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May 11, 2026

Ms. Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> 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  
Reply Comments**

Dear Ms. Bergman:

Otter Tail Power Company (Otter Tail Power) hereby submits to the Minnesota Public Utilities Commission (Commission) its Reply Comments in the above-referenced matter.

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed.

Please contact me at 218-739-8603 or [cwicklund@otpc.com](mailto:cwicklund@otpc.com) if you have any questions regarding this filing.

Sincerely,

*/s/ CHARLES WICKLUND*  
Charles Wicklund  
Supervisor, Regulatory Compliance

kde  
Enclosures  
By electronic filing  
c: Service List

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

**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**

**REPLY COMMENTS**

**I. INTRODUCTION**

On March 31, 2026, the Minnesota Public Utilities Commission (Commission) issued a Notice of Comment Period inviting comments on the following issue:

Should the Commission implement the proposed Grid Data Sharing Framework and accept the Report?

The following topics were noted as being open for comment:

- Should the Commission accept, modify, or reject the Grid Data Sharing Framework Report submitted into the record on March 4, 2026?
- 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 CAO?
- Should the Commission accept, modify, or reject the framework's evaluation recommendations?
- Are there other issues or concerns related to this matter?

Otter Tail Power Company (OTP) respectfully submits these comments for consideration.

**II. OTTER TAIL RESPONSES**

Otter Tail Power Company recommends that the Commission accept the Grid Data Sharing Framework Report. The Report reflects a multi-year stakeholder process and provides a well-reasoned framework for evaluating requests for access to electric distribution grid data while appropriately recognizing the security risks associated with broader data disclosure. We believe the Report accurately summarizes the workgroup discussions and presents a balanced approach that can serve as a useful reference for utilities as they develop and refine internal data-sharing processes. Adopting the framework will encourage consistency in approach while allowing the flexibility for each utility to adjust internal procedures depending on their unique system configuration, risk profile, and resource availability.

Otter Tail Power Company supports the Commission's acceptance of the Framework's proposed appeals process, including the use of the Grid Security Working Group (GSWG) as an informal forum to address complaints prior to submittal to the Commission's Consumer Affairs Office. While more processes specifics are needed, leveraging the GSWG for informal resolution is consistent with the Framework's emphasis on risk-based decision-making and stakeholder engagement, and it provides an efficient mechanism to resolve issues without undue burden for the Commission.

Otter Tail Power Company supports acceptance of the Framework's evaluation recommendations. The proposed evaluation metrics appropriately focus on whether the framework is functioning as intended and provides the Commission with meaningful insight into process performance, efficiency, and dispute resolution activity. Evaluating success based on process integrity will help ensure the framework remains sustainable, adaptable, and aligned with utilities' ongoing responsibility to protect critical infrastructure and sensitive customer information.

### **III. CONCLUSION**

Otter Tail Power Company appreciates the efforts of Converge Strategies in facilitating the stakeholder workgroup meetings and thanks Commission Staff, the Department of Commerce, and all participating stakeholders for their engagement in this process. The workgroup discussions were productive and provided meaningful insight into grid security considerations and data-sharing challenges facing utilities. While the concerns raised by other commenters may warrant consideration, OTP believes the resulting Framework and supporting materials reflect the benefit of collaborative discussion and will serve as a useful basis for future efforts.

Dated: May 11, 2026

Respectfully submitted,

**OTTER TAIL POWER COMPANY**

By: /s/ CHARLES WICKLUND  
Charles Wicklund  
Supervisor, Regulatory Compliance  
Otter Tail Power Company  
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**CERTIFICATE OF SERVICE**

**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**

I, Khris Ekstrom, hereby certify that I have this day served a copy of the following, or a summary thereof, on Sasha Bergman and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company  
Reply Comments**

Dated this **11th** day of **May, 2026**.

/s/ KHRIS EKSTROM  
Khris Ekstrom  
Regulatory Filing Coordinator  
Otter Tail Power Company  
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