



April 30, 2026

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

***Subject: Dakota Electric Association Comments in Response to  
March 31, 2026 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 Ms. Bergman:

Dakota Electric Association (Dakota Electric or Cooperative) respectfully submits these comments in response to the Minnesota Public Utilities Commission's (Commission) March 31, 2026 Notice of Comment Period (March 2026 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. Throughout 2021 and 2022, Dakota Electric, investor-owned utilities (IOUs), and interested parties filed various rounds of comments providing the Commission with additional information on the topic of grid security and distribution grid data sharing. The Commission also issued Orders on August 3, 2022 (August 2022 Order) and June 7, 2023 (June 2023 Order) in this investigation. In its June

2023 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 its 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 a Notice of Comment Period issued on October 9, 2024 (October 2024 Notice), Commission Staff also filed its summary of the workgroup discussions and its recommendations and next steps.<sup>1</sup>

On November 12, 2024 and December 4, 2024, the Cooperative filed supplemental comments and reply comments, respectively, in response to the Commission’s October 2024 Notice. In these comments, Dakota Electric recommended that the Commission establish a workgroup to make use of the National Association of Regulatory Utility Commissioners (NARUC) Grid Data Sharing Framework.<sup>2</sup> The Minnesota Department of Commerce (Department) provided a robust discussion around security risks, a thorough overview of the NARUC Framework, and provided a Grid Data Sharing Report from their security consultant, Converge Strategies, LLC (Converge). This Grid Data Sharing Report covered security risks to the electric grid, existing threat landscape analysis, recommendations for a data sharing process implementation, and recommendations for stakeholder working group discussions.

On February 7, 2025, the Commission issued its Order Accepting Report, Establishing Standing Workgroup, and Assigning Procedures and Tasks for the Workgroup (February 2025 Order). In its February 2025 Order, the Commission established an ongoing workgroup, approved use of the NARUC Grid Data Sharing Playbook and Framework and clarified its use in the workgroup, established a timeline to authorize

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<sup>1</sup> Commission Workgroup Report, October 9, 2024.

<sup>2</sup> The following parties also filed comments in response to the Commission’s October 2024 Notice: Xcel Energy (Xcel), Minnesota Power, Otter Tail Power Company (Otter Tail), Minnesota Department of Commerce (Department), Minnesota Grid Access Advocates (Grid Advocates), and Nokomis Energy (Nokomis).

additional workgroup meetings, and directed the workgroup to complete three workgroups (Use case analysis, Data protection capabilities, Data sharing mechanisms). The Department's security consultant Converge convened workgroups on July 7, 2025 (Data protection capabilities), August 11, 2025 (Data sharing mechanisms), and October 6, 2025 (Use case analysis).

On March 31, 2026, the Commission issued its March 2026 Notice. In this notice, the Commission raised the following issue:

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

The Commission also noted that the following topics were 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?

Dakota Electric addresses each of these topics separately below. Before responding to the Commission's March 2026 Notice, the Cooperative wishes to thank Converge for facilitating discussion at the three workgroup meetings and the workgroup participants. These workgroups were productive and Dakota Electric believes that their structure and the collaborative nature of the parties helped Converge produce its Report and provide parties with a better understanding of how a grid data sharing framework could work.

## **II. Dakota Electric Response**

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

In its June 2023 Order, the Commission 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.<sup>3</sup> Since the Commission issued this Order, Dakota Electric continues to use its internal DER screening tool as part of our interconnection process. This remains an effective, robust tool that allows us to efficiently determine whether DER interconnection is possible at a particular location, while also protecting distribution grid data. The Cooperative continues to believe that protecting grid data and allowing developers and other interested parties the ability to review on-site, or through teleconference,<sup>4</sup> with Dakota Electric staff, as approved in the Commission's June 2023 Order, remains an appropriate and reasonable solution.<sup>5</sup> Converge provided a brief discussion of on-site review in the Report.<sup>6</sup>

In light of Dakota Electric's position, we do not provide a specific recommendation regarding whether using the Grid Security Framework for facilitating the sharing of, and access to, distribution grid data with third parties should be implemented. That being said, after reviewing the framework, Dakota Electric believes there are certain positive aspects to the framework, and we intend to incorporate certain methods and processes into our internal screening process. If, in the future, we receive third party requests, the Cooperative will be able to use all, or parts of the framework, as part of our vetting process before bringing a developer in to review data. Dakota Electric provides additional discussion on how it anticipates using portions of the framework in its internal process later in these comments.

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

Based on its review, Dakota Electric recommends that the Commission accept the Report. The Cooperative will discuss this in greater detail below, but if the Commission wishes to make any modifications to the Report, Dakota Electric identified two areas that require modification or additional clarity and discussion. The first appropriate

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<sup>3</sup> June 7, 2023 Order, Page 10 and Ordering Point No. 1.

<sup>4</sup> June 30, 2021 Dakota Electric Comments, Page 13.

<sup>5</sup> On the topic of requests for distribution grid data, the Cooperative has not received requests or inquires from third parties about use of this tool or to meet privately with Dakota Electric about potential projects.

<sup>6</sup> Report, Page 17.

modification involves the inclusion of a discussion about artificial intelligence (AI) and potential considerations associated with grid data sharing. The Grid Data Sharing Framework does not specifically address any concerns related to Artificial Intelligence or Large Language Models. This is likely because, when this investigation began, and during most of the record development in this matter, more powerful AI tools and software packages were not available or considered by parties. Potential concerns associated with AI and how it could impact grid data sharing, especially as it relates to the aggregation of data, were raised and discussed by parties at the Third Workgroup.

The second modification that the Commission may wish to consider is its relevance to parties seeking information related to siting and connecting large load facilities or other loads in a utility's service territory. Although the NARUC handbook, which formed the basis for the workgroup discussions, includes load and developer scenarios,<sup>7</sup> the Report, along with the record in this investigation, is framed through the lens of how distribution data can be used to site DER and renewable generation facilities. The prospect of large and/or rapid load growth, some by sophisticated entities, is a reality that was not expected when this investigation began and during record development in this matter. The Cooperative believes that the use of grid data by prospective loads, and what impacts this may have on the distribution system and the security of data, should first be considered and reviewed by the Commission to determine whether this use case is in the public interest and that it does not pose risks or concerns that are different than for DER development.

*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?*

The Cooperative reviewed the framework's appeal process and recommends that the Commission accept it. Dakota Electric has advocated for independent and collaborative review of potential disputes in this, and other dockets, and we believe that the process

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<sup>7</sup> NARUC Grid Data Sharing Playbook, Page 34.

has the potential to efficiently and constructively resolve disputes without Commission involvement. Dakota Electric also believes that the Commission should accept the use of the Grid Security Working Group (GSWG) as the means to address informal complaints. This is in line with our prior recommendations in this docket.<sup>8</sup> Although the Cooperative believes the GSWG is the appropriate venue at this time, we do note that the Distribution Generation Working Group (DGWG), of which there may be participant overlap with the GSWG, is currently reviewing several highly technical matters that require significant attention from the participants. If a complaint were to occur, this may impact review.

*Should the Commission accept, modify, or reject the framework's evaluation recommendations?*

Dakota Electric recommends that the Commission accept the evaluation recommendations. These metrics represent a useful set of information that encompasses discussion at the workgroups and are relevant to the Commission understanding the grid data sharing process and its operation. Dakota Electric reiterates that it has not, to date, received inquiries from groups that would relate to grid data sharing. Although the Cooperative is supportive of these evaluation metrics, we do note that if we were to begin receiving significant third parties inquiries, we may incur additional costs to track and maintain these data.

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

The Cooperative provides additional discussion on several issues related to grid security, the Converge Report, and the grid data sharing framework.

As noted above, Dakota Electric recommends that the Commission reaffirm its June 2023 Order that allows the Cooperative to use our internal screening tool and provide discrete sets of information on-demand, in the context of other existing DER

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<sup>8</sup> November 12, 2024 Dakota Electric Supplemental Comments; December 4, 2024 Dakota Electric Supplemental Reply Comments, Page 2.

interconnection tools and improvements being considered, to maintain an orderly, efficient, and cost-effective deployment of DER in Minnesota. Dakota Electric believes that this method continues to be a reasonable path forward and, with certain modifications noted in the Report, will allow the Cooperative to maintain a collaborative approach between us and DER developers while also protecting our members' data. We believe that our method recognizes the unique characteristics of our utility and is also a means by which developers can obtain some locational based hosting capacity and system information without compromising grid security. Furthermore, we believe that our screening tool, coupled with discussions with internal engineering staff, can create a collaborative environment where utilities and developers are able to cost effectively and efficiently interconnect DER resources.

Although the Cooperative concludes that our Commission-approved process is reasonable and appropriate, this should not be seen as disagreeing with the workgroup process or concluding that the recommendations in the Report are not useful. Dakota Electric actively participated in the workgroup meetings and there was significant positive discussion and consensus during these meetings. The discussion and collaboration amongst parties in these meetings was extremely helpful and Dakota Electric has a better understanding of how we can interact with developers and interested parties to help achieve potential project goals.

Dakota Electric appreciates Converge's framework recommendations detailed in Section 3.30 of its Report. Dakota Electric notes the following positive examples below and how these could be applied to Dakota Electric:

**Background checks / pre-screening** – Dakota Electric appreciates the discussion regarding background checks and pre-screening. Our currently approved process of working directly with the member or data requestor to understand their request more thoughtfully and providing limited data has worked well, but, in the future, we may consider requiring a background check if the data required becomes an elevated risk or would fit into the risk levels discussed in the workgroup.

**Formalized application** – Dakota Electric understands why a formal application may be beneficial for both the data requestor and the utility. Dakota Electric has not yet received a third-party grid data request and, in general, receives a low quantity of data requests related to DERs. The use of a formal application, as well as required timelines, requires additional resources and process creation and may be premature at this time. If the quantity of data requests increases in the future, we may consider a formal application and queue process.

**Scoping meeting** – In Section 3.3, Risk Analysis, Converge provided discussions regarding an initial scoping meeting and facilitating open dialogue between the utility and the data requestor. Dakota Electric’s current process of working directly with the member or data requestor is similar to a formal scoping meeting. We expect to continue this process going forward.

**Risk analysis** – Dakota Electric appreciates the discussion regarding risk analysis and categorizing a request by its level of risk. Given the lack of third-party data requests, the Cooperative is concerned that risk categorization and the processes associated with screening data types could represent significant cost and resource concerns for Dakota Electric. Dakota Electric may consider some type of risk analysis categorization in the future, but the Cooperative believes our current process of working directly with the member or requestor to fully understand their request and provide guidance to them on publicly available data or provide discreet set of on demand data is effective.

As noted earlier in these comments, the Report does not include discussion about the potential impacts, and consequences, of AI and its relation to the sharing of distribution grid data. With the rapid evolution of generative AI tools, Dakota Electric is concerned about the impact of providing new datasets to external entities. Generative AI could be used concurrent with the utility providing data that, on its own, is low risk.

The compounding impact of generative AI could result in this low-level data, or a combination of datasets of low-risk data, to elevate these data into medium- or high-risk data that could compromise utility operations and the public interest. Additionally, AI could be utilized to analyze and identify trends in data which, when combined with other datasets, may leak Personal Identifiable Information or provide insights into high-risk areas of the distribution system. The Cooperative acknowledges that these concerns remain somewhat conceptual, but the use cases for AI are themselves nascent and not well understood. Even if known impacts are difficult to quantify at this time, Dakota Electric believes the Commission should consider these potential impacts when applying any grid data sharing framework.

As noted earlier in these comments, the current framework does not consider the impacts of large loads, or loads in general, having access to distribution grid data. Although loads were not discussed in depth during the workgroup process, the potential grid security concerns may be similar to DER developers, but the impacts of load on the distribution are potentially different. In addition, as potential loads are growing in size (this phenomenon is not simply limited to hyperscale data centers) the impact of a third-party having access to grid data may have unintended consequences to the distribution system. This uncertainty can also be increased given potential complex interactions between loads, DER developers, and the utility operator. The Cooperative also reviewed the various Commission Orders in this investigation, and there are no references to loads. The Commission's Orders focus grid security and access to distribution data on DER development. Large loads and loads in general are likely to use grid data differently which may result in different use cases or outcomes. If the Commission believes the framework should apply to other use cases beyond DER development, the Cooperative believes additional discussion and review is necessary.

Finally, there remains an open question about liability and funding of potential grid data sharing. Although the Report provides significant discussion about various risk levels, there is no discussion on how entities would handle liability if they were judged responsible for an unauthorized release of grid data. The consequences of the release of grid data are potentially significant, and it is important that any framework addresses

this issue and how, if possible, it can be mitigated. The Cooperative believes that additional discussion on liability and treatment of cost is necessary.

### III. Conclusion

Dakota Electric would like to again thank the Department, Converge, and all workgroup participants. The Report filed by Converge provides the Commission with a reasonable and accurate summary of our efforts and provides the Commission with a framework and associated methods and processes that we believe are useful. Dakota Electric continues to believe its currently approved internal screening method is appropriate, and we anticipate incorporating certain parts of the framework into our screening process.

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 30th day of April 2026

*/s/ Nicole McEathron*

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Nicole McEathron

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