



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

PUBLIC AFFAIRS

February 25, 2008

In reply refer to: DK-7

Cathy L. Schaufelberger  
PO Box 3621, PGSD-5  
Portland, OR 97208-3621

FOIA: #08-017

Dear Ms. Schaufelberger:

This letter is a final response to your request for information that you made to the Bonneville Power Administration (BPA), under the Freedom of Information Act (FOIA), 5 U.S.C. § 552. The request was received on Friday, January 11, 2008, and assigned control number, 08-017.

In your letter, you requested information on individuals in organizations with department codes that begin with PG and for individuals in the organization with the department code of PTK. Information you requested included awards, bonuses, and other monetary payouts such as Retention Allowance, Recruitment/Relocation Bonuses, Awards, Tuition Reimbursement, Student Loan Reimbursement, Other Bonuses, Sustained Superior Performance, Quality Step Increases, and Promotions based on Accretion of Duties. Information in response to your request is attached. It includes data obtained through a search of the information systems in which the data is processed.

BPA is withholding the names of recipients of a Quality Step Increase (QSI) and names of recipients of a Performance Award because they are protected under Exemption 6 of the FOIA. Exemption 6 protects personnel, medical and similar files when disclosure would cause a clearly unwarranted invasion of personal privacy 5 U.S.C. 552(b)(6). In addition, BPA is withholding the age of the recipients. Age is not a data element in the information systems used to store employee data and process employee actions.

In determining whether the names of QSI recipients are required to be released under the FOIA, we balanced the privacy interests in the information against the public interest served by the disclosure. Exemption 6 is intended to protect individuals from the injury and embarrassment that could result from unnecessary disclosure of personal information. In order to determine whether an agency record should be withheld under exemption 6 an agency must: (1) identify whether a privacy interest exists, (2) identify whether release of the document would further the public interest by shedding light on the operations and activities of the Government, and (3) weigh the identified privacy interests against the public interest in order to determine whether disclosure would constitute a clearly unwarranted invasion of personal privacy.

Due to the size of the responsive documents they can not be posted. To obtain a copy please contact the BPA FOIA Officer at 503-230-7305.

First, we have determined that a legitimate personal privacy interest exists for information that reveals the details of an employee's job performance. Both favorable and unfavorable details trigger this interest. QSI's may be granted to a GS/GM employee who receives a "significantly exceeds expectations" rating of record, and whose performance demonstrates sustained high quality performance that substantially and consistently exceeds the results expected. Therefore, revealing the names of QSI recipients would reveal details about the employee's performance.

Second, we have determined that disclosure of this information would not further the public interest. Although there is public interest in ensuring that awards are fairly distributed and that agencies properly adhere to stated guidelines in distributing awards, release of QSI recipients and employees that received sustained superior performance does not significantly contribute to the public's understanding of BPA operations or activities, or shed light on the performance of BPA's statutory duties.

Third, we find the individual privacy interest in protecting the names of recipients of a Quality Step Increase (QSI) and of recipients of a Performance Award outweighs any public interest in disclosure.

If you are dissatisfied with this determination, you may make an appeal within thirty (30) days of your receipt of this letter to Director, Office of Hearings and Appeals, Department of Energy, 1000 Independence Avenue, Washington D.C., 20585. Both the envelope and letter must clearly be marked "Freedom of Information Act Appeal."

I appreciate the opportunity to assist you with this matter. If you have any questions about this response, please contact my FOIA Specialist, Laura M. Atterbury, at (503) 230-7305.

Sincerely,

*/s/ Christina J. Brannon*

Christina J. Brannon  
Freedom of Information Act/Privacy Act Officer

Enclosure(s): Responsive Documents