



April 29, 2024

VIA E-FILING

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

Re: In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt
Open Data Access Standards and a Commission Inquiry into Privacy
Policies of Rate-Regulated Energy Utilities
Docket Nos. E,G-999/M-19-505 and E,G-999/CI-12-1344
REPLY COMMENTS

Dear Mr. Seuffert:

Minnesota Power (or “the Company”) submits these Reply Comments in response to Initial Comments in the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Data Access Standards and a Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities.

Xcel Energy, OtterTail Power, Minnesota Energy Resources Corporation (“MERC”), Minnesota Power, the Citizens Utility Board of Minnesota (“CUB”), and the Minnesota Department of Commerce, Division of Energy Resources (“Department”) filed Initial Comments.

REPLY COMMENTS

Minnesota Power appreciates the discussion in this docket to date and the engagement by all parties. As noted in initial comments, the Company does not believe that enough record support has been developed to adopt use cases for anonymized CEUD – a position echoed by Xcel Energy, OtterTail Power, and MERC. In these reply comments, Minnesota Power will address minimum time intervals for data, anonymized CEUD and consumer protection, the 15/15 screen, and the DOC’s cost concerns, should the Commission decide to adopt use cases for anonymized CEUD.

Minimum Time Intervals for Requested Data

While CUB recommended that a minimum time interval for requested anonymized data be removed, Minnesota Power believes that if the Commission permits the release of

anonymized CEUD, the hour-long interval data should remain the shortest allowable time interval. As CUB stated, hourly interval data is sufficient for most analysis. Additionally, as stated in the Company's initial comments, Minnesota Power is concerned about the time involved with aggregating and anonymizing CEUD, and a decrease in or removal of a minimum time interval could significantly increase the amount of staff time needed to provide anonymous CEUD. The Company must ensure the needs of its customers are met and requests for anonymized CEUD are supplementary and not related to utilities direct customer service or an active regulatory proceeding. The Company must manage workload by customer priority and Minnesota Power's first responsibility is to its customers.

Anonymized CEUD and Consumer Protection

While there may be some benefits from research conducted using anonymized CEUD as noted by CUB in their initial comments, the risk of re-identification is higher than with aggregated data. The Company echoes Xcel Energy's comments that to date, neither company has found "independent, research-based analysis to support anonymization standards that provide an objective basis for assessing the risk of re-identification of customer data for a given scope and time interval."

Additionally, if anonymized CEUD are not adopted with this proceeding, that does not preclude Minnesota Power from working with interested entities to further Minnesota policy goals. As noted by CUB, Minnesota Power worked with CUB in 2020 to conduct an analysis of customer usage patterns to inform the Company's proposed time-of-day rate. Not allowing additional use cases for anonymized CEUD simply means the Company is able to better assess opportunities and risks regarding the use of anonymized customer data.

15/15 Screen

As both the Department and CUB noted, screening each hour of an anonymized dataset can be both costly and time intensive. The Company understands that screening each hour of anonymized data can be time intensive as illustrated in initial comments, however that is not a sufficient justification to risk customer privacy. Minnesota Power agrees with the Department's assessment that each hour of an hourly dataset must meet the 15/15 screen, and that maintaining customer privacy is critical.

Cost Impacts

In their comments, the Department recommends the Commission explicitly require utilities to reflect costs and revenues associated with responding to data requests for anonymized data in rate cases, as the Standards permit the utility to charge the requestor a fee based on the utility's actual costs to create and deliver the data. While utilities would have the ability to charge organizations for anonymized CEUD, accurately assessing costs could

be difficult for the utility. As stated in the Company's initial comments, it would likely take several hundred hours of development and testing time to automate an anonymization process, in addition to manual verification and processing time for each individual request. In the future there may need to be additional technology or infrastructure needs to accommodate requests, based on the volume of requests. It is unclear who these development, technology, or infrastructure costs should be charged to, and how they are divided.

Minnesota Power thanks the parties for the discussions in this docket. As stated in initial comments and in the comments above, the Company does not believe that sufficient record support has been developed to adopt additional use cases for anonymized CEUD.

If you have any questions regarding this filing, please contact me at 218.591.4870 or avang@mnpower.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Vang', with a stylized flourish at the end.

Ana Vang
Senior Public Policy Advisor

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

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 29th day of April, 2024, she served Minnesota Power's Reply Comments in **Docket Nos. E,G-999/M-19-505 and E,G-999/CI-12-1344** 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.



Tiana Heger