BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

GEORGIA POWER COMPANY
DOCKET NO. 55378

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

As part of its 2023 Integrated Resource Plan Update ("2023 IRP Update"), filed in Docket No. 55378, Georgia Power Company ("Georgia Power" or the "Company") submits to the Georgia Public Service Commission its Application for Certification of Robins, Moody, Hammond, and McGrau Ford Phase II Battery Energy Storage Systems ("BESS"), including Attachments A through H, which contain information and data supporting the proposed projects, including sensitive terms and conditions contained within the Engineering, Procurement, and Construction ("EPC") Agreements and the Battery and Equipment Supply Agreements ("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, including confidential details regarding current and future transmission projects (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 pricing and operational capability data, including project development timelines where applicable, specific to the resources under contract and 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.

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.

Additionally, the Information contains competitively sensitive cost information related to the prices Georgia Power has estimated for transmission equipment and specific details related to the Company's transmission infrastructure. Public dissemination of the Information would allow Georgia Power's competitors and suppliers to have access to the costs paid by the Company and insight into the Company's transmission planning process. Access to the Information would also allow competitors to gain specific insight into the Company's technical analysis regarding planned projects. Competitors would obtain an unfair advantage because they are not required to reveal similar information and can structure the pricing for competing products based on the Information. In the event the Information was released, it is quite likely that suppliers would use the Information to set the floor in establishing their own prices, thus artificially and inefficiently setting a market price that may not be representative of the best cost that the market could offer. 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. Finally, the Information includes details concerning Georgia Power's transmission infrastructure that may be used to pin-point vulnerabilities in the transmission system. Such portions of the Information contain Critical Energy Infrastructure Information ("CEII"), the distribution of which is subject to regulation under the Code of Federal Regulations Section 388.113.

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 Application for Certification of Robins, Moody, Hammond, and McGrau Ford Phase II Battery Energy Storage Systems along with Attachments A through H filed in Georgia Power's 2023 IRP Update in Docket No. 55378 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 14 day of August, 2024.

Notary Public

My Commission expires:

DANA L MCLEAN NOTARY PUBLIC COWETA COUNTY GEORGIA EXPIRES APRIL 26, 2026