



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	05/18/2022	
Departmental Element & Site	Bonneville Power Administration Headquarters, Portland, Oregon	
Name of Information System or IT Project	Customer Data Management (CDM) & Central Mailing List System (CMLS) BAE-GSS	
Exhibit Project UID	BPA is a Non-Appropriated Federal agency and is exempt from Exhibit 300 submissions.	
New PIA <input type="checkbox"/>	This is an updated PIA for an existing system.	
Update <input checked="" type="checkbox"/>		
	Name, Title	Contact Information Phone, Email
System Owner	Yvette Gill Supervisory IT Specialist; JL	503-230-3947 YRGill@bpa.gov
Information Owner (CDM)	Jamie Sims, KSC-4 Supervisory Public Utilities Specialist	(503) 230-3886 jtsims@bpa.gov
Co-Information Owner (CMLS)	Trent Keffer, NWPP-B1 Supervisory Management Analyst	(503) 230-3204 takeffer@bpa.gov



MODULE I – PRIVACY NEEDS ASSESSMENT

Local Privacy Act Officer	Candice Palen, CGI FOIA/Privacy Act Officer	503-230-3602 cdpalen@bpa.gov
Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.)	Nick Choi, JS Information System Security Officer	(503) 230-5397 hcchoi@bpa.gov
Person Completing this Document	Alex Singharaj, JSC IT Specialist Justin Steel, JLSC Supervisory IT Specialist	(503) 230-4322 asingharaj@bpa.gov 503-230-3854 jasteel@bpa.gov
Purpose of Information System or IT Project	<p>CDM The Customer Data Management system is designed to consolidate BPA’s customer information/data into one database and build business processes to support the maintenance and accuracy of the information. The system provides basic demographic business information regarding utility customer relationships with industry associations.</p> <p>CDM collects name and work contact information (email, phone, address, fax) for employees, contractors, and members of the public.</p> <p>CDM is used primarily by organization KSC.</p> <p>CMLS Central Mailing List System is a component of CDM that consists of two main information categories:</p> <ul style="list-style-type: none"> • Internal contacts (employees and contractors) – stores names, work place addresses, physical building and floor location, job title, and duty station. • External contacts (Customers, industry groups, interested parties, etc.) – stores names, job titles, physical mailing addresses, and email addresses. <p>CLMS is used primarily by organization NWPP.</p>	
Type of Information Collected or Maintained by the System:	<input type="checkbox"/> SSN Social Security number <input type="checkbox"/> Medical & Health Information e.g. blood test results <input type="checkbox"/> Financial Information e.g. credit card number <input type="checkbox"/> Clearance Information e.g. "Q" <input type="checkbox"/> Biometric Information e.g. finger print, retinal scan <input type="checkbox"/> Mother’s Maiden Name	



MODULE I – PRIVACY NEEDS ASSESSMENT

- DoB, Place of Birth
- Employment Information
- Criminal History
- CDM:** Name, work phone, physical work address, work email address, revenue analyst, meter analyst, BPA customer account team, fax numbers for employees, contractors, and members of the public (utility customer points of contact)
- CMLS:** Name, work phone, physical work address, work email address, fax numbers for employees, contractors, and members of the public.
- Other – Please Specify

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.

Yes, the above-listed PII is known to exist in the system.

If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)

Direct review of database and system information during the system upgrade and migration.

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?

- 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.



MODULE I – PRIVACY NEEDS ASSESSMENT

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 Power Project Act provides administrative authority to contract to fulfill Bonneville Power Administration’s mission. (See 16 U.S.C. § 832a(f); 16 U.S.C. § 839f(a)).



MODULE II – PII SYSTEMS & PROJECTS

<p>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)?</p>	<p>CDM: When a customer wants to do business with BPA, they fill out a form that includes their name, phone number, address and associated contact information. As the relationship evolves, additional contacts (name, email, phone number, fax, address) are added under the customer as they provide them over the phone, email, in person or other means of contact with BPA.</p> <p>This information is maintained manually by the users of CDM, primarily the data stewards or account executives of the customer.</p> <p>There is no opt-in or out form.</p> <p>Note: CDM no longer collects the SSN from customer accounts that have an accounts payable due to BPA. In addition, historical SSN has also been deleted from CDM.</p> <p>CMLS: Federal and Contract personnel cannot opt out. All external contacts doing business with BPA must provide basic information to facilitate communications.</p>
<p>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?</p>	<p>Yes, contractors are involved with the project and system development.</p> <p>Yes, all of BPA’s supplemental labor contracts involving contractor access to BPA records contain a clause that requires contractors to comply with the Privacy Act per BPA Purchasing Instructions Clause 23-4.</p>



MODULE II – PII SYSTEMS & PROJECTS

<p>4. IMPACT ANALYSIS: How does this project or information system impact privacy?</p>	The Privacy Impact Rating is LOW			
	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			
<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>	Data is retrieved in the regular course of business by customer information (e.g., by customer ID number, which corresponds to a business, not an individual; and by customer business name), not by personal identifier.			
<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>	N/A			



MODULE II – PII SYSTEMS & PROJECTS

<p>7. SORNs 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>CDM: Manual entry via the data stewards who are spread across the agency (marketers, power, transmission, sales, energy efficiency, etc.). CMLS: Manual entry via the data stewards.</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, in the project's data schema, the logical data model, and the software application documentation.</p>
<p>DATA USE</p>	
<p>11. How will the PII be used?</p>	<p>The name, address, and phone number will be used to contact the individual. The mailing address will be used for mailing.</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>None</p>
<p>Reports</p>	
<p>14. What kinds of reports are produced about individuals or contain an individual's data?</p>	<p>None</p>
<p>15. What will be the use of these reports?</p>	<p>N/A</p>
<p>16. Who will have access to these reports?</p>	<p>N/A</p>
<p>Monitoring</p>	
<p>17. Will this information system provide the capability to identify, locate, and monitor individuals?</p>	<p>No</p>



MODULE II – PII SYSTEMS & PROJECTS

<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>
<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>CDM: Manual entry via the data stewards whom are spread across the agency (marketers, power, transmission, sales, energy efficiency, etc.).</p> <p>CMLS: Manual entry via the data stewards.</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>This is operated on BPA facilities</p>
<p>Records Management</p>	
<p>22. Identify the record(s).</p>	<p>CDM: Data related to BPA customers, developers, associations and constituents which includes fields such as account type, addresses, address type, phone, fax, email, external contact name, title, addresses, phone, and fax. Other information may include legal name of entity, account number and other internal identifiers, account status, ownership type, customer class, service type, generation type, Hub, Open Access Technology International (OATI) Registration, Data Universal Numbering System (DUNS) number, Energy Information Agency (EIA) Utility ID, internal Customer Account Team (CAT) members, relationships to other organizations (parent/child/subsidiary), etc.</p> <p>CMLS: Data related to the mailing address of the internal BPA Employees, BPA Contractors, and external contacts.</p>
<p>23. Identify the specific disposition authority(ies) that correspond to the record(s) noted in no. 22.</p>	<p>N1-305-07-001-2c</p> <p>PT-1300 / Destroy 10 years after the records are closed.</p> <p>GRS 6.5, item 020</p>
<p>24. Records Contact</p>	<p>IGLM@bpa.gov</p>
<p>ACCESS, SAFEGUARDS & SECURITY</p>	



MODULE II – PII SYSTEMS & PROJECTS

<p>25. What controls are in place to protect the data from unauthorized access, modification or use?</p>	<p>The System Owner has implemented and tested all baseline security controls appropriate to its FIPS categorization in accordance with BPA’s Cybersecurity Program Plan (CSPP) directives and requirements.</p>
<p>26. Who will have access to PII data?</p>	<p>CDM: Only authorized users have access to information inside of CDM.</p> <p>CMLS: Authorized NWPP personnel and application administrators who have demonstrated a need-to-know.</p>
<p>27. How is access to PII data determined?</p>	<p>CDM: Based on being an ‘authorized’ user of the CDM system.</p> <p>CMLS: Based on a need-to-know basis and IO approval.</p>
<p>28. Do other information systems share data or have access to the data in the system? If yes, explain.</p>	<p>CDM: Yes, there are 9 downstream systems that consume CDM data downstream: Financial Management System (FMS), Agency Data Warehouse (ADW/ETL), Customer Billing System (CBC/PowerOptix-Billing), Metering Report System (MDM/PowerOptix-MDM), Commercial Business Support Application (CBSA) and the Rates and Analysis Model (RAM). Information from CDM may pass through ADW to LORA-LT, TRFA and SPP. PIAs have been completed for each of these systems.</p> <p>The other systems are primarily concerned with the Customer ID, but may also use the non-sensitive PII information</p> <p>CMLS: Yes, there are 2 downstream systems that consume CMLS data downstream: Agency Data Warehouse (ADW/ETL) and Workflow (Bentley Functionalities).</p> <p>The other systems are primarily concerned with the customer ID but may also use the non-sensitive PII information.</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</p>
<p>30. Who is responsible for ensuring the authorized use of personal information?</p>	<p>CDM: Information Owners. CDM IO for CDM data</p> <p>CMLS: Information Owners. CMLS IO for CMLS data.</p>

END OF MODULE II



PRIVACY IMPACT ASSESSMENT: **JLSC – Customer Data Management (CDM & CMLS)**
PIA Template Version 5 – August 2017



SIGNATURE PAGE		
	Signature	Date
System Owner	_____ (Print Name) _____ (Signature)	_____ _____
Information Owner (CDM)	_____ (Print Name) _____ (Signature)	_____ _____
Co-Information Owner (CMLS)	_____ (Print Name) _____ (Signature)	_____ _____
Local Privacy Act Officer	_____ (Print Name) _____ (Signature)	_____ _____
Ken Hunt Chief Privacy Officer	_____ (Print Name) _____ (Signature)	_____ _____