

Supporting Statement for Bonneville Power Administration

Part A: Justification

OMB No. 1910-New

- Form 5632.01, Security Incident Report*
- Form 5632.08, Unclassified Visits & Assignments – Foreign Nationals Registration*
- Form 5632.09, Personnel Identity Verification Request*
- Form 5632.11, Visitor Access Request*
- Form 5632.12, Evidence/Property Custody Document*
- Form 5632.18, Crime Witness Telephone Report*
- Form 5632.27, Badge Replacement Request*
- Form 5632.30, Pin Code Request*
- Form 5632.32, Card Key Access Request*

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Introduction

BPA is a power marketing administration, a federal nonprofit agency based in the Pacific Northwest. Although BPA is part of the U.S. Department of Energy, it is self-funding and covers its costs by selling its products and services.

BPA markets wholesale electrical power from 31 federal hydro-electric dams in the Columbia River Basin, one non-federal nuclear plant and several other small non-federal power plants. The U.S. Army Corps of Engineers and the Bureau of Reclamation own and operate the federal dams. BPA is responsible for marketing about one-third of the electric power used in the Northwest. BPA also operates and maintains about three-fourths of the high-voltage transmission in its service territory. BPA's service territory includes Idaho, Oregon, Washington, western Montana and small parts of eastern Montana, California, Nevada, Utah, and Wyoming.

As part of its responsibilities, BPA promotes energy efficiency, renewable resources, and new technologies. The agency also funds regional efforts to protect and rebuild fish and wildlife populations affected by hydroelectric power development in the Columbia River Basin.

To ensure the security and safety of its employees, contractors, and facilities, BPA's security offices issue identification and access card keys to employees and contractors to control access. These information collections allow BPA to exercise management and oversight over the personal security of the public and physical security of its facilities. Incidents of property damage and loss are also reported and managed using these collections.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on September 18, 2018, volume 83, number 181, and page number 47145. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

These collections require OMB approval under the Paperwork Reduction Act because the various forms gather information from contract employees, vendors, and other utilities. The relevant instruments for these collections are forms and a Federal website:

BPA F 5632.01 - Security Incident Report: Form used to report any criminal vandalism, or theft of Government or personal property.

BPA F 5632.08 - Unclassified Visits & Assignments – Foreign Nationals Registration: In accordance with Department of Energy Order, all foreign nationals must complete a foreign national registration form to document the purpose and dates of their intended visit/assignment.

BPA F 5632.09 - Personnel Identity Verification Request: Used by BPA Security to register applicants and initiate the PIV process for issuance of a DOE security badge.

BPA F 5632.11 - Visitor Access Request: For all visitors attending or visiting BPA facilities.

BPA F 5632.12 - Evidence/Property Custody Document: **Form used to document chain of custody of evidence or property.**

BPA F 5632.18 - Crime Witness Telephone Report: **A form used when collecting information from a witness to a crime, via telephone.**

BPA F 5632.27 - Badge Replacement Request: **A Badge Replacement Request is used to report lost/stolen or damaged/faded/malfunctioning ID Badges.**

BPA F 5632.30 - Pin Code Request: **Form that is used by employees/contractors to set a pin code associated with a local site specific only badge or proximity card.**

BPA F 5632.32 - Card Key Access Request: **Form that is used by employees for access to specific physical sites.**

A.1. Legal Justification

As a Federal Agency, BPA employees are required to adhere to a number of Federal regulations, executive orders, DOE Orders, policies and procedures. BPA's Safeguards and Security Program seeks to comply with these requirements and also provide a safe and secure working environment for all employees, and members of the public using its facilities. The purpose of the program is to provide measures to safeguard personnel; to prevent unauthorized access to equipment, facilities, material and documents; to safeguard against espionage, sabotage, and theft; and to provide adequate contingency plans to meet general and national emergencies. The physical protection of BPA buildings and facilities is accomplished through the use of security measures to include: contract security officers, alarm systems, cardkey access systems for after hours and special access needs, and closed circuit TV.

The authorities for this collection are:

The Bonneville Project Act of 1937, 16 U.S.C § 832a

42 U.S.C. § 2165

E.O. 12333, United States Intelligence Activities (December 4, 1981)

E.O. 13284, Amendment of Executive Orders, and Other Actions, in Connection with the Establishment of the Department of Homeland Security (January 23, 2003)

E.O. 13467, Security Requirements for Government Employees, April 27, 1953

E.O. 13488, Granting Reciprocity on Excepted Service and Federal Contactor Employee Fitness and Reinvestigating Individuals in Positions of Public Trust (January 16, 2009)

E.O. 13764, Amend the Civil Service Rules, Executive Order 13488, and Executive Order 13467 to Modernize the Executive Branch-Wide Governance Structure and Processes for Security Clearances, Suitability and Fitness for Employment, and Credentialing, and Related Matters (January 17, 2017)

E.O. 13470, Further amendments to Executive Order 12333, United States Intelligence Activities (July 30, 2008)

FERC Order No. 706

Federal Information Processing Standard Publication 201-2 (FIPS 201-2) and Homeland Security Presidential Directive 12 (August 27, 2004).

A.2. Needs and Uses of Data

The public, contract employees, vendors, and other utilities complete these forms to gain access to BPA facilities and report incidents of damage or loss. BPA's Security and Continuity of Operations use the information provided on the forms to manage and oversee personal and physical security.

A.3. Use of Technology

All of the instruments are fillable electronic PDF forms submitted via encrypted email, internal mail, or via fax.

A.4. Efforts to Identify Duplication

The information is not collected by other means or in another form by BPA or DOE.

A.5. Provisions for Reducing Burden on Small Businesses

Some of the vendors that contract with BPA are small businesses. The number of survey questions is kept to a minimum to ensure low impact to these businesses.

A.6. Consequences of Less-Frequent Reporting

BPA's facilities are restricted to authorized personnel to secure the reliability of the region's electrical grid. The information is collected to manage access to facilities and oversee the security of personnel and physical locations. If the collections were not made, that oversight would not be possible.

A.7. Compliance with 5 CFR 1320.5

The information collections are conducted in a manner consistent with OMB guidelines.

A.8. Summary of Consultations Outside of the Agency

The Department published a 60-day *Federal Register Notice* and Request for Comments concerning this collection in the Federal Register on September 18, 2018, volume 83, number 181, and page number 47145. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

After the 60-day request for comments, the Department published a 30-day *Federal Register Notice* and Request for comments in the Federal Register on February 20, 2019, volume 84, number 20, and page number 5064. No comments were received.

Additionally, the Tennessee Valley Authority (TVA) reviewed our submission and provided comments.

A.9. Payments or Gifts to Respondents

Respondents will not receive any payment or gift.

A.10. Provisions for Protection of Information

BPA has completed the Privacy Act process to identify a system of record and provide notice to respondents for instruments that collect personally identifiable information (PII). For instruments that do not collect PII, no assurance of confidentiality is provided. BPA provides notice that the proposed collection of information in this program will not be part of a system of records covered by the Privacy Act and may be available under the Freedom of Information Act.

A.11. Justification for Sensitive Questions

None of the information requested is of a sensitive nature.

A.12. Estimate of Respondent Burden Hours

Table A1. Estimated Respondent Burden

Form Number/Title	Annual Reporting Frequency	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours
BPA F 5632.01 - Security Incident Report	1	450	450	0.28	126
BPA F 5632.08 - Unclassified Visit & Assignments - Foreign Nationals Registration	1	350	350	0.21	74
BPA F 5632.09 - Personnel Identify Verification Request	1	1,300	1,300	0.30	390
BPA F 5632.11 - Visitor Access Request	1	5,400	5,400	0.16	864
BPA F 5632.12 - Evidence/Property Custody Document	1	30	30	0.10	3
BPA F 5632.18 - Crime Witness Telephone Report	1	12	12	0.10	1
BPA F 5632.27 - Badge Replacement Request	1	300	300	0.21	63
BPA F 5632.30 - Pin Code Request	1	1,300	1,300	0.11	143
BPA F 5632.32 - Card Key Access Request	1	500	500	0.17	85
TOTAL		9,642	9,642		1,749

The totals in the above table are three-year averages provided by BPA's security staff.

A.13. Annual Cost to Respondents

Annual cost to the public is estimated to be \$61,512 based on an average of \$35.17/hour and total of 1,749 responses. The hourly average is based on the Department of Labor Section 22 – Utilities (NAICS 221000) hourly wage. Capital and startup costs do not apply to this questionnaire.

A.14. Annual Cost to the Federal Government

The estimated budget for the Security office that processes this information collection is \$1,423,639 annually. This includes estimated federal burden for BPA personnel processing the completed forms, which is based on the total number of hours it would take to complete review and verification of information. The estimate for a fully burdened, average full time equivalent (FTE) is approximately \$85.00/hour. DOE approximates 1 hour to review each form

- 9642 reports/year x 1 hour/report x \$85.00/hour = \$819,570
- Those costs for the Security Office budget that are not personnel-related and for office and equipment are \$604,069.

A.15. Reasons for Changes in Burden

This is a new collection, therefore there are no program changes or adjustments scheduled.

A.16. Collection, Tabulation, and Publication Plans

This information collection will not be published.

A.17. OMB Number and Expiration Date

BPA is not seeking approval to not display the expiration date for OMB approval of this information collection.

A.18. Certification Statement

There are no exceptions to the certification statement.