



AN ALLETE COMPANY

April 30, 2026

**VIA E-FILING**

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

**Re:** 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**  
**UTILITY INITIAL COMMENTS**

Dear Ms. Bergman:

In accordance with the Minnesota Public Utilities Commission's March 31, 2026 Notice of Comment Period in the above-referenced docket, Minnesota Power respectfully submits the attached Initial Comments.

If you have any questions regarding this filing, please contact me at (218-355-3016) or [jgries@mnpower.com](mailto:jgries@mnpower.com).

Respectfully,

A handwritten signature in black ink that reads "Joshua Gries". The signature is written in a cursive style with a long, sweeping tail on the letter "s".

Joshua Gries  
*Public Policy Advisor*

JG:th  
Attach.

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

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In the Matter of the Commission Investigation  
on Grid and Customer Security Issues  
Related to Public Display or Access to  
Electric Distribution Grid Data

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Docket No. E999/CI-20-800  
**UTILITY INITIAL COMMENTS**

**I. INTRODUCTION**

Minnesota Power (or, the “Company”) respectfully submits the following Initial Comments regarding the Minnesota Public Utilities Commission (“Commission”) Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data. These initial Comments address the topic open for discussion. Specifically, the Converge Strategies, LLC (“Converge”) Grid Data Sharing Report (“Report”) filed in this docket on March 4, 2026.

**II. BACKGROUND**

On October 30, 2020, the Commission opened docket CI-20-800, *“In the Matter of the Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data.”* Over the ensuing years, several interested parties participated in multiple robust discussions across several different forums to improve and develop collective understandings of Grid Security risks and challenges and to develop guidelines and best practices to mitigate these risks. These forums include Initial and Reply Comments, working groups, and informal or internal discussions. On March 4, 2026, Converge filed a comprehensive Report developed from these discussions. On March 31, 2026, the Commission issued a Notice of Comment Period to discuss the findings, recommendations, and conclusions of the Converge Report.

**III. DISCUSSION**

The Company appreciates the opportunities for collaboration the Commission has provided in this docket and respectfully provides the following Comments in response to

the topics outlined in the Commission's Notice of Comment Period, specifically:

**1. Should the Commission accept, modify, or reject the Grid Data Sharing Framework Report submitted into the record on March 4, 2026?**

The Company generally agrees with the Converge Report. Although the Company would not oppose the Converge Report's recommended 90-day intermediation timeline, the Company would prefer the recommended intermediation timelines to be targets rather than hard caps. The Company believes that this adjustment ensures that the review process is predictable for all interested parties, yet flexible enough for each utility to account for necessary scoping meetings and the potential for numerous higher risk requests that may be coupled with lower-risk high volume data requests that utilities may encounter in the future.

The Company believes that hard caps could result in incomplete risk assessments, increasing the likelihood of an unintentional disclosure of sensitive grid data. Furthermore, expediting the vetting process for organizations and individuals may cause critical risks - such as cyber security threats and vulnerabilities with foreign entities to be overlooked.

However, the Company agrees with Converge and other parties that longer timelines, such as 120 or 150 days, may result in unnecessary administrative lags and information barriers for entities with a legitimate need. Unnecessary administrative lags may result in delayed market participation and innovation from developers, customers, academics, and other stakeholders.

The Company believes a 90-day soft target is consistent with parties' formal comments in this docket. During several workshop sessions, the Company and other parties highlighted the lack of dedicated teams to support these requests. Although the Company takes great pride in reasonably serving customer needs, these requests will create costs and administrative challenges for each individual utility required to ensure sensitive grid and customer data is handled appropriately.

Ultimately, the Company agrees with the Converge Report and believes that a 90-day soft cap will lead to the efficient and secure data sharing that may be associated with the implementation of this framework.

**2. 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 the CAO?**

The Company proposes that the Commission should reject the Report’s appeals process. Rather, the Company proposes that sole adjudicative authority for formal and informal complaints remain with the Commission’s Consumer Affairs Office (“CAO”).

The Company recognizes the valuable technical expertise that members of the Grid Security Working Group (“GSWG”) possess and the diligent efforts of those members in this docket. Specifically, this knowledge relates to grid security risks and the intermediation of informal complaints. The Company also understands the administrative burden the Company’s proposal may have on the CAO, including that adjudicating these inquiries and complaints may require technical grid expertise. However, the Company believes the risks to utilities, grid reliability, and ultimately the customers and communities served that may be created by deferring adjudicative authority to the GSWG will outweigh any potential gain in doing so.

The Company believes that utilizing a multi-stakeholder group like the GSWG to review specific, potentially non-public information disputes between consumers and utilities introduces new and significant risks to grid security, customer confidentiality, and each utility’s competitiveness. Because GSWG includes such a diverse range of participants, the reviews of specific data-sharing requests, complaints, or denials could expose sensitive business strategies or critical infrastructure details to other market participants, and even potential market competitors. The Company believes that currently, the GSWG forum does not have the necessary controls to prevent secondary exposure of sensitive information which risks creating information asymmetries. These information

asymmetries may pose risks to markets and grid reliability that utilities ultimately bear the responsibility for protecting. The Company believes that accepting the Report's appeals process as it stands will ultimately have negative downstream effects on consumers.

To ensure the CAO has the necessary resources to adjudicate these informal complaints appropriately, the Company proposes the Commission allow the CAO access to technical experts from the Department of Commerce or another State government resource to ensure a clear delineation between policy development from industry experts and dispute resolution. If these proposals are not palatable for interested parties, the Company is certainly open to further dialogue to develop more equitable solutions for all parties.

**3. Should the Commission accept, modify, or reject the Framework's evaluation recommendations?**

The Company is not opposed to the Commission accepting the Report's evaluation recommendations. The Company is not opposed to any of the metrics included in these guidelines, or the timeframe for this formal evaluation process.

**4. Are there other issues or concerns related to this matter?**

The Company certainly appreciates the hard work and diligence that Converge Strategies put into this study that will serve as the bedrock for statewide grid security. However, the Company remains concerned with several risks that have not been sufficiently evaluated in this docket. First, the Company is concerned with data aggregation. Pooled together, enough low-risk data and information could be compiled to reveal system vulnerabilities. Although the Company internally tracks these requests, the Company still believes clear legal recourse and liability protections will proactively enhance grid and data security protections. The Company would welcome further dialogue to continue shaping data security frameworks and best practices.

The Company also remains concerned about cost recovery. Fulfilling specialized data requests can require significant preparatory work from engineers and administrators to sanitize the data, conduct reviews, and format the data accordingly. To prevent these costs from being shifted onto ratepayers who may not receive any benefits from the data sharing, the Company proposes the Commission consider and potentially adopt a cost-causation model to ensure those requesting the data are responsible for the costs associated with the administrative work necessary to fulfill the data request.

The Company appreciates this opportunity for collaboration and takes pride in its role as a steward of sensitive grid infrastructure and consumer data. To ensure continued system security, the Company must maintain the necessary discretion over information releases involving grid and customer security.

## VII. CONCLUSION

The Company appreciates the opportunity to clarify and provide Initial Comments in this proceeding. The Company would like to thank parties and workgroup participants for their contributions to the development of this record. The Company also believes that the Report filed by Converge provides the Commission and utilities with a valuable tool for the understanding, development, and implementation of methodologies and processes that will contribute to enhanced grid security that is ultimately to the benefit of the Company's customers and all those served by the grid in Minnesota.

If you have any questions regarding this filing, please contact me at 218-355-3016 or [jgries@mnpower.com](mailto:jgries@mnpower.com).

Date Submitted: April 30, 2026

Respectfully submitted

A handwritten signature in blue ink that reads "Joshua Gries".

Joshua Gries  
Public Policy Advisor  
Minnesota Power  
30 W Superior St.  
Duluth, MN 55802

STATE OF MINNESOTA    )  
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COUNTY OF ST. LOUIS    )

AFFIDAVIT OF SERVICE VIA  
ELECTRONIC FILING

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I, Tiana C. Heger of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 30<sup>th</sup> day of April, 2026, I electronically filed a true and correct copy of Minnesota Power's Initial Comments in **Docket No. E999/CI-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 eDocket's Official Service List for this Docket were served as requested.



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Tiana C. Heger