

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

**GEORGIA POWER COMPANY
DOCKET NO. 36498**

**AFFIDAVIT AND BASIS FOR THE ASSERTION THAT PORTIONS OF THE
INFORMATION SUBMITTED ARE PROTECTED TRADE SECRETS**

As part of its 2013 Integrated Resource Plan and Application for Decertification of Plant Branch Units 3 and 4, Plant McManus Units 1 and 2, Plant Kraft Units 1-4, Plant Yates Units 1-5, Plant Boulevard Units 2 and 3, and Plant Bowen Unit 6 ("2013 IRP"), filed in Docket No.36498, Georgia Power Company ("Georgia Power" or the "Company") submits to the Georgia Public Service Commission Technical Appendix Volume 1, which contains specific resource, technology, expected unserved energy costs, and reserve margin information (the "Information") of the Company. Certain portions of the Information are trade secrets of Georgia Power and the Southern Company and their affiliates.

The trade secret portions of the Information derive economic value from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from their disclosure or use. Specifically, the trade secret portions of the Information contain competitively sensitive cost information related to process and data used by Georgia Power in analyzing resource addition schedules, available technology options, and optimal reserve margins and reserve margin scenarios. Public dissemination of the trade secret portions of the Information would allow Georgia Power's competitors and suppliers to have access to such processes and strategies and thereby gain an unfair competitive advantage in the marketplace. Competitors would obtain an unfair advantage because they are not required to reveal similar information and can utilize such trade secret portions of the Information to manipulate pricing and timing of supply to the disadvantage of Georgia Power. Competitors would also unfairly benefit in having access and insight into the Company's planning processes and methodologies. This competitive advantage for the Company's suppliers and competitors would mean that Georgia Power will potentially pay higher prices to suppliers, ultimately harming customers as well as Georgia Power.

Additionally, certain trade secret portions of the Information contain proprietary cost data and analysis prepared on the Company's behalf by outside consultants. These studies were prepared by paid consultants of the Company at a significant cost and thus derive economic value from not being generally known. To allow competitors to access information related to and contained in these studies would economically harm the Company in that competitors would be able to benefit from the information and analysis contained in the studies without similarly being required to purchase the analysis and intelligence. Thus, Georgia Power would be at a competitive disadvantage against such competitors, who would have access to such information without expending similar resources.

The trade secret portions of the Information are subject to substantial procedures to maintain their secrecy. Only select Georgia Power and Southern Company personnel are granted access to the trade secret portions of the Information. Those personnel receive access only on a

“need to know” basis. Parties outside Georgia Power and Southern Company who have been granted access to the trade secret portions of the Information, if any, have been required to sign confidentiality agreements.

Kyle C. Leach, first being duly sworn, deposes and states that he has reviewed Technical Appendix Volume 1 of the Company's 2013 IRP and that to the best of his knowledge the specific information designated as trade secret constitute trade secrets in accordance with O.C.G.A. Article 27 of Chapter 1 of Title 10.



Kyle C. Leach
Director, Resource Policy & Planning
Georgia Power Company

Subscribed and sworn to before me this 29th day of January, 2013.



Notary Public

My Commission expires: 9-10-2014