BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

GEORGIA POWER COMPANY
DOCKET NO. 55378

2023 IRP UPDATE SUPPLEMENTAL FILING

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

As part of Georgia Power Company's 2023 Integrated Resource Plan Update filed in Docket No. 55378 ("2023 IRP Update"), Georgia Power Company ("Georgia Power" or the "Company") submits to the Georgia Public Service Commission its 2023 IRP Update Supplemental Filing ("Supplemental Filing"). In the Supplemental Filing, the Company has provided data supporting proposed projects including Company-owned proposals, which include sensitive pricing, resource operational capability data, and development timelines, and also certain information regarding the Company's proprietary planning processes, financial data, technology screening assumptions, generic technology and resource cost information, specific resource, technology and avoided cost information, economic analyses, load and energy forecast data assumptions, and other data, including confidential details regarding current and future transmission projects (the "Information"). All of such information constitutes trade secret information of 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 trade secret portions of the Information contained herein include competitively sensitive pricing and operational capability data, including project development timelines where applicable, specific to the resources under contract within each power purchase agreement or proposed to be developed. If the Information were made public, competitors, bidders, and suppliers could use the Information to unfairly manipulate the request for proposals process and competitive market to structure future bids and set an artificial price floor to arbitrarily increase prices to the detriment of the Company and its customers. Public dissemination of the Information would undermine Georgia Power's ability to negotiate the best price and contract terms and could harm the Company's ability to secure the best cost bids and resources for the benefit of customers. In addition, the terms of the power purchase agreements themselves provides for the confidentiality and protection of the Information. Compromising the confidentiality of such Information could harm Georgia Power in future PPA negotiations, as counterparties may fear compelled disclosure of key contractual terms. Lastly, the Company's competitors are not required to reveal or publish similar information.

The trade secret portions of the Information also contain competitively sensitive cost information related to available technology options, processes and data used by Georgia Power in analyzing resource addition schedules, financial data used in the Company's resource analyses, and other confidential details including data supporting resource economic evaluations. Public dissemination of the trade secret portions of the Information would allow Georgia Power's

competitors and suppliers to have access to such processes and strategies and thereby gain an unfair competitive advantage in the marketplace. Competitors would obtain an unfair advantage because they are not required to reveal similar information and can utilize such trade secret portions of the Information to manipulate pricing and timing of supply to the disadvantage of Georgia Power. Competitors would also unfairly benefit in having access and insight into the Company's planning processes and methodologies. This competitive advantage for the Company's suppliers and competitors would mean that Georgia Power will potentially pay higher prices to suppliers, ultimately harming Georgia Power and its customers.

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.

Jeffrey R. Grubb, first being duly sworn, deposes and states that he has reviewed the Company's 2023 IRP Update Supplemental Filing and that to the best of his knowledge the specific information designated as trade secret constitute trade secrets in accordance with O.C.G.A. § 10-1-761 (2021).

Jeffrey R. Grubb
Director, Resource Policy & Planning
Georgia Power Company

Subscribed and sworn to before me this 4th day of December, 2023.

Notary Public

My Commission expires:

