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

Data Request No. STF-199-9

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

In response to Data Request STF-199-9, 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 revealing information related to the Company's and its contractors' corrective action programs and technical information. The resulting economic harm could impair Owners, Owners' affiliates and contractors, and Owners' customers.

More specifically, the Information that has been redacted contains sensitive and proprietary information related to the Company's and its contractors' Corrective Action Programs. Public release of the Information would reveal the Company's and its contractors' internal confidential and proprietary methods for analyzing, managing, and reporting events requiring corrective actions. Public disclosure of this information would harm the Company and the Contractor because competitors could emulate these approaches without investing the significant time and effort that the Company and the Contractor invested to develop these processes. Potential competitors could use the trade secret portions of the Information to obtain a detailed picture of the Company's evaluation process and sensitive engineering details, thereby gaining a competitive advantage to the disadvantage of the Company's customers. Moreover, 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, fewer vendors might be willing to sell to the Company, thus reducing the opportunity for the Company to enter into contracts best suited 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.