

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

**GEORGIA POWER COMPANY
DOCKET NO. 44160**

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

As part of its 2022 Integrated Resource Plan ("2022 IRP"), filed in Docket No. 44160, 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, specific resource, technology and avoided cost information, financial data, unit retirement study, and environmental compliance strategy, including projected and current cost estimates for CCR ARO ash pond closure and landfill projects (the "Information") of the Company. Certain portions of the Information are trade secrets of Georgia Power and Southern Company and their affiliates and is therefore protected from public disclosure under Commission Rule 515-3-1-.11.

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 data related to unit retirement decisions, demand-side program details, financial assumptions and other confidential data used in the Company's resource analyses. 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 tailor proposals and bids to artificially set price floors to the disadvantage of Georgia Power and its customers. Such suppliers and competitors are not similarly required to reveal confidential information.

The trade secret portions of the Information contained herein also include details concerning Georgia Power's environmental compliance strategy, planned or required capital investments, cost data, and analyses, all of which have economic value that could be inappropriately leveraged by competitors, vendors, or other persons. Specifically, the trade secret portions of the Information contain competitively sensitive details on the site specific and CCR unit specific costs the Company is expected to incur to close its ash ponds and landfills as well as the timing and issuance of future contracts, as well as the Georgia Power's plans and expected investment in beneficial reuse projects. Publicly disclosing these costs would allow bidders and vendors to tailor proposals according to the Company's expected costs, setting an artificial floor on bidding to the detriment and harm of the Company and its customers. Disclosure of the trade secret portions of the Information could prevent the Company from adequately soliciting and obtaining the best cost estimates for future consulting work and harm the Company's efforts to obtain optimal pricing in current or future negotiations. In addition, the Company's competitors are not generally required to disclose similar information, and to require the Company to do so would put it at an economic disadvantage.

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 Georgia Power and Southern Company affiliates and their legal counsel 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 2022 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 (2021).



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

Subscribed and sworn to before me this 28th day of JANUARY, 2022.



Notary Public

My Commission expires:

