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

Data Request No. STF-199-20

BASIS FOR THE ASSERTION THAT THE INFORMATION SUBMITTED IS A TRADE SECRET

In response to Data Request STF-199-20, 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 "Co-owners"), and their affiliates and contractors. These provisions 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 Information could give competitors an unfair advantage by showing the Company's schedule and project configuration and that harm could in turn impair Georgia Power, the Co-owners, and their respective customers.

More specifically, the Information that has been redacted is information related to the Company's and its contractor's management of and decisions related to the project schedule. The Company and its contractors developed this detailed schedule information only through extensive efforts. Public disclosure of this Information would expose the Company's internal methods of developing and managing the schedule. Georgia Power's competitors are not required to disclose their respective project schedule information. Competitors, in turn, could emulate these strategies that the Company developed only after its own significant time and investment. Moreover, if prospective vendors or subcontractors had access to the trade secret portions of the Information, the Company would be placed at an economic disadvantage because the prospective vendors and subcontractors could use of the information to inflate prices for construction services or materials to the detriment of the Company and its customers.

Public release of the trade secret portions of the Information could have adverse economic consequences for the Company. Public release of the trade secret portions of the Information could 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 ratepayers.

Additionally, the Information is subject to extensive efforts to maintain its secrecy. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to the 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 Information, the party is required to sign a confidentiality agreement.