BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
GEORGIA POWER COMPANY
DOCKET NO. 29849

Data Request No. STF-132-19

Basis for the Assertion that Redacted Portions of the Information Submitted are Protected Trade Secrets

In response to Data Request STF-132-19, in Georgia Public Service Commission Docket No. 29849, Georgia Power Company ("Georgia Power" or the "Company") has provided Information (the "Information"). Certain provisions of the Information are trade secrets of Georgia Power, Southern Company, Oglethorpe Power Corporation, the Municipal Electric Authority of Georgia, and the City of Dalton (collectively the "Owners"), and their affiliates and contractors. These portions of the Information are protected 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. Public disclosure of the trade secret portions of the Information could give competitors and vendors an unfair advantage by showing the information related to the Company's and its contractors' confidential assessments, progress reports, analyses, forecasts, projections, and project configuration. The resulting economic harm could in turn impair Owners, Owners' affiliates and contractors, and Owners' customers.

More specifically, the Information that has been redacted contains confidential details relating to the management of costs, schedules, and future work on the Plant Vogtle Units 3 and 4 Project, as well as strategies to maintain and improve project performance. These portions of the Information are considered confidential and proprietary by the Company and its contractors and are generally not known to the public. Public release of this Information would reveal proprietary methods for analyzing and reporting project performance, giving potential competitors a detailed picture of the Company's and its contractors' internal management and evaluation process details, which could result in the competitors gaining a competitive advantage to the disadvantage of the Company's customers. The public disclosure of this Information would also harm the Company and its contractors because competitors could emulate these approaches without investing the significant time and effort that the Company invested to develop these processes.

Public release of the trade secret portions of the Information could also make potential vendors unwilling or unable to conduct business with the Company. By causing the vendors' proprietary information to be publicly available, even fewer vendors might be willing to contract with the Company, thus reducing the opportunity for the Company to procure the best options to meeting its customers' needs and potentially compelling the Company to deal with a vendor that does not offer the best cost option. This could cause significant added costs to the Company and ultimately to Georgia Power's customers.

The trade secret portions of the Information are subject to extensive efforts to maintain their secrecy. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to this information. Those personnel receive access only on a "need to know" basis. If a party outside Georgia Power and Southern Company and their legal counsel are granted access to the trade secret portions of the Information, the party is required to sign a confidentiality agreement.