

May 11, 2026

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

RE: Reply Comments of the Minnesota Department of Commerce
Docket No. E999/CI-20-800

Dear Ms. Bergman,

Attached are the reply comments of the Minnesota Department of Commerce (Department) in the following matter:

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

The Grid Data Sharing Framework Report was filed by Converge Strategies, LLC. (Converge) on March 3, 2026. Parties filed initial comments on April 30, 2026.

The Department recommends the Commission **accept the Report and implement the Grid Data Sharing Framework with modifications** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

RW/ar
Attachment

Before the Minnesota Public Utilities Commission**Comments of the Minnesota Department of Commerce**

Docket No. E999/CI-20-800

I. INTRODUCTION

The present docket represents years of stakeholder work to address ongoing grid and customer security concerns related to the sharing of grid data. The Commission’s 2020 Order on Xcel Energy’s 2019 Hosting Capacity Analysis (HCA) Report delegated authority to the Executive Secretary to open a Commission investigation on grid and customer security issues related to public display or access to grid data.¹ Since the docket was opened in 2020, the Commission has accepted multiple rounds of stakeholder feedback and updates to the record, which have resulted in the formation of the Grid Security Working Group (GSWG) in 2025.² The Minnesota Department of Commerce obtained technical assistance from Converge Strategies, LLC. (Converge) to both facilitate the GSWG as well as aid in appropriately addressing grid security concerns raised by stakeholders throughout the docket history. The goal of the workgroup was not full consensus, but collaboration toward a workable solution.

As ordered by the Commission, the workgroup was tasked with providing recommendations for a process for securely sharing the necessary data for DER interconnection.³ In the same Order, the Commission approved the usage of the NARUC Grid Data Sharing Framework Playbook (NARUC Playbook) as a model, but not a binding manual for the GSWG’s work.⁴ The GSWG, under the guidance of Converge and the NARUC Playbook, focused on three main topics: 1) use case analysis, 2) data sharing capabilities, and data sharing mechanisms.⁵ The Report filed by Converge on March 4, 2026 represents the outcomes of the GSWG and the proposed process for securely sharing grid data.⁶

The Department commends Converge and workgroup participants for their collaborative effort and overall high level of participation in the three workgroup sessions. Although the Converge Report does not represent full consensus from parties, the Department concludes that the Report and the Framework therein provide a path forward—grounded in utility, developer and regulatory collaboration—for the secure sharing of grid data to facilitate DER interconnection. The Department also believes that the conversations held within the stakeholder group bode well for continued security/risk assessment collaboration. The Department also notes that the Converge Report lays out

¹ *In the Matter of Xcel’s 2019 Hosting Capacity Analysis Report, Order Accepting and Setting Further Requirements*, July 31, 2020, Docket No. E002/M-19-685, (eDockets) [20207-165472-01](#), at Order Point 19.

² *In the Matter of the Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Order Accepting Report, Establishing Standing Workgroup, and assigning procedures and tasks for the Workgroup*, February 7, 2025, Docket No. E-999/CI-20-800, (eDockets) [20252-215085-01](#) (hereinafter: “February 2025 Order”).

³ *Id.*, at order point 4.

⁴ February 2025 Order, at order point 3.

⁵ *Id.*, at order point 6.

⁶ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Converge Strategies, LLC., Recommendations for a Grid Data Sharing Framework, March 4, 2026, Docket No. E999/CI-20-800, (eDockets) [202410-210841-01](#) (hereinafter “Converge Report”).

an evaluation process that would allow for iteration on the Framework should stakeholders find that the process requires updates.

II. PROCEDURAL BACKGROUND

June 7, 2023	The Minnesota Public Utilities Commission (Commission) issued an Order in Docket No. E999/CI-20-800 which, among other items, convened a work group to develop the record more fully for Commission consideration within 18 months and requested the Department retain specialty services to provide a recommendation on privacy and security and to participate in related analysis and stakeholder engagement. ⁷ The Department subsequently selected Converge Strategies, LLC (Converge) to provide the required specialty services.
July 2, 2024	The Commission issued a notice of work group to commence the process required by the 2023 Order for meetings later in the summer. ⁸
August 28, 2024 and October 4, 2024	The Commission issued draft notes of the three Commission-led workgroup meetings. ⁹
October 9, 2024	The Commission issued its mid-workgroup report with a summary of the discussions, conclusions, recommendations, next steps, and remaining points of disagreement. ¹⁰ The Workgroup Report formally submitted into the record the NARUC framework. ¹¹ The Commission issued its Notice of Supplemental Comment Period in the present docket. ¹²
October 28, 2024	The Department convened the first workgroup session in parallel with the supplemental comment period, facilitated by Converge, to present

⁷ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Order Establishing Work Group*, June 7, 2023, Docket No. E999/CI-20-800, (eDockets) [20236-196417-02](#).

⁸ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Notice of Comment Period*, July 2, 2024, Docket Nos. E999/CI-20-800, (eDockets) [20247-208237-01](#).

⁹ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Notes from Workshops 1 and 2*, August 19, 2024, Docket No. E999/CI-20-800, (eDockets) [20248-209599-01](#); *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Workgroup Session 3 Notes*, October 4, 2024, Docket No. E999/CI-20-800, (eDockets) [202410-210725-01](#).

¹⁰ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Workgroup Report*, October 9, 2024, Docket No. E999/CI-20-800, (eDockets) [202410-210841-01](#) (hereinafter “2024 Workgroup Report”).

¹¹ 2024 Workgroup Report Attachment 1.

¹² *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Notice of Supplemental Comment Period*, October 9, 2024, Docket No. E999/CI-20-800, (eDockets) [202410-210840-01](#).

Converge's initial findings and framework proposal and to plan for the proposed standing workgroup.

February 7, 2025

The Commission issued an Order accepting the Workgroup Report, delegated authority to the Executive Secretary to establish and maintain an ongoing workgroup to review the implementation of grid data sharing practices and bring recommendations to the Commission as needed, and requesting that the Commissioner of Commerce seek authority to incur costs for further specialty services to facilitate three workshops to specifically address the following: use case analysis, data protection capabilities, and data sharing mechanisms.¹³

July 7, August 11, and
October 6, 2025

Converge and the Department of Commerce convened stakeholders for a series of three Commission-ordered workshops on data protection capabilities, data sharing mechanisms, and use case analysis, respectively.

March 4, 2026

Converge filed its Recommendations for a Grid Data Sharing Framework final report into the instant docket; the report summarized the information and perspectives shared by workgroup participants and provided recommendations regarding the development of a standardized data request template and review process.¹⁴

March 31, 2026

The Commission issued its Notice of Comment Period asking stakeholders to provide input on the question of whether the Commission should accept the Report and implement the proposed Grid Data Sharing Framework.¹⁵

April 30, 2026

¹³ February 2025 Order.

¹⁴ Converge Report.

¹⁵ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Notice of Comment Period*, March 31, 2026, Docket No. E999/CI-20-800, (eDockets) [20263-229850-01](#).

Several parties including the Department,¹⁶ the Joint Parties,¹⁷ the Coalition for Community Solar Access (CCSA),¹⁸ Minnesota Power (MP),¹⁹ Xcel Energy (Xcel),²⁰ and Dakota Electric Association (DEA),²¹ filed initial comments in the present docket.

Topic(s) 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?

III. DEPARTMENT ANALYSIS

The Department maintains its recommendations from initial comments to 1) accept the Report and implement the framework, 2) use the Grid Security Working Group for appeals. The Department includes a modification to its recommendation from initial comments regarding the evaluation recommendations. The Department also appreciates and responds to feedback from other parties and provides additional recommendations in the present comments. The full list of the Department’s recommendations is included in section IV below.

A. COST RECOVERY

¹⁶ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Department Initial Comments, April 30, 2026, Docket No. E999/CI-20-800, (eDockets) [20264-231225-01](#) (hereinafter: “Department Initial Comments”).

¹⁷ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Joint Parties Initial Comments, April 30, 2026, Docket No. E999/CI-20-800, (eDockets) [20264-231294-01](#) (hereinafter: “Joint Parties Initial Comments”). Note: the “Joint Parties” include the Minnesota Solar Energy Industry Association (MNSEIA) and US Solar.

¹⁸ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, CCSA Initial Comments, April 30, 2026, Docket No. E999/CI-20-800, (eDockets) [20264-231290-01](#) (hereinafter: “CCSA Initial Comments”).

¹⁹ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Minnesota Power Initial Comments, April 30, 2026, Docket No. E999/CI-20-800, (eDockets) [20264-231281-01](#) (hereinafter: “MP Initial Comments”).

²⁰ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Xcel Energy Initial Comments, April 30, 2026, Docket No. E999/CI-20-800, (eDockets) [20264-231269-01](#) (hereinafter: “Xcel Initial Comments”).

²¹ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data*, Dakota Electric Association Initial Comments, April 30, 2026, Docket No. E999/CI-20-800, (eDockets) [20264-231220-01](#) (hereinafter: “DEA Initial Comments”).

Xcel, in its initial comments, recommended the Commission address cost recovery in the ongoing proceeding stating that the lack of cost recovery discussion in the Converge report is a critical gap. Xcel recommends the Commission allow the “costs to develop the secure portal and any other technology solutions necessary to implement the approved framework” to be recovered through the Transmission Cost Recovery Rider.²² Xcel Further requests that the program administration costs related to Xcel’s “support of the data sharing process” be recovered through a user fee structure based on the cost-causation principle.²³ Xcel states the administrative cost user fee is appropriate so that retail customers do not subsidize DER developers.²⁴

MP also notes that cost recovery should be addressed.²⁵ MP cites that fulfilling specialized data requests could require significant preparatory work from its engineers and administrators to securely share the data requested. MP proposes the Commission consider and potentially adopt a cost-causation model to ensure retail customers are not subsidizing the costs of data sharing that they may not benefit from.²⁶

As stated in the Converge Report:

This report does not address or provide recommendations on the following topics, as they were outside the scope of this effort, as stipulated by the docket. Any authority, deliberation, or decision made regarding them lies with either the Minnesota PUC, the Department of Commerce, or the relevant state agency or legislative authority:

- Estimated costs for implementation.
- How or by whom costs should be covered.²⁷

The Commission’s February 7, 2025 Order specifically stipulated the workgroup should address the following:

- Use case analysis.
- Data protection capabilities.
- Data sharing mechanisms.²⁸

The Department appreciates the discussion regarding cost recovery as well as the utilities’ concern about the cross-subsidization of data-sharing costs. However, there is also no record development on the actual costs relating to the implementation of the Framework. As the actual costs are unknown at this time, it would be premature to discuss the appropriate cost recovery or cost allocation

²² Xcel Initial Comments, at 4.

²³ *Ibid.*

²⁴ *Id.*, at 5.

²⁵ MP Initial Comments, at 6.

²⁶ *Id.*, at 6.

²⁷ Converge Report, at 6.

²⁸ February 2025 Order, at order point 6.

mechanism. The Department concurs with Converge’s determination in its Report that cost recovery was out of scope for the workgroup process. The Department further concludes that cost recovery is not an issue for decision in the immediate proceeding.

The Department recommends the Commission defer any decision on cost allocation and cost recovery to the appropriate proceeding.

B. DEA PROPOSAL

DEA cited the Commission’s June 2023 Order wherein the Commission accepted a DEA proposal to provide discrete sets of information on-demand.²⁹ DEA believes the Commission-approved process is sufficient and proposes to continue using it, instead of the framework proposed in the Converge report.³⁰ The Commission’s June 2023 Order states:

The Commission adopts and applies to Dakota Electric Association, Otter Tail Power, and Minnesota Power, the Dakota Electric Association proposal outlined in its June 30, 2021 Reply Comment 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. Utilities implementing this process shall make a compliance filing, to be filed with their IDPs, providing a narrative report on their implementation of this policy.³¹

The Department reiterates that the Order Point referenced by DEA also approves the use of the on-demand data sharing process for Otter Tail and MP. The Department contends that if the Commission considered the on-demand data sharing process a sufficient process for securely sharing the necessary data for DER interconnection, the Commission would not have continued to seek recommendations and stakeholder input through the GSWG and the docket in general toward the development of the Framework. The Department appreciates that one measure to securely share data with requestors may be through view-only access, as discussed in the Converge Report regarding high-risk data.³² However, the Department contends that the goal of the workgroup was to create a standardized framework for the rate regulated utilities to utilize when sharing distribution data for the purpose of DER interconnection; it would be inappropriate not apply the framework to each utility.

The Department recommends the Commission require all of the rate-regulated utilities to implement the grid data sharing framework.

²⁹ DEA Initial Comments, at 2.

³⁰ *Id.*, at 3.

³¹ *In the Matter of a Commission Investigation on Grid and Customer Security Issues Related to Public Display or Access to Electric Distribution Grid Data, Order Establishing Work Group*, June 7, 2023, Docket Nos. E999/CI-20-800 and E002/M-19-685, (eDockets) [20236-196417-02](#) (hereinafter: “June 2023 Order”) at Order Point 1.

³² Converge Report, at 30-31.

C. APPEALS PROCESS

In initial comments, MP proposes the Commission reject the Converge Report's proposal to utilize the GSWG to address informal complaints, and instead proposes that sole adjudicative authority for formal and informal complaints remain with the Commission's Consumer Affairs Office (CAO). MP cites concerns regarding competitiveness, customer confidentiality and grid security:

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.³³

Xcel discusses that the appeals process lacks sufficient process clarity. Xcel recommends that the Commission direct the GSWG to develop a clearly defined dispute resolution process to address, at a minimum:

- Parties who will be involved in reviewing disputes,
- The criteria parties will use to evaluate competing positions, and
- The procedural steps for elevating unresolved matters.³⁴

The Joint Parties also pose similar concerns regarding the process of utilizing the GSWG for informal complaints. The Joint Parties recommend a timeline be implemented to ensure timely complaint resolution or elevation, if a resolution cannot be made. The Joint Parties recommend 30 days for complaint resolution or elevation.³⁵

The Department supports the use of the GSWG as a venue for addressing informal complaints, as it did in initial comments.³⁶ The Department appreciates the concerns raised by parties regarding the process under which the GSWG should operate to resolve complaints. The Department notes that dispute resolution process was outside of the scope of the workgroup, and acceptance of the Report should not be predicated on the establishment of a dispute process, as recommended by Xcel.³⁷ The Department agrees that additional development of the GSWG could be done to actualize the dispute resolution process within the group.

³³ MP Initial Comments, at 4-5.

³⁴ Xcel Initial Comments, at 17.

³⁵ Joint Parties Initial Comments, at 19-20.

³⁶ Department Initial Comments, at 8.

³⁷ Xcel Initial Comments, at 17.

The Department recommends the Commission direct the GSWG to develop a clearly defined dispute resolution process that addresses, at a minimum, the following:

- **Parties who will be involved in reviewing disputes,**
- **The criteria parties will use to evaluate competing positions,**
- **The procedural steps for elevating unresolved matters,³⁸ and**
- **A dispute resolution timeline.³⁹**

Both the Joint Parties and Xcel recommend the Commission require the development of a list of data that can be requested by parties with risk-level classification for each type of data.⁴⁰ Xcel believes the list of shareable data is necessary to ensure only the minimum data necessary to support a requestor's stated purpose is required to be shared.⁴¹ The Joint Parties state that the list of shareable data and its risk level is necessary to avoid sole-discretion on behalf of the utility as to shareability and risk level of the data requested.⁴²

The Department contends that a static, Commission-approved list of shareable data and its corresponding risk level would quickly become obsolete as technologies and the security landscape change. The Converge Report is designed to be a criteria-based evaluation process for risk level and the appropriate protection measure. The criteria-based approach was developed in an effort to acknowledge that each data request will be unique, as will each requestor and the intended use of the data. The Department does not support the creation of a list of shareable data and the risk level for each type of data.

The Department recommends the Commission deny the Joint Parties and Xcel's recommendation for the development of a list of requestable data and its risk level.

D. EVALUATION

The Department responds to the following Notice topic:

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

In its Report, Converge recommends annual reporting as well as a fulsome review of the Framework three years after implementation. The Department likens this reporting and review cycle to the term of a pilot project in other proceedings. Should the proposed Framework prove to be incomplete or ineffectual, the annual reporting and review after three years should demonstrate the need for

³⁸ Xcel Initial Comments, at 17.

³⁹ Joint Parties Initial Comments, at 19-20.

⁴⁰ Xcel Initial Comments, at 13 and Joint Parties, at 11-12.

⁴¹ Xcel Initial Comments at 13; Xcel cites the Commission's February 2025 Order that states: 'Within six months of this order, the workgroup must provide recommendations for a process for securely sharing the minimum necessary data [emphasis added] for DER interconnection,' at Order Point 4.

⁴² Joint Parties Initial Comments, at 11.

modification. No party expressly opposed the proposed evaluation schedule and metrics in initial comments. The Joint Parties recommend additional reporting metrics to shown in redlines below:

- Total number of data requests per utility, per year.
- Total number of fulfilled requests per utility, per year.
- Total number of denied requests per utility, per year.
- Total number of fulfilled and denied requests for each risk level (high-, medium-, and low-risk), per year.
- Reasons why requests (if any) were denied, per year.
- How many requests were brought to the GSWG for dispute resolution, with an explanation of why the dispute occurred (e.g., why request was denied, timeline of remediation efforts between the utility and requester, and statements of position and desired outcome by both the dispute initiator and responder), per year.
- Average fulfillment time for requests per utility, per year.
- List of requesters for the year from each utility, per year.
- Any data breaches from requesters who have been given data that each utility knows of, per year, and any data breaches by the utility or utility contractors.
- Average time to process data requests, broken down by risk level and topic area.
- Appeals outcomes broken down by risk level and topic area.

The Joint Parties also proposed a 30-day negative check-off period after the annual reporting by the utilities. The Joint Parties state that the 30-day negative check-off periods would allow interested parties to review the reports filed and evaluate the efficacy of the grid data request process. The Joint Parties proffer that, if a party files comments on an annual report, the comments will trigger a period review.⁴³ The Department interprets the Joint Parties' request to mean that if Joint Parties file comments on an annual report, the Commission would then issue a Notice of Comment in the present docket to further develop the issues identified by the filing party. The Department understands the Joint Parties' recommendation to be a trigger for earlier review of the grid data sharing process, should issues arise earlier than the proposed fulsome review after three-years of implementation.

The Department is not opposed to the recommendations of the Joint Parties on the Converge Report's evaluation metrics. The Department recommends the Commission adopt the Joint Parties' recommended modifications to the evaluation process. The Department specifies the recommendation below (modifying its recommendation from initial comments):

The Department recommends the Commission require annual reporting by each of the rate-regulated utilities in the current docket. The Department recommends the Commission adopt the following reporting metrics, as modified by the Joint Parties:

- **Total number of data requests per utility, per year.**
- **Total number of fulfilled requests per utility, per year.**
- **Total number of denied requests per utility, per year.**

⁴³ Joint Parties Initial Comments, at 20-22.

- Total number of fulfilled **and denied** requests for each risk level (high-, medium-, and low-risk), per year.
- Reasons why requests (if any) were denied, per year.
- How many requests were brought to the GSWG for dispute resolution, with an explanation of why the dispute occurred (e.g., why request was denied, timeline of remediation efforts between the utility and requester, and statements of position and desired outcome by both the dispute initiator and responder), per year.
- Average fulfillment time for requests per utility, per year.
- List of requesters for the year from each utility, per year.
- Any data breaches from requesters who have been given data that each utility knows of, per year, **and any data breaches by the utility or utility contractors.**
- **Average time to process data requests, broken down by risk level and topic area.**
- **Appeals outcomes broken down by risk level and topic area.**

The Department recommends the Commission delegate authority to the Executive Secretary to issue a Notice of Comment Period following the annual report filings should parties raise concern during the 30-day negative check-off period.

E. OTHER ISSUES

The Department responds to the following Notice topic:

Are there other issues or concerns related to this matter?

E.1. Application and Request Timeline

In its initial comments, MP noted it was concerned that the 90-day proposed timeline for the application request process was a hard cap.⁴⁴ The Department notes that although a 90-day timeline is discussed elsewhere in the Report, particularly in the After-Action Reports,⁴⁵ the ultimate recommendation for the Framework is a two-month timeline from pre-application to request fulfillment.⁴⁶ It is the Department's understanding that the proposed two month timeline is a general guideline, not a hard cap. The timeline is meant to set time-based goals and expectations for utilities and requestors of which the utility should make a good faith effort to keep.⁴⁷ However, the Converge Report recognizes that some requests may take longer to fulfill, and the timeline could be adjusted with clear communication between the utility and the requestor.

Similarly to the concern raised by MP regarding the application request process timeline, Xcel discusses the two-month timeline stating that two months may be too prescriptive for the review and fulfillment of a request.⁴⁸ The Department reiterates that the two-month timeline is merely a guideline that could

⁴⁴ MP Initial Comments, at 3.

⁴⁵ Converge Report, Attachment B at 48-49.

⁴⁶ Converge Report, at 19.

⁴⁷ *Ibid.*

⁴⁸ Xcel Initial Comments, at 10-11.

be adapted to extenuating circumstances (such as the risk-level or volume of the data requested) with clear, consistent communication and shared expectations between the requestor and the utility. As stated in the Converge Report:

While utilities should make every good-faith effort to resolve requests in an efficient and timely manner, we recognize that some requests may take longer due to their complexity or the need to facilitate engagements with the Commission. Additionally, normal activities (e.g., utility employees taking PTO, medical, or family leave, and natural staff turnover) and fluctuating volumes of requests, could impact the timeline. These circumstances should be clearly communicated to the requester, along with a reasonable estimated time of completion.

Regardless, this suggested timeline is meant to set time-based goals and expectations for utilities when navigating this process. However, if timelines become extended, for reasons that are not—or are not demonstrably not similar to—the ones discussed above (e.g., total unexplained lack of communication at any point during process, inflexibility in scheduling meetings that can be a means to block progress, etc.), then the appeals process discussed in Section 4 should be used by the aggrieved party.⁴⁹

The Department concludes that Xcel’s revisions to the language surrounding the two-month timeline are unnecessary given the discussion in the Converge Report cited above. The Department disagrees that the two-month timeline is overly prescriptive.

The Department recommends the Commission deny Xcel’s modifications to the data request timeline.

E.2. Overall Implementation Schedule

Xcel proposes in its initial comments to include a revision to the Converge Report to include an implementation timeline following the issuance of the Commission’s Order on the Report and the Framework.⁵⁰ Implementation process was largely out of scope for the workgroup and the Report—Converge was tasked with proposing a framework for secure grid data sharing, not necessarily a full implementation roadmap for the rate-regulated utilities.

However, the implementation timeline is a matter that the Commission could address if it accepts the Converge Report and implements the Framework. However, the implementation timeline was not a noticed topic in this proceeding, so there has been little feedback on the issue thus far. The Department, as stated in initial comments, believes that the Converge Report and the Framework therein is consistent with the Commission’s February 2025 Order and is representative of the

⁴⁹ Id., at 19.

⁵⁰ Xcel Initial Comments, at 11.

workgroup process and participant feedback.⁵¹ Further, the Department believes that the Converge Report and the Framework represent a path forward—based in utility, developer, and regulatory collaboration—for the secure sharing of grid data to facilitate DER interconnection.⁵² Also, the evaluation process included with the framework and modified herein, allows for iteration on the process, if stakeholders determine updates are necessary.⁵³ As such, the Department concludes that the framework can and should be implemented. Given the scant record development on a reasonable implementation timeline, the Department is unconvinced that Xcel’s recommendation for at least a 12-month implementation timeframe is reasonable.

If the Commission accepts the Converge Report and implements the framework, the Department recommends the Commission require the rate-regulated utilities to file a compliance filing 60 days after the Commission Order in this proceeding to include a proposal for a reasonable implementation timeline for the approved framework.

E.3. Data Aggregation Risk

In its initial comments, MP stated it was concerned with data aggregation—specifically if large amounts of low-risk data were pooled together, it may raise security concerns.⁵⁴ The topic of aggregation was discussed in the GSWG, both as a lever that would decrease the risk level of data or as a possible indication that more protective measures need to be in place to allow secure sharing of the data. For example, the July 2025 session of the workgroup worked to define the risk levels of distribution data and the protection measures needed for each level.⁵⁵ When asked for feedback on the concepts and ideas presented through out the day relating to the three risk levels (high-, medium- and low-risk), participants agreed that the aggregation of low-risk data could move it into the medium-risk level.⁵⁶ The GSWG discussed protection measures for medium-risk data such as access controls, requestor vetting and training, or scrubbing/encryption of the data.⁵⁷ Further, the Department contends, that the internal tracking of data requests, that MP states it does,⁵⁸ at least partially mitigates the concern. MP’s internal tracking should illuminate a pattern of requests over time and allow the Company to reassess the risk-level of the data requested.

E.4. Alignment with the NARUC Playbook

In initial comments, the Joint Parties assert that “[t]he process undertaken in this docket and in the construction of the Draft Framework by Converge does not utilize every component of the NARUC Playbook.”⁵⁹ The Department reasserts that the Commission, in its February 2025 Order specified that

⁵¹ Department Initial Comments, at 7.

⁵² *Id.*, at 1.

⁵³ *Ibid.*

⁵⁴ MP initial Comments, at 5.

⁵⁵ Converge Report, Appendix A.

⁵⁶ *Id.*, at 42.

⁵⁷ *Id.*, at 31.

⁵⁸ MP initial comments, at 5.

⁵⁹ Joint Parties Initial Comments, at 23.

the use of the NARUC Playbook was to serve as a guide for the workgroup process, not a binding manual for the operations of the workgroup. The Commission’s February 2025 Order at Order Point 3:

The Commission approves use of the National Association of Regulatory Utility Commissioners (NARUC) Grid Data Sharing Playbook and Framework. The Commission clarifies that the NARUC Playbook and Framework are not a binding manual of operations for the workgroup.⁶⁰

E.5. Presumption of Openness

In initial comments, the Joint Parties support a “presumption of openness” and state that the Joint Parties disagree with the Converge Report’s presumption that grid data is “closed.”⁶¹

The Department disagrees that the Converge Report presumes all grid data is closed, or not shareable. The Department asserts, in contrast, that the purpose of this proceeding is to facilitate the sharing of grid data while balancing grid security risks. The Commission and parties throughout the history of the present docket have agreed that there are security risks to sharing non-public grid data to facilitate the interconnection of DER. From the Commission’s February 2025 Order:

The Commission initiated this docket in recognition of the longstanding tension between the need to provide adequate information to support the continued development of DER with the need to protect system security. Despite their different motivations and objectives, participants in this docket—and the workgroup supporting this docket—agree that a balance must be struck between access to distribution grid data and ensuring data security. To date, participants have developed a voluminous record in an effort to find consensus as to where, precisely, that balance may lie [internal citation removed].⁶²

The Commission has perpetually directed stakeholders to investigate the balance of grid security and data access. If the Commission had determined that there was no risk in sharing distribution grid data and that the data should be made public, it is the Department’s contention that the Workgroup would have been given entirely different priorities. The directive of the Commission was to create a framework for secured sharing of the minimum data necessary to facilitate DER interconnection.⁶³

E.6. Background Checks and Scoping Meetings

⁶⁰ February 2025 Order, at Order Point 3.

⁶¹ Joint Parties Initial Comments, at 26.

⁶² February 2025 Order, at 2.

⁶³ Id., at Order Point 4.

The Joint Parties recommend the Commission move background checks later in the data request process, as a potential protection measure when justified by the data requested.⁶⁴ The Joint Parties also request that the scoping meeting element of the data request process be made optional.⁶⁵

The Department contends that both the background check requirement and the scoping meeting requirement are important first-line access controls. Verifying the identity of a requestor and any potential security concerns relating to the requestor, before investigating whether the requested non-public data could be provided, is a logical step to balancing grid security with data access. Moving a background check to later in the process could also waste resources if the data requestor were to fail the background check after the utility has fully reviewed the application. Scoping meetings, between the utility and the requestor, are in place to ensure requestors are asking for data that fits the needs or business of the requestor, and if not, if there are alternatives that the utility could provide. The Department contends that scoping meetings could serve equally as an access control and a mitigation for potentially denied applications due to unclear requests or requests that do not seem to match the requestor's intent or business; *i.e.*, scoping meetings could allow the requestor to clarify a request.

The Department recommends the Commission deny the Joint Parties' recommendation to delay the requirements for background checks and to make scoping meetings optional.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the Converge Report, participation in the stakeholder workgroup, and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

- The Department recommends the Commission accept the Report and implement the framework therein.
- The Department recommends the Commission accept the use of the Grid Security Working Group to address informal complaints.
- The Department recommends the Commission delegate authority to the executive Secretary to issue a Notice of Comment Period following the third annual report in the present docket to determine if there are modifications needed to the Framework or the reporting metrics/cadence.

A. COST RECOVERY

- The Department recommends the Commission defer any decision on cost allocation and cost recovery to the appropriate proceeding.

B. DEA PROPOSAL

⁶⁴ Joint Parties Initial Comments, at 9.

⁶⁵ *Id.*, at 10.

- The Department recommends the Commission require all of the rate-regulated utilities to implement the grid data sharing framework.

C. APPEALS PROCESS

- The Department recommends the Commission direct the GSWG to develop a clearly defined dispute resolution process that addresses, at a minimum, the following:
 - Parties who will be involved in reviewing disputes,
 - The criteria parties will use to evaluate competing positions,
 - The procedural steps for elevating unresolved matters,⁶⁶ and
 - A dispute resolution timeline.⁶⁷
- The Department recommends the Commission deny the Joint Parties and Xcel's recommendation for the development of a list of requestable data and its risk level.

D. EVALUATION

- The Department recommends the Commission require annual reporting by each of the rate-regulated utilities in the current docket. The Department recommends the Commission adopt the following reporting metrics, as modified by the Joint Parties:
 - Total number of data requests per utility, per year.
 - Total number of fulfilled requests per utility, per year.
 - Total number of denied requests per utility, per year.
 - Total number of fulfilled and denied requests for each risk level (high-, medium-, and low-risk), per year.
 - Reasons why requests (if any) were denied, per year.
 - How many requests were brought to the GSWG for dispute resolution, with an explanation of why the dispute occurred (e.g., why request was denied, timeline of remediation efforts between the utility and requester, and statements of position and desired outcome by both the dispute initiator and responder), per year.
 - Average fulfillment time for requests per utility, per year.
 - List of requesters for the year from each utility, per year.
 - Any data breaches from requesters who have been given data that each utility knows of, per year, and any data breaches by the utility or utility contractors.
 - Average time to process data requests, broken down by risk level and topic area.
 - Appeals outcomes broken down by risk level and topic area.
- The Department recommends the Commission delegate authority to the Executive Secretary to issue a Notice of Comment Period following the annual report filings should parties raise concern during the 30-day negative check-off period.

⁶⁶ Xcel Initial Comments, at 17.

⁶⁷ Joint Parties Initial Comments, at 19-20.

E. OTHER ISSUES

- The Department recommends the Commission deny Xcel's modifications to the data request timeline.
- If the Commission accepts the Converge Report and implements the framework, the Department recommends the Commission require the rate-regulated utilities to file a compliance filing 60 days after the Commission Order in this proceeding to include a proposal for a reasonable implementation timeline for the approved framework.
- The Department recommends the Commission deny the Joint Parties' recommendation to delay the requirements for background checks and to make scoping meetings optional.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of people by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Reply Comments**

Docket No. E999/CI-20-800

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

/s/Sharon Ferguson

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