BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

GEORGIA POWER COMPANY
DOCKET NO. 44160

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

As part of its 2022 Integrated Resource Plan ("2022 IRP"), filed in Docket No. 44160, Georgia Power Company ("Georgia Power" or the "Company") submits to the Georgia Public Service Commission its Engineering, Procurement, and Construction Agreement ("EPC Agreement") Compliance Filing for the McGrau Ford Phase 1 Battery Energy Storage System, which contains information and data supporting the McGrau Ford Phase 1 Battery Energy Storage System proposed in the 2022 IRP, including sensitive terms and conditions contained within the EPC Agreement and the Battery and Equipment Supply Agreement ("BESA"), pricing information, resource operational capability data, and development timelines, as well as certain information regarding the Company's proprietary planning processes, financial data, technology screening assumptions, generic technology and resource cost information, specific resource and technology cost information, economic analyses, and other data (the "Information"). Certain portions of the Information are trade secrets of Georgia Power and Southern Company and their affiliates and is therefore protected from public disclosure 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. Specifically, the trade secret portions of the Information contained herein include competitively sensitive contractual terms and conditions, pricing and operational capability data, including project development timelines where applicable, specific to the resources under contract 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. Furthermore, 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 Engineering, Procurement, and Construction agreement, as well as the BESA, provides for the confidentiality and protection of the Information. Compromising the confidentiality of such Information could harm Georgia Power in future 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. 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 and selection 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 trade secret portions of the Information are subject to substantial procedures to maintain their secrecy. Only select Georgia Power and Southern Company personnel are granted access to the trade secret portions of the Information. Those personnel receive access only on a "need to know" basis. Parties outside Georgia Power and Southern Company affiliates and their legal counsel who have been granted access to the trade secret portions of the Information, if any, have been required to sign confidentiality agreements.

Jeffrey R. Grubb, first being duly sworn, deposes and states that he has reviewed the Engineering, Procurement, and Construction Agreement Compliance Filing for the McGrau Ford Phase 1 Battery Energy Storage System filed in Georgia Power's 2022 IRP in Docket No. 44160 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 8 day of August, 2024.

Notary Public

My Commission expires:

