BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

SEMI-ANNUAL COAL COMBUSTION RESIDUALS
ASSET RETIREMENT OBLIGATION REPORT
DOCKET NO. 43083

GEORGIA POWER COMPANY

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

In accordance with the order of the Georgia Public Service Commission, Georgia Power Company ("Georgia Power" or the "Company") hereby submits the Coal Combustion Residuals Asset Retirement Obligation ("CCR ARO") Program Semi-Annual Program Status Report ("Report") in Docket No. 43083. In the Report, the Company has submitted details related to its environmental compliance strategies, including projected and current cost estimates for CCR ARO ash pond closures and landfill projects (the "Information"), that constitute trade secret information of the Southern Company, Georgia Power, and its affiliates and is therefore protected from public disclosure under Commission Rule 515-3-1-11.

The Information derives 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 its disclosure or use. Specifically, the trade secret portions of the Information contain competitively sensitive details on the site specific and CCR unit specific costs the Company is expected to incur to close its ash ponds and landfills, the timing and issuance of future contracts, as well as the Company's expected investment in beneficial reuse projects. Publicly disclosing these costs would allow bidders and vendors to tailor proposals according to the Company's expected costs, setting an artificial floor on bidding, to the detriment and harm of the Company and its customers by not allowing the Company to conduct a proper solicitation and obtain the best cost estimates for future work. Disclosure of the Information could harm the Company and its customers in its efforts to obtain optimal pricing in current or future negotiations. In addition, the Company's competitors are not generally required to disclose similar information, and to require the Company to do so would put it at an economic disadvantage.

The Information is subject to extensive efforts to maintain its confidentiality. 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 of Georgia Power and Southern Company and their legal counsel are granted access to the Information, the party is required to sign a confidentiality agreement with respect to the Information.

Brett Mitchell, first being duly sworn, deposes and states that he has reviewed the Report and that, to the best of his knowledge, the specific information designated as trade secret therein constitutes trade secrets pursuant to Article 27, Chapter 1, Title 10 of the Georgia Code.

Brett Mitchell
Environmental Affairs CCR PMO Director
Georgia Power Company

Subscribed and sworn to before me this 27th day of September, 2022.

Notary Public

My Commission expires: 6.5.23