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

Data Request No. STF-225-2

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

In response to Data Request STF-225-2, 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 Company's individual components of costs, forecasts, plans, and models. The resulting economic harm could in turn impair Owners, Owners' affiliates and contractors, and Owners' customers.

More specifically, the trade secret portions of the Information contain sensitive details from the Company's internal accounting and project management procedures. This information is considered confidential and proprietary by the Company and is not generally known to the public. Georgia Power's competitors are not required to disclose their respective internal accounting and project management procedure information. If the Company's competitors had access to the details of the trade secret portions of the Information, the Company would be placed at an economic disadvantage. In particular, disclosure of the trade secret portions of the Information would expose the Company's internal proprietary methods for structuring and formulating internal accounting and project management procedures. Potential competitors of the Company could use the Information to obtain a detailed picture of the Company's internal project management procedures, thereby gaining a competitive advantage to the disadvantage of the Company's customers. Competitors, in turn, can emulate these strategies that the Company developed only after its own significant time and investment.

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.