



# Tennessee Valley Authority Privacy Impact Assessment (PIA)

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## *Renewable Energy Tracking System (RecTracker)*

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

06/06/2024

Responsible TVA Business Unit

CES O&R

Name of System

Renewable Energy Tracking System (RecTracker)

**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]	06/13/2024
Senior Privacy Program Manager	Chris Marsalis	Chris Marsalis (E-Signature)	06/06/2024



### SYSTEM OVERVIEW

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

The EmissionsTracker is a comprehensive software package that automates end-to-end emissions tracking and management processes, including inventory tracking, trading and compliance. RECTracker a component of EmissionsTracker provides a comprehensive solution that automates end-to-end REC tracking and management processes, from generation to assignment and retirement. RECTracker is designed to facilitate enterprise-wide inventory tracking, trading and compliance supporting multiple jurisdictions and RECs tracking systems for various mandatory and voluntary compliance markets.

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
- How is the information collected? the information is pulled through contracts

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 type="checkbox"/> Financial Information         | <input type="checkbox"/> Biometric Information                           |
| <input checked="" type="checkbox"/> Home Address | <input type="checkbox"/> Clearance Information         | <input type="checkbox"/> Citizenship                                     |
| <input type="checkbox"/> Home Email              | <input type="checkbox"/> Mother's Maiden Name          | <input type="checkbox"/> Driver's License Number                         |
| <input 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 type="checkbox"/> Work Phone              | <input type="checkbox"/> Criminal History              | <input type="checkbox"/> Other:  |
| <input type="checkbox"/> Work Email              | <input type="checkbox"/> Social Security number (SSN)  | <div style="border: 1px solid black; width: 150px; height: 15px;"></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



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

PIA's, SORN's, Privacy Act Statement

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

From Green Power Providers (GPP) Agreement – Participants understand that TVA may publish or disclose information obtained from the Program to others, but will not, to the extent permitted by law, release information that could personally identify Participant without prior consent of Participant, except to employees, contractors, or agents of Distributor and TVA, or when disclosure is required by law.

### 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?

Based on contract terms (10-20 years)

### 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?

On a monthly basis, prior to importing data into RECTracker, renewable energy amounts are vetted from the below sources and compared to amounts in the North American Renewables Registry (NAR) and North Carolina Renewable Energy Tracking System (NC-RETS) to ensure alignment:  
o GPP Summary Report  
o Renewable Standard Offer (RSO) Summary Report  
o Interchange Transaction Report

### Access and Redress

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

The individual would have to reach out to their LPC to make any changes.

### 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 in the system is limited to the user and admin of the system.

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

RETracker data feeds into EmissionTracker and indirectly (via the Transaction Report) has an impact on TVA's General Ledger (Oracle)

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

NAR, NC-RETS

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)