

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

**GEORGIA POWER COMPANY
DOCKET NO. 44902 (FCR-26)**

**BASIS FOR THE ASSERTION THAT CERTAIN REDACTED PORTIONS
OF THE EXHIBITS TO THE DIRECT TESTIMONY OF
SARAH P. ADAMS AND ADAM D. HOUSTON
ARE PROTECTED TRADE SECRETS**

In support of Georgia Power Company's ("Georgia Power") Fuel Cost Recovery Rate (FCR-26) Application in Georgia Public Service Commission (the "Commission") Docket No. 44902, Georgia Power has submitted to the Commission the Direct Testimony and Exhibits of Sarah P. Adams and Adam D. Houston. The Exhibits include information and data regarding the Company's total projected fuel costs, projected generation data and forecast sales (the "Information"). The Information constitutes trade secret of the Southern Company, Georgia Power, and certain of its affiliates (the "Company") and is therefore protected from 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, revealing the Information would give competitors a competitive advantage in the marketplace by revealing the Company's forecasted costs. If the Information was disclosed to the public, a competitor could use the Information to tailor proposals with the intention of targeting certain groups of customers, thereby undermining the Company's market position. Competitors could also use the Information in determining the Company's costs of operation, including the Company's marginal costs. Such information would enable competitors to undercut bids to win both wholesale and retail customers. In addition, such Information could reveal the Company's needs in the short term and allow future fuel vendors to artificially adjust their offers, which could result in economic harm to the Company and its customers. Competitors of the Company 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 secrecy. Only select Company personnel are granted access to the Information. Those personnel receive access only on a "need to know" basis. If parties outside the Company are granted access to the Information, they are required to sign confidentiality agreements with respect to the Information.

Sarah P. Adams, first being duly sworn, deposes and states that she has reviewed the Exhibits included in this filing in Docket No. 44902, and that to the best of her knowledge the specific information designated as trade secret constitutes trade secrets in accordance with O.C.G.A. § 10-1-761 (2020).

Sarah P. Adams
Sarah P. Adams
Vice President and Comptroller
Georgia Power Company

Subscribed and sworn to before me this 24th day of February, 2023.

Lakeitha Ferrell
Notary Public

My Commission expires:

11/24/2023

