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 Technical Appendix to the Application for Certification of Robins, Moody, Hammond, and McGrau Ford Phase II Battery Energy Storage Systems ("BESS"), 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"), such as pricing information, resource operational capability data, and development timelines (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 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. 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, terms included in the EPC agreements, as well as the BESA's, provide for the confidentiality and protection of the Information. This proprietary information cannot be disclosed publicly, and if disclosed could harm Georgia Power's ability to negotiate favorable terms with vendors in the future. . 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, 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. 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 Technical Appendix to 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