**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

**GEORGIA POWER COMPANY**

**DOCKET NO. 44280**

**Georgia Power Company’s 2022 Rate Case**

**Joint Petition to Extend the Alternate Rate Plan**

**BASIS FOR THE ASSERTION THAT THE**

**INFORMATION SUBMITTED IS A TRADE SECRET**

As part of Georgia Power Company’s 2022 Rate Case filed in Docket No. 44280 (“2022 Rate Case”), Georgia Power Company (“Georgia Power” or the “Company”) submits to the Georgia Public Service Commission its Joint Petition to Extend the Alternate Rate Plan (the “Joint Petition”). In the Joint Petition, the Company has provided detailed investment tax credit (“ITC”) and production tax credit (“PTC”) information and amounts (the “Information”). All such Information constitutes trade secret information of the Southern Company, Georgia Power, and its affiliates and is therefore protected from public disclosure under Commission Rule 515-3-1-.11.

The Information derives 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 Information contains detailed data related to the Company’s estimate of ITCs to be generated by year and potentially transferred to counterparties, as well as information regarding the top and bottom end of PTC limitations. The prices and amounts for these tax credits are negotiated with unrelated third parties in the event of a transfer transaction. Disclosure of these amounts would grant such third parties a competitive advantage and undermine the Company’s position when negotiating such prices and amounts.

Further, this Information could also be used to determine the Company’s capital estimates and estimated in-service dates for projects for which the Company is actively competing in solicitations and/or seeking bids for engineering, construction, and procurement services. If revealed to the public, competing bidders could use the Information to tailor their bids or proposals with the intention of pricing products that could affect the Company’s competitive position. Such disclosure could unduly allow competitors to undermine the competitive bidding process, gain an unfair advantage over the Company, and ultimately harm retail customers. The Company’s competitors are generally not required to file such information. In addition, the disclosure of Information could provide contractors an advantage in future negotiations for pricing of these capital projects to the detriment of the Company and its retail customers.

The Information is subject to substantial procedures to maintain its secrecy. Only select Georgia Power and Southern Company Services personnel are granted access to the Information. Those personnel receive access only on a “need to know” basis. Parties outside the Company who have been granted access to the Information, if any, have been required to sign confidentiality agreements with respect to the Information.