



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**

<b>Date</b>	July 6, 2023	
<b>Departmental Element &amp; Site</b>	Bonneville Power Administration Headquarters, 905 NE 11 <sup>th</sup> Ave, Portland OR	
<b>Name of Information System or IT Project</b>	TariffShark Tiger	
<b>Exhibit Project UID</b>	BPA is a self-funded Federal Agency and is exempt from Exhibit 300 submissions.	
<b>New PIA</b> <input checked="" type="checkbox"/>	New	
<b>Update</b> <input type="checkbox"/>		
	<b>Name, Title</b>	<b>Contact Information Phone, Email</b>
<b>Information System Owner</b>	Yvette Gill, JL Supervisory IT Specialist	503-230-3947 yrgill@bpa.gov
<b>Information Owner</b>	Sarah Kutil, LT Supervisory Attorney – Adviser (General)	503-230-5374 smkutil@bpa.gov



## MODULE I – PRIVACY NEEDS ASSESSMENT

<b>Local Privacy Act Officer</b>	Candice Palen Privacy Act Officer	503-230-5602 cdpalen@bpa.gov
<b>Cyber Security Expert</b> reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi ISSO	503-230-5397 hcchoi@bpa.gov
<b>Person Completing this Document</b>	Christian Griffen, LT Paralegal Specialist	503-230-5107 cwgriffen@bpa.gov
<b>Purpose of Information System or IT Project</b>	<p>Statutes and Federal Energy Regulatory Commission (FERC) rules require BPA to produce administrative records in rate proceedings. TariffShark is an e-tariff management software solution that generates compliant XML-tagged zip packages in a hosted environment.</p> <p>TariffShark is used to package BPA’s public administrative records according to a prescribed XML schema for submission to FERC.</p> <p>The primary repository for the documents is <a href="http://ratecase.bpa.gov">http://ratecase.bpa.gov</a>. All documents are public documents and no new data is collected, with the exception of the Transmittal Letter for FERC (a public legal document outlining the contents of the submission). The TariffShark client facilitates uploading all documents for XML tagging, and then produces one or more .zip file(s) for the user to upload to FERC using FERC’s e-Tariff interface. The system is only used during an active rate case, and currently has just one active user.</p> <p>The user profile contains BPA email address and self-selected user name.</p> <p>Packages uploaded to the system include briefs, motions, testimony, and orders from rate proceedings. The packages include names, phone numbers, and some qualification statements (background showing witness qualifications) collected via the BPA rate case site. Information is not searchable by name.</p> <p>Packages also include Transmittal Letters to FERC, with attachments showing the signing attorney’s name and work contact information.</p>	
<b>Type of Information Collected or Maintained by the System:</b>	<input type="checkbox"/> SSN <input type="checkbox"/> Medical & Health Information <input type="checkbox"/> Financial Information	



## MODULE I – PRIVACY NEEDS ASSESSMENT

	<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 checked="" type="checkbox"/> Employment Information (witness testimony may include some background information, not searchable by name) <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, e-mail address (package documents include name and phone number, user profile contains e-mail address) <input checked="" type="checkbox"/> Other – user profile contains a unique user name
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<p><b>Has there been any attempt to verify PII does not exist on the system?</b>          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.</p>	N/A
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<p><b>If “Yes,” what method was used to verify the system did not contain PII? (e.g. system scan)</b></p>	Non-sensitive PII is stored on the system.
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### Threshold Questions

<p><b>1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?</b></p>	Yes
<p><b>2. Is the information in identifiable form?</b></p>	Yes
<p><b>3. Is the information about individual Members of the Public?</b></p>	Yes
<p><b>4. Is the information about DOE or contractor employees?</b></p>	<input checked="" type="checkbox"/> Federal Employees <input type="checkbox"/> Contractor Employees



## MODULE I – PRIVACY NEEDS ASSESSMENT

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?**

Section 7i of the Northwest Power Act (16 USC 839e(i))



## MODULE II – PII SYSTEMS & PROJECTS

<p><b>2. CONSENT</b></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>Administrative users provide information as a job requirement. People involved with the rate case provide their information as a prerequisite to provide testimony or documentation to the rate case.</p>																																
<p><b>3. CONTRACTS</b></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>The required Privacy clauses are included in the contract.</p>																																
<p><b>4. IMPACT ANALYSIS:</b></p> <p>How does this project or information system impact privacy?</p>	<p>The Impact Rating is LOW</p> <table border="1" data-bbox="625 1066 1243 1623"> <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>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>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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## MODULE II – PII SYSTEMS & PROJECTS

<p><b>5. SORNs</b></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><b>6. SORNs</b></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><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>

### DATA SOURCES

<p><b>8. What are the sources of information about individuals in the information system or project?</b></p>	<p>User accounts are manually created. Documents added to the system are manually uploaded.</p>
<p><b>9. Will the information system derive new or meta data about an individual from the information collected?</b></p>	<p>No</p>
<p><b>10. Are the data elements described in detail and documented?</b></p>	<p>In the System Security Plan.</p>

### DATA USE



## MODULE II – PII SYSTEMS & PROJECTS

11. How will the PII be used?	User ID and email address are used for transaction logging and access.
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
<b>Reports</b>	
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
<b>Monitoring</b>	
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><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>System Administrator will review profiles and update annually (currently only one profile in the system).</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>N/A</p>
<p><b>Records Management</b></p>	
<p><b>22. Identify the record(s).</b></p>	<p>Administrative records of rate proceedings from BPA ratecase site (ratecase.bpa.gov), which are public legal documents including studies, documentation, exhibits, briefs, orders, and motions. Additionally, a Transmittal letter with attachments to describe the submission for FERC.</p>
<p><b>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</b></p>	<p>Check appropriately and cite as required.  <input type="checkbox"/> Unscheduled <input checked="" type="checkbox"/> Scheduled (cite NARA authority(ies) below)            N1-305-07-001-3b; PS-1200            Destroy 5 years after the records are closed.</p>
<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>Controls are outlined in the controls of the System Security Plan.</p>
<p><b>26. Who will have access to PII data?</b></p>	<p>System Administrator</p>
<p><b>27. How is access to PII data determined?</b></p>	<p>Access is restricted to only System Administrator.</p>





## MODULE II – PII SYSTEMS & PROJECTS

<b>28. Do other information systems share data or have access to the data in the system? If yes, explain.</b>	No
<b>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?</b>	N/A
<b>30. Who is responsible for ensuring the authorized use of personal information?</b>	The 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>DOE Chief Privacy Officer</b>	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>