October 22, 2024

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
GEORGIA POWER COMPANY
DOCKET NO. 55931

BASIS FOR THE ASSERTION THAT PORTIONS OF GEORGIA POWER COMPANY'S PLANT YATES UNITS 8 - 10 MONTHLY CONSORTIUM REPORT ARE PROTECTED TRADE SECRETS

As part of construction monitoring process following the certification of Units 8-10 at Plant Yates, Georgia Power Company ("Georgia Power" or "the Company") submits to the Georgia Public Service Commission (the "Commission") the Plant Yates Units 8-10 Monthly Consortium Report (the "Consortium Report"). Certain provisions of the Consortium Report are trade secrets of Georgia Power, Southern Company, and their affiliates and contractors and are protected from disclosure under Commission Rule 515-3-1-.11.

The trade secret provisions of the Consortium Report 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 trade secret information in the Consortium Report could give other utilities and competitors an unfair competitive advantage by showing the Company's costs and project configuration and could interfere with the Company's ability to negotiate for best cost equipment from vendors and suppliers. In addition, the Company's vendors and suppliers could arbitrarily price their products, equipment, and services based on the Company's expected cost rather than the best cost to the detriment of the Company and its customers.

Included in the Consortium Report are confidential information and assessments regarding construction, procurement, and support provided by Black and Veatch and Mitsubishi Corporation (the "Consortium"). The information and assessments contained in the Consortium Report include the proprietary information of the Consortium and other contractors. Public release of the confidential information included in the Consortium Report could have adverse economic consequences for the Company. In addition, public release of the confidential information could make potential vendors unwilling or unable to conduct business with the Company. For many pieces of essential equipment there are already very few potential vendors from which Georgia Power might be able to purchase the needed equipment. By causing the vendors' proprietary information to be publicly available, even fewer vendors might be willing to sell to the Company. This could cause significant added costs to the Company and ultimately to customers.

Additionally, the trade secret portions of the Consortium Report are subject to extensive efforts to maintain their confidentiality. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to the trade secret portions of the Information. Those personnel receive access only on a "need to know" basis. Before a party outside of Georgia Power and Southern Company and their legal counsel are granted access to the trade secret portions of the Information, the party is required to sign a confidentiality agreement with respect to the trade secret portions of the Information.