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November 12, 2024

**VIA E-FILING**

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

Re: Supplemental comments 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. E015/M-20-800**  
**SUPPLEMENTAL COMMENTS**

Mr. Seuffert:

Minnesota Power (or, the "Company") respectfully submits the following Supplemental Comments regarding the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid.

Please feel free to contact me with any questions related to this matter.

Respectfully,

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**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

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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. E015/M-20-800

**SUPPLEMENTAL COMMENTS**

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**I. INTRODUCTION**

On October 9, 2024, the Minnesota Public Utilities Commission (“Commission”) issued a Notice of Supplemental Comment Period (“Notice”) following the conclusion of three stakeholder workgroup meetings facilitated by Commission Staff to discuss the establishment of a data sharing framework. The question at issue is: *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?* The Company addresses the three topics open for comment below.

**II. RESPONSE TO TOPICS OPEN FOR COMMENT**

**1. Do parties have additional comments on the workgroup recommendations filed with this notice?**

The Company appreciates the opportunity to constructively engage with utilities, private developers, and state and federal agencies on this critical topic. The stakeholder meetings were constructive and well led. The Company is broadly in alignment with the recommendations filed by Commission Staff on October 9, 2024. The Company continues to advocate for flexibility to adopt best-fit data security practices. The Company wishes to state that there may not be a one-size-fits-all solution to every security concern and that any guiding framework for the upcoming Grid Security Workgroup should not be overly prescriptive in its methodology.

**2. 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?**

The Company recommends that the Commission approve the DOE/NARUC Framework (or, the “Framework”) for use by the standing workgroup, with special attention to the flexibility issue noted above. The Company calls attention to the fact that the Framework is a very new document, published in November 2023. The standing workgroup will be in the vanguard of testing this document going forward, which may or may not be adequate for all current and future data sharing and security challenges. The Company’s recommendation to approve carries the caveat that the Framework not be a binding manual of operation, but a starting point for discussion. In the event that an unforeseen challenge arises for which the proposed methodologies in the Framework prove inadequate, it is the Company’s position that the standing workgroup should be permitted to pursue mutually agreed upon best practice solutions outside of it. The Company proposes the following language adjustment in red to that put forth in the recommendations:

“...to determine the security methods to be employed the NARUC Grid Data Sharing Framework **when feasible.**”

As noted in the October 9 recommendations, the standing workgroup disagreed on what security tactics should be associated with each data item. Given the variety of these items and the methods for classifying them, such disagreements are to be expected and should continue to be engaged in future workgroup meetings. The other area of disagreement hinged upon the question of whether the Commission should order that “sharing data securely includes that the recipients of the data can, and will, keep the data secure.” The Company strongly supports some mechanism for the security of data provided to developers to be assured at its end point. Recognizing the limitations of Commission

control over non-regulated businesses, the Company is open to suggestion on how to maintain this endpoint security, but believes that the Commission should explicitly declare the need for it.

**3. 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.**

Converge Strategies stated in the October 28<sup>th</sup> Department of Commerce facilitated meeting that it plans to propose an NDA template be developed and shared by utilities and state agencies for the express purpose of grid data sharing. The Company is open to such a template, but remains unconvinced that agreement on what it would entail would be possible or convenient considering the diversity of utility sizes, business models, and regional DER demand. Again, the Company emphasizes the need for flexibility in addressing these challenges. Furthermore, the Company wishes to state that an NDA is an entry point to data sharing, and should not be considered a substitution for Commission assurance that the recipients of sensitive grid data will keep it secure. NDAs impose an obligation on a receiving party, and provide the Company with a formal mechanism by which to stop disclosures in violation of that obligation. However, exercising that right would require the Company to file a lawsuit against the disclosing party and possibly pursue litigation. In the event of an emergency, such a process would be too cumbersome to quickly employ.

### III. CONCLUSION

Minnesota Power is grateful to Commission Staff for organizing the preceding workgroup meetings and found the discussions with all stakeholders to be fruitful. The Company looks forward to continuing the development of data sharing protocols in a future workgroup and reiterates its commitment to securely providing safe, reliable electricity to its customers.

If you have any questions regarding this filing, please contact me at 218.428.9846 or [jmccullough@mnpower.com](mailto:jmccullough@mnpower.com).

Respectfully submitted,



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STATE OF MINNESOTA    )  
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AFFIDAVIT OF SERVICE VIA  
ELECTRONIC FILING

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Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 12<sup>th</sup> day of November, 2024, she served Minnesota Power's Supplemental Comments in **Docket No. E015/M-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 E-Docket's Official Service List for this Docket were served as requested.



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