**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

**GEORGIA POWER**
**DOCKET NO. 11949**

# AFFIDAVIT AND BASIS FOR THE ASSERTION THAT THE INFORMATION SUBMITTED IS A TRADE SECRET

As required pursuant to the Commission's Order in Docket No. 11949, Georgia Power ("Georgia Power" or the "Company") has provided electronic copies of a number of documents containing plant specific operational and financial information (collectively, "Plant Performance Reports"), portions of which constitute trade secrets of the Southern Company, Georgia Power, and their affiliates (the "Information").

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 contains competitively sensitive commercial and plant performance, plant operation and financial information. Public dissemination of the information would provide wholesale market participants with vital information regarding Georgia Power's statistical plant performance, characteristics that could be used to adversely affect the competitive pricing of wholesale power markets in the Southeastern Electric Reliability Council region. Further, wholesale power competitors would obtain an unfair advantage because they are not required to reveal similar information. The end result is Georgia Power could potentially lose wholesale business to competitors and pay higher prices to wholesale suppliers for replacement power, ultimately harming retail and wholesale requirements customers as well as Georgia Power. In addition, the Information provides the planned maintenance schedules for the Company's plants in the reporting period calendar year. Public dissemination of the Information would allow Georgia Power's competitors and suppliers to take advantage of the scheduled service downtime, when the Company may especially rely on outside suppliers to meet load demands. Naturally, such manipulation of the market could affect wholesale market price for replacement power during such maintenance outages. The end result is Georgia Power will potentially pay higher prices to wholesale suppliers, again ultimately harming retail and wholesale requirements customers as well as the Company. Also, the Information details average and incremental fuel cost for the operation of the coal-fired generating plants which could be used to derive Georgia Power's marginal cost of production, giving a competitor information that could be used to unfairly compete against the Company and undermine its competitive bidding process. By obtaining these costs, bidders could tailor their bids to undercut the Company's production costs without fear of underbidding. Finally, the Information includes detailed financial schedules that would give competitors an unfair advantage because they are not required to reveal similar information and could structure the pricing for competing products based on Georgia Power's Information rather than their own costs and abilities. Suppliers would lose incentive to bid competitively and would price their products and services based on the Information. Georgia Power could potentially lose business to

competitors and pay higher prices to suppliers, once again harming retail and wholesale requirements customers as well as the Company.

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 Georgia Power and Southern Company Services who have been granted access to the Information, if any, have been required to sign confidentiality agreements with respect to the Reports. Additionally, access to Georgia Power and Southern Company buildings is restricted.

Matthew S. Berrigan, first being duly sworn, deposes and states that he has reviewed Georgia Power Company's Plant Performance Reports and that to the best of his knowledge the information included in such reports is accurate and that the specific information designated as trade secret constitute trade secrets pursuant to Article 27, Chapter 1, Title 10 of the Georgia Code.

Matthew S. Berrigan
Assistant Comptroller
Georgia Power Company

Subscribed and sworn to before me this 13 day of July, 2023.

Notary Public

My Commission expires:

Stephanie W. Fuller
Notary Public, Paulding County, Georgia
My Commission Expires July 31, 2024