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

BASIS FOR THE ASSERTION THAT PORTIONS OF GEORGIA POWER COMPANY'S PLANT VOGTLE UNITS 3 AND 4 WESTINGHOUSE SERVICES AGREEMENT STATUS REPORT ARE PROTECTED TRADE SECRETS

As part of construction monitoring process following the certification of Units 3 and 4 at Plant Vogtle, Georgia Power Company ("Georgia Power" or "the Company") submits to the Georgia Public Service Commission (the "Commission") the Westinghouse Services Agreement Status Report (the "Status Report"). Certain provisions of the Status Report are trade secrets of Georgia Power, Southern Company, Oglethorpe Power Corporation, Municipal Electric Authority of Georgia, and the City of Dalton (collectively the "Co-owners"), and their affiliates and contractors. These provisions of the Status Report are protected under Commission Rule 515-3-1-.11.

The trade secret provisions of the Status Report 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 information in the Status Report could give other utilities and competitors an unfair competitive advantage by showing the Company's costs and project configuration and could interfere with the Company's ability to negotiate for best cost equipment from vendors. Disclosure could also severely harm the Co-owners' contractors, and that harm could in turn impair Georgia Power, the Co-owners, and their customers.

Included in the Status Report are confidential information and assessments regarding engineering, procurement, and support provided by Westinghouse Electric Company LLC ("Westinghouse"). The information and assessments contained in the Status Report include the proprietary information of Westinghouse and other contractors. Public release of the confidential information included in the Status Report could have adverse economic consequences for the Company. Public release of the confidential information could make potential vendors unwilling or unable to conduct business with the Company. For many pieces of essential equipment there are already very few potential vendors from which Georgia Power might be able to purchase. By causing the vendors' proprietary information to be publicly available, even fewer vendors might be willing to sell to the Company, thus, reducing the opportunity for the Company to purchase the equipment 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 ratepayers.

Additionally, the trade secret portions of the Information are subject to extensive efforts to maintain their confidentiality. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to the trade secret portions of the Information. Those personnel receive access only on a "need to know" basis. Before a party outside of 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 with respect to the trade secret portions of the Information.