

2019 Surveillance Impact Report

CURRENT DIVERSION TEAM: CHECK METER DEVICE

Seattle City Light

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Surveillance Impact Report (“SIR”) overview

About the Surveillance Ordinance

The Seattle City Council passed Ordinance [125376](#), also referred to as the “Surveillance Ordinance,” on September 1, 2017. SMC 14.18.020.b.1 charges the City’s executive with developing a process to identify surveillance technologies subject to the ordinance. Seattle it, on behalf of the executive, developed and implemented a process through which a privacy and surveillance review is completed prior to the acquisition of new technologies. This requirement, and the criteria used in the review process, are documented in [Seattle it policy pr-02](#), the “surveillance policy”.

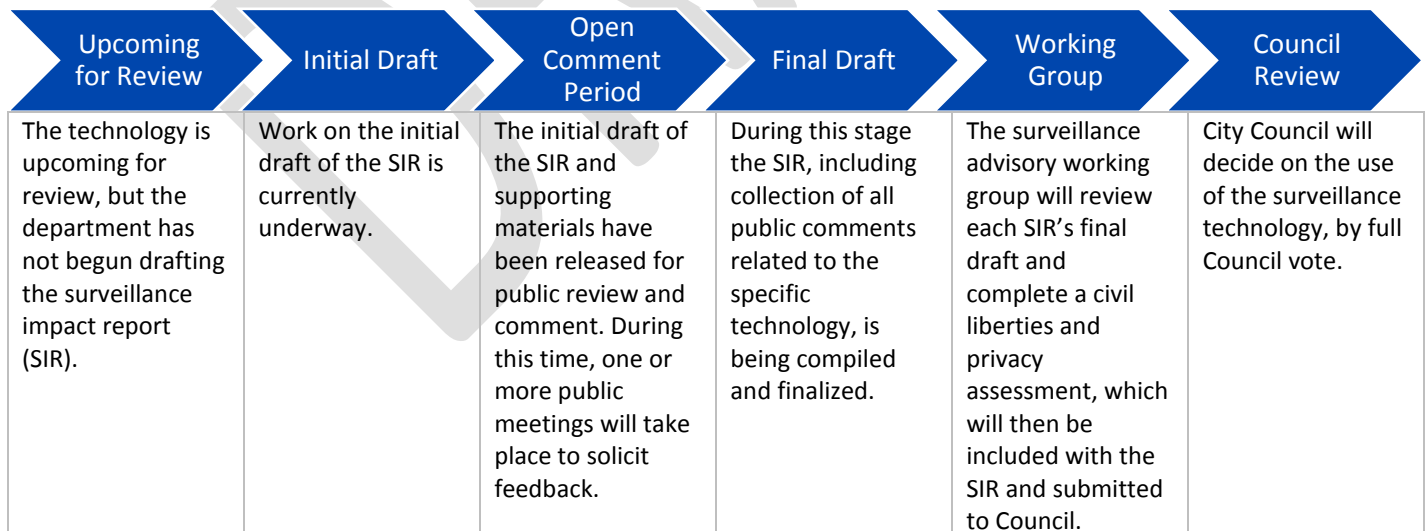
How this Document is Completed

This document is completed by the requesting department staff, support and coordinated by the Seattle information technology department (“Seattle it”). As Seattle it and department staff complete the document, they should keep the following in mind.

1. Responses to questions should be in the text or check boxes only; all other information (questions, descriptions, etc.) Should **not** be edited by the department staff completing this document.
2. All content in this report will be available externally to the public. With this in mind, avoid using acronyms, slang, or other terms which may not be well-known to external audiences. Additionally, responses should be written using principally non-technical language to ensure they are accessible to audiences unfamiliar with the topic.

Surveillance Ordinance Review Process

The following is a high-level outline of the complete SIR review process.



Privacy Impact Assessment

Purpose

A Privacy Impact Assessment (“PIA”) is a method for collecting and documenting detailed information collected in order to conduct an in-depth privacy review of a program or project. A PIA asks questions about the collection, use, sharing, security and access controls for data that is gathered using a technology or program. It also requests information about policies, training and documentation that govern use of the technology. The PIA responses are used to determine privacy risks associated with a project and mitigations that may reduce some or all of those risks. In the interests of transparency about data collection and management, the City of Seattle has committed to publishing all PIAs on an outward facing website for public access.

When is a Privacy Impact Assessment Required?

A PIA may be required in two circumstances.

1. When a project, technology, or other review has been flagged as having a high privacy risk.
2. When a technology is required to complete the surveillance impact report process. This is one deliverable that comprises the report.

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1.0 Abstract

1.1 Please provide a brief description (one paragraph) of the purpose and proposed use of the project/technology.

Seattle City Light's ("City Light") Current Diversion Team ("CDT") consists of a group of approximately five journey-level engineers who are dispatched to collect data to attempt to determine whether a suspected diversion of current (i.e., alterations to the City Light-owned electrical system by a third-party in order to consume electric power without it being registered by the City Light meter installed for that purpose) has taken place. In support of this mission, the CDT crew uses a Check Meter (subsequently referred to as SensorLink TMS throughout this SIR) device. Data from the device are retrieved via secure radio protocol. If a determination of diversion is sustained, data may be used to respond to lawful requests from the proper law enforcement authorities for evidence for recovering the value of the diverted energy.

In conjunction with this technology, two others – standard, commercial-grade, unpowered binoculars, and the SensorLink Ampstik device – are used by the CDT. As a result, City Light's three retroactive Surveillance Impact Reports ("SIRs") may be, at times, duplicative, so that each report contains the necessary information.

1.2 Explain the reason the project/technology is being created or updated and why the PIA is required.

This technology is used in furtherance of a mission supported by ordinance ([SMC 21.49.100](#), requiring recovery of payment for electric services provided) and an existing City Light department policy procedure ([DPP 500 P III-416](#), hereafter "DPP"). City Light provided the information in the Privacy Impact Assessment to fulfill the requirements of the Surveillance Ordinance and so that the public may understand the nature of the CDT and the tools that are essential to its carrying out its mission for the benefit of ratepayers. The SensorLink TMS device provides data to the CDT member by recording data over time for the CDT to retrieve at a later date via a secure wireless protocol.

2.0 Project / Technology Overview

Provide an overview of the project or technology. The overview gives the context and background necessary to understand the purpose, mission and justification for the project / technology proposed

2.1 Describe the benefits of the project/technology.

As described in Section 1, the CDT utilizes the SensorLink TMS device in order to assess whether suspected diversions of current have occurred and/or are continuing to occur. The SensorLink TMS device allows the Utility to determine the valuation of the energy illegally diverted, which supports City Light's mission of recovering this value for the ratepayers via a process called "back-billing."

2.2 Provide any data or research demonstrating anticipated benefits.

In 2017, the CDT's operations, via the use of the SensorLink TMS device (in combination with the other two technologies under review), City Light recovered \$1.6 million. This would otherwise remain a substantial financial loss to the Utility. City Light implemented the SensorLink TMS technology as an efficient and accurate means of assessing amounts of current being diverted after CDT staff studied their use by Portland General Electric, the electric energy provider for the Portland, Oregon area.

2.3 Describe the technology involved.

The SensorLink TMS device measures the amount of City Light-provided electrical energy flowing through the service-drop wire over time, digitally capturing the instantaneous information on the device for later retrieval by the CDT via the use of a secure wireless protocol. The SensorLink TMS device is housed in a black, weatherproofed box of approximately four square inches, with a City Light inventory control number on the outside for identification by City Light line crews. These are typically deployed on the electric pole, adjacent to the transformer, from one week to one month, depending on the specific case need and crew availability.

2.4 Describe how the project or use of technology relates to the department's mission.

The SensorLink TMS device allows City Light to maintain the integrity of its electricity distribution system, to determine whether suspected current diversions have taken place, and to provide the valuation of the diverted energy to proper authorities for cost recovery. These are supported by ordinance ([SMC 21.49.100](#)) and Department Policy and Procedure ([DPP](#)).

2.5 Who will be involved with the deployment and use of the project / technology?

The CDT members are the only City Light staff who deploy the SensorLink TMS device, and always upon pre-existing and/or reported suspicion of current diversion (e.g., neighbor report, unusual or no energy consumption detected upon a routine meter reading by City Light, visual observation of tampered-with meter or other City Light-owned or -maintained electrical equipment

3.0 Use Governance

Provide an outline of any rules that will govern the use of the project / technology. Please note: non-City entities contracting with the City are bound by restrictions specified in the surveillance ordinance and privacy principles and must provide written procedures for how the entity will comply with any restrictions identified.

3.1 Describe the processes that are required prior to each use, or access to/ of the project / technology, such as a notification, or check-in, check-out of equipment.

The CDT owns six SensorLink TMS units, which are deployed on the basis of case number and need. Deployment level on a given case can vary from none (zero) to all (six). Once a case is properly opened, CDT crew members may check them out without prior additional authorization, though the Current Diversion Coordinator is under nearly all circumstances aware of deployment due to position responsibilities. Serial numbers are recorded and the CDT member to whom they are assigned, as well as their deployment status, are logged.

3.2 List the legal standards or conditions, if any, that must be met before the project / technology is used.

Routine deployment in support of making an internal determination as to current diversion is not subject to additional prior legal authorization.

3.3 Describe the policies and training required of all personnel operating the project / technology, and who has access to ensure compliance with use and management policies.

In addition to routine privacy and security training undergone by all City Light employees per Seattle IT policy, the Current Diversion Coordinator has responsibility for ensuring compliance with all existing rules and procedures.

4.0 Data Collection and Use

4.1 Provide details about what information is being collected from sources other than an individual, including other IT systems, systems of record, commercial data aggregators, publicly available data and/or other City departments.

No additional information is collected by the CDT in making its determinations, nor is any third-party or other aggregation taking place.

4.2 What measures are in place to minimize inadvertent or improper collection of data?

Risk of inadvertent or improper collection is low for two reasons. First, the CDT only investigates specific, metered locations previously identified and properly documented as sites of suspected current diversion. And second, SensorLink TMS devices are used only on those service-drop lines that are delivering electrical service to the suspected location.

4.3 How and when will the project / technology be deployed or used? By whom? Who will determine when the project / technology is deployed and used?

SensorLink TMS devices are used throughout the year based on suspected cases of current diversion, by the CDT staff and with the approval of the Current Diversion Coordinator. As mentioned above, these can be triggered in several ways, for example: neighbor report to the customer service bureau or other City Light representatives; recognition by billing specialists of highly out-of-the-ordinary meter readings; or observations by meter and other crews of tampering with metering or other electrical service provision equipment.

4.4 How often will the technology be in operation?

SensorLink TMS devices, once deployed pursuant to determinations mentioned in 4.3 and the approval of the Current Diversion Coordinator, are in operation for a period varying from approximately one week and one month at a time on a given case.

4.5 What is the permanence of the installation? Is it installed permanently, or temporarily?

SensorLink TMS devices are installed temporarily for periods normally varying from one week to one month. The amount of time depends on the specific measurement need of the case, as well as crew availability.

4.6 Is a physical object collecting data or images visible to the public? What are the markings to indicate that it is in use? What signage is used to determine department ownership and contact information?

The SensorLink TMS device is not “visible to the public” in any conventional sense, though to a trained eye, it may be visible near a transformer on an electrical pole (for images of the technology, see the attached Specification Sheet in the “Expertise and References” section 3.0). The device contains an City Light inventory tag so that line workers may know what function it serves when they are working in the electrical space of the pole. No notification is made to the public of its use, as this may risk defeating its purpose of detecting a diversion of current on a single, previously-suspected service-drop.

4.7 How will data that is collected be accessed and by whom?

CDT members, who are journey-level electrical workers trained in the placement, use, and removal of the SensorLink TMS device, may collect this data. The quantitative data – accumulated consumption (in kilowatt-hours), average volts (current strength), average amps (current flow), and interval consumption (in kilowatt-hours per a pre-defined time-unit) – are accessed by CDT crew members remotely using a secure radio protocol and a specific, password-protected software program, known as Steelhead.

4.8 If operated or used by another entity on behalf of the City, provide details about access, and applicable protocols.

City Light is the only entity operating or using the technology.

4.9 What are acceptable reasons for access to the equipment and/or data collected?

The SensorLink TMS device is used only to make determinations about whether a current diversion is likely to be taking place. As the device gathering and storing data for later retrieval over time, the SensorLink TMS may be accessed for said data retrieval, or for its installation or removal in connection with the given investigation.

4.10 What safeguards are in place, for protecting data from unauthorized access (encryption, access control mechanisms, etc.) And to provide an audit trail (viewer logging, modification logging, etc.)?

Data obtained by means of the SensorLink TMS device are stored in a private folder on City Light’s digital file locations, accessible only by CDT members and management. Data stored in the SensorLink TMS device itself are deleted after its observations are retrieved by the CDT and/or upon its removal from the electrical pole (i.e., no data remain on the SensorLink TMS once its use for a given determination of current diversion has been completed and before it is therefore made available to other CDT staff for subsequent deployment).

5.0 Data Storage, Retention and Deletion

5.1 How will data be securely stored?

Data obtained by means of the SensorLink TMS device are stored in a private folder on City Light's digital file locations, accessible only by CDT members and management. Data stored in the SensorLink TMS device itself during deployment are deleted after its observations are retrieved by the CDT and/or upon its removal from the electrical pole (i.e., no data remain on the SensorLink TMS once its use for a given determination of current diversion has been completed and, therefore, before it is made available for subsequent deployment).

5.2 How will the owner allow for departmental and other entities, to audit for compliance with legal deletion requirements?

City Light will make CDT file locations and staff available for properly authorized entities wishing to ensure compliance. Data will be retained per City Light record retention schedules.

5.3 What measures will be used to destroy improperly collected data?

To the extent permitted by the Washington State Public Disclosure Law, any improperly collected data will be deleted from City Light's digital file locations, and hard-copy documents will be destroyed.

5.4 which specific departmental unit or individual is responsible for ensuring compliance with data retention requirements?

The Current Diversion Coordinator has responsibility for this function.

6.0 Data Sharing and Accuracy

6.1 Which entity or entities inside and external to the City will be data sharing partners?

Data, or information derived from the data, may be shared with other parties in two instances, both of which are public entities. These are (1) when a determination is made that current diversion has taken place, in which case a valuation of the stolen energy is sent to the customer billing division of City Light for “back-billing” to the customer for cost recovery, and (2) when police investigators and/or prosecutors require evidence for further proceedings in complex or aggravated cases, as when large sums of energy have been diverted/stolen, or where there is a safety risk to the public.

6.2 Why is data sharing necessary?

In both cases, this is required for City Light to recoup stolen energy costs. In the second case (information sharing with police investigators) it may also be required to protect public safety, since unauthorized alterations to the electrical system can pose a serious and at times lethal danger to the public.

6.3 Are there any restrictions on non-City data use?

Yes No

6.3.1 If you answered yes, provide a copy of the department’s procedures and policies for ensuring compliance with these restrictions.

Data are collected and maintained for City Light use and may only be shared with outside entities for the purposes of law enforcement or legal action by the relevant jurisdictional authority. This policy is formally laid out in Seattle City Light Department Policy & Procedure [DPP 500 P III-416](#).

6.4 How does the project/technology review and approve information sharing agreements, memorandums of understanding, new uses of the information, new access to the system by organizations within City of Seattle and outside agencies?

City Light anticipates no additional data-sharing, as the CDT’s mission is fixed. Additional changes would require review the Current Diversion Coordinator. Law enforcement, as mentioned in 6.3, may request these data and findings but only pursuant to a subpoena or a request pursuant to the Public Disclosure Law (based upon probable cause, see [RCW 42.56.335](#)).

6.5 Explain how the project/technology checks the accuracy of the information collected. If accuracy is not checked, please explain why.

As the data come from the SensorLink TMS device are designed to measure accurately in a scientific manner the amount of energy passing through them, these data are not checked further, beyond regular maintenance of the equipment to ensure proper functioning.

6.6 Describe any procedures that allow individuals to access their information and correct inaccurate or erroneous information.

Upon a proper finding of current diversion, customers are back-billed to recoup these losses. [DPP 500 P III-416](#) provides that “all customers shall receive uniform consideration and courtesy in all matters involving actual or suspected current diversion.” Customers are notified of findings and offered opportunities to respond and/or object.

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7.0 Legal Obligations, Risks and Compliance

7.1 What specific legal authorities and/or agreements permit and define the collection of information by the project/technology?

One of City Light's core missions as an electric utility is to recoup the costs of the energy it provides to its customers as part of its operations, as required in [SMC 21.49.100](#).

7.2 Describe what privacy training is provided to users either generally or specifically relevant to the project/technology.

CDT members are trained in how to store information in private folders on City Light's digital storage locations, in addition to the general privacy and security training required by Seattle IT.

7.3 Given the specific data elements collected, describe the privacy risks identified and for each risk, explain how it was mitigated. Specific risks may be inherent in the sources or methods of collection, or the quality or quantity of information included.

The SensorLink TMS device only measures specific, individual service-drops directly linking the customer suspected of current diversion to City Light's electric services. As such, there is no additional privacy risk present.

7.4 Is there any aspect of the project/technology that might cause concern by giving the appearance to the public of privacy intrusion or misuse of personal information?

City Light has considered but does not anticipate such objections, since the data collected are used for one purpose only.

8.0 Monitoring and Enforcement

8.1 Describe how the project/technology maintains a record of any disclosures outside of the department.

When a report is sent to law enforcement, it does not include power consumption information. Law enforcement then relies upon the Public Disclosure Law to request power records, if they decide to do so, and City Light would provide that information pursuant to that request. This may be effectuated either by a subpoena or by a request from law enforcement based upon probable cause and pursuant to the Washington Public Disclosure Law (see [RCW 42.56.335](#)).

8.2 What auditing measures are in place to safeguard the information, and policies that pertain to them, as well as who has access to the audit data? Explain whether the project/technology conducts self-audits, third party audits or reviews.

To safeguard the information, the Current Diversion Coordinator will request Seattle IT to provide audit data, so that City Light may complete an audit to ensure that access rights are assigned only those who should have access to the shared drive containing customer/current-diversion data.

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Financial Information

Purpose

This section provides a description of the fiscal impact of the surveillance technology, as required by the surveillance ordinance.

1.0 Fiscal Impact

Provide a description of the fiscal impact of the project/technology by answering the questions below.

1.1 Current or potential sources of funding: initial acquisition costs.

Current potential

Date of initial acquisition	Date of go live	Direct initial acquisition cost	Professional services for acquisition	Other acquisition costs	Initial acquisition funding source
2014 & 2016	Same	\$4,800	None	None	City Light

Notes:

City Light obtained the SensorLink TMS technology in 2014. A reorder was placed in 2016. City Light now owns six such devices.

1.2 Current or potential sources of funding: on-going operating costs, including maintenance, licensing, personnel, legal/compliance use auditing, data retention and security costs.

Current potential

Annual maintenance and licensing	Legal/compliance, audit, data retention and other security costs	Department overhead	IT overhead	Annual funding source
None	See below	None	None	City Light

Notes:

Compliance and audit costs are internal, as detailed above, and are therefore part of Current Diversion Team's normal workflow and procedures. There are no costs directly related to the "use" or "maintenance" of the six SensorLink TMS devices.

1.3 Cost savings potential through use of the technology

In 2017, through the use of the Current Diversion Team's technologies – including the SensorLink TMS device – City Light was able to recover \$1.6 million in stolen energy costs.

1.4 Current or potential sources of funding including subsidies or free products offered by vendors or governmental entities

None identified.

Expertise and References

Purpose

The following information is provided to ensure that Council has a group of experts to reference while reviewing the completed surveillance impact report (“SIR”). Any individuals or agencies referenced must be made aware ahead of publication that their information has been included. All materials must be available for Council to access or review, without requiring additional purchase or contract.

1.0 Other Government References

Please list any other government bodies that have implemented this technology and can speak to the implementation of this technology.

Agency, municipality, etc.	Primary contact	Description of current use
N/A	N/A	N/A


2.0 Academics, Consultants, and Other Experts

Please list any experts in the technology under consideration, or in the technical completion of the service or function the technology is responsible for.

Agency, municipality, etc.	Primary contact	Description of current use
N/A	N/A	N/A

3.0 White Papers or Other Documents

Please list any authoritative publication, report or guide that is relevant to the use of this technology or this type of technology.

Title	Publication	Link
SensorLink TMS Overhead Transformer Meter Technical Specification Sheet	 TMS%20Datasheet %20V01.pdf	Weblink to PDF document

Racial Equity Toolkit (“RET”) and Engagement for Public Comment Worksheet

Purpose

Departments submitting a SIR are required to complete an adapted version of the Racial Equity Toolkit (“RET”) in order to:

- Provide a framework for the mindful completion of the SIR in a way that is sensitive to the historic exclusion of vulnerable and historically underrepresented communities. Particularly, to inform the public engagement efforts departments will complete as part of the surveillance impact report.
- Highlight and mitigate any impacts on racial equity from the adoption and the use of the technology.
- Highlight and mitigate any disparate impacts on individuals or vulnerable communities.
- Fulfill the public engagement requirements of the surveillance impact report.

Adaptation of the RET for Surveillance Impact Reports

The RET was adapted for the specific use by the Seattle Information Technology Departments’ (“Seattle IT”) Privacy Team, the Office of Civil Rights (“OCR”), and Change Team members from Seattle IT, Seattle City Light, Seattle Fire Department, Seattle Police Department, and Seattle Department of Transportation.

Racial Equity Toolkit Overview

The vision of the Seattle Race and Social Justice Initiative (“RSJI”) is to eliminate racial inequity in the community. To do this requires ending individual racism, institutional racism and structural racism. The RET lays out a process and a set of questions to guide the development, implementation and evaluation of policies, initiatives, programs, and budget issues to address the impacts on racial equity.

1.0 Set Outcomes

1.1. Seattle City Council has defined the following inclusion criteria in the surveillance ordinance, and they serve as important touchstones for the risks departments are being asked to resolve and/or mitigate. Which of the following inclusion criteria apply to this technology?

- The technology disparately impacts disadvantaged groups.
- There is a high likelihood that personally identifiable information will be shared with non-City entities that will use the data for a purpose other than providing the City with a contractually agreed-upon service.
- The technology collects data that is personally identifiable even if obscured, de-identified, or anonymized after collection.
- The technology raises reasonable concerns about impacts to civil liberty, freedom of speech or association, racial equity, or social justice.

1.2 What are the potential impacts on civil liberties through the implementation of this technology? How is the department mitigating these risks?

Because SensorLink TMS, in conjunction with the two other diversion technologies being reviewed, are designed to measure electric current at one connection point assigned to one customer, no impacts on civil liberties are anticipated from the technologies themselves. At the same time, City Light is aware that the methods and procedures surrounding the use or installation of an otherwise non-offensive technology is just as important. For that reason, we ensure that our staff are clearly identified as Seattle City Light employees when in the field; there is no surreptitious operation in the field.

1.3 What are the risks for racial or ethnicity-based bias through each use or deployment of this technology? How is the department mitigating these risks?

Include a description of any issues that may arise such as algorithmic bias or the possibility for ethnic bias to emerge in people and/or system decision-making.

City Light is committed to equitable enforcement of all its legal mandates, in the same way that it is committed to equity in its provision of clean, affordable, and reliable power for its customers. City Light aims to ensure that the enforcement mechanisms are similarly equitable, in that they should be not only unbiased but also equitably enforced. For that reason, City Light is undertaking an equity analysis of past enforcement locations and will be reviewing these to ensure that our existing policies and procedures are as equitable as possible.

1.4 Where in the City is the technology used or deployed?

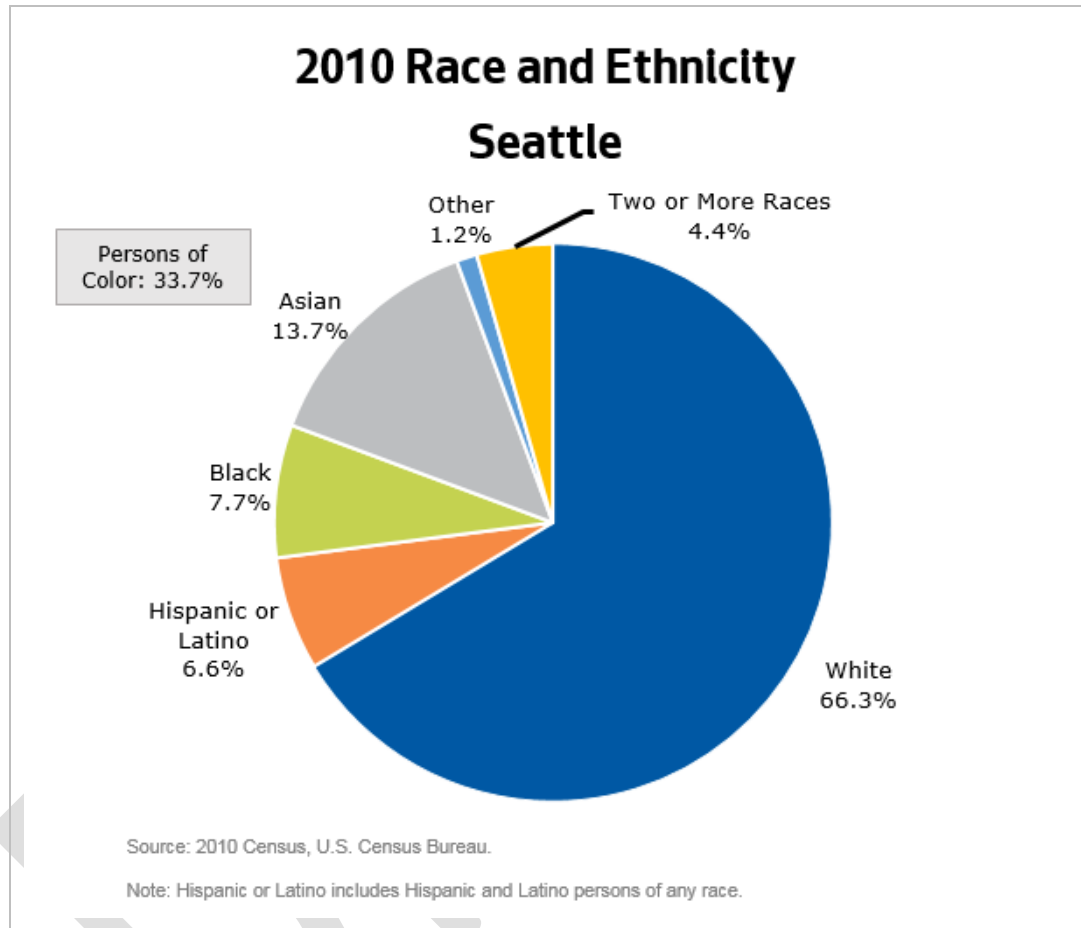
all Seattle neighborhoods

- | | |
|---|--|
| <input type="checkbox"/> Ballard | <input type="checkbox"/> Northwest |
| <input type="checkbox"/> Belltown | <input type="checkbox"/> Madison Park / Madison Valley |
| <input type="checkbox"/> Beacon Hill | <input type="checkbox"/> Magnolia |
| <input type="checkbox"/> Capitol Hill | <input type="checkbox"/> Rainier Beach |
| <input type="checkbox"/> Central District | <input type="checkbox"/> Ravenna / Laurelhurst |
| <input type="checkbox"/> Columbia City | <input type="checkbox"/> South Lake Union / Eastlake |
| <input type="checkbox"/> Delridge | <input type="checkbox"/> Southeast |
| <input type="checkbox"/> First Hill | <input type="checkbox"/> Southwest |
| <input type="checkbox"/> Georgetown | <input type="checkbox"/> South Park |
| <input type="checkbox"/> Greenwood / Phinney | <input type="checkbox"/> Wallingford / Fremont |
| <input type="checkbox"/> International District | <input type="checkbox"/> West Seattle |
| <input type="checkbox"/> Interbay | <input type="checkbox"/> King county (outside Seattle) |
| <input type="checkbox"/> North | <input type="checkbox"/> Outside King County. |
| <input type="checkbox"/> Northeast | |

If possible, please include any maps or visualizations of historical deployments / use.

Seattle City Light’s service territory extends beyond the boundary of the City of Seattle. Other areas include: Burien, Lake Forest Park, Normandy Park, Renton, SeaTac, Shoreline, Tukwila, and areas of unincorporated King County.

1.4.1 What are the racial demographics of those living in this area or impacted by these issues?



1.4.2 How does the Department to ensure diverse neighborhoods, communities, or individuals are not specifically targeted through the use or deployment of this technology?

DPP 500 P III-416 provides that “all customers shall receive uniform consideration and courtesy in all matters involving actual or suspected current diversion.” City Light aims to ensure that the enforcement mechanisms are equitable, in that they should be not only unbiased but also equitably enforced. For that reason, City Light is undertaking an equity analysis of past enforcement locations and will be reviewing these to ensure that our existing policies and procedures are as equitable as possible.

1.5 How do decisions around data sharing have the potential for disparate impact on historically targeted communities? What is the department doing to mitigate those risks?

Data is collected for Seattle City Light use and may only be shared with outside entities for the purposes of law enforcement or legal action by the relevant jurisdictional authority. This policy is formally laid out in Seattle City Light Department Policy & Procedure DPP 500 P III-416. As stated previously, City Light aims to ensure that the enforcement mechanisms are equitable, in that they should be not only unbiased but also equitably enforced. For that reason, City Light is undertaking an equity analysis of past enforcement locations and will be reviewing these to ensure that our existing policies and procedures are as equitable as possible.

1.6 How do decisions around data storage and retention have the potential for disparate impact on historically targeted communities? What is the department doing to mitigate those risks?

Data is maintained for Seattle City Light use and may only be shared with outside entities for the purposes of law enforcement or legal action by the relevant jurisdictional authority. This policy is formally laid out in Seattle City Light Department Policy & Procedure DPP 500 P III-416. As stated previously, City Light aims to ensure that the enforcement mechanisms are equitable, in that they should be not only unbiased but also equitably enforced. For that reason, City Light is undertaking an equity analysis of past enforcement locations and will be reviewing these to ensure that our existing policies and procedures are as equitable as possible.

1.7 What are potential unintended consequences (both negative and positive potential impact)? What proactive steps can you can / have you taken to ensure these consequences do not occur.

One of City Light's core missions as an electric utility is to recoup the costs of the energy it provides to its customers as part of its operations (as required in [SMC 21.49.100](#) and the general rule against gifts of public funds found in the Washington State Constitution at Article VIII, Section 7). Per DPP 500 P III-416, "all customers shall receive uniform consideration and courtesy in all matters involving actual or suspected current diversion." As stated previously, City Light aims to ensure that the enforcement mechanisms are equitable, in that they should be not only unbiased but also equitably enforced. For that reason, City Light is undertaking an equity analysis of past enforcement locations and will be reviewing these to ensure that our existing policies and procedures are as equitable as possible.

2.0 Public Outreach

2.1 Organizations who received a personal invitation to participate.

Please include a list of all organizations specifically invited to provide feedback on this technology.

1. ACLU of Washington	2. Ethiopian Community Center	3. Planned Parenthood Votes Northwest and Hawaii
4. ACRS (Asian Counselling and Referral Service)	5. Faith Action Network	6. PROVAIL
7. API Chaya	8. Filipino Advisory Council (SPD)	9. Real Change
10. API Coalition of King County	11. Friends of Little Saigon	12. SCIPDA
13. API Coalition of Pierce County	14. Full Life Care	15. Seattle Japanese American Citizens League (JAACL)
16. CAIR	17. Garinagu HounGua	18. Seattle Neighborhood Group
19. CARE	20. Helping Link	21. Senior Center of West Seattle
22. Central International District Business Improvement District	23. Horn of Africa	24. Seniors in Action
25. Church Council of Greater Seattle	26. International ImCDA	27. Somali Family Safety Task Force
28. City of Seattle Community Police Commission (CPC)	29. John T. Williams Organizing Committee	30. South East Effective Development
31. City of Seattle Community Technology Advisory Board	32. Kin On Community Health Care	33. South Park Information and Resource Center SPIARC
34. City of Seattle Human Rights Commission	35. Korean Advisory Council (SPD)	36. STEMPaths Innovation Network
37. Coalition for Refugees from Burma	38. Latina/o Bar Association of Washington	39. University of Washington Women's Center
40. Community Passageways	41. Latino Civic Alliance	42. United Indians of All Tribes Foundation
43. Council of American Islamic Relations - Washington	44. LELO (Legacy of Equality, Leadership, and Organizing)	45. Urban League
46. East African Advisory Council (SPD)	47. Literacy Source	48. Wallingford Boys & Girls Club
49. East African Community Services	50. Millionair Club Charity	51. Washington Association of Criminal Defense Lawyers
52. Education for All	53. Native American Advisory Council (SPD)	54. Washington Hall
55. El Centro de la Raza	56. Northwest Immigrant Rights Project	57. West African Community Council
58. Entre Hermanos	59. OneAmerica	60. YouthCare
61. US Transportation expertise	62. Local 27	63. Local 2898
64. (SPD) Demographic Advisory Council	65. South Seattle Crime Prevention Coalition (SSCPC)	66. CWAC
67. NAAC		

2.1 Scheduled public meeting(s).

Meeting notes, sign-in sheets, all comments received, and questions from the public will be included in Appendix B, C, D, E, F, G, H and I. Comment analysis will be summarized in section 3.0 Public Comment Analysis.

Location	Updated 2/12/19: Bertha Knight Landes Room, 1st Floor City Hall 600 4th Avenue, Seattle, WA 98104
Time	February 27, 2019; 6:00 p.m. – 8:00 p.m.
Capacity	100+
Link to URL Invite	Not Available

2.2 Scheduled focus Group Meeting(s)

Meeting 1

Community Engaged	
Date	

Meeting 2

Community Engaged	
Date	

3.0 Public Comment Analysis

This section will be completed after the public comment period has been completed on [DATE] by Privacy Office staff.

3.1 Summary of Response Volume

Dashboard of respondent demographics.

3.2 Question One: What concerns, if any, do you have about the use of this technology?

Dashboard of respondent demographics.

3.3 Question Two: What value, if any, do you see in the use of this technology?

Dashboard of respondent demographics.

3.4 Question Three: What would you want City leadership to consider when making a decision about the use of this technology?

Dashboard of respondent demographics.

3.5 Question Four: General response to the technology.

Dashboard of respondent demographics.

3.5 General Surveillance Comments

These are comments received that are not particular to any technology currently under review.

Dashboard of respondent demographics.

4.0 Response to Public Comments

This section will be completed after the public comment period has been completed on [DATE].

4.1 How will you address the concerns that have been identified by the public?

What program, policy and partnership strategies will you implement? What strategies address immediate impacts? Long-term impacts? What strategies address root causes of inequity listed above? How will you partner with stakeholders for long-term positive change?

DRAFT

5.0 Equity Annual Reporting

5.1 What metrics for this technology be reported to the CTO for the annual equity assessments?

Respond here.

DRAFT

Privacy and Civil Liberties Assessment

Purpose

This section shall be completed after public engagement has concluded and the department has completed the racial equity toolkit section above. The privacy and civil liberties assessment is completed by the community surveillance working group (“working group”), per the surveillance ordinance which states that the working group shall:

“Provide to the executive and the City Council a privacy and civil liberties impact assessment for each SIR that must be included with any departmental request for surveillance technology acquisition or in-use approval. The impact assessment shall include a description of the potential impact of the surveillance technology on civil rights and liberties and potential disparate impacts on communities of color and other marginalized communities. The CTO shall share with the working group a copy of the SIR that shall also be posted during the period of public engagement. At the conclusion of the public engagement period, the CTO shall share the final proposed SIR with the working group at least six weeks prior to submittal of the SIR to Council for approval. The working group shall provide its impact assessment in writing to the executive and the City Council for inclusion in the SIR within six weeks of receiving the final proposed SIR. If the working group does not provide the impact assessment before such time, the working group must ask for a two-week extension of time to City Council in writing. If the working group fails to submit an impact statement within eight weeks of receiving the SIR, the department and City Council may proceed with ordinance approval without the impact statement.”

Working Group Privacy and Civil Liberties Assessment

Respond here.

Submitting Department Memo

Description

Provide the high-level description of the technology, including whether software or hardware, who uses it and where/when.

Purpose

State the reasons for the use cases for this technology; how it helps meet the departmental mission; benefits to personnel and the public; under what ordinance or law it is used/mandated or required; risks to mission or public if this technology were not available.

Benefits to the Public

Provide technology benefit information, including those that affect departmental personnel, members of the public and the City in general.

Privacy and Civil Liberties Considerations

Provide an overview of the privacy and civil liberties concerns that have been raised over the use or potential mis-use of the technology; include real and perceived concerns.

Summary

Provide summary of reasons for technology use; benefits; and privacy considerations and how we are incorporating those concerns into our operational plans.

DRAFT

Appendix A: Glossary

Accountable: (taken from the racial equity toolkit.) Responsive to the needs and concerns of those most impacted by the issues you are working on, particularly to communities of color and those historically underrepresented in the civic process.

Community outcomes: (taken from the racial equity toolkit.) The specific result you are seeking to achieve that advances racial equity.

Contracting equity: (taken from the racial equity toolkit.) Efforts to achieve equitable racial outcomes in the way the City spends resources, including goods and services, consultants and contracting.

DON: “department of neighborhoods.”

Immigrant and refugee access to services: (taken from the racial equity toolkit.) Government services and resources are easily available and understandable to all Seattle residents, including non-native English speakers. Full and active participation of immigrant and refugee communities exists in Seattle’s civic, economic and cultural life.

Inclusive outreach and public engagement: (taken from the racial equity toolkit.) Processes inclusive of people of diverse races, cultures, gender identities, sexual orientations and socio-economic status. Access to information, resources and civic processes so community members can effectively engage in the design and delivery of public services.

Individual racism: (taken from the racial equity toolkit.) Pre-judgment, bias, stereotypes about an individual or group based on race. The impacts of racism on individuals including white people internalizing privilege, and people of color internalizing oppression.

Institutional racism: (taken from the racial equity toolkit.) Organizational programs, policies or procedures that work to the benefit of white people and to the detriment of people of color, usually unintentionally or inadvertently.

OCR: “Office of Civil Rights.”

Opportunity areas: (taken from the racial equity toolkit.) One of seven issue areas the City of Seattle is working on in partnership with the community to eliminate racial disparities and create racial equity. They include: education, health, community development, criminal justice, jobs, housing, and the environment.

Racial equity: (taken from the racial equity toolkit.) When social, economic and political opportunities are not predicted based upon a person’s race.

Racial inequity: (taken from the racial equity toolkit.) When a person’s race can predict their social, economic, and political opportunities and outcomes.

RET: “racial equity toolkit”

Seattle neighborhoods: (taken from the racial equity toolkit neighborhood.) Boundaries defined for the purpose of understanding geographic areas in Seattle.

Stakeholders: (taken from the racial equity toolkit.) Those impacted by proposed policy, program, or budget issue who have potential concerns or issue expertise. Examples might include: specific racial/ethnic groups, other institutions like Seattle housing authority, schools, community-based organizations, change teams, City employees, unions, etc.

Structural racism: (taken from the racial equity toolkit.) The interplay of policies, practices and programs of multiple institutions which leads to adverse outcomes and conditions for communities of color compared to white communities that occurs within the context of racialized historical and cultural conditions.

Surveillance ordinance: Seattle City Council passed ordinance [125376](#), also referred to as the “surveillance ordinance.”

SIR: “surveillance impact report”, a document which captures the fulfillment of the Council-defined surveillance technology review process, as required by ordinance [125376](#).

Workforce equity: (taken from the racial equity toolkit.) Ensure the City's workforce diversity reflects the diversity of Seattle.



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Appendix B: Public Comment Analysis

Appendix C: Public Comment Demographics

Appendix D: Comment Analysis Methodology

Appendix E: Questions and Department Responses

Appendix F: Public Outreach Overview

Appendix G: Meeting Notice(s)

Appendix H: Meeting Sign-in Sheet(s)

Appendix I: All Comments Received from Members of the Public

Appendix J: Letters from Organizations or Commissions

Appendix K: Supporting Policy Documentation

DRAFT

Appendix L: CTO Notification of Surveillance Technology

Thank you for your department's efforts to comply with the new Surveillance Ordinance, including a review of your existing technologies to determine which may be subject to the Ordinance. I recognize this was a significant investment of time by your staff; their efforts are helping to build Council and public trust in how the City collects and uses data.

As required by the Ordinance (SMC 14.18.020.D), this is formal notice that the technologies listed below will require review and approval by City Council to remain in use. This list was determined through a process outlined in the Ordinance and was submitted at the end of last year for review to the Mayor's Office and City Council.

The first technology on the list below must be submitted for review by March 31, 2018, with one additional technology submitted for review at the end of each month after that. The City's Privacy Team has been tasked with assisting you and your staff with the completion of this process and has already begun working with your designated department team members to provide direction about the Surveillance Impact Report completion process.

Please let me know if you have any questions.

Thank you,
Michael Mattmiller

DRAFT

Technology	Description	Proposed Review Order
Binoculars/Spotting Scope	The spotting scope is used to read meters from a distance when direct access to the meter is obstructed. Scopes are used by SCL's Current Diversion team to conduct investigations. Use of this technology may occur without informing a domicile's resident(s).	1
SensorLink Amp Fork	The SensorLink Amp Fork is used by SCL's Current Diversion team to measure the load on line-side entrance conductors, allowing SCL to determine the total amount of power being consumed at a service location. This tool provides an instantaneous reading to the group conducting the investigation. Use of this technology may occur without informing a domicile's resident(s).	2
Check Meter Device	This device measures the total amount of power being consumed at a service location where current diversion is confirmed or suspected. The device is set at the transformer and is used when a prolonged reading is desired by the Current Diversion team. Use of this technology may occur without informing a domicile's resident(s).	3