



# Tennessee Valley Authority Privacy Impact Assessment (PIA)

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## *Financial Information and Regulatory System Tool (FIRST) 1.0*

This PIA is a tool used by the TVA Privacy Office to identify privacy risks at the planning/initiation phase of the system development lifecycle (SDLC) or early stages of project/program development. The PIA should be reviewed and updated on an annual basis, or sooner, if the system undergoes a major change. Questions regarding this document should be directed to [privacy@tva.gov](mailto:privacy@tva.gov).

PIA should be submitted to:

TVA Privacy Office

[privacy@tva.gov](mailto:privacy@tva.gov)

Version 3.0  
September 2018



PROGRAM MANAGEMENT

Author Name

[Redacted]

Date of Submission

07/25/2024

Responsible TVA Business Unit

Regulatory Assurance

Name of System

Financial Information and Regulatory System Tool (FIRST) 1.0

System Owner Details

Reason for Completing PIA

Name

[Redacted]

Title

Phone

Email

- New system
- Significant modification to an existing system
- To update existing PIA for a security authorization

PRIVACY DETERMINATION

(To be completed by the TVA Privacy Program)

Privacy Office Comments

[Empty box for comments]

The signatures below certify that the information in this document has been reviewed and approved:

	Name	Signature	Date
System Owner	[Redacted]	[Redacted]	07/25/2024
Senior Privacy Program Manager	Chris Marsalis	Chris Marsalis (E-Signature)	07/25/2024



### SYSTEM OVERVIEW

1. Please describe the purpose of the system/collection:

The Local Power Companies (LPC)s have a requirement to submit monthly and annual usage and revenue reporting information to TVA using the FIRST application. FIRST collects this financial information from all of TVA's 153 LPCs, TVA performs statistical analysis against what is reported versus actuals.

2. About whom does the system collect, maintain, use and/or disseminate information? Check all that apply:

- TVA employees
- TVA contractor
- Members of the public

3. Is the information collected directly from the individual?

- Yes
- No

4. What type of personally identifiable information (PII) can be/is collected, maintained, used, and/or disseminated?

Check all that apply: (Per the Office of Management and Budget (OMB) Circular A-130, *Managing Information as a Strategic Resource*, personally identifiable information (PII) means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual.)

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Home Phone                        | <input checked="" type="checkbox"/> Financial Information | <input type="checkbox"/> Biometric Information  |
| <input type="checkbox"/> Home Address                      | <input type="checkbox"/> Clearance Information            | <input type="checkbox"/> Citizenship  |
| <input checked="" type="checkbox"/> Home Email             | <input type="checkbox"/> Mother's Maiden Name             | <input type="checkbox"/> Driver's License Number  |
| <input checked="" type="checkbox"/> Employment Information | <input type="checkbox"/> Date of Birth                    | <input checked="" type="checkbox"/> Username/Password                                       |
| <input checked="" type="checkbox"/> Work Address           | <input type="checkbox"/> Place of Birth                   | <input type="checkbox"/> Passport Number  |
| <input checked="" type="checkbox"/> Work Phone             | <input type="checkbox"/> Criminal History                 | <input type="checkbox"/> Other:   |
| <input checked="" type="checkbox"/> Work Email             | <input type="checkbox"/> Social Security number (SSN)     | <div style="border: 1px solid black; width: 150px; height: 15px; margin-left: 10px;"></div> |
| <input checked="" type="checkbox"/> Name                   | <input type="checkbox"/> Medical or Health Information    |   |

If none of the above data elements are checked, stop and submit this PTA as-is to TVA Privacy Office at [privacy@tva.gov](mailto:privacy@tva.gov). Otherwise, please continue completing the remaining questions in the document.

### Privacy Notice and Transparency

5. Legal authority to collect, use, maintain, and share data in the system:

Tennessee Valley Authority Act of 1933, 16 U.S.C. 831-831ee; Executive Order 10577; Executive Order 10450; Executive Order 11478; Executive Order 11222; Equal Employment Opportunity Act of 1972, Public Law 92-261, 86 Stat. 103; Veterans' Preference Act of 1944, 58 Stat. 387, as amended; various sections of title 5 of the United States Code related to employment by TVA.

6. Does the system have a SORN? (If PII in the system is retrieved using one or more of the identifiers listed in Question 4, a System of Records Notice (SORN) is required.)

- Yes
- No

List name(s) of applicable SORN(s): TVA-2-Personnel Files

7. How are individuals notified as to how their information will be collected, maintained, used, and/or disseminated within this system?

PIA's, Privacy Act Statement, SORN's

8. What consent options do individuals have regarding specific uses or sharing of their information?

None. LPC's are required to do this as part of the power contract agreement with TVA.

### DATA MINIMIZATION

9. Are only the minimum PII elements that are relevant and necessary to accomplish the legally authorized purpose collected, used and retained?

- Yes     No

10. What are the retention periods for the information in the system?

Indefinite. Per OGC, the annual reports are supposed to be archived and never destroyed.

### DATA QUALITY

11. How is data quality (i.e., accuracy, relevance, timeliness, and completeness) ensured throughout the data lifecycle and business processes associated with the use of the information? Check all that apply.

- Information is collected directly from individuals (preferred method of collection, whenever possible)  
 If collected via a form, please list form(s) name and number here:

- Cross referencing information enties with other systems     Third party information verification  
 Character limits on text submissions     Numerical restrictions in text boxes

Other:

12. How is inaccurate or outdated information checked for and corrected?

Information is checked for and reviewed annually.

### Access and Redress

13. How can an individual access their information and have it corrected, amended, or deleted?

The LPC would reach out to their analyst to make any corrections, amendments, or make any deletions.

### Internal and External Sharing

14. Explain how the information in the system is limited to the uses specified in the notices discussed above.

The information is limited to the LPC's and the admin of the system.

15. With which (if any) internal TVA systems is the information shared?

Credit Risk, Auto Audit, ECM, Rate Design and Analysis (this is a group)

16. With which (if any) organizations external to TVA is information shared?

LPC's, State Taxing Agencies

17. Does the system have any associated websites/applications including an external TVA website or third-party owned or managed website or application (e.g., Facebook, YouTube, Twitter, Flickr, etc.)?

Yes  No

### SECURITY

18. What privacy orientation or training is provided to authorized users of the system or individuals with access to the system?

[Redacted]

19. Has a FIPS 199 determination been made?

[Redacted]

20. What is the FIPS 199 determination? Check one for each.

[Redacted]

21. What types of technical safeguards are in place to protect the information?

[Redacted]

22. What types of physical safeguards exist to protect the information?

[Redacted]



23. What types of administrative safeguards exist to protect the information?

[Redacted]

24. What monitoring, recording, and auditing safeguards are in place to prevent or detect unauthorized access or inappropriate usage?

All monitoring, recording, and auditing safeguards are in place by TVA Cybersecurity.

25. Discuss any other potential privacy risks to the information within the system and safeguards that are in place to mitigate those risks.

None.

Please submit completed form to: **TVA Privacy Office**  
[privacy@tva.gov](mailto:privacy@tva.gov)