



PRIVACY IMPACT ASSESSMENT: PE – Online Lighting Calculator
PIA Template Version 5 – August 2017

Affects Members Of the Public? **X**

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	October 31, 2024	
Departmental Element & Site	Bonneville Power Administration (BPA) HQ, 905 NE 11 th Ave, Portland, OR	
Name of Information System or IT Project	Online Lighting Calculator (OLC)	
Exhibit Project UID	BPA is a self-funded Federal agency and is exempt from Exhibit 300 submissions.	
New PIA Update	<input checked="" type="checkbox"/> <input type="checkbox"/>	This is a new PIA for Software as a Service that is replacing an Excel spreadsheet
	Name, Title	Contact Information Phone, Email
Information System Owner	Yvette Gill, JL Supervisory IT Specialist	503-230-3947 yrgill@bpa.gov
Information Owner	Dave Moody, PE Deputy Vice President, Energy Efficiency	503-230-7557 dfmoody@bpa.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Candice Palen, CGI Privacy Act Officer	503-230-3602 cdpalen@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi, JLS Information System Security Officer	503-230-5397 hcchoi@bpa.gov
Person Completing this Document	Hugh Fraser, JLP IT PMO	503-230-4459 hwfraser@bpa.gov
Purpose of Information System or IT Project	<p>The Online Lighting Calculator (OLC) is a Software as a Service (SaaS) solution to replace the Lighting Calculator (LC) which is a macro-enabled Microsoft Excel spreadsheet. Replacing this file with the OLC will improve BPA's cybersecurity posture. The Online Lighting Calculator (OLC) will help trade allies and utilities participate in energy efficiency programs by allowing them to enter information on energy efficiency lighting projects for reimbursement or incentives. The system produces data reports that are imported into the BPA Energy Efficiency Track System (BEETS) for processing. (BEETS is covered under a separate PNA and the information exported to BEETS is a subset of the OLC information and does not contain PII.)</p> <p>OLC is a website and mobile application that will allow electricians, contractors, utilities, etc. to enter lighting information about their energy-efficiency lighting projects in the field. That information is then processed and bundled from the client into the Hancock Cloud, which is a server hosted in Microsoft Azure's West Coast region.</p> <p>OLC collects the following personally identifiable information for specific groups. Trade allies: business name, business address, business point-of-contact first and last name, client business or project address, client business contact information. Utility users: business address information and business point-of-contact information. Project details: project location. User Profile: username/login name, full name, business email address, business address (optional), and business phone number (optional). Administrator: username/login name, full name, business email address, business address (optional), and business phone number (optional).</p> <p>BPA AIM ID # 1448</p>	
Type of Information Collected or	<input type="checkbox"/> SSN	



MODULE I – PRIVACY NEEDS ASSESSMENT

Maintained by the System:	<input type="checkbox"/> Medical & Health Information <input type="checkbox"/> Financial Information <input type="checkbox"/> Clearance Information <input type="checkbox"/> Biometric Information <input type="checkbox"/> Mother's Maiden Name <input type="checkbox"/> DoB, Place of Birth <input type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Business Email, Business Phone, Business Address <input type="checkbox"/> Other – Please Specify
Has there been any attempt to verify PII does not exist on the system? DOE Order 206.1, <i>Department of Energy Privacy Program</i> , 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 identified PII exists on the system.
If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)	N/A
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



MODULE I – PRIVACY NEEDS ASSESSMENT

- 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 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

1. AUTHORITY

What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?

The Bonneville Project Act of 1937, 16 U.S.C. § 832 and the Pacific Northwest Electric Power Planning and Conservation Act of 1980, 16 U.S.C § 839.



MODULE II – PII SYSTEMS & PROJECTS

<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>Existing trade allies will consent to inclusion in the new software. New trade allies will consent by entering their information in the system.</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 relevant privacy act clauses were included in the contract for the SaaS.</p>																																
<p>4. IMPACT ANALYSIS:</p> <p>How does this project or information system impact privacy?</p>	<p>BPA Privacy assesses the impact of the Online Lighting Calculator is LOW due to the efforts made to ensure low data field sensitivity of the collection.</p> <table border="1" data-bbox="623 1125 1481 1680"> <thead> <tr> <th>PII Factors</th> <th>Low</th> <th>Med</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 & Location of PII</td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Overall Privacy Risk Level</td> <td>X</td> <td></td> <td></td> </tr> </tbody> </table>	PII Factors	Low	Med	High	Identifiability	X			Quantity of PII	X			Data Field Sensitivity	X			Context of Use		X		Obligation to Protect Confidentiality	X			Access to & Location of PII		X		Overall Privacy Risk Level	X		
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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>User reports and audit reports will be restricted to BPA admin users, who can pull information on user accounts. Audit reports detail account level information, such as username, which are used to verify active users, disabled users, and other common administrative actions.</p> <p>It will not be possible for non-admin users to search the system by username, name, or other user profile information.</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>DOE-82: Grant and Contract Records for Research Projects, Science Education, and Related Activities</p> <p>DOE-18: Financial Accounting System</p>
<p>7. SORNs</p> <p>If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>No</p>
<p>DATA SOURCES</p>	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>Individuals provide their own business contact information and project location details (allies may be able to update their own info).</p> <p>Trade allies / utility users are expected to enter Client Business contact information, as well as a mailing address in case the project location is different from the client business address.</p> <p>BPA administrators are added via Roles in OLC, which is updated manually as needed.</p>
<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>No</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>10. Are the data elements described in detail and documented?</p>	<p>The OLC System Security Plan (SSP) contains this information.</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>BPA uses this information to audit claims submitted by utility customers. BPA requests that utility customers supply supporting documentation to validate the claims for payment they have reported to BPA. The nature of the documentation sometimes contains non-sensitive PII about the end user where the energy efficiency measure was installed, who supports it, who installed it, etc. 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>
<p>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?</p>	<p>N/A</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>The reviewing utility (utility authorizes the work and is responsible for paying the trade ally—trade ally info is included for auditing purposes to be good custodians of the governments funds).</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>User security report</p>
<p>15. What will be the use of these reports?</p>	<p>Managing user accounts.</p>
<p>16. Who will have access to these reports?</p>	<p>BPA Admin, OLC Admin</p>
<p>Monitoring</p>	



MODULE II – PII SYSTEMS & PROJECTS

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

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.	Records about users are maintained by Admin users who will update information as requested.
21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites?	N/A - system will be hosted in the Cloud as a Software-as-a-Service (SaaS).

Records Management

22. Identify the record(s).	The system contains data related to large scale energy efficiency lighting projects and ancillary data associated with such efforts such as watts, addresses, lighting types, installation date, support personnel, etc.
23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.	<p>Check appropriately and cite as required.</p> <p><input type="checkbox"/> Unscheduled <input checked="" type="checkbox"/> Scheduled (<i>cite NARA authority(ies) below</i>)</p> <p>N1-305-07-001-0013b EC-1200 Destroy 3 years after close of project.</p>
24. Records Contact	IGLM@bpa.gov

ACCESS, SAFEGUARDS & SECURITY



MODULE II – PII SYSTEMS & PROJECTS

25. What controls are in place to protect the data from unauthorized access, modification or use?	Role-based access control (RBAC) has been established and periodic review of accounts is being performed by the System Administrator as assigned by the Information Owner (IO).
26. Who will have access to PII data?	Only authorized users will have access to limited PII information as approved by the Information Owner and delegates.
27. How is access to PII data determined?	Users will be provided access on a need-to-know basis by the Information Owner and delegates.
28. Do other information systems share data or have access to the data in the system? If yes, explain.	OLC shares lighting project information with BPA's Energy Efficiency and Tracking System (BEETS) for processing. No other integrations are enabled.
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?	An ISA has been signed between BEETS's vendor Applied Energy Group (AEG) and OLC's vendor Hancock Software.
30. Who is responsible for ensuring the authorized use of personal information?	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/>