects that would be intermixed with staffing resources. While we would be able to break these costs out for the purposes of a rate case, it is unclear how we would do so on an individual request basis.

D. Other Requests Submitted in Comments

The Company made other recommendations in our Comments that we would like to re-iterate in this Reply.

Technical Corrections

We recommend the following addition [*in italics below*] to clarify that a “unique customer identifier” will not be carried to other data sets.

A unique customer identification code shall be assigned to each anonymous customer in a data set. The customer identification code shall remain consistent within the data set *and shall not be used in other data sets.*

Contract Modification Recommendations

If the Commission retains its current data anonymization practices as approved in the ODAS, we ask it to limit the duration a third party requester may retain anonymized

CEUD so the data does not remain available after its original intended purpose. We recommend adding requirement F. below to Section III.

F. A third party that has received aggregated or anonymized customer CEUD shall delete the data once it is no longer required or 12 months after received (whichever is sooner).

Clarification of PII Definitions in Application

In our Comments, the Company requested guidance on how the Commission's definition of PII coincides with state breach notification laws. As written in the ODAS, PII is currently defined by the Commission as:

customer data which can be used to distinguish or trace the identity of an individual (e.g., name, social security number, biometric records, etc.) alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual (e.g., date and place of birth, mother's maiden name, etc.). (Source: NIST's Security and Privacy Controls for Federal Information Systems and Organizations; 800-53; April 2013).

In comparison, Minnesota's state breach notification statute governs the release of:

an individual's first name or first initial and last name in combination with any one or more of the following data elements, when the data element is not secured by encryption or another method of technology that makes electronic data unreadable or unusable, or was secured and the encryption key, password, or other means necessary for reading or using the data was also acquired: (1) Social Security number; (2) driver's license number or Minnesota identification card number; or (3) account number or credit or debit card number, in combination with any required security code, access code, or password that would permit access to an individual's financial account.

The combination of these definitions leads to a broad, largely undefined scope of customer data, which makes it difficult to assess the risk of whether anonymization will result in re-identification. Further, it makes management of CEUD difficult. For example, the ODAS define PII as customer data, such as name or social security number, "alone." So the release of just one of those elements is considered identification of a customer. In contrast, the Minnesota state breach notification statute considers a breach, for example, release of a name "in combination with" other data elements (social security number, driver's license number, account number, etc.). Under the state statute, name or social security number *alone* is not considered sufficient for identification of a customer. Thus, a refinement of the Commission's PII definition in the ODAS to align with the State breach notification statute, such as

removal of the phrase “alone or,” would help clarify what is and is not considered a “re-identification” of a customer.

CONCLUSION

The Company appreciates the opportunity to respond to Comments submitted in this docket. We believe providing third parties anonymized CEUD adds inherent risk re-identification of a customers private information. We ask the Commission to halt any further expansion of the ODAS regarding data anonymization.

Dated: April 29, 2024

Northern States Power Company

CERTIFICATE OF SERVICE

I, Christine Schwartz, hereby certify that I have this day served copies of the foregoing document on the attached lists of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket Nos. E,G999/CI-12-1344
E,G999/M-19-505

Dated this 29th day of April 2024

/s/

Christine Schwartz
Regulatory Administrator

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Phyllis	Reha	phyllisreha@gmail.com		3656 Woodland Trail Eagan, MN 55123	Electronic Service	No	OFF_SL_19-505_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-505_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-505_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_19-505_Official
Brendon	Slotterback	bslotterback@mcknight.org	The McKnight Foundation	710 S 2nd St Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_19-505_Official
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-505_Official
Caitlin	Straabe	caitlin.straabe@mdu.com	Great Plains Natural Gas Co.	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_19-505_Official
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_19-505_Official
Patricia	Whitney	patricia@pwhitneylaw.com	St. Paul Assn of Responsible Landlords	627 Snelling Avenue South St. Paul, MN 55116	Electronic Service	No	OFF_SL_19-505_Official
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_19-505_Official
Jeff	Zethmayr	jzethmayr@citizensutilityboard.org	Citizens Utility Board	309 W. Washington, Ste 800 Chicago, IL 60606	Electronic Service	No	OFF_SL_19-505_Official