

**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 1, which contains certain information regarding the company's reserve margin, expected unserved energy costs, proprietary planning processes, load and energy forecast data, financial data, technology screening assumptions, technology and resource cost information, economic analyses, and other data, including projected and current cost estimates for environmental compliance costs and 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 their disclosure or use. Specifically, the trade secret portions of the Information contain competitively sensitive cost information related to available technology options, optimal reserve margins and reserve margin scenarios, process and data used by Georgia Power in analyzing resource addition schedules, financial data used in the Company's forecasting, and other confidential details. 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.

Certain trade secret portions of the Information provided includes detailed forecasted information regarding the Company's future energy and demand growth, which could be used to determine the Company's short-term capacity needs. If revealed to the public, a generation wholesaler or power marketer could use the trade secret portions of the Information to tailor proposals with the intention of pricing products in a manner that would undermine the Company's market position. Such disclosure could unfairly allow competitors to manipulate the wholesale market and ultimately harm retail customers through higher rates and less reliability. Lastly, the Company's competitors are not required to file their respective forecast information.

The trade secret portions of the Information contained herein also include details concerning Georgia Power's projected environmental 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 for the

expected issuance of future contracts. 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.

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 expend similar resources for the analysis and intelligence.

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 affiliates and their legal counsel who have been granted access to the trade secret portions of the Information, if any, have been required to sign confidentiality agreements.

Jeffrey R. Grubb, first being duly sworn, deposes and states that he has reviewed Technical Appendix Volume 1 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 28<sup>th</sup> day of JANUARY, 2022.



Notary Public

My Commission expires:

