



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	3/20/2024	
Departmental Element & Site	EE - Office of Energy Efficiency and Renewable Energy	
Name of Information System or IT Project	Interconnection Innovation e-Xchange (i2X) stakeholder online community, aka “i2X Connect”. (To be established using <u>Open Social</u> Drupal distribution on a DOE’s server mirroring energy.gov)	
Exhibit Project UID	019-000000141	
New PIA	<input checked="" type="checkbox"/>	
Update	<input type="checkbox"/>	
	Name, Title	Contact Information Phone, Email
System Owner	Garrett Nilsen, Acting Director	(202) 287-1676 Garrett.Nilsen@ee.doe.gov



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Local Privacy Act Officer	Shaida Beklik	(202) 586-4769 Shaida.Beklik@ee.doe.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Shaida Beklik.	(202) 586-4769 Shaida.Beklik@ee.doe.gov
Person Completing this Document	Susanna Murley, Strategic Engagements, Lead	202.695.4535 Susanna.murley@ee.doe.gov
Purpose of Information System or IT Project	<p>The i2X program is a multi-year multi-office effort designed to bring together hundreds of organizations across the electricity ecosystem to enable simpler, faster, and fairer interconnection processes for distribution energy resources (DER) and bulk power system (BPS). The program is designed as an open collaboration among utilities, grid operators, state and local governments, clean energy industry, energy justice groups, non-profits, and others to share and exchange ideas and know-how while facilitating the implementation of new solutions to improve interconnection procedures within the next five years and beyond leading to a decarbonized electricity system by 2035. Right now, the only way to collaborate is through the use of scheduled webinars, which creates challenges when people are unable to attend. Open dialogue amongst all stakeholders is critical to the success of this program.</p> <p>The features of the program’s website at www.energy.gov/i2X. <u>By nature, the website is only able to</u> offer one-way communication and content sharing from EERE to the i2X stakeholders. The features of DOE’s current website do not facilitate ongoing peer-learning, ideation, and solution exchange among professionals in key organizations, who expressed interest to engage each other key topics related to interconnection. The i2X program stakeholders repeatedly expressed the need for an online community of practice for interconnection-related issues to be facilitated by an objective and trusted public organization such as EERE. Open Social, a Drupal add-on that is hosted on DOE’s server, offers the features needed for this collaboration to be inclusive and effective.</p>	
Type of Information Collected or Maintained by the System:	<p>An interconnection stakeholder, using their company/organization email address, may create a login and password to join the i2X Connect online community. Once approved by EERE, users may log into the system and can voluntarily post content pertaining to six areas of interest for other authenticated users to view. These interconnection stakeholders can also message each other and post articles about areas of interest. Users are not required to share any information or post any content to use the online community and benefit from the resources it offers.</p>	



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- 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 (see note below)
- Criminal History
- Name, Phone, Address (only Name and Phone are maintained in the system; these are optional fields once the user has already registered that can be filled out on their user profile)
- Other – Please Specify

The only employment information collected pertains to the domain of the email address with which a user registers.

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.

NO –Limited “business-card” type PII is expected, such as a person's name, job title, and affiliated company/organization. Other information a user may provide is related to technical areas of interests about interconnection and electricity markets.

Wif “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. The system may contain or maintain information about



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	<p>individuals. Users have the option to provide information on a personal profile. The fields in which they can enter information are:</p> <ul style="list-style-type: none"> • First Name • Last Name • Profile Image • Job Title • Organization • Phone Number • Summary of Expertise • Self Introduction • Areas of Interest
<p>2. Is the information in identifiable form?</p>	<p>YES</p>
<p>3. Is the information about individual Members of the Public?</p>	<p>YES. Individual members of the public in their professional capacity and as representatives of their organizations (e.g. utilities, grid operators, state governments, businesses, academic institutions)</p>
<p>4. Is the information about DOE or contractor employees?</p>	<p><input type="checkbox"/> Federal Employees <input type="checkbox"/> Contractor Employees</p>

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.



MODULE I – PRIVACY NEEDS ASSESSMENT

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>Energy Act of 2020, Section 3004(b)(2)</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>Participation is voluntary. Individual personal information is optional. There are no penalties for refusing to provide contact information. Providing information here facilitates engagement with others and may reduce future burdens or inconveniences individuals or organizations may encounter while engaging each other online part of topical technical working groups or discussion boards.</p> <p>The system will note the necessary disclaimer language before users sign up to the join the online community. Users can delete their accounts and the posted content.</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 Privacy Act clauses were included in these contracts. These contracts include the following:</p> <ul style="list-style-type: none"> • 52.224-1- Privacy Notification, 52.224-2 Privacy Act • 52.239-1 – Privacy or Security Safeguards <p>All contractors involved in the design, development, and maintenance of the system are required to adhere to DOE Privacy Orders per stated requirements in their current support contracts.</p>



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<p>4. IMPACT ANALYSIS: How does this project or information system impact privacy?</p>	<p>The impact on individual privacy is minimal. The system does not collect specific individual information. The system may have information that individuals post on the platform such as name, contact information, employer, areas of interest. The content a user shares is the type of information collected during public events, meetings or conferences.</p>
<p>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.</p>	<p>Data will be retrieved based on areas of interest, profession, and user activities (e.g. posts or comments, likes). Although the system does allow for searches of PII, specifically and only username, username searches will not be regularly used to retrieve information.</p>
<p>6. SORNs 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>Yes, DOE-82 Grant and Contractor Records for Research Projects, Science Education and Related Activities</p>
<p>7. SORNs If the information system is being modified, will the SORN(s) require amendment or revision?</p>	<p>This is a new form but is collecting standard public-engagement information that is covered by existing SORNs.</p>
<p>DATA SOURCES</p>	
<p>8. What are the sources of information about individuals in the information system or project?</p>	<p>The data will be sourced from individuals directly. No other sources will be used.</p>



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<p>9. Will the information system derive new or meta data about an individual from the information collected?</p>	<p>No, there are no system meta data or aggregation efforts to derive more information on each individual other than what was originally provided.</p>
<p>10. Are the data elements described in detail and documented?</p>	<p>Yes, the intake form itself will serve to document the small number (5-10) of data elements collected</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>The information will be used support public engagement through planning, communicating, coordinating, and managing topical working groups, meetings, and collaborative activities. Topical interests that individual express on behalf of their organizations may be used to plan, organize, communicate, manage working groups, meetings, and collaborative activities throughout the life of the program.</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>The system will not derive meta data.</p>
<p>13. With what other agencies or entities will an individual's information be shared?</p>	<p>An individual's information will not be shared with an outside agency or entity that has no contract or agreement with DOE.</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>No plans to produce reports about individuals' activities on the system. Data about aggregate user activities such as most liked post or most popular messaging board or working group may be produced to evaluate programmatic priorities such as focused outreach effort or technical assistance.</p>
<p>15. What will be the use of these reports?</p>	<p>Aggregate user activity report may be used to evaluate the program's priorities and new topics or interests or research.</p>



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<p>16. Who will have access to these reports?</p>	<p>DOE staff and supporting contractors working on the i2X program</p>
<p>Monitoring</p>	
<p>17. Will this information system provide the capability to identify, locate, and monitor individuals?</p>	<p>No. The system has no ability to identify, locate or monitor individuals. The system does not require a user to create an account using a business mail account that can identify the individual through online public records. Users may choose to self-identify and provide information about workplace and contact information.</p>
<p>18. What kinds of information are collected as a function of the monitoring of individuals?</p>	<p>There is no information collected to monitor individuals. This is not applicable.</p>
<p>19. Are controls implemented to prevent unauthorized monitoring of individuals?</p>	<p>The system has no monitoring capabilities. This is not applicable.</p>
<p>DATA MANAGEMENT & MAINTENANCE</p>	
<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 original individual-provided information will not be verified.</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 system is operated on a single site.</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>Email address and password. Voluntarily posted content for users to view such as name, contact information, employer information, and areas of interests. Users posted messages and posted articles about employee, and areas of interests.</p>



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<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<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> <ul style="list-style-type: none"> System Access Files GRS 3.2, item 30 (DAA-GRS-2013-0006-0003) Temporary. DOE Business Use: Destroy 1 year after system access terminated. <p><input checked="" type="checkbox"/> Unscheduled</p> <ul style="list-style-type: none"> Messaging and Collaboration Records About Administrative Topics. Temporary. Destroy after 5 years.
<p>24. Records Contact</p>	<p>Tia Alexander Tia.Alexander@ee.doe.gov 202-586-3135</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>Access to the system administrative features is restricted to a limited number of DOE staff. User-generated content is available on the system for all registered user that login to the system and such.</p>
<p>26. Who will have access to PII data?</p>	<p>List Roles Only DOE staff as assigned by DOE federal office directors or managers. The roles of staff who will have access to the information systems are:</p> <ul style="list-style-type: none"> System admin(s) with rights to add, update, and remove records. System users (EERE program staff and contractors) who have been assigned rights to view and use aggregate user activity reports for program updates to DOE management and to evaluate program priorities.
<p>27. How is access to PII data determined?</p>	<p>Authorized users will have access to all the data on the system as necessary to plan, coordinate, communicate, and manage the online platform</p>



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<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>No. This system does not share with other system. This system is not accessible by other systems.</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>This system is not connected with other systems.</p>
<p>30. Who is responsible for ensuring the authorized use of personal information?</p>	<p>System Owner Cyber Security Program Manager</p>

END OF MODULE II



SIGNATURE PAGE		
	Signature	Date
System 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/>
<i>Ken Hunt</i> Chief Privacy Officer	<hr/> <p>(Print Name)</p> <hr/> <p>(Signature)</p>	<hr/>