



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	08/11/2022
Departmental Element & Site	Bonneville Power Administration (BPA)
Name of Information System or IT Project	Transmission Asset System (TAS) (805) This PIA covers the following applications: TAS – Cascade (148) TAS - Cascade ODS (150) TAS - Cascade Viewer (1228) - DEV TAS – Cascade Integration Architecture (CIA) (175) TAS – Cascade Integration Layer (CIL) (176) TAS – Treeview (806) TAS – Cascade O&M Tool (149) (all numbers are internal system ID numbers)
Exhibit Project UID	BPA is a Non-Appropriated Federal agency and is exempt from Exhibit 300 submissions
New PIA <input checked="" type="checkbox"/>	This is a new PIA for an existing system



MODULE I – PRIVACY NEEDS ASSESSMENT

Update	<input type="checkbox"/>	
	Name, Title	Contact Information Phone, Email
Information System Owner	Yvette Gill Information System Owner	yrqill@bpa.gov 503-230-3947
Information Owner	Tim Kemper, TFAI Business Controls Supervisor	tjkemper@bpa.gov 360-418-8453
Local Privacy Act Officer	Candice Palen, CGI Privacy Act/FOIA Officer	cdpalen@bpa.gov 503-230-7303
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi, JLS Information System Security Officer	hcchoi@bpa.gov 503-230-5397
Person Completing this Document	Marian Waggener, JLST, 123 Supervisory IT Specialist	mawaggener@bpa.gov 360.619.6866
Purpose of Information System or IT Project	<p>Transmission Asset System (TAS) provides a unified transmission asset register supporting asset health determination. The application includes a mobile component, making the information available to Transmission Field workers in a disconnected state.</p> <p>TAS is a software system identified by the Enterprise Process Improvement Program (EPIP) as one of the Agency's top process improvement opportunities. As the name implies, TAS is used to better manage BPA's transmission assets. An asset is anything that Transmission owns, operates, inspects and/or maintains including breakers, relays, lines, towers, vegetation, communication, right of way, tools/work equipment, facilities and mobile equipment.</p> <p>The system will serve as the transmission business unit's centralized data store or "asset inventory" by providing improved access to, and analysis of, transmission infrastructure data through a common tool. TAS is a "one stop shop" for data (e.g. nameplate information, asset condition, outage history and historical maintenance costs). TAS is capable of storing and tracking assets as well as a place where staff can view data on asset condition.</p>	



MODULE I – PRIVACY NEEDS ASSESSMENT

TAS will provide a framework for asset health determination that will be used in developing and modifying asset maintenance plans and support decisions to repair, replace or retire specific assets. The system collects the following PII which is used to track and assign work: Employee Name, HRMIS ID, BPA Email address. Some public landowner information is collected by TLM linemen during inspections and is used as necessary to gain access while performing routine inspections and/or maintenance.

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
- Other – Please Specify Employee type,
 - Employee email address
 - HRMIS ID
 - Employee BUD ID
 - Landowner names and telephone numbers (members of the public) related to Restrictions & Directions related for BPA-maintained Right-of-Way (ROW).

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

No – the system contains PII.



MODULE I – PRIVACY NEEDS ASSESSMENT

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.

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

Notes captured in Cascade inspections about Restrictions and Directions associated with the transmission Right Of Ways (ROW) may include information about accessing the ROW, such as land owner names and telephone numbers.

4. Is the information about DOE or contractor employees?

- 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.



MODULE I – PRIVACY NEEDS ASSESSMENT

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 Transmission Asset System is authorized by the Department of Energy Authorization Act, 42 U.S.C. Sec. 7101, et seq. and the Bonneville Power Project: Administrative Authority to Contract, 16 U.S.C. Sec. 832a(f), 839f(a).

2. CONSENT

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)?

Employee Name and Employee BUD ID are required to establish an Employee Record and User definition within Cascade. If a user declines to provide the information a Cascade user account cannot be established.

Information about land owners (restrictions and directions associated with the ROW) is gathered directly from the land owner and captured in the Notes and used by linemen to capture anything they need to be aware of for inspecting the ROW. For example, directions, addresses, phone numbers, code to open a gate, etc. Land owners can decline to provide information at the time of contact.



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?

Contractors are involved in all aspects of the system. Privacy Act clauses are included in BPA IT supplemental labor pool contracts and the Digital Inspections master contract.

4. IMPACT ANALYSIS:

How does this project or information system impact privacy?

The overall privacy impact is moderate.

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		

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.

Yes, PII can be retrieved by using a variety of applications within Cascade, including the “Employee” feature, by using the individual’s name. Any other application that produces the individual’s name, such as MXOrder or MXHistory can then also trace back to additional employee information. However, PII is not retrieved by employee identifier in the regular course of business.



MODULE II – PII SYSTEMS & PROJECTS

<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>Information is provided to TAS from HRMIS using the "People Web Service" or manually by users when setting up accounts.</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 – the data elements are described in detail in the vendor (Digital Inspections) ERD diagram.</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>The information will be used to track work done, including who did the work.</p> <p>Information about land owners (restrictions and directions associated with the ROW) is captured in the Notes by linemen and used by linemen for inspecting the right-of-way. For example, directions, addresses, phone numbers, code to open a gate, etc.</p>



MODULE II – PII SYSTEMS & PROJECTS

<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>N/A</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>None</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>No reports are specifically produced about individuals. However, some reports about work done contain limited data about individuals, like name.</p>
<p>15. What will be the use of these reports?</p>	<p>To track costs associated with specific work orders or pieces of equipment.</p>
<p>16. Who will have access to these reports?</p>	<ul style="list-style-type: none"> • Accountants and financial analysts and managers • Transmission design engineers • Transmission crews and technicians • Facilities personnel • Planners and performance managers • Program managers and technical engineers • Transmission and corporate asset analysts and managers
<p>Monitoring</p>	
<p>17. Will this information system provide the capability to identify, locate, and monitor individuals?</p>	<p>This system cannot be used to track or monitor individuals.</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>



MODULE II – PII SYSTEMS & PROJECTS

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>The Transmission Asset System will have a daily update from other BPA systems of record, using the “People Web Service”.</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 information will be stored in a consolidated database. Remote workstations and computing devices will use MobiLink replication to synchronize remote databases with the central database. The remote devices are planned to synchronize daily, but it is expected some remote users may synchronize somewhat less often.</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>Transmission asset maintenance and maintenance history</p>
<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<p>N1-305-07-001-11b FE-1200 - Destroy 5 years after the records are closed, approved, submitted, or become inactive.</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>Only authorized BPA network accounts can access the system. The system implements role-based access control Access to the system is allowed only after a Manager’s approval and after training has been completed. Users are assigned to Security roles that grant access only to areas of the application that are required for their job duties. User access is automatically revoked when a BUD account becomes inactive.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>26. Who will have access to PII data?</p>	<p>All Security roles have access to Employee Name and BUD IDs. Access to HRMIS id is limited to Admins of the system.</p> <p>Access to the Land Owner information is limited to Admins of the system and the TLM Users.</p>
<p>27. How is access to PII data determined?</p>	<p>All authorized users of the system will have access to all data.</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>TAS will acquire work order information from Asset Suite. TAS will acquire asset information from Asset Suite and Transmission Line Design Database (TLDD).</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>N/A. TAS is only connected to systems which are all under the authority of the same authorizing official.</p>
<p>30. Who is responsible for ensuring the authorized use of personal information?</p>	<p>TAS Information Owner (IO).</p>

END OF MODULE II



SIGNATURE PAGE		
	Signature	Date
Information 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/>