

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

**GEORGIA POWER COMPANY
DOCKET NO. 42310**

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

As part of its 2019 Integrated Resource Plan and Application for Certification of Capacity from Plant Scherer Unit 3 and Plant Goat Rock Units 9-12 and Application for Decertification of Plant Hammond Units 1-4, Plant McIntosh Unit 1, Plant Estatoah Unit 1, Plant Langdale Units 5-6, and Plant Riverview Units 1-2 ("2019 IRP"), filed in Docket No. 42310, Georgia Power Company ("Georgia Power" or the "Company") submits to the Georgia Public Service Commission Technical Appendix Volume 2, which contains certain information regarding the Company's demand-side plans, proprietary planning processes, specific resource, technology and avoided cost information, financial data, unit retirement study, and environmental compliance strategy (the "Information") of the Company. Certain portions of the Information are trade secrets of Georgia Power and 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 its 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. 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 Georgia Power and its customers.

The trade secret portions of the Information contained herein also include details concerning Georgia Power's response to environmental regulations, environmental allowance projections and data analyses, all of which would have economic values to other persons and competitors. If Georgia Power's suppliers had access to the trade secret portions of the Information, it would place the Company at a severe economic disadvantage and provide an economic advantage to competitors or bidders, who would thus have access to Georgia Power's allowance projections and environmental project cost projections, which could, in turn, increase costs to Georgia Power. This exposure would harm Georgia Power in its allowance purchase efforts and efforts to construct environmental projects. Georgia Power's ability to negotiate the optimum price and contract terms and conditions would be undermined if competitors and suppliers had access to the projections and analysis contained in the trade secret portions of the Information. Ultimately, the customers of Georgia Power would be harmed by higher rates and less reliability if such trade secret portions of the Information were publicly available.

Technical Appendix Volume 2 also contains trade secret portions of the Information related to the financial data utilized in the Company's forecasting, data related to unit retirement decisions, demand-side program details, and other confidential details. All such trade secret portions of the Information, if revealed to suppliers or competitors, would grant an unfair competitive advantage in that such parties would be able to optimally tailor plans and bids in a way that would disadvantage Georgia Power and ultimately harm ratepayers. Such suppliers and competitors are not similarly required to reveal confidential information.

Finally, all of the trade secret portions of the Information described above is subject to substantial procedures to maintain its secrecy. Only select Georgia Power and Southern Company affiliate personnel are granted access to the trade secret portions of the Information. Those personnel receive access on a "need to know" basis only. Any parties outside the Company who would be granted access to the trade secret portions of the Information would be required to sign confidentiality agreements.

Jeffrey R. Grubb, first being duly sworn, deposes and states that he has reviewed Technical Appendix Volume 2 of the Company's 2019 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. § 10-1-761 (2018).



Jeffrey R. Grubb
Director, Resource Policy & Planning
Georgia Power Company

Subscribed and sworn to before me this 23 day of January, 2019.



Notary Public

My Commission expires:

