EXHIBIT__(RS/RT-22)

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

GEORGIA POWER COMPANY
DOCKET NO. 44280
Georgia Power Company's 2022 Rate Case

Data Request No. STF-LA-2-111

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

As part of Georgia Power Company's 2022 Rate Case filed in Docket No. 44280 ("2022 Rate Case"), Georgia Power Company ("Georgia Power" or the "Company") submits to the Georgia Public Service Commission its response to STF-LA-2-111 ("Response"). In the Response, the Company has provided information related to cost allocation methodologies of the Company (the "Information"). All such Information constitutes 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 Information could be used by competitors of the Company to gain confidential details regarding the Company's internal cost allocation methodologies. These methodologies are proprietary and have been developed over time and through the expenditure of significant resources. Access to such methodologies would bestow on the Company's competitors an unfair advantage to the extent that such competitors would not similarly be required to expend such resources to develop similar methodologies. In addition, access to the Information would provide insight into the Company's costs, which could also undermine the Company's position. Competitors are not required to disclose similar customer information and to require Georgia Power to do so would put it at an economic disadvantage.

The Information is subject to substantial procedures to maintain its secrecy. Only select Georgia Power and Southern Company Services personnel are granted access to the Information. Those personnel receive access only on a "need to know" basis. Parties outside the Company who have been granted access to the Information, if any, have been required to sign confidentiality agreements with respect to the Information.

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Staff Data Request No. STF-LA-2

STF-LA-2-111

Question:

Has SCS updated any of its allocation factors for use in 2022? If not, explain fully why not. If so, identify and explain each allocation factor that SCS is using in 2022. Also provide the supporting calculations and Excel files showing the calculations for each allocation factor that SCS is using in 2022.

Response:

Yes. Allocation factors are updated and reviewed annually as part of SCS' Affiliate Transaction Review (ATR) process. Employee, Network ID (NTID), System Air, and Total SCS Billing statistics are evaluated quarterly. Other changes during the year are made if material events (acquisitions, divestitures, plant retirements, etc.) occur.

STF-LA-2-111 Attachment contains statistics as of May 2022 and reflects the month all allocation statistics were updated for the year.