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

Data Request No. STF-157-3

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

In response to Data Request STF-157-3, 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 information related to the Company's and its contractors' costs, internal performance tracking, and project configuration. The resulting economic harm could in turn impair Owners, Owners' affiliates and contractors, and Owners' customers.

More specifically, the Information that has been redacted contains proprietary processes, procedures, and performance metrics related to Bechtel Corporation's scope of work on the Plant Vogtle Units 3 and 4 Project. Public release of this information would reveal Bechtel's proprietary methods for analyzing and reporting project performance. The public disclosure of this information would harm Bechtel because competitors could emulate these approaches without investing the significant time and effort that Bechtel invested to develop these processes. The trade secret portions of the Information are also subject to confidentiality provisions agreed to by Bechtel and the Owners.

Moreover, 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 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.