



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](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](mailto:Privacy@hq.doe.gov)

No hand-written submissions will be accepted.

This template may not be modified.

## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Date</b>	01/04/2021	
<b>Departmental Element &amp; Site</b>	Department of Energy (DOE) Bonneville Power Administration (BPA) Portland, Oregon	
<b>Name of Information System or IT Project</b>	BPA Energy Efficiency Tracking System (BEETS)	
<b>Exhibit Project UID</b>	BPA is a Non-Appropriated Federal agency and is exempt from Exhibit 300 submissions	
<b>New PIA</b> <input checked="" type="checkbox"/>	This is a new PIA for a new SaaS system that replaces BPA internal system: Interim System 2.0 (previously a PNA)	
<b>Update</b> <input type="checkbox"/>		
	<b>Name, Title</b>	<b>Contact Information Phone, Email</b>
<b>Information System Owner</b>	Yvette Gill Supervisory IT Specialist	503-230-3947 yrgill@bpa.gov



## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Information Owner</b>	Jamae Hilliard Creecy VP, Energy Efficiency	503-230-3135 jlhilliard@bpa.gov
<b>Local Privacy Act Officer</b>	Candice Palen Privacy Act Officer	503-230-5602 <a href="mailto:cdpalen@bpa.gov">cdpalen@bpa.gov</a>
<b>Cyber Security Expert</b> reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi Information System Security Officer	503-230-5397 hcchoi@bpa.gov
<b>Person Completing this Document</b>	Adam Morse, Public Utilities Specialist (Product Owner) and Joe Lagerstrom, Project Manager	503-230-5722 <a href="mailto:armorse@bpa.gov">armorse@bpa.gov</a>  503-936-4166 JMLagerstrom@bpa.gov
<b>Purpose of Information System or IT Project</b>	<p>BPA Energy Efficiency Tracking System (BEETS) is used by Energy Efficiency staff/contractors and BPA utility customers to intake and process energy efficiency invoices from utility customers, calculate and validate energy efficiency savings, manage utility customer budgets, provide document management and storage, and pass information downstream to Finance for payment of the validated savings. The system will be accessible by both internal BPA users and Utility Customers.</p> <p>Documentation collected during the energy efficiency invoice review and oversight process sometimes contains non-sensitive PII regarding end-use electricity consumers. This PII (e.g. name, address, contact information) is often contained on receipts and invoices and forms that show the energy efficiency project/measures that are installed in a homeowner’s premise. This PII is not required by BPA and is not captured in data fields; it is captured on scanned paperwork uploaded by utility customers. BPA does not utilize or capture this information in a structured database, but it is not feasible to separate it from the information that is required for review, so it is present in the BEETS system.</p> <p>The system does collect login name and email addresses in data fields.</p>	
<b>Type of Information Collected or</b>	<input type="checkbox"/> SSN <a href="#">Social Security number</a>	



## MODULE I – PRIVACY NEEDS ASSESSMENT

<p><b>Maintained by the System:</b></p>	<p><input type="checkbox"/> Medical &amp; Health Information e.g. blood test results</p> <p><input type="checkbox"/> Financial Information e.g. credit card number</p> <p><input type="checkbox"/> Clearance Information e.g. "Q"</p> <p><input type="checkbox"/> Biometric Information e.g. finger print, retinal scan</p> <p><input type="checkbox"/> Mother's Maiden Name</p> <p><input type="checkbox"/> DoB, Place of Birth</p> <p><input type="checkbox"/> Employment Information</p> <p><input type="checkbox"/> Criminal History</p> <p><input checked="" type="checkbox"/> Name, Phone, Address. Some underlying end use customer/homeowner information may be passed along by the utilities in the form of unstructured data, such as scanned receipts and invoices, in documentation collected by the system. The data is not entered into structured databases but has the potential to be collected incidentally on supporting documents.</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Personal Contact Information (phone, email)</li> <li>• Personal Address</li> </ul> <p>Also, for user login, the new system will capture:</p> <ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Email Address</li> </ul>
<p><b>Has there been any attempt to verify PII does not exist on the system?</b></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 – PII is known to exist in the SaaS</p>
<p><b>If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)</b></p>	<p>N/A</p>



## MODULE I – PRIVACY NEEDS ASSESSMENT

### 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 <input checked="" type="checkbox"/> Federal Employees <input checked="" type="checkbox"/> 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 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



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>1. AUTHORITY</b></p> <p><b>What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?</b></p>	<p>The Bonneville Power Project Act provides administrative authority to contract to fulfill BPA’s mission.</p> <p>The Pacific Northwest Electric Power Planning and Conservation Act requires BPA to acquire resources through conservation and implement conservation measures (16 U.S. Code 839d(a))</p>
<p><b>2. CONSENT</b></p> <p><b>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)?</b></p>	<p>The end user consents to providing their information to the utility. BPA doesn’t require PII from the utility to process payments, but utilities will sometimes include PII on the documentation provided as part of their own requirements.</p>
<p><b>3. CONTRACTS</b></p> <p><b>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?</b></p>	<p>Yes, privacy clauses are in the contract with Applied Energy Group, Inc.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>4. IMPACT ANALYSIS:</b> How does this project or information system impact privacy?</p>	<p>The Privacy Impact Rating is Low.</p> <table border="1" data-bbox="625 422 1243 999"> <thead> <tr> <th>Privacy Impact Analysis</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>X</td> <td></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></td> <td>X</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><b>Overall Privacy Risk</b></td> <td><b>X</b></td> <td></td> <td></td> </tr> </tbody> </table>	Privacy Impact Analysis	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			<b>Overall Privacy Risk</b>	<b>X</b>		
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<p><b>5. SORNs</b> 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>Records are not retrieved by individual identifier in the regular course of business.</p>																																
<p><b>6. SORNs</b> 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><b>7. SORNs</b></p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>N/A</p>
<p><b>DATA SOURCES</b></p>	
<p><b>8. What are the sources of information about individuals in the information system or project?</b></p>	<p>Non-sensitive PII on scanned documentation provided via an upload in to the BEETS system. BPA’s utility customers upload the documentation for BPA review.</p> <p>The documentation will not be shared or transferred to any other systems.</p> <p>Login information is provided directly by the end users.</p>
<p><b>9. Will the information system derive new or meta data about an individual from the information collected?</b></p>	<p>No, the information is supplied in non-structured format (i.e. scanned documentation) and not utilized anywhere within the system or outside the system to derive any new data.</p>
<p><b>10. Are the data elements described in detail and documented?</b></p>	<p>The BEETS System Security Plan (SSP) contains this information.</p>
<p><b>DATA USE</b></p>	
<p><b>11. How will the PII be used?</b></p>	<p>BPA does not use this information. BPA requests that utility customers supply supporting documentation to validate the claims for payment they have reported to BPA. The nature of the documentation (e.g. receipts or invoices) sometimes contains non-sensitive PII about the end user where the energy efficiency measure was installed. To substantiate the claim from utility customers, BPA periodically performs oversight for audit purposes to ensure the claims are substantiated with adequate documentation to prove the measure claimed was accurate and not duplicative of a previous claim.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>12. If the system derives meta data, how will the new or meta data be used?</b></p> <p><b>Will the new or meta data be part of an individual's record?</b></p>	<p>N/A</p>
<p><b>13. With what other agencies or entities will an individual's information be shared?</b></p>	<p>BPA sometimes shares information with companies that BPA contracts with to perform analysis for BPA, such as third-party evaluators and regional nonprofits. The information shared can sometimes include PII in unstructured format (e.g., scanned receipts and forms provided by utilities). The PII could include the name of the customer submitting the documents and contact information, which could include the home address. This information has the potential to be found on scanned receipts or invoices that the customer provides.</p>
<p><b>Reports</b></p>	
<p><b>14. What kinds of reports are produced about individuals or contain an individual's data?</b></p>	<p>No reports are generated or necessary. In addition, the PII data is not collected in a structured format, therefore no reports can actually be generated with the information.</p>
<p><b>15. What will be the use of these reports?</b></p>	<p>N/A</p>
<p><b>16. Who will have access to these reports?</b></p>	<p>N/A</p>
<p><b>Monitoring</b></p>	
<p><b>17. Will this information system provide the capability to identify, locate, and monitor individuals?</b></p>	<p>No</p>
<p><b>18. What kinds of information are collected as a function of the monitoring of individuals?</b></p>	<p>N/A</p>
<p><b>19. Are controls implemented to prevent unauthorized monitoring of individuals?</b></p>	<p>N/A</p>





## MODULE II – PII SYSTEMS & PROJECTS

### DATA MANAGEMENT & MAINTENANCE

<p><b>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.</b></p>	<p>The non-sensitive PII is not deliberately collected and does not need to be maintained.</p>
<p><b>21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?</b></p>	<p>This system will be hosted in the Cloud as a Software-as-a-Service (SaaS).</p>
<p><b>Records Management</b></p>	
<p><b>22. Identify the record(s).</b></p>	<p>System will have both data and documents (PDF, Excel, Word, pictures, etc). The data includes records of Energy Efficiency projects and measures that have been implemented in the BPA region. The documents are supporting information that relates to the data as entered (e.g. such as a receipt showing what equipment was purchased/installed).</p>
<p><b>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</b></p>	<p>1) Records related to payment requests and vouchers:</p> <ul style="list-style-type: none"> <li>- DAA-GRS-2013-0003-0001</li> <li>- GRS 1.1, Item 010 / Retain for 6 years after final payment or cancellation and security</li> </ul> <p>Records related to EE projects and measures:</p> <ul style="list-style-type: none"> <li>- N1-305-07-13/b</li> <li>- Life of EE projects + 3 years.</li> </ul>
<p><b>24. Records Contact</b></p>	<p>IGLM@bpa.gov</p>
<p><b>ACCESS, SAFEGUARDS &amp; SECURITY</b></p>	
<p><b>25. What controls are in place to protect the data from unauthorized access, modification or use?</b></p>	<p>The Information System Owner has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with BPA's Cybersecurity Program Plan (CSPP) and DOE Directives.</p>



## MODULE II – PII SYSTEMS & PROJECTS

<b>26. Who will have access to PII data?</b>	Only authorized users will have access to limited PII information as approved by the Information Owner and delegates.
<b>27. How is access to PII data determined?</b>	Users will be provided access on a need-to-know basis by the Information Owner and delegates.
<b>28. Do other information systems share data or have access to the data in the system? If yes, explain.</b>	BEETS will send and receive data (payment voucher requests and expenditure information) from Financial Management System (FMS). BEETS is not integrated directly with any other system, and the data is only shared via file transfer.
<b>1. 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?</b>	Yes, an ISA is in place between BPA and the vendor for BEETS Applied Energy Group (AEG).
<b>2. Who is responsible for ensuring the authorized use of personal information?</b>	Information Owner.

**END OF MODULE II**



## SIGNATURE PAGE

	Signature	Date
<b>System Owner</b>	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
<b>Information Owner</b>	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
<b>Local Privacy Act Officer</b>	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>
<b>Chief Privacy Officer</b>	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>