



PRIVACY IMPACT ASSESSMENT: JLSI – IRAM/IRC
PIA Template Version 5 – August 2017

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	12/14/2022	
Departmental Element & Site	Department of Energy (DOE) Bonneville Power Administration (BPA) Portland, Oregon	
Name of Information System or IT Project	Agency Rate Case (Rate Case Site)	
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 existing system	
Update <input type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
System Owner	Yvette Gill (BPA) - JLS-3	yrgill@bpa.gov 503-230-3947
Information Owner	Chong Tim, Marcus H (BPA) - L-7	mhchongtim@bpa.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

		503-230-4083
Local Privacy Act Officer	Palen, Candice D (BPA) - CGI-7	cdpalen@bpa.gov 503-230-3602
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Choi, Nick (BPA) - JLS-3	hcchoi@bpa.gov 503-230-5397
Person Completing this Document	Oliver Rose Jr	oxrose@bpa.gov 503-230-3616
Purpose of Information System or IT Project	<p>The Rate Case Site (RCS) is a document management and control application for use in BPA Rate Cases. Official parties, the Hearing Officer, and the Rate Case Clerk use the secure area of the RCS to submit and access all discovery documents, including exhibits, data requests, data responses, motions, and orders.</p> <p>Members of the public who have a specific role in the rate case register with the application to submit documents or view secure areas of the RCS. Registration is not required for, and information is not collected on, members of the public who only use the system to view public records. Generally rate case records are public, except data requests and responses and certain other confidential or proprietary information.</p> <p>The system provides a public-facing user interface that lists all documents in each proceeding, which also provides filtering and search functions.</p> <p>The system collects email address, name, company, phone, and password for registered users, including members of the public.</p>	
Type of Information Collected or Maintained by the System:	<input type="checkbox"/> SSN Social Security number <input type="checkbox"/> Medical & Health Information e.g. blood test results <input type="checkbox"/> Financial Information e.g. credit card number <input type="checkbox"/> Clearance Information e.g. "Q" <input type="checkbox"/> Biometric Information e.g. finger print, retinal scan	



MODULE I – PRIVACY NEEDS ASSESSMENT

- Mother's Maiden Name
- DoB, Place of Birth
- Employment Information
- Criminal History
- Name
- Other – email, phone, company name, password

Has there been any attempt to verify PII does not exist on the system?

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.

N/A – the above PII listed exists on the system.

If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)

Threshold Questions

1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?

YES

2. Is the information in identifiable form?

YES

3. Is the information about individual Members of the Public?

YES

4. Is the information about DOE or contractor employees?

YES

Federal Employees

Contractor Employees

If the answer to all 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.



MODULE I – PRIVACY NEEDS ASSESSMENT

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.

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.

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.

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>Section 7i of the Northwest Power Act (16 USC 839e(i))</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>Users voluntarily provide their information to register an account.</p>



MODULE II – PII SYSTEMS & PROJECTS

3. CONTRACTS

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?

The Privacy Clause is included in the contract.

4. IMPACT ANALYSIS:

How does this project or information system impact privacy?

ARC is designed to protect PII and mitigate privacy risk via the following administrative, technical, and physical controls:

- Strict access control enforcement based on need-to-know

While ARC contains some PII, the ensuing risk to the privacy of individuals is generally low as the focus of ARC is to provide document management and control application for use in BPA Rate Cases. The Impact Rating is LOW

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		



MODULE II – PII SYSTEMS & PROJECTS

<p>5. SORNs</p> <p>How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?</p> <p>If yes, explain, and list the identifiers that will be used to retrieve information on the individual.</p>	<p>Data is not retrieved by identifier in the regular course of business.</p>
<p>6. SORNs</p> <p>Has a Privacy Act System of Records Notice (SORN) been published in the <i>Federal Register</i>?</p> <p>If "Yes," provide name of SORN and location in the <i>Federal Register</i>.</p>	<p>N/A</p>
<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>User accounts are created manually by a self-registration process. Administrator accounts used by IT are role-based using Active Directory groups within the Operating System.</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>No</p>
<p>10. Are the data elements described in detail and documented?</p>	<p>Yes, in the System Security Plan.</p>

DATA USE



MODULE II – PII SYSTEMS & PROJECTS

11. How will the PII be used?	Name and email address will be used to identify system users and for transaction logging.
12. If the system derives meta data, how will the new or meta data be used? Will the new or meta data be part of an individual's record?	N/A
13. With what other agencies or entities will an individual's information be shared?	None
Reports	
14. What kinds of reports are produced about individuals or contain an individual's data?	None
15. What will be the use of these reports?	N/A
16. Who will have access to these reports?	N/A
Monitoring	
17. Will this information system provide the capability to identify, locate, and monitor individuals?	No
18. What kinds of information are collected as a function of the monitoring of individuals?	N/A
19. Are controls implemented to prevent unauthorized monitoring of individuals?	N/A

DATA MANAGEMENT & MAINTENANCE



MODULE II – PII SYSTEMS & PROJECTS

<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>The user has access to update their phone number only. The BPA application administrator can change the name, phone number, email, and company. The BPA application administrator can also disable the account.</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>N/A</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>The main interface contains PDFs of filings, testimony, exhibits, motions, briefs, and ultimately a draft and final record of decision. The purpose is to conduct administrative law hearings/proceedings pursuant to Section 7i of the Northwest Power Act. The discovery interface is ancillary to this, containing PDFs and other formats such as Microsoft Office suite documents provided in response to data requests.</p>
<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<p>Rate Filings and Hearings - N1-305-07-001-3d Rate case final records of decision - N1-305-07-001-6e1</p> <p>Rate filings and hearings - PS-1400 - Destroy 50 years after the records are closed. Rate case final records of decision - LL-1500 - Destroy 50 years after the records are closed.</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 have to be approved by a BPA application administrator prior to using the system.</p> <p>ASP.NET core identity manager to manage user information and roles.</p> <p>These controls are outlined in the controls of the System Security Plan.</p>
<p>26. Who will have access to PII data?</p>	<p>System Administrators</p>



MODULE II – PII SYSTEMS & PROJECTS

27. How is access to PII data determined?	Access is restricted to administrators using role based permissions.
28. Do other information systems share data or have access to the data in the system? If yes, explain.	No
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?	N/A
30. Who is responsible for ensuring the authorized use of personal information?	The Information Owner.

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/>



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