



May 11, 2026

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

***Subject: Dakota Electric Association Reply Comments in Response to
March 31, 2026 Notice of Comment Period***

***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***

Dear Ms. Bergman:

Dakota Electric Association (Dakota Electric or Cooperative) respectfully submits these reply comments in response to the Minnesota Public Utilities Commission's (Commission) March 31, 2026 Notice of Comment Period (March 2026 Notice) in the above referenced docket.

I. Background

On October 30, 2020, the Commission opened an *Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data* in Docket No. E999/CI-20-800. Over the next several years, Dakota Electric, the other investor-owned utilities (IOUs), and interested parties filed various rounds of comments providing the Commission with additional information on the topic of grid security and distribution grid data sharing. The Commission also issued four Orders. This included the Commission's February 7, 2025 Order Accepting Report, Establishing

Standing Workgroup, and Assigning Procedures and Tasks for the Workgroup (February 2025 Order). In its February 2025 Order, the Commission established an ongoing workgroup, approved use of the NARUC Grid Data Sharing Playbook and Framework and clarified its use in the workgroup, established a timeline to authorize additional workgroup meetings, and directed the workgroup to complete three workgroups (Use case analysis, Data protection capabilities, Data sharing mechanisms).

On March 31, 2026, the Commission issued its March 2026 Notice. In this notice, the Commission raised the following issue:

Should the Commission implement the proposed Grid Data Sharing Framework and accept the Report?

The Commission also noted that the following topics were open for comment:

- Should the Commission accept, modify, or reject the Grid Data Sharing Framework Report submitted into the record on March 4, 2026?
- Should the Commission accept, modify, or reject the Framework's appeals process? Specifically, should the Commission accept, modify, or reject the use of the Grid Security Working Group to address informal complaints to minimize submittal to CAO?
- Should the Commission accept, modify, or reject the framework's evaluation recommendations?

Are there other issues or concerns related to this matter?

On April 30, 2026, the Cooperative filed comments in response to the Commission's March 2026 Notice. In these comments, Dakota Electric recommended that the Commission reaffirm its June 2023 Order that allows the Cooperative to use our internal screening tool and provide discrete sets of information on-demand, in the context of other existing DER interconnection tools and improvements being considered, to maintain an orderly, efficient, and cost-effective deployment of DER in Minnesota.

The following parties also filed comments in response to the Commission's Notice:

- Xcel Energy;
- Minnesota Power;
- Minnesota Department of Commerce (Department);

- Minnesota Solar Energy Industries Association (MnSEIA) and United States Solar Corporation (US Solar), jointly filings as the Joint Parties (Joint Parties); and
- Coalition for Community Solar Access.

Generally speaking, the parties appreciated the effort of the workgroup participants and the report compiled by Converge, the Department's grid security consultant. The parties also had concerns with certain aspects of the report and the associated grid data sharing framework and recommended that the Commission make certain adjustments to the framework and/or provide further clarification on certain topics.

II. Dakota Electric Reply Comments

Based on our review of other party comments, the Cooperative maintains its original recommendation in our comments that the Commission reaffirm its June 2023 Order that allows the Cooperative to use our internal screening tool and provide discrete sets of information on-demand. Dakota Electric responds briefly below to topics raised by other parties in comments.

In its comments, Minnesota Power expressed concern that utilizing the Grid Security Working Group (GSWG) to review specific, potentially non-public information disputes introduces new and significant risks to grid security, customer confidentiality, and each utility's competitiveness. Minnesota Power also noted that it does not believe the current GSWG is structured to have the necessary controls to prevent secondary exposure of potentially critical information. They concluded by stating that accepting the Report's appeals process as it stands will have a negative effect on consumers.¹

Dakota Electric is a strong proponent of third-party processes that attempt to resolve issues before a formal complaint is needed at the Commission. The Cooperative

¹ April 30, 2026 Minnesota Power Comments, Pages 1-2.

believes that many issues (not related strictly to grid security) can be addressed in a manner that does not require formal action from the Commission. That being said, Dakota Electric acknowledges the concerns raised by Minnesota Power and also has concerns related to the appeals process raised by the Joint Parties.² We continue to believe there is significant value in a process that attempts to resolve issues, but the concerns raised by Minnesota Power and the Joint Parties may require additional development by the standing workgroup and the Commission.

Both Xcel Energy and Minnesota Power raised the issue of cost surrounding the creation of the grid data sharing tools and the ongoing administration of the program.³ On the issue of costs, Xcel Energy provided a recommendation to the Commission that it be allowed to use its Transmission Cost Recovery (TCR) Rider to recover costs associated with implementing a data sharing system. Xcel also proposed that the ongoing administration costs related to support of the system be recovered through user fees.⁴

Although the Cooperative continues to support its Commission approved methodology, Dakota Electric agrees with Xcel Energy and Minnesota Power that treatment of costs associated with any grid data sharing process is a significant issue that needs to be addressed. The Cooperative also notes that the Joint Parties also advocated for the establishment of a centralized process for grid data in Minnesota.⁵ Whatever process or methodology the Commission ultimately chooses, Dakota Electric believes that a full understanding of how costs will be recovered and how the system is administered is paramount and should be addressed in the near term. The Cooperative is concerned that if these systems are not adequately specified they could represent a security concern and potentially shift costs amongst consumers. Specifically, on the topic of Xcel Energy's cost recovery proposals, we note that in terms of user fees, this proposal is similar to how we would treat costs for our approved process. In terms of program implementation and the TCR Rider, Dakota Electric is agnostic as to its appropriateness for Xcel Energy. The Cooperative notes, however, that we are a

² Joint Parties Comments, Pages 19-20.

³ April 30, 2026 Xcel Energy Comments, Pages 2-6 and Minnesota Power Comments, Page 6.

⁴ April 30, 2026 Xcel Energy Comments, Page 4.

⁵ Joint Parties Comments, Page 1.

distribution only electric utility and do not have the ability to file a TCR Rider. As such, we request that the Commission consider potential cost recovery mechanisms that acknowledge the business realities of all utilities.

In its comments, the Joint Parties expressed frustration that Converge's Report and the grid sharing framework did not more closely follow the entirety of the NARUC Playbook.⁶ Earlier in the proceeding, several commentors, including the Cooperative, noted the need for flexibility between different utilities when using the NARUC Grid Data Sharing Framework. In particular, Dakota Electric previously stated in part that "... the framework provides a structure..." and "It is intended to be flexible."⁷ The Commission acknowledged this in its February Order with the following language:

The Commission will clarify that the NARUC Framework is not a binding manual of operations for the workgroup. Although this clarification was not overtly recommended by the workgroup, the clarification is consistent with the NARUC Framework and, importantly, was not opposed by any commenter. Indeed, one of the valuable tenets of the NARUC Framework is its flexible and iterative approach to data sharing. The Commission is persuaded that a standing workgroup, guided by the NARUC Framework without being bound to it, can facilitate resolutions to current and future grid data sharing issues expeditiously and with an air of expertise. The Converge Report, being influenced by Minnesota-specific experiences, observations, and voices, will be a useful supplement to the NARUC Framework.⁸

The Commission approves use of the National Association of Regulatory Utility Commissioners (NARUC) Grid Data Sharing Playbook and Framework. The Commission clarifies that the NARUC Playbook and Framework are not a binding manual of operations for the workgroup.⁹

As noted in prior comments, Dakota Electric participated in workgroup sessions associated with the NARUC Playbook at the 2023 NARUC Annual Meeting and sees significant value in the process. As such, the Cooperative understands the concerns raised by the Joint Parties. That being said, the NARUC Playbook clearly states that it is

⁶ April 30, 2026 Comments of the Joint Parties, Pages 22-26.

⁷ November 12, 2024 Dakota Electric Supplemental Comments, Page 4.

⁸ February Order, Page 6.

⁹ February Order, Ordering Point No. 3.

meant to be flexible in its use, which means a commission could use it in whatever manner it deems appropriate for its jurisdiction. This is what the Commission did in its February Order. If the Commission were interested in applying the NARUC Playbook in its entirety, it would have ordered its use and likely given different guidance for the workgroup.

The Joint Parties also expressed concern in their comments regarding the overall assumptions inherent with the Report. In particular, they were concerned that the data sharing framework shifts the burden to a requestor and not the utility. The Joint Parties explained that this was not the conclusion of other states¹⁰ and was not in alignment with the NARUC Playbook.¹¹ The Joint Parties also provided the following support for why they believe the burden of proof is on the utility in the case of grid data sharing:

At its core, our parties believe there should be a presumption of openness for sharing grid data. This is due to the fact that the distribution grid is a publicly-funded good that the utilities manage, rather than an exclusively corporate asset.¹²

Dakota Electric respectfully disagrees with these conclusions.¹³ The Cooperative discussed burden of proof at length in this investigation,¹⁴ and we continue to believe that the burden as it relates to grid security and grid data is shared between the utilities and requestors. Dakota Electric does not believe that the processes laid out in the Report and framework create an undue burden on either group of parties and attempt to balance the question of burden. The idea of a shared burden is important because the consequences of a release of grid data are potentially wide ranging and difficult to mitigate compared to a situation, for example, where a rate is incorrectly set or

¹⁰ Joint Parties Comments, Pages 13-14.

¹¹ *Id.* Page 26.

¹² *Id.*

¹³ The Cooperative notes that the term “publicly fund” has a specific definition and, although electrical service is considered a public good in the economic sense, it is not funded by taxpayer monies. The Cooperative also notes that, at least in Minnesota, the majority of water and sewerage systems are in fact publicly funded and this infrastructure is, to our knowledge, protected from public disclosure (June 30, 2021 Dakota Electric Reply Comments, Page 17 and DEA Attachment 2).

¹⁴ June 30, 2021 Dakota Electric Reply Comments, Pages 14-16; November 17, 2022 Dakota Electric Reply Comments, Pages 10-11; and November 12, 2024 Dakota Electric Supplemental Comments, Page 5.

established. A failure to protect grid data could lead to catastrophic results for both the utility and the general public.

III. Conclusion

Dakota Electric appreciates the comments by other parties and believes there are reasonable suggestions and potential modifications that the Commission may wish to consider. The Cooperative maintains its recommendation that it continue to be allowed to use its internal screening method and that we anticipate incorporating certain parts of the framework in our internal screening process.

Dakota Electric and its representatives are available to answer any questions that the Commission may have.

Sincerely,

/s/ Alex Nelson

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Certificate of Service

I, Nicole McEathron, hereby certify that I have this day served copies of the attached document to those on the following service list by e-filing, personal service, or by causing to be placed in the U.S. mail at Farmington, Minnesota.

Docket No. E-999/CI-20-800

Dated this 11th day of May 2026

/s/ Nicole McEathron

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