



Affects Members Of the Public?	<input checked="" type="checkbox"/>
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Department of Energy

Privacy Impact Assessment (PIA)

Guidance is provided in the template. See DOE Order 206.1, Department of Energy Privacy Program, Appendix A, Privacy Impact Assessments, for requirements and additional guidance for conducting a PIA: https://www.directives.doe.gov/directives-documents/200-series/0206.1-BOrder/@_images/file

Please complete form and return via email to Privacy@hq.doe.gov

No hand-written submissions will be accepted.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT

Date	10/14/2021	
Departmental Element & Site	Bonneville Power Administration Department of Energy	
Name of Information System or IT Project	Agency Enterprise Portal (AEP) Customer Portal	
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions	
New PIA <input checked="" type="checkbox"/>	This is a new PIA for an updated system (previously Customer Portal)	
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
Information System Owner	Yvette Gill JL – Supervisory IT Specialist	yrgill@bpa.gov Phone: 503-230-3947



MODULE I – PRIVACY NEEDS ASSESSMENT

Information Owner	Tara Mannhalter Lead Public Utilities Specialist	tdmannhalter@bpa.gov Phone: 503-230-4169
Local Privacy Act Officer	Candice D. Palen Privacy Act Officer	cdpalen@bpa.gov Phone: 503-230-5602
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi Information System Security Officer	hcchoi@bpa.gov Phone: 503-230-5397
Person Completing this Document	Oliver Rose Jr. Business Applications	oxrose@bpa.gov Phone:503-230-3616
Purpose of Information System or IT Project	<p>There are two existing sites that together make up the Agency Enterprise Portal (AEP) project. The first is the Enterprise Public Portal (EPP) at www.bpa.gov, the second is the Customer Portal (CP) at www.customerportal.bpa.gov.</p> <ul style="list-style-type: none"> • EPP - General publicly available content, structured and un-structured as well as two-way user submitted content (e.g. public comments and email signup forms). • CP - BPA's suite of Power and Transmission data (i.e. from Grid Modernization projects and APSC projects. Agency Metering System (AMS) replacement, Customer Billing Center (CBC) replacement, Energy Imbalance Market (EIM) Settlements, and Energy Efficiency replacement project, including other BPA external customer facing websites). <p>Goals of the project:</p> <ol style="list-style-type: none"> 1. Implement a configurable, scalable, secure and compliant web content management system with workflows, to better manage publishing BPA's suite of operational business data in a standard BPA Style format for general agency information (EPP) and customer operations (CP). The solution will contribute to improved CMMI Communication and Customer Capabilities and align with Enterprise Architecture's direction for future expansion. 2. The solution will replace the existing BPA.gov website and Customer Portal (CP) with a single Enterprise Public Portal (EPP) which has a migration path and pass-through capabilities to information from other systems which will preserve current state functionality and demonstrate a repeatable migration process for future expansion. 	



MODULE I – PRIVACY NEEDS ASSESSMENT

Addressing the future of EPP and CP supports BPA's Strategic Objectives in a number of ways. It will enhance the customer's experience and support BPA's responsiveness to customer needs by allowing customer access to data via automation, improving accuracy, and enhancing visibility. It will support BPA's ability to continuously evolve with market changes and improve commercial operations.

Customer Portal displays customer contract, billing, load and resource forecasting, customer account team information, Energy Imbalance Market documents, NERC reliability documents, metering information, and nomograms. This information is not stored on CP. It is displayed from upstream systems.

Customer Portal receives, displays and stores the following customer information from the Customer Data Management system: account name, account number, address, user names and user business email addresses, and BPA customer account team names and contact information. The user business email address then translates over to the user login ID in Customer Portal.

Type of Information Collected or Maintained by the System:

- SSN [Social Security number](#)
- Medical & Health Information [e.g. blood test results](#)
- Financial Information [e.g. credit card number](#)
- Clearance Information [e.g. "Q"](#)
- Biometric Information [e.g. finger print, retinal scan](#)
- Mother's Maiden Name
- DoB, Place of Birth
- Employment Information
- Criminal History
- Name, Phone, Address,
- Other – Please Specify – Name and business email address



MODULE I – PRIVACY NEEDS ASSESSMENT

<p>Has there been any attempt to verify PII does not exist on the system?</p> <p><i>DOE Order 206.1, Department of Energy Privacy Program, defines PII as any information collected or maintained by the Department about an individual, including but not limited to, education, financial transactions, medical history and criminal or employment history, and information that can be used to distinguish or trace an individual's identity, such as his/her name, Social Security number, date and place of birth, mother's maiden name, biometric data, and including any other personal information that is linked or linkable to a specific individual.</i></p>	<p>N/A. Non-sensitive PII is known to exist in the system.</p>
<p>If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)</p>	<p>N/A</p>
<p>Threshold Questions</p>	
<p>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</p>	<p>Yes</p>
<p>2. Is the information in identifiable form?</p>	<p>Yes</p>
<p>3. Is the information about individual Members of the Public?</p>	<p>Yes – BPA Customer Contact Information</p>
<p>4. Is the information about DOE or contractor employees?</p>	<p>Yes</p> <p><input checked="" type="checkbox"/> Federal Employees</p> <p><input checked="" type="checkbox"/> Contractor Employees</p>
<p>If the answer to <u>all</u> four (4) Threshold Questions is "No," you may proceed to the signature page of the PIA. Submit the completed PNA with signature page to the CPO.</p>	
<p>Module II must be completed for all systems if the answer to any of the four (4) threshold questions is "Yes." All questions must be completed. If appropriate, an answer of N/A may be entered.</p> <p>The goal of the threshold questions is to legitimately and efficiently determine whether additional assessment is necessary. If there is doubt, it is in the System Owner's best interest to complete Module II.</p> <p>PIAs affecting Members of the Public are posted on the DOE Privacy website. For this reason, PIAs affecting Members of the Public should be written in plain language and at a high level so they are easily understandable and do not disclose sensitive information.</p>	



MODULE I – PRIVACY NEEDS ASSESSMENT

END OF PRIVACY NEEDS ASSESSMENT

MODULE II – PII SYSTEMS & PROJECTS

AUTHORITY, IMPACT & NOTICE

<p>1. AUTHORITY</p> <p>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</p>	<p>Federal Power Act (16 U.S. Code), Sections:</p> <p>824o(c)(2)(D), (e)(4) (Electric reliability) 839b(e)(3)(d),(g) (NW regional planning and participation) 839c(b)(1),(g) (Sale of power; contracts) 839d(h) (Conseravation and resource acquisition; billing credits) 839e(d) (Rates)</p>
<p>2. CONSENT</p> <p>What opportunities do individuals have to decline to provide information (e.g. where providing information is voluntary) or to consent only to particular uses of the information (other than required or authorized uses)?</p>	<p>Customer Portal signup is strictly voluntary. If customers choose not to have a CP site, BPA customers can still get all the information they need from alternate sources. BPA employee contacts (customer account teams) are also displayed on CP. BPA contacts do not have an opportunity to consent.</p>
<p>3. CONTRACTS</p> <p>Are contractors involved with the design, development and maintenance of the system? If yes, was the Privacy Order CRD or Privacy Act clauses included in their contracts?</p>	<p>Yes, the system is a SaaS.</p> <p>The Privacy Clause is included in the Master Agreements with Contractor.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>4. IMPACT ANALYSIS: How does this project or information system impact privacy?</p>	<p>The Privacy Impact is LOW</p> <table border="1"> <thead> <tr> <th>Confidentiality Factors</th> <th>Low</th> <th>Moderate</th> <th>High</th> </tr> </thead> <tbody> <tr> <td>Identifiability</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Quantity of PII</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Data Field Sensitivity</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Context of Use</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Obligation to Protect Confidentiality</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Access to and Location of PII</td> <td>X</td> <td></td> <td></td> </tr> <tr> <td>Overall Privacy Risk</td> <td>X</td> <td></td> <td></td> </tr> </tbody> </table>	Confidentiality Factors	Low	Moderate	High	Identifiability	X			Quantity of PII		X		Data Field Sensitivity	X			Context of Use	X			Obligation to Protect Confidentiality	X			Access to and Location of PII	X			Overall Privacy Risk	X		
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<p>5. SORNs How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)? If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</p>	<p>The data is not retrieved by identifier in the regular course of business.</p>																																
<p>6. SORNs Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>? If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p>	<p>N/A</p>																																



MODULE II – PII SYSTEMS & PROJECTS

<p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>N/A</p>
<p>DATA SOURCES</p>	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>Customers provide the information directly to BPA and it is inputted into the Customer Data Management system, which feeds the Customer Portal. BPA customer account team assignments are also managed in the Customer Data Management system.</p> <p>In the future, customer contact information can come not only from the Customer Data Management system but also from the Customer's Customer Portal Admin who will now have the ability to manage their own Customer Portal users, electronically, within the AEP CP system. BPA CP Admins will have the ability to see all users in the system at any one time, when they have logged in, what pages they went to and what user permissions they have. BPA CP Admins will also be able to produce CP user reports containing this same information.</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>No, there is no aggregation of contact information currently. In the future the new system will have analytic capabilities to track user information (when logged in, where they went on the site, how long they stayed on the site, etc).</p>
<p>10. Are the data elements described in detail and documented?</p>	<p>Yes. The System Security Plan has the data elements and their confidentiality, integrity and availability thresholds outlined in detail.</p>
<p>DATA USE</p>	



MODULE II – PII SYSTEMS & PROJECTS

<p>11. How will the PII be used?</p>	<p>Customer business contact information is used internally by BPA Account Specialists and other roles who interact with customer personnel, as well as a validation method to enable access to CP.</p> <p>BPA customer account team information is used by the customer to know who to interact with at BPA.</p>
<p>12. If the system derives meta data, how will the new or meta data be used?</p> <p>Will the new or meta data be part of an individual's record?</p>	<p>The system does not derive meta data on individuals.</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>Customer contact information is not shared outside BPA with any other agency or outside entity.</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>User reports will be produced to track and record access and activity of customer users by the system information owner.</p>
<p>15. What will be the use of these reports?</p>	<p>This information will be used to improve customer satisfaction by providing targeted, useful, timely, accurate information that the customer needs to have available.</p> <p>Reports will also be used to manage and verify use of CP and monitor access of CP, pages visited and data consumed.</p> <p>In the future state, we will have capabilities about customer accounts (non-PII data) to identify users who have not logged in, how long they stayed on a page, what pages they visited, and other web analytical metrics.</p>
<p>16. Who will have access to these reports?</p>	<p>BPA Customer Portal Administrators</p>
<p>Monitoring</p>	



MODULE II – PII SYSTEMS & PROJECTS

<p>17. Will this information system provide the capability to identify, locate, and monitor individuals?</p>	<p>No</p>
<p>18. What kinds of information are collected as a function of the monitoring of individuals?</p>	<p>N/A</p>
<p>19. Are controls implemented to prevent unauthorized monitoring of individuals?</p>	<p>N/A</p>

DATA MANAGEMENT & MAINTENANCE

<p>20. How will records about individuals be kept current and verified for accuracy, relevance and completeness? Include PII data collected from sources other than DOE records.</p>	<p>Currently, the customer contact notifies BPA when customer business personnel changes occur and the CP customer contact data is updated by BPA Admins. There is no PII collected from any other source.</p> <p>In the future, within the new AEP system, all existing legacy CP users will automatically be set up in the new system with the existing user permissions they have today. Any additions, deletions or changes to these users will be managed by the Customer’s Customer Portal Admin. BPA’s CP Admins will be able to see all additions, deletions or changes to all users at any given time and will be able to run reports on user information. Any new customer that chooses to have a new CP site after AEP goes live must look to their designated Customer Portal Admin to create and manage users for their company’s new CP site in AEP.</p>
<p>21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?</p>	<p>The system is a hosted SaaS cloud solution.</p>

Records Management



MODULE II – PII SYSTEMS & PROJECTS

<p>22. Identify the record(s).</p>	<p>There are 6 families of data held in the Customer Portal.</p> <ol style="list-style-type: none"> 1. Customer profile information that includes Customer Account Team contact information, customer business contact information, business address information, business website information 2. Billing information. Bill summary information, actual pdf copy of the monthly bills. Customer Portal will retain up to 2 years of customer bills. 3. Contracts / Agreements. Contract summary information, actual pdf of the agreement/contact, exhibit, or amendment. 4. Meter information. Meter contract point information contained in the Exhibit E of the Regional Dialog Contract. Users can run reports within the system that will pull a copy of the metering information from the metering system. 5. Load Forecasting data. Ten years of load forecast information will be maintained in the Customer Portal. Load forecasts shall include series for Energy, Average MW, Non-Coincidental Peak, and Coincidental Peak. In addition, ten years of historical actual load data will be made available. 6. NERC reliability documents pertinent to customer's meeting their NERC reliability requirements will be displayed.
<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<p>N1-305-07-001-2a</p>
<p>24. Records Contact</p>	<p>IGLM@BPA.gov</p>
<p>ACCESS, SAFEGUARDS & SECURITY</p>	
<p>25. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>Users must use a unique name & password to access CP. BPA Customer Portal Administrators have configure role-based access control based on a customer's complete CP form and create distinct profiles to only allow access to their company information.</p>
<p>26. Who will have access to PII data?</p>	<p>BPA Customer Portal Administrators.</p>
<p>27. How is access to PII data determined?</p>	<p>CP is a secure-access system. Customer contact personnel are only able to view their company's contact information.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>Yes. Customer Portal is downstream and receives data from upstream systems that are internal to BPA. This includes Billing, Contracts, Customer Data, Load Forecasting, and Metering systems. No PII data is transferred into Customer Portal from these systems.</p>
<p>29. For connecting information systems, is there an Interconnection Security Agreement (ISA) or other agreement between System Owners to ensure the privacy of individuals is protected?</p>	<p>Yes, an ISA has been completed and added to the authorization package for the AEP.</p>
<p>30. Who is responsible for ensuring the authorized use of personal information?</p>	<p>CP Information Owner</p>

END OF MODULE II



SIGNATURE PAGE		
	Signature	Date
System Owner	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
Information Owner	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
Local Privacy Act Officer	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
Ken Hunt Chief Privacy Officer	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>



PRIVACY IMPACT ASSESSMENT: [JLSI – Agency Enterprise Portal - CP](#)
PIA Template Version 5 – August 2017

