

**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

**GEORGIA POWER COMPANY  
DOCKET NO. 56002**

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

As part of its 2025 Integrated Resource Plan ("2025 IRP"), filed in Docket No. 56002, Georgia Power Company ("Georgia Power" or the "Company") submits to the Georgia Public Service Commission Technical Appendix Volume 1, which contains certain information regarding the Company's demand-side plans, load and energy forecast data, reserve margin, unit retirements, unit upgrades, proprietary planning processes, wholesale-to-retail offers, and Critical Energy Infrastructure Information ("CEII") in the form of drawings/schematics of dam infrastructure of the Company's hydro facilities (collectively, 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 its disclosure or use. Specifically, the trade secret portions of the Information contain competitively sensitive cost information related to optimal reserve margins and reserve margin scenarios, processes and data used by Georgia Power in analyzing resource addition and retirement schedules, demand-side program details, financial assumptions 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 processes and methodologies. With this competitive advantage, Georgia Power will potentially pay higher prices to suppliers, ultimately harming Georgia Power and its customers. The Information also includes sensitive details concerning Georgia Power's infrastructure that must be protected from public disclosure in the interests of system security and reliability. Such portions of the Information contain Critical Energy Infrastructure Information as defined by the Code of Federal Regulations Section 388.113.

Certain trade secret portions of the Information provided includes detailed forecasted information regarding the Company's future energy and demand growth, which could be used to determine the Company's short-term capacity needs. If revealed to the public, a generation wholesaler or power marketer could use the trade secret portions of the Information to tailor proposals with the intention of pricing products in a manner that would undermine the Company's market position. Such disclosure could unfairly allow competitors to manipulate the wholesale market and ultimately harm retail customers through higher rates and less reliability. Lastly, the Company's competitors are not required to file their respective forecast information.

The trade secret portions of the Information described above is subject to substantial procedures to maintain its secrecy. Only select Georgia Power and Southern Company affiliate personnel are granted access to the trade secret portions of the Information. Those personnel receive access on a “need to know” basis only. 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 Technical Appendix Volume 1 of the Company’s 2025 IRP 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 27 day of January, 2025.

  
Notary Public

My Commission expires:

