

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 4, which contains the power purchase agreements from the Company's 2022-2028 Capacity Request for Proposals ("RFP") and include sensitive pricing and resource operational capability data of the Company (the "Information"). The Information is a trade secret of Georgia Power and Southern Company and their affiliates and is therefore protected from public disclosure under Commission Rule 515-3-1-.11.

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 their disclosure or use. Specifically, the Information contains competitively sensitive pricing and operational capability data specific to the resources under contract within each power purchase agreement. If the Information were made public, competitors, bidders, and suppliers could use the Information to unfairly manipulate the request for proposals process and competitive market to structure future bids and set an artificial price floor to arbitrarily increase prices to the detriment of the Company and its customers. Public dissemination of the Information would undermine Georgia Power's ability to negotiate the best price and contract terms and could harm the Company's ability to secure the best cost bids and resources for the benefit of customers. In addition, the terms of the power purchase agreements themselves provides for the confidentiality and protection of the Information. Compromising the confidentiality of such Information could harm Georgia Power in future PPA negotiations, as counterparties may fear compelled disclosure of key contractual terms. Lastly, the Company's competitors are not required to reveal or publish similar information.

The Information is subject to substantial procedures to maintain their secrecy. Only select Georgia Power and Southern Company personnel are granted access to 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 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 4 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 24th day of January, 2022.



Notary Public

My Commission expires:

