
Supporting Statement for Bonneville Power Administration

Part A: Justification

OMB No. 1910-5188

Form 1400.22a, Other Utility/Contractor/Vendor Worker Access Request

Form 1400.22e, Non-Government Employee Data in HRMIS

Form 5630.04e, Security Privilege Request – for BPA Control Centers

Form 5632.01e, Security Incident Report

Form 5632.08e, Unclassified Visits & Assignments – Foreign Nationals Registration

Form 5632.09e, Personnel Identity Verification Request

Form 5632.11e, Visitor Access Request

Form 5632.11e, Visitor Access Request – with Continuation page

Form 5632.12e, Evidence/Property Custody Document

Form 5632.18e, Crime Witness Telephone Report

Form 5632.27e, Badge Replacement Request

Form 5632.30e, Pin Code Request

Form 5632.32e, Card Key Access Request

August 2022

U.S. Department of Energy
Washington, DC 20585

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Introduction

Provide a brief introduction of the Information Collection Request. Include the purpose of this collection, note the publication of the 60-Day Federal Register Notice, and provide the list of forms within this collection.

Bonneville Power Administration (BPA) has submitted to the Office of Management and Budget (OMB) for clearance, a proposal for collection of information pursuant to the Paperwork Reduction Act of 1995. The proposed collection will allow BPA to exercise management and oversight over the personal security of the public and physical security of its facilities. In order 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.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on May 3, 2022, volume 87, number 85, and page number 26190. 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 employees, contract employees, and members of the public.

This collection adds three new collection tools.

The relevant instruments for these collections are the following forms:

(New addition to Security package) BPA F 1400.22a - Other Utility/Contractor/Vendor Worker Access Request: **Form used to confirm identity and determine suitability during badge request process.**

(New addition to Security package) BPA F 1400.22e - Non-Government Employee Data in HRMIS: **Form used to add contractor personnel to HRMIS system.**

(New addition to Security package) BPA F 5630.04e - Security Privilege Request - for BPA Control Centers: **Form is used for requesting physical and cyber access to BPA Control Center Cyber and Critical Cyber Assets.**

BPA F 5632.01e - Security Incident Report

BPA F 5632.08e - Unclassified Visits and Assignments - Foreign Nationals Registration (Short Form)

BPA F 5632.09e - Personal Identity Verification (PIV) Request for LSSO/Smart Credential

BPA F 5632.11e- BPA Visitor(s) Access Request – with continuation page

BPA F 5632.11e - BPA Visitor(s) Access Request

BPA F 5632.12e - Evidence/Chain of Custody Document

BPA F 5632.18e - Crime Witness Telephone Report

BPA F 5632.27e - Badge Replacement Request

BPA F 5632.30e - PIN Code Request

BPA F 5632.32e - Card Key Access Request

Gathering this information is necessary because BPA must be able to ensure the security of facilities and personnel in accordance with laws and regulations.

A.1. Legal Justification

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.

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.

The authorities for this collection are:

- The Bonneville Project Act of 1937, 16 U.S.C § 832a
- 5 U.S.C. § 1302, 2951, 3301, 3372, 4118, & 8347
- 42 U.S.C. § 2165 & 7101 et. Seq.
- CFR Title 5 parts 5 & 736
- E.O. 10450, Security Requirements for Government Employment (April 27, 1953)
- E.O. 12107, Relating to the Civil Service Commission and labor-management in the Federal Service (December 28, 1978)
- 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. 13470, Further amendments to Executive Order 12333, United States Intelligence Activities (July 30, 2008)
- 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)
- FERC Order No. 706
- Federal Information Processing Standard Publication 201-3 (FIPS 201-3)
- Homeland Security Presidential Directive 12 (August 27, 2004)

- Department of Energy Order 205.1B, Change 3 (April 29, 2014)

As a Federal Agency, BPA employees and contractors 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.

A.2. Needs and Uses of Data

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection

The information collected in these documents is used to securely determine and grant access to BPA facilities, report incidents of damage or loss, conduct background investigations on personnel, and screen visitors and foreign nationals for access to facilities.

BPA F 1400.22a - Other Utility/Contractor/Vendor Worker Access Request: collects first name, middle initial, last name, position title, if the person successfully passed a national criminal history check, if they've completed annual training, and if the person completed Personal Identity Verification.

BPA F 1400.22e - Non-Government Employee Data in HRMIS: if the person has been employed at BPA since 10/1/96, if yes then full legal name at the time of employment, current full legal name, Social Security Number, country of citizenship, date of birth, and gender.

BPA F 5630.04e - Security Privilege Request - for BPA Control Centers: requester's name, business address, work phone number, employment status, BPA Login ID, and BPA HRMIS ID.

BPA F 5632.01e - Security Incident Report: name and work phone number of reporting party.

BPA F 5632.08e - Unclassified Visits and Assignments - Foreign Nationals Registration (Short Form): visitor full name, citizenship, country of employer, gender, date of birth, country of birth, host's name and contact info.

BPA F 5632.09e - Personal Identity Verification (PIV) Request for LSSO/Smart Credential: full legal name, email address, mailing address, date of birth, daytime phone number, place of birth, citizenship, dual citizenship, Social Security Number, and employment with the federal government in the last 24 months.

BPA F 5632.11e- BPA Visitor(s) Access Request – with continuation page: name, citizenship, and company name.

BPA F 5632.11e - BPA Visitor(s) Access Request: name, citizenship, and company name.

BPA F 5632.12e - Evidence/Chain of Custody Document: name, grade, and title of person from whom evidence received from.

BPA F 5632.18e - Crime Witness Telephone Report: first name, middle initial, last name, location of caller, description of any injuries, witness name and contact info, and suspect name and description if known.

BPA F 5632.27e - Badge Replacement Request: badge holder first and last name.

BPA F 5632.30e - PIN Code Request: last name, first name, and middle initial.

BPA F 5632.32e - Card Key Access Request: employee name.

A.3. Use of Technology

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

The instruments are fillable electronic PDF forms submitted via email, internal mail, or fax. Based on the number of responses submitted per form annually, 65% of the forms are submitted by email, 34.67% of the forms are submitted by internal mail, and .33% of the forms are submitted via fax based on form owner response. The cost of additional automation significantly outweighs the potential reduction in burden on respondents.

BPA F 1400.22a - Other Utility/Contractor/Vendor Worker Access Request: email submission.

BPA F 1400.22e - Non-Government Employee Data in HRMIS: email submission.

BPA F 5630.04e - Security Privilege Request - for BPA Control Centers: email, fax, or internal mail submission.

BPA F 5632.01e - Security Incident Report: email submission.

BPA F 5632.08e - Unclassified Visits and Assignments - Foreign Nationals Registration (Short Form): email submission.

BPA F 5632.09e - Personal Identity Verification (PIV) Request for LSSO/Smart Credential: email submission or internal mail submission.

BPA F 5632.11e - BPA Visitor(s) Access Request – with continuation page: email submission.

BPA F 5632.12e - Evidence/Chain of Custody Document: internal mail submission.

BPA F 5632.18e - Crime Witness Telephone Report: email submission.

BPA F 5632.27e - Badge Replacement Request: email submission.

BPA F 5632.30e - PIN Code Request: email or internal mail submission.

BPA F 5632.32e - Card Key Access Request: email submission.

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

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

A.5. Provisions for Reducing Burden on Small Businesses

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

While the collection applies to every type of party (private individuals, small businesses, government agencies, etc), this collection will not have a significant impact on small entities such as small businesses, organizations, or government bodies. The number of survey questions is kept to minimum to ensure a low impact to the businesses.

A.6. Consequences of Less-Frequent Reporting

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

In accordance with EO 13467 BPA's facilities are restricted to authorized personnel to secure the reliability of the region's electrical grid. The information in this series 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

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines:

- (a) requiring respondents to report information to the agency more often than quarterly;**
- (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- (c) requiring respondents to submit more than an original and two copies of any document;**
- (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years;**

(e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study;

(f) requiring the use of statistical data classification that has not been reviewed and approved by OMB;

(g) that includes a pledge of confidentiality that is not supported by authority established in stature of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

(h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The information collection is conducted in a manner consistent with OMB guidelines.

A.8. Summary of Consultations Outside of the Agency

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on May 3, 2022, (volume 87, number 85, and page number 26190). No comments were received.

The Department published a 30-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on July 21, 2022, (volume 87, number 139, and page number 43505). No comments received as of the date the supporting statement was routed.

Due to the operational nature of the collection instruments in this package no other attempts were made to gather feedback from the public. Much of what is requested in these forms is required for compliance with federal security rules under which BPA operates.

A.9. Payments or Gifts to Respondents

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Respondents will not receive any payment or gift.

A.10. Provisions for Protection of Information

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

BPA provides notice that the proposed collection of information in this program will be part of a system of records covered by the Privacy Act and may not be available under the Freedom of Information Act. Collection instruments requiring a Privacy Act statement contain that statement, not all forms in this collection require a Privacy Act statement.

A.11. Justification for Sensitive Questions

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are asked of respondents.

A.12A. Estimate of Respondent Burden Hours

Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

The totals in the table below are three-year averages provided by BPA’s security and human resources staff. Burden hours were estimated based upon staff timing while reviewing instructions and filling out the collection instrument.

Table A1. Estimated Respondent Hour Burden

| Form Number/Title (and/or other Collection Instrument name) | Type of Respondents | Number of Respondents | Annual Number of Responses | Burden Hours Per Response | Annual Burden Hours | Annual Reporting Frequency |
|---|---------------------|-----------------------|----------------------------|---------------------------|---------------------|----------------------------|
| BPA F 1400.22a - Other Utility/Contractor/Vendor Worker Access Request | contractors | 24 | 24 | .1 | 2 | 1 |
| BPA F 1400.22e - Non-Government Employee Data in HRMIS | contractors | 1,115 | 1,115 | .1 | 112 | 1 |
| BPA F 5630.04e - Security Privilege Request - for BPA Control Centers and/or BPA Power Scheduling Centers | employees | 350 | 875 | .25 | 219 | 2.5 |
| BPA F 5630.04e - Security Privilege Request - for BPA Control Centers and/or BPA Power Scheduling Centers | contractors | 150 | 375 | .25 | 94 | 2.5 |
| BPA F 5632.01e - Security | employees | 50 | 50 | .28 | 14 | 1 |

| | | | | | | |
|--|-------------------------------------|--------------|-----------------|--------------|--------------|---|
| Incident Report | | | | | | |
| BPA F 5632.01e - Security Incident Report | contractors | 171 | 171 | .28 | 48 | 1 |
| BPA F 5632.08e - Unclassified Visits and Assignments - Foreign Nationals Registration (short form) | employees | 150 | 150 | .35 | 53 | 1 |
| BPA F 5632.08e - Unclassified Visits and Assignments - Foreign Nationals Registration (short form) | contractors / members of the public | 175 | 175 | .35 | 61 | 1 |
| BPA F 5632.09e - Personal Identity Verification (PIV) Request for LSSO/Smart Credential | employees | 450 | 450 | .33 | 149 | 1 |
| BPA F 5632.09e - Personal Identity Verification (PIV) Request for LSSO/Smart Credential | contractors / members of the public | 700 | 700 | .33 | 231 | 1 |
| BPA F 5632.11e - BPA Visitor(s) Access Request with Continuation page | <i>included</i> | <i>in</i> | <i>5632.11e</i> | <i>total</i> | | |
| BPA F 5632.11e - BPA Visitor(s) Access Request | contractors | 1,735 | 1,735 | .16 | 278 | 1 |
| BPA F 5632.12e - Evidence/Chain of Custody Document | employees | 2 | 2 | .10 | 0 | 1 |
| BPA F 5632.12e - Evidence/Chain of Custody Document | contractors | 12 | 12 | .10 | 1 | 1 |
| BPA F 5632.18e - Crime Witness Telephone Report | employees | 15 | 15 | .10 | 2 | 1 |
| BPA F 5632.18e - Crime Witness Telephone Report | contractors | 64 | 64 | .10 | 6 | 1 |
| BPA F 5632.27e - Badge Replacement Request | employees | 150 | 150 | .16 | 24 | 1 |
| BPA F 5632.27e - Badge Replacement Request | contractors | 150 | 150 | .16 | 24 | 1 |
| BPA 5632.30e - PIN Code Request | employees | 650 | 650 | .083 | 54 | 1 |
| BPA 5632.30e - PIN Code Request | contractors | 650 | 650 | .083 | 54 | 1 |
| BPA F 5632.32e - Card Key Access Request | employees | 220 | 220 | .16 | 35 | 1 |
| BPA F 5632.32e - Card Key Access Request | contractors | 300 | 300 | .16 | 48 | 1 |
| Summary Total Employees | | 2,037 | 2,562 | | 550 | |
| Summary Total Contractors | | 5,246 | 5,471 | | 959 | |
| TOTAL | | 7,283 | 8,033 | | 1,509 | |

A.12B. Estimate of Annual Cost to Respondent for Burden Hours

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of

contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.

Annual cost to the public is estimated to be \$68,924 based on an average of \$40.35/hour using BLS data from: <http://www.bls.gov/news.release/ecec.nr0.htm> using civilian worker average compensation and 5246 responses; for Federal employees an average of \$54.96/hour using BLS data for the state and local government average compensation and 2037 responses. The hourly average is based on the Bureau of Labor and Statistics Employer Costs for Employee Compensation Summary at a fully burdened rate. Capital and startup costs do not apply to this questionnaire.

Table A2. Estimated Respondent Cost Burden

| Type of Respondents | Total Annual Burden Hours | Hourly Wage Rate | Total Respondent Costs |
|---------------------|---------------------------|------------------|------------------------|
| contractors/public | 959 | 40.35 | \$38,696 |
| Federal employees | 550 | 54.96 | \$30,228 |
| TOTAL | 1,509 | | \$68,924 |

A.13. Other Estimated Annual Cost to Respondents

Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

Other than those described above, BPA does not anticipate any additional annual cost burden to respondents. There will be no ongoing operation or maintenance costs for respondents.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

The estimated budget for the Security office that processes this information collection is \$168,567 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 \$54.96/hour (based on the Bureau of Labor and Statistics Employer Costs for Employee Compensation Summary <http://www.bls.gov/news.release/ecec.nr0.htm>). BPA approximates .3 hour to review each form.

- 5644 reports/year x .3 hour/report x \$54.96/hour = \$93,058
- Those costs for the Security Office budget that are not personnel-related and for office and equipment are \$75,509.

The estimated budget for the Human Resources office that processes this information collection is \$6,773 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 \$54.96/hour. BPA approximates .1 hour to review each form.

- 1139 reports/year x .1 hour/report x \$54.96/hour = \$6,260
- Those costs for the Human Resource budget that are not personnel-related and for office and equipment are \$513.

The estimated budget for the Transmission System Operations office that processes this information collection is \$222,522 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 \$54.96/hour. BPA approximates 2 hours to review each form.

- 1250 reports/year x 2 hours/report x \$54.96/hour = \$137,400
- Those costs for the Human Resource budget that are not personnel-related and for office and equipment are \$85,122.

The total cost for the Security Collection is \$397,862.

A.15. Reasons for Changes in Burden

Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

This collection had three forms added to it, which were determined to fit under the Security nexus of this package. Additionally, during the review by form owners the time requirements were adjusted for the existing forms based on a recent review that modified the time requirements as well as a reduction in the average number of times forms were filled out over the last three years.

Table A3. ICR Summary of Burden

| | Requested | Program Change Due to Agency Discretion | Change Due to Adjustment in Agency Estimate | Previously Approved |
|---------------------------|------------------|--|--|----------------------------|
| Total Number of Responses | 8033 | 0 | -1609 | 9,642 |
| Total Time Burden (Hr) | 1,509 | 0 | -240 | 1,749 |
| Total Cost Burden | \$68,924 | 0 | +\$7,412 | \$61,512 |

A.16. Collection, Tabulation, and Publication Plans

For collections whose results will be published, outline the plans for tabulation and publication.

This information collection will not be published.

A.17. OMB Number and Expiration Date

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

BPA will display the OMB Control Number and expiration date on all collection vehicles.

A.18. Certification Statement

Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

There are no exceptions to the certification statement.