

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 3, which contains confidential details regarding current and future transmission projects (the "Information") that is a trade secret of Georgia Power and Southern Company and their affiliates.

The Information derives 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 Information contains competitively sensitive cost information related to the prices Georgia Power has estimated for transmission equipment and specific details related to the Company's transmission infrastructure. Public dissemination of the Information would allow Georgia Power's competitors and suppliers to have access to the costs paid by the Company and insight into the Company's transmission planning process. Access to the Information would also allow competitors to gain specific insight into the Company's technical analysis regarding planned projects. Competitors would obtain an unfair advantage because they are not required to reveal similar information and can structure the pricing for competing products based on the Information. In the event the Information was released, it is quite likely that suppliers would use the Information to set the floor in establishing their own prices, thus artificially and inefficiently setting a market price that may not be representative of the best cost that the market could offer. 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. Finally, the Information includes details concerning Georgia Power's transmission infrastructure that may be used to pin-point vulnerabilities in the transmission system. Such portions of the Information contain Critical Energy Infrastructure Information, the distribution of which is subject to regulation under the Code of Federal Regulations Section 388.113.

Additionally, the Information is subject to substantial procedures to maintain its secrecy. Only select Georgia Power and Southern Company affiliate personnel are granted access to 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 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 3 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 16th day of January, 2019.



Notary Public

My Commission expires:

