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

Data Request No. STF-44-1

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

In supplementing its response to Data Request STF-44-1, 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 highly confidential 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 provisions 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 Information could give competitors of the Company an unfair advantage by showing the Company's cost, schedule, and project configuration and that harm could in turn impair Georgia Power, the Owners, and their customers.

More specifically, the trade secret portions of the Information that has been redacted pertain to the Company's and its contractor's confidential and proprietary information, including sensitive information specifically related to the Company's and its contractors' respective Corrective Action Programs. The Company is contractually obligated to protect this sensitive information from public disclosure. Public release of the Information could have adverse economic consequences for the Company because it 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 ratepayers. Also, public disclosure of the trade secret portions of the Information would expose the Company's and its contractors' internal proprietary methods for managing and reporting events requiring corrective actions. Competitors, in turn, can emulate these strategies that the Company developed only after its own significant time and investment.

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.