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

Data Request No. STF-29-1 Update

BASIS FOR THE ASSERTION THAT PORTIONS OF THE INFORMATION SUBMITTED ARE PROTECTED TRADE SECRETS

In response to Data Request STF-29-1, 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 "Co- 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 an unfair advantage by showing the Company's costs, schedule and project configuration and that harm could in turn impair Georgia Power, the Co-owners and their customers.

More specifically, the trade secret portions of the Information that have been redacted contain information related to the performance, strategies, metrics, and management of Westinghouse Electric Company LLC and its affiliates ("Westinghouse") and Bechtel Corporation ("Bechtel") with respect to the engineering, procurement, and construction of Plant Vogtle Units 3 and 4. The Information consists of correspondence between Company senior management, Westinghouse, and Bechtel related to their performance, as well as commercial issues that have arisen between Westinghouse, Bechtel, and the Co-owners. This Information is considered confidential and proprietary by the Company and its contractors and is not generally known by the public.

Moreover, public release of the trade secret portions of the Information could have adverse economic consequences for the Company. Public release of the trade secret portions of the Information 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 contract with the Company, thus, reducing the opportunity for the Company to procure the best options 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.

Additionally, the Information is subject to extensive efforts to maintain its secrecy. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to 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 Information, the party is required to sign a confidentiality agreement.