



November 12, 2024

Will Seuffert, Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, MN 55101-2147

***Subject: Dakota Electric Association Supplement Comments in Response to  
October 9, 2024 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 Mr. Seuffert:

Dakota Electric Association® (Dakota Electric or Cooperative) respectfully submits these supplemental comments in response to the Minnesota Public Utilities Commission's (Commission) October 9, 2024 Notice of Supplemental Comment Period (October 2024 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. This investigation grew out of Xcel Energy's Hosting Capacity analysis in Docket No. E002/M-19-685. As part of this investigation, the Commission issued a Notice of Comment Period on October 30, 2020 (October 2020 Notice) requesting comment and analysis on measures for the public release of distribution grid data.

Dakota Electric provided comments on January 29, 2021 and June 30, 2021 responding to the Commission's October 2020 Notice and the comments of other parties in this investigation. Through these comments, the Cooperative expressed significant concern that the release of non-aggregated distribution data has the potential to harm grid security and may be used by bad actors to harm utility operations and customers. Given these concerns, Dakota Electric also referenced a potential in-house data solution it was investigating. The Cooperative explained that, in addition to an in-house report, a new process could be created, for developers, where instead of using Pre-Application report requests for each individual interconnection location, Dakota Electric's engineering staff could meet directly with a potential developer or member to answer any technical questions and go over any other relevant information related to a proposed project. The Cooperative explained that this internal process would be more secure, and the potential DER applicant would receive timely, project specific, and useful information via this one-on-one meeting versus a less detailed global release of data covering the entire Dakota Electric distribution system to the general public.

On June 9, 2022, the Commission met to consider the grid security investigation, and on August 3, 2022 it issued an Order (August 2022 Order) in this investigation. Subsequent to the August 2022 Order, the Commission issued a Notice of Comment Period on August 17, 2022 (August 2022 Notice) requesting further record development. On October 18, 2022 and November 17, 2022, Dakota Electric filed comments and reply comments in response to the Commission's August Notice. The Cooperative's filings provided an update on the security landscape at that time, additional information about Dakota Electric's internal screening tool, response to the position of other parties, discussion regarding a stakeholder process, and Dakota Electric's position regarding closing the proceeding.

On April 20, 2023, the Commission met to consider comments associated with its August 2022 Notice, and on June 7, 2023 the Commission issued an Order in this matter (June 2023 Order). In this order, the Commission authorized further workgroup discussion regarding grid security and grid data access. The Commission also adopted Dakota Electric's proposal to 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.

On July 2, 2024, the Commission issued a Notice of Workgroup (Workgroup Notice) scheduling workgroup meetings in response to the Commission's June 2023 Order. Dakota Electric was an active participant in these workgroup meetings and appreciated the open and transparent discussion from various parties. Concurrent to the October 2024 Notice, Commission Staff also filed its summary of the workgroup discussions and its recommendations and next steps. In this summary, Commission Staff noted that the parties requested Commission guidance on several items. The Commission's October 2024 Notice identified the following issues to be addressed in supplemental comments:

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 October 2024 Notice identified the following topics as being open for comment:

- Do parties have additional comments on the workgroup recommendations filed with this notice?
- What information from the DOC/NARUC framework (submitted into record on October 9, 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.

Dakota Electric responds separately to these issues below.

## **II. Dakota Electric Supplemental Comments**

Dakota Electric would like to begin by acknowledging the efforts of the other parties in this investigation and the workgroup participants. Although issues still remain, as evidenced by Commission's Staff's workgroup summary, the Cooperative appreciated the open and collaborative nature of the workgroup meetings and the commitment from participants to better understand their respective positions and attempts to bring the Commission potential policy decisions. In particular, Dakota Electric would like to acknowledge the efforts of the Minnesota Department of Commerce (Department) and its security consultant to help build the record in this matter and provide the Commission with a more thorough understanding of the current threat environment and party positions. The issue of grid security, and its relationship to the interconnection and development of DER in Minnesota, remains a significant energy policy matter that requires the Commission to make measured, and thoughtful, decisions.

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

Dakota Electric believes that the workgroup recommendations presented by Commission Staff are appropriate and encompass our overall understanding of where the workgroup participants are at this point in the process.

2. *What information from the DOC/NARUC framework 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?*

Dakota Electric had the opportunity to participate in a tabletop exercise at the 2023 NARUC Annual Meeting involving the use of the *NARUC Grid Data Sharing Playbook* and found its principles to be an effective tool to attempt and reach consensus and understanding between different parties on data sharing issues. The Cooperative also found discussions related to this playbook useful during the workgroup meetings. Based on our experience from last year's NARUC Annual Meeting, and the workgroup process

to date, we believe that most information within the framework is applicable to decisions related to this investigation. We agree that maintaining a standing workgroup is appropriate and that the Commission should approve the framework for these matters. Although the Cooperative sees significant value in using the NARUC framework in the workgroup process, and recommends approval of the framework, this recommendation does not envision the Commission being inflexible in its application of the framework. As noted in the playbook, the authors expect the framework to be adjusted to meet the unique regulatory circumstances of different jurisdictions and use cases. This expectation is best illustrated in this quote from the playbook:

Rather than outlining a rigid process, the Framework provides a structure for collecting, examining, and documenting information that can guide decision-making related to grid data sharing. It is intended to be flexible. Individual PUCs can start where it makes most sense. That could be a use case in some instances, or state priorities in others. In some instances, a PUC may not find it necessary to address each content area to reach a decision on grid data sharing. The intent is to provide decision-makers and stakeholders with a valuable starting point. Each jurisdiction can tailor the Framework to fit its own established decision-making processes.<sup>1</sup>

Keeping this flexibility in mind, Dakota Electric believes that the Commission, and workgroup participants, will have adequate flexibility to deal with unique use cases in this ever-evolving environment.

*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?*

First, several parties, including the Department's security consultant and law enforcement, provided discussion about the importance of adhering to the principle of least data access. The Cooperative agrees with this overall approach and recommends

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<sup>1</sup> NARUC Grid Data Sharing Playbook, Page 4 and October 9, 2024 Workgroup Report, Page 12 in Docket No. E999/CI-20-800.

that the Commission use this guideline or principle if or when it decides on potential data sharing frameworks or requirements.

Second, during the workgroup process, the Cooperative notes that developers stated on several occasions that they are not interested in locational data. Dakota Electric does not dispute their assertion, but we caution the Commission that it is unclear how relevant grid data are without associated locational data.<sup>2</sup> Dakota Electric looks forward to engaging further on this topic in this record and in the workgroup process.

Third, based on our understanding of commentary from various parties, in an effort to minimize security risks to the grid, Dakota Electric opines that a more collaborative approach between utilities and developers remains a more reasonable path forward in these matters rather than posting information online. Members of the workgroup, and parties in other Commission dockets, referenced Minnesota's 100% Carbon Free standard, and the significant policy ramifications associated with this legislation. Distributed resources will be part of meeting this policy objective, and Dakota Electric believes that utilities and developers will need to work together to efficiently, and cost effectively, site DER to provide the greatest benefit to the grid without compromising the security of grid assets and customer/member data. In the case of Dakota Electric, we believe that our internal DER screening tool is an appropriate, and reasonable, method to facilitate this collaborative approach. As part of this collaborative approach or process, it is important to understand that grid security is not only a risk to the utility but to utility ratepayers and potentially society as a whole. With this in mind, Dakota Electric continues to advocate that grid security and data protection is a shared burden among developers, utilities, regulators, policy advocates, and ratepayers.

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<sup>2</sup> It remains unclear to Dakota Electric what value most of the data points requested by developers have without associated locational information. For example, Feeder 1 may have 5 MW of available capacity, but without knowing where Feeder 1 is located, this information is superfluous. The Cooperative invites developers to provide other parties and the Commission with further clarification on this topic.

### III. Conclusion

Dakota Electric appreciates the opportunity to provide additional discussion in this investigation and our response Commission Staff's Workgroup Report. To date, Dakota Electric is encouraged by the workgroup and is hopeful that productive conversations can continue into the future. We believe that the NARUC playbook is a useful tool and basis to further record development of these issues, and Dakota Electric is prepared to use it with different parties to try and resolve grid security and data access issues.

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 12th day of November 2024

*/s/ Nicole McEathron*

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