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

Data Request No. STF-236-1

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

In response to Data Request STF-236-1, 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 trade secret portions of the Information that have been redacted contain modeling and economic evaluation information developed for the purpose of comparing the economics of Plant Vogtle Units 3 and 4 to other capacity options. The trade secret portions of the Information are considered confidential and proprietary by the Company and are not generally known by the public. Public release of the trade secret portions of the Information could have adverse economic consequences for the Company. In particular, this would expose the Company's internal modeling methods and economic evaluation data. Competitors, in turn, can emulate these strategies and information that the Company developed only after its own significant time and investment. Potential competitors of the Company could also use the trade secret portions of the Information to obtain a detailed picture of the Company's modeling strategy and results to guide purchases from and sales to the Company and thereby gain a competitive advantage to the disadvantage of the Company's customers.

Additionally, 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 the trade secret portions of the 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 with respect to the trade secret portions of the Information.