

REVISED DECISION OPTIONS

1/16/2025

Workgroup Report

1. Accept the October 9, 2024 workgroup report. (Staff)
2. Modify the Commission's October 9, 2024 workgroup report recommendations as follows:
 - A. "...to determine the security methods to be employed the NARUC Grid Data Sharing Framework **when feasible.**" (Minnesota Power)
 - B. "From the workshop, the parties requested Commission guidance on a few items. They recommended the Commission affirm that the **minimum** necessary data should be shared **with requestors (including individual property owners, as well as third-party DER developers),** and that it should be shared securely **if a reasonably heightened security treatment is justified.** They recommended authorizing the workgroup to determine the security methods to be employed via the NARUC Grid Data Sharing Framework, **subject to a party's right to appeal that determination to the Commission. . ."** (MGAA)

ALT 2B. "From the workshop, the parties requested Commission guidance on a few items. They recommended the Commission affirm that the **minimum** necessary data should be shared **with requestors (including individual property owners, as well as third-party DER developers),** and that it should be shared securely ~~if a reasonably heightened security treatment is justified.~~ They recommended authorizing the workgroup to determine the security methods to be employed via the NARUC Grid Data Sharing Framework, ~~subject to a party's right to appeal that determination to the Commission...~~" (Xcel)

MGAA ALT 2B. "From the workshop, the parties requested Commission guidance on a few items. They recommended the Commission affirm that the minimum necessary data should be shared **with requestors (including individual property owners, as well as third-party DER developers),** and that it should be shared securely **if heightened security is reasonably justified.** They recommended authorizing the workgroup to determine the security methods to be employed via the NARUC Grid Data Sharing Framework, **subject to a party's right to appeal that determination to the Commission...**" (MGAA)

3. Close Docket No. E999/CI-20-800. (Staff, *if the Commission does not establish a formal workgroup via Decision Option 4*)

Formal Workgroup Process and Procedure

4. Delegate authority to the Executive Secretary to establish and maintain an ongoing workgroup to review implementation of grid data sharing practices, challenges, and protocols, and bring recommendations to the Commission as needed. (DEA, MP, OTP, Xcel, MGAA, Department. *Edited by staff for process and procedure purposes*)

MGAA ALT 4. Delegate authority to the Executive Secretary to establish and maintain an ongoing workgroup under the commission's authority to review implementation of grid data sharing practices, challenges, and protocols, and bring recommendations to the Commission as needed. (MGAA)

5. Approve use of the National Association of Regulatory Utility Commissioners (NARUC) Grid Data Sharing Playbook and Framework. (DEA, Minnesota Power, Otter Tail Power, Xcel, MGAA, Department)

A. Clarify that the NARUC Playbook and Framework are not a binding manual of operations for the workgroup. (Minnesota Power)

6. Require the workgroup to file its recommendations regarding a data sharing process for DER interconnection within six months of the Order. (Department, as clarified by DEA)

ALT 6. Require the workgroup to provide recommendations for a process for sharing the minimum necessary data for DER interconnection securely within six months of the issue date of this Order. The Commission delegates authority to the Executive Secretary to modify this timeline, should more time be needed to achieve the objectives stated in this Order. The workgroup shall submit quarterly updates to the Commission on progress and the expected completion date. (Xcel)

7. The Commission requests that the Commissioner of Commerce seek authority from the Commissioner of Management and Budget to incur costs for specialty services to provide a recommendation on privacy and security in the Commission Investigation on grid data and security and to participate in related analysis and stakeholder engagement, and subsequently bill those expenses to Xcel pursuant to Minn. Stat. § 216B.62, subd. 8. (Department)

Workgroup Guidance

8. Adopt a guidance of utilities sharing only the minimum necessary data, also called least data access. (DEA, Xcel)
9. Request the workgroup discuss whether any party opposes sharing the information detailed in FERC Order 792. (*Staff interpretation of Nokomis Energy*)
10. Clarify that federal requirements and standards may be included in workgroup discussions. (Xcel)

11. Allow utilities the discretion to withhold data from parties that do not meet the established data security tactics. (Xcel)
12. Direct the workgroup to include privacy in its scope of discussions to determine if shared data violates privacy rules and policies. (Xcel)
13. Find that data items listed in Table 2, page 6 of the MGAA comments are generally relevant to DER development and interconnection. (MGAA)
14. Acknowledge the state statutes found on page 8-9 of the MGAA comments. (MGAA)
15. Place the burden of proof on utilities so that a utility proposing to limit access to grid data must develop a public record of relevant and factual information documenting the specific security risks of public access to data before the Commission will approve redaction or limiting access to data. (MGAA)

Workgroup Direction

16. Request the workgroup look at other state examples of data sharing frameworks. (MGAA)
17. Direct the workgroup to complete three workshops specifically on the items below and further characterized in the Converge report: (Department)
 - A. Use case analysis
 - B. Data protection capabilities
 - C. Data sharing mechanisms
18. Direct the workgroup to craft a standardized data request template. (Department, MGAA)
MGAA ALT 18. Direct the workgroup to craft a standardized data request template and process (MGAA)
19. Request the workgroup develop a mechanism for the security of data provided to third parties to be assured at its endpoint. (*Staff interpretation of Minnesota Power*)
20. Direct the workgroup to examine the relevance of grid data without associated locational data. (*Staff interpretation of DEA*)
MGAA ALT 20. Direct the workgroup to examine the relevance of grid data without associated locational data that provides information identifying the associated feeder, substation and node, without providing a complete map of the utility's distribution feeders and substations. (MGAA)
21. Direct the workgroup to integrate zero trust concepts into the framework as the workgroup continues on its use of the NARUC Framework. (Xcel)

22. Direct the workgroup to consider data quality in conjunction with data security. (MGAA)

Staff recommends Decision Options 1, 4, 5, 5A, ALT 6, 7, 10, 12, 17A, 17B, 17C, 18, and 20.