

NOTICE OF SUPPLEMENTAL COMMENT PERIOD

Issued: October 9, 2024

In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data

PUC Docket Number(s): E-999/CI-20-800

Comment Period: Initial comment period closes November 12, 2024 at 4:30pm

Reply comment period closes December 4, 2024 at 4:30pm

Comments received after the close of the comment period may or may not be considered by the Commission.

Issue: What, if any, action by the Commission is needed to address electric distribution grid and customer security issues related to public display or access to grid data; including, but not limited to, distribution grid mapping, aggregated load data, and critical infrastructure?

Topic(s) Open for Comment:

- Do parties have additional comments on the workgroup recommendations filed with this notice?
- What information from the DOE/NARUC collaborative framework (submitted into record on October 9th, 2024 as an attachment to the workgroup report) is applicable to decisions being made in this record? Should the Commission approve the framework for use by a standing workgroup to consider data sharing and security issues between parties as recommended by the workgroup?
- Was there any specific information provided by security experts and other new parties during the workgroup meetings that would help inform Commissioners in their decision making? Information already in the record does not need to be resubmitted.

Background

The Commission's July 31, 2020 Order on Xcel Energy's 2019 Hosting Capacity Analysis (HCA) Report (Docket No. E002/M-19-685) directed the Executive Secretary to open a Commission investigation on grid and customer security issues related to public display or access to grid data

which includes, but is not limited to, distribution grid mapping, aggregated load data, and critical infrastructure. The July 31, 2020 Order discusses the privacy and security considerations.¹

The Commission's August 3, 2022 Order in Docket No. E999/CI-20-800 considered substantial party comments provided between March to September 2021, additional proposals filed in June 2022, and requested additional comment on various proposals offered by parties and to update the record to better reflect the current security landscape and how recent developments may impact issues in this docket.

The Commission's June 7, 2023 Order in Docket No. E999/CI-20-800 considered the additional proposals and updated record regarding the security landscape, adopting proposals to provide discrete sets of information on-demand, to convene a work group and make recommendations regarding remaining points of disagreement, and to look at models from other states and request participation from stakeholders currently not engaged in the record.

The workgroup met three times between August and September to discuss remaining points of disagreement, engage with security and other professions specifically not previously engaged in the record, and find agreement regarding a framework and binning data items. The workgroups notes and a mid-workgroup report have been submitted into the record, along with a proposed framework by the workgroup.

Due to the significant record development over multiple comment periods and workgroups, this notice of supplemental comment period is not intended to regurgitate previous record development. Instead, it is to submit any new pertinent facts, clarifying positions, final comments on the workgroup recommendations, or final comments on the NARUC grid data sharing playbook and framework.

Filing Requirements: Utilities, telecommunications carriers, official parties, and state agencies are **required** to efile documents using the Commission's electronic filing system (eFiling). All parties, participants, and interested persons are encouraged to use eFiling at:

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Submit Public Comments:

Online: <https://mn.gov/puc/get-involved/public-comments/>, and follow the instructions.

Email: consumer.puc@state.mn.us

U.S. Mail: Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul MN 55101

¹ ORDER APPROVING (April 19, 2019), pp. 11-12. MN DIP is accessible online at: https://mn.gov/puc/assets/MN%20DIP_tcm14431769.pdf

Full Case Record: See all documents filed in this matter on the Commission’s website at: mn.gov/puc/edockets, select *Go to eDockets Project Database*, enter the year (20) and the docket number (800), and select *Search*.

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Questions about this docket or Commission process and procedure? Contact Commission staff, Christian Noyce, at christian.noyce@state.mn.us or 651-201-2215.

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CERTIFICATE OF SERVICE

I, Mai Choua Xiong, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

**Minnesota Public Utilities Commission
NOTICE OF SUPPLEMENTAL COMMENT PERIOD**

Docket Number **E999/CI-20-800 ; E002/M-19-685**

Dated this 9th day of October, 2024

/s/ Mai Choua Xiong

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