



April 30, 2026

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

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. E-999/CI-20-800

Dear Executive Secretary Bergman:

The Coalition for Community Solar Access (CCSA) respectfully submits these comments in response to the Commission’s March 31, 2026 Notice of Comment Period regarding the Grid Data Sharing Framework Report (“Draft Framework”) filed by Converge Strategies. Thank you to the Commission and Converge Strategies for working on such a vital topic. While CCSA did not participate in the working groups, access to distribution grid data is important to our members and to the success of the Speaker Melissa Hortman Community Solar Garden Program.

CCSA is a 501(c)(6) nonprofit trade organization focused on supporting the community solar industry through legislative and regulatory efforts. CCSA has more than 120 member companies and is active in virtually all state-level community solar markets, as well as at the federal level.

CCSA supports the Joint Parties’ (MnSEIA and US Solar Corporation) initial comments and appreciates the Commission’s continued leadership in advancing a transparent, consistent, and secure approach to grid data sharing in Minnesota. Establishing a statewide framework is an important and necessary step toward enabling efficient distributed energy resource (“DER”) deployment while maintaining appropriate safeguards for grid security.

However, as outlined by the Joint Parties, the Draft Framework in its current form risks creating unintended barriers to data access that could hinder the development of community solar and other distributed energy resources. Access to timely, accurate, and sufficiently granular grid data is essential for developers, researchers, and market participants to site projects efficiently, reduce interconnection delays, and minimize costs for customers. A framework that is overly burdensome or unclear may ultimately slow progress toward Minnesota’s carbon-free energy goals.

CCSA agrees with several key recommendations offered by the Joint Parties:

First, the data request process should be more clearly calibrated to the level of risk associated with the requested data. Applying the same procedural requirements—such as mandatory background checks or scoping meetings—to all requests, regardless of risk level, will create inefficiencies and unnecessary delays. A more proportional, risk-based approach will better balance security concerns with practical access needs.

Second, the Draft Framework should provide greater standardization and clarity around risk classification, mitigation measures, and decision-making criteria. Leaving these determinations largely to utility discretion introduces uncertainty and may lead to inconsistent outcomes across utilities and requests. Establishing clearer guidelines will improve predictability, reduce disputes, and enhance confidence in the process.

Third, the framework should more fully align with the intent of the NARUC Grid Data Sharing Playbook by recognizing both the risks of sharing data and the risks of not sharing data. The current draft places disproportionate emphasis on potential security risks without adequately considering the economic, policy, and reliability impacts of restricted access. A balanced approach is critical to ensuring that data-sharing policies support, rather than impede, Minnesota's clean energy transition.

Fourth, the Commission should strengthen timelines, accountability measures, and evaluation metrics. Clearly defined process timelines and transparent reporting on request outcomes, processing times, and appeals will be essential to ensuring the framework functions effectively and evolves over time.

Finally, CCSA agrees that the proposed Grid Security Working Group (GSWG) could serve as a useful informal dispute resolution mechanism, provided it remains optional, operates within defined timelines, and does not delay access to formal Commission review.

In sum, CCSA supports adoption of a statewide grid data sharing framework, but only with the targeted modifications identified by the Joint Parties. By refining the request process, clarifying standards, and ensuring alignment with broader policy goals, the Commission can establish a framework that both protects critical infrastructure and enables the efficient deployment of distributed energy resources.

Thank you for your consideration of these comments and for your continued work on this important issue.

Sincerely,

/s/ Nick Bowman

Senior Manager, Markets & Research

Coalition for Community Solar Access

Telephone: 843-345-8150

Email: nick@communitysolaraccess.org