

May 21, 2025

VIA ELECTRONIC DELIVERY

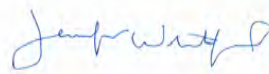
Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334

Re: Motion Challenging Georgia Power Company's Trade Secret Assertions

Dear Ms. Tanner:

Please find enclosed an electronic version of the following **Motion Challenging Georgia Power Company's Trade Secret Assertions** to be filed in Docket No. 56002 and 56003.

Respectfully submitted,



Jennifer Whitfield
Senior Attorney
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, Georgia 30309
678 277-4821
jwhitfield@selc.org

Counsel for GIPL and Southface

STATE OF GEORGIA
BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:)	
)	
Georgia Power Company's)	
2025 Integrated Resource Plan)	Docket No. 56002
)	
And)	
)	
Georgia Power Company's 2025)	Docket No. 56003
Application for the Certification,)	
Decertification, and Amended)	
Demand-Side Management Plan)	

MOTION CHALLENGING GEORGIA POWER COMPANY'S
TRADE SECRET ASSERTIONS

The Southern Environmental Law Center, on behalf of intervenors Georgia Interfaith Power & Light (GIPL) and Southface Energy Institute (hereinafter collectively referred to as “Movants”), moves the Georgia Public Service Commission to order Georgia Power Company to disclose to the public critical information related to the planning, cost, and resource assumptions in Georgia Power’s 2025 Integrated Resource Plan (IRP). Specifically, Movants ask that the public be given access to the following information redacted by Georgia Power in the above-captioned docket:

- Estimated overall cost of expanding the electric system with the proposals in this IRP (**Exhibit 2-A**)¹

¹ 2025 IRP Financial Review PUBLIC DISCLOSURE, from Technical Appendix Volume 2 of Georgia Power Company’s 2025 IRP Main Document Filing (Docket 56002) (attached as Exhibit 2-A).

- How many megawatts per year Georgia Power includes in its forecast because of expected large loads (**Exhibit 3-A**)²
- The specific overall contribution of different classes of customers (e.g. residential, commercial, industrial) and other high-level adjustments to the projected load forecast that forms the underlying basis of the IRP (**Exhibit 4-A**)³
- What size and type of power plants Georgia Power expects to own or operate during the next ten years, as requested in part by GIPL and Southface in HR-1-2 (**Exhibit 5-A**)⁴
- What basic assumptions Georgia Power uses about the overall cost and performance of generic types of power production to evaluate which resources are most economically optimal for Georgia Power customers (**Exhibit 6-A**)⁵
- Basic information about major outages experienced by Georgia Power customers during the past three years (**Exhibit 7-A**)⁶
- Estimated costs of Georgia Power’s transmission plan which is created in consultation with other Georgia electric utilities (**Exhibit 8-A**)⁷

The ability to freely discuss this information during Georgia Power’s IRP proceedings is crucial for the Commission, Georgia Power customers, the public, and any other stakeholders to adequately and accurately assess Georgia Power’s proposed plans. Georgia Power has failed to

² *Table 7.2.1: Budget 2025 External Peak Adjustments for Large Loads*, from Budget 2025 Load and Energy Forecast 2025 to 2044, in Technical Appendix Volume 1 of Georgia Power Company’s 2025 IRP Main Document Filing (Docket 56002) (attached as Exhibit 3-A).

³ *Attachment 6.0-2: Winter Coincident Demand with Adjustments (MW)*, from Budget 2025 Load and Energy Forecast 2025 to 2044, in Technical Appendix Volume 1 of Georgia Power Company’s 2025 IRP Main Document Filing (Docket 56002) (attached as Exhibit 4-A).

⁴ HR 1-2 (Docket 56002) (attached as Exhibit 5-A).

⁵ *Table 5: B2025 Technology Cost and Performance Summary*, from 2025 IRP Resource Mix Study, in Technical Appendix Volume 2 of Georgia Power Company’s 2025 IRP Main Document Filing (Docket 56002) (attached as Exhibit 6-A).

⁶ *[C2] 2022-2024 System Performance*, from 2025 IRP Transmission Plan, in Technical Appendix Volume 3 of Georgia Power Company’s 2025 IRP Main Document Filing (Docket 56002) (attached as Exhibit 7-A).

⁷ *Georgia Projects (Includes ITS & Savannah Projects)*, pp. 7-20, from 2025 IRP Transmission Plan, in Technical Appendix Volume 3 of Georgia Power Company’s 2025 IRP Main Document Filing (Docket 56002) (attached as Exhibit 8-A).

meet its statutory burden of proving that this information should be protected as trade secret, meaning this information has been inappropriately withheld and should be disclosed to the public.

BACKGROUND

Georgia Power’s Integrated Resource Planning process is an important, contested proceeding in which the Commission determines, among other things, how the 2.7 million Georgians who pay Georgia Power bills will invest in sources of energy “to satisfy future energy service demands . . . while balancing the interests of utility customers, utility shareholders and society-at-large.”⁸ The IRP Act and Commission rules require extensive information disclosures, which allow the public to scrutinize, comment, and otherwise meaningfully engage in this critical process.⁹ “At the hearing any interested person may make comments to the commission regarding the contents and adequacy of the plan.”¹⁰ And at the end of the IRP process, the Commission is charged with determining “which combinations of resource options . . . best serve the public interest. . . .”¹¹

In the 2025 IRP, Georgia Power has shielded fundamental planning, cost, and resource information from the general public by claiming it as trade secret. This means that as a member of the public, there is only one way to access that information in this docket: intervention.¹² But there are significant barriers to intervention, including the requirement that a party seeking to intervene must submit a timely, “verified” application in writing that “set[s] forth with particularity the facts pertaining to his interest and the grounds upon which his application for intervention are based.”¹³ It is difficult to imagine how organizations, members of the public, Georgia Power customers, or

⁸ Ga. Comp. R. & Regs. (Rule) 515-3-4-.02(25).

⁹ *See, e.g.*, Rule 515-3-4-.06, *et seq.*

¹⁰ O.C.G.A. § 46-3A-2(b).

¹¹ Rule 515-3-4-.05(4).

¹² Rule 515-3-1-.11(3).

¹³ O.C.G.A. § 46-2-59(c).

other stakeholders can meaningfully engage in the regulatory process—which includes proceedings in which the rates that Georgia Power customers will pay are decided—without first being aware of the costs and resources Georgia Power is requesting approval of in the first place.

Furthermore, intervention by parties who have signed confidentiality agreements, and are therefore granted access to trade secret information (like GIPL and Southface), becomes much more complicated when information is designated as trade secret. First, trade secret information must be destroyed by the intervening party at the conclusion of each docket, making it extremely burdensome—if not impossible—to identify trends over time related to, for example, costs and assumptions labeled trade secret and to recommend meaningful improvements to the planning process using history as a guide. Second, intervening parties do not have access to discovery, so their only opportunity to ensure that their questions and assumptions about the IRP are answered is in the public hearing. But it is nearly impossible to ask effective questions about certain essential topics without revealing information labeled as trade secret by Georgia Power. Third, critical information, such as the information requested in this motion, is only accessible to the individual signatories of a trade secret agreement. This means that despite there being individual people at organizations like Southface and GIPL who have access to this information, the organizations are still restricted from discussing that information among their members, constituents, and broader organizations, thus further impeding advocacy efforts. Fourth, and relatedly, a key aspect of both GIPL's and Southface's missions is to educate the public about what is at stake in Public Service Commission proceedings. Ultimately, Georgia Power's inappropriate overuse of trade secret designations makes it impossible to communicate publicly about essential topics in the regulatory process.

Prior to filing this motion, Movants sent Georgia Power a formal request to lift the trade secret designation on the same information requested in this motion.¹⁴ As of the date of this motion’s filing, Georgia Power’s attorneys have not provided a substantive response to the request.¹⁵

LEGAL STANDARDS AND ARGUMENT

I. Georgia Power bears the burden of demonstrating that the information it withholds meets the legal standard for a “trade secret.”

The Georgia Trade Secrets Act defines “trade secret” as information that is not commonly known by or available to the public, **and** that meets two tests:

- (A) The information derives economic value, actual or potential, 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; **and**
- (B) The information is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.¹⁶

A trade secret claim fails if any of the elements are not adequately shown.¹⁷

When Georgia Power files information in a proceeding before the Commission that it believes constitutes a trade secret, it must provide the legal and factual basis for why each item claimed to be trade secret should not be disclosed. The justification must include, but is not limited to, the following:

- (1) Why the information derives economic value from not being generally known to others;

¹⁴ See *Letter from SELC to Troutman Pepper Locke* (May 8, 2025) (attached as Exhibit 1-A).

¹⁵ See *Email Correspondence Between SELC and Troutman Pepper Locke* (May 8, 2025) (attached as Exhibit 1-B).

¹⁶ O.C.G.A. § 10-1-761(4). Trade secret information can take any form, “including, but not limited to, technical or nontechnical data, a formula, a pattern, a compilation, a program, a device, a method, a technique, a drawing, a process, financial data, financial plans, product plans, or a list of actual or potential customers or suppliers.” O.C.G.A. § 10-1-761(4).

¹⁷ *EarthCam, Inc. v. OxBlue Corp.*, 49 F. Supp. 3d 1210, 1225 (N.D. Ga. 2014).

- (2) How others can obtain economic value from its disclosure; and
- (3) Procedures utilized by the affected party or utility to maintain its secrecy.¹⁸

Georgia courts have found that information has “economic value” when a trade secret claimant presents evidence of a competitor that is specific and relevant to the industry and has an interest in the information at issue.¹⁹ In other words, the information must be valuable *to a competitor* in order to meet the definition of being economically valuable under the statute.²⁰ Additionally, the trade secret claimant should demonstrate a “direct link” between the asserted trade secret and the economic benefit that the claimant purportedly gains from protecting the trade secret information.²¹

The burden of proving each element described above to the Commission lies with the utility.²² If Georgia Power fails to adequately demonstrate any of these three requirements for each piece of trade secret information challenged, that information does not constitute a trade secret and should be disclosed to the public.²³

- a. As further explained in the following sections, Georgia Power’s identification of hypothetical harms is insufficient to establish that the withheld information derives “economic value” from not being known to others.**

This Commission has previously required Georgia Power to disclose important information it improperly withheld as trade secret based on improbable hypothetical harms. For example, in

¹⁸ Rule 515-3-1-.11(1)(c).

¹⁹ *See, e.g., Penalty Kick Mgmt. v. Coca Cola Co.*, 318 F.3d 1284 (11th Cir. 2003) (finding that information had economic value under the statute when the claimant presented actual evidence of a competing company previously seeking the information at issue); *see also Elm City Cheese Co. v. Federico*, 251 Conn. 59, 88-89 (1999) (finding economic value where a direct competitor testified that it endeavored to make the same product that the claimant was making, with the intention to serve the same particular “specialized niche” that the claimant served).

²⁰ *Id.*; *see also Vito v. Inman*, 286 Ga. App. 646, 650 (2007).

²¹ Restatement (Third) of Unfair Competition § 39 (updated Oct. 2024) (citing *Sun Media Sys., Inc. v. KDSM, LLC*, 564 F. Supp. 2d 946, 970 (S.D. Iowa 2008)).

²² Rule 515-3-1-.11(7).

²³ *Id.*; *see also In Re Georgia Power Co.’s Application for Certification of Units 4, 5, and 6 at Plant McDonough and the Decertification of Units 1 and 2 at Plant McDonough*, No. 24506-U, 2007 WL 2480172, *1 (Ga. P.S.C. Aug. 21, 2007).

the 2007 *Plant McDonough* matter, Georgia Power failed to meet its burden of proving that a map of various routes for a planned pipeline warranted trade secret protection.²⁴ The Commission rightfully rejected Georgia Power's argument that it "would have already done the 'homework' for others who might be considering the construction and location of a pipeline."²⁵ Instead, the Commission emphasized that the information in the map was "of little value" to competitors because it was "unlikely" that any competitor of Georgia Power would use the map to its benefit or be interested in locating a pipeline in the area.²⁶

Similarly, here, Georgia Power has failed to demonstrate, as required by the Commission's rules, how its withheld information derives economic value from not being generally known to others.²⁷ Although Georgia Power has filed affidavits asserting that redacted information is trade secret, those assertions are generic, sweeping, and conclusory. And just as in the *Plant McDonough* matter, Georgia Power's assertions here are insufficient to show that any party or specific competitor would find economic value in the challenged information.

As described in more detail for the individual exhibits below, most of the trade secret assertions challenged here are explained by Georgia Power in affidavits that apply to entire technical appendices which contain a wide variety of redactions.²⁸ Accordingly, the arguments here are focused on what appears to be Georgia Power's justification for withholding this information.²⁹

²⁴ *In Re Plant McDonough*, 2007 WL 2480172, *1.

²⁵ *Id.*

²⁶ *Id.*

²⁷ Rule 515-3-1-.11(1)(c).

²⁸ These affidavits are paired with their respective redacted documents in the exhibits to this motion. For example, Exhibit 2-A contains a redacted document and Exhibit 2-B is the accompanying trade secret assertion proffered by Georgia Power.

²⁹ GIPL and Southface reserve the right to amend these arguments should Georgia Power clarify its assertions or supplement its affidavits in response.

b. As further explained the following sections, Georgia Power has failed to identify how competitors—and which competitors—would obtain economic value from disclosure of the requested information.

Although Georgia Power claims, generally, that the public disclosure of this information would lead to its competitors gaining an economic advantage, it fails to identify who those competitors are or how those competitors could use the information to gain a competitive edge. Information is considered trade secret when the claimant demonstrates that a relevant competitor exists in the particular industry in which the claimant operates: Georgia courts have held that “a trade secret is protected from misappropriation because the secret gives the trade secret owner a competitive advantage in the industry.”³⁰

In *Vito v. Inman*, the Georgia Court of Appeals was unconvinced by a podiatrist’s argument that a list of his clients was trade secret due to the risk that lawyers could use such a list to find clients for malpractice cases against him. Rather, the court found that the list could only be considered trade secret under the statute if the information, if disclosed, could “reduce [his] competitive edge *in his field*.”³¹ Although the trade secret claimant identified a real economic harm from the disclosure—lawyers, a third party, could potentially derive economic value from the list by using it to target the claimant for malpractice suits—the claimant did not provide evidence that there was a threat of other *podiatrists* specifically using his patient list and causing him competitive harm.³² In other words, generalized concerns of diminishing economic value are not sufficient. A trade secret claimant must present evidence of a relevant competitor in the specific industry in which it operates that seeks the information at issue.

³⁰ *Vito v. Inman*, 286 Ga. App. 646, 650 (2007).

³¹ *Id.* (emphasis added).

³² *Id.*

As a regulated monopoly, Georgia Power by definition has no competitors for its customers, with the limited exception of its potential competition for new large-load customers, and it has no competition for most infrastructure projects.³³ In fact, the Supreme Court of Georgia emphasized that “[t]he long history of regulated monopoly in this state shows that the General Assembly is free to restrict competition among public utilities where, such competition may be injurious to existing public service . . . [t]he regulation of utilities is now . . . based on the theory of regulated monopoly *rather than competition*.”³⁴ None of Georgia Power’s trade secret assertions contain any mention or discussion of who exactly its competitors are in relation to the information challenged in this motion.³⁵ And tellingly, a Georgia Power witness testified that Georgia Power does not “compete against anybody” in the state of Georgia to build transmission.³⁶

The crux of the matter is that trade secrets are only protected “because the secret gives the trade secret owner a competitive advantage in the industry.”³⁷ Here, there is no relevant competitor, and therefore no competitive advantage lost by Georgia Power, so there is no reason to protect the information as a trade secret.

c. Georgia Power has failed to establish that it had adequate protections in place to maintain the secrecy of the information. Merely stating that Georgia Power personnel receive access on a “need to know basis” in an affidavit is insufficient to meet this requirement.

Georgia Power’s methods to maintain confidentiality, as asserted in its affidavits, are insufficient under the statute. The Georgia Trade Secrets Act requires “efforts that are reasonable

³³ There are, of course, circumstances under which Georgia Power could rightfully claim information as trade secret, despite the fact that it is a regulated monopoly. Those circumstances, however, do not apply to any of the requested pieces of information here.

³⁴ *City of Calhoun v. N. Georgia Elec. Membership Corp.*, 233 Ga. 759, 767-78 (1975) (emphasis added).

³⁵ See generally Exhibits 2-B, 3-B, 4-B, 5-B, 6-B, 7-B, and 8-B.

³⁶ *Hearing Day 1 Transcript*, Docket No. 56002 (Mar. 25, 2025) at p. 545, lines 9-13 (attached as Exhibit 11).

³⁷ *Vito*, 286 Ga. App. at 650; see also *Tronitec, Inc. v. Shealy*, 249 Ga. App. 442 (2001), overruled on other grounds by *Williams Gen. Corp. v. Stone*, 279 Ga. 428 (2005) (finding that certain information was trade secret where the claimant presented evidence showing that “the industry is *highly competitive and secretive*” (emphasis added)).

under the circumstances to maintain its secrecy.”³⁸ A trade secret claimant may demonstrate this requirement by presenting evidence of nondisclosure agreements, efforts to specifically notify parties of a document’s trade secret status when distributing it, or the implementation of other similar methods.³⁹ It is important to note, however, that Georgia courts have found that a general internal non-disclosure agreement, without more, is insufficient to maintain the secrecy of trade secret information under the statute.⁴⁰

II. Intervenor may challenge trade secret designations.

Any intervenor is permitted to challenge a trade secret designation by filing a motion.⁴¹ Upon such motion, the Commission shall conduct a hearing and an in-camera inspection to assess whether the information constitutes a trade secret. Again, it is the utility’s burden of proving the trade secret status of the information at issue.

As described further below, movants submit that Georgia Power’s cursory trade secret assertions do not meet its burden, and movants do not anticipate Georgia Power can meet its burden of proving the required elements to establish that the withheld information is a “trade secret.”

THE REQUESTED INFORMATION IS NOT TRADE SECRET

Georgia Power has not met its burden to establish that the information at issue constitutes a “trade secret” under the Georgia Trade Secrets Act. As explained below for each type of

³⁸ O.C.G.A. § 10-1-761(4).

³⁹ *See, e.g., Infrasource, Inc. v. Hahn Yalena Corp.*, 272 Ga. App. 703, 709 (2005); *see also Georgia Dep’t of Nat. Res. v. Theragenics Corp.*, 273 Ga. 724, 725 (2001).

⁴⁰ *Equifax Servs., Inc. v. Examination Mgmt. Servs., Inc.*, 216 Ga. App. 35, 40 (1994); *see also Stargate Software Int’l, Inc. v. Rumph*, 224 Ga. App. 873, 876-77 (1997) (finding that a company requiring employees to sign confidentiality agreements did not meet the statutory standard, in part because no additional instructions regarding how to maintain secrecy were given to the employees whose work involved reviewing the purportedly trade secret material).

⁴¹ Rule 515-3-1-.11(7).

information challenged (organized by the illustrative exhibits attached to this motion), the Commission should order Georgia Power to disclose publicly the requested information for the following reasons:

1. Georgia Power has not and cannot explain why the information derives economic value from not being generally known to others.
2. Georgia Power has failed to identify how others can obtain economic value from this information's disclosure. In fact, Georgia Power has failed to identify any competitors at all—as a regulated monopoly, Georgia Power has no relevant competitors in this context.
3. Georgia Power has failed to establish that it had adequate protections in place to maintain the secrecy of the information. Merely stating that Georgia Power personnel receive access on a “need to know basis” in an affidavit is insufficient to meet this requirement.

Exhibit 2-A: Revenue Requirements

Georgia Power has withheld revenue requirement information, which is the closest approximation of an actual overall cost to billpayers of Georgia Power's proposed IRP.⁴² This information is crucial for the public, intervenors, and the Commission to adequately assess the scope of Georgia Power's request.

The requested information in Exhibit 2-A is not trade secret. Georgia Power has not and cannot establish how the top-line revenue requirement information—generated to meet a statutory requirement—derives economic value from not being generally known or how others can obtain

⁴² According to Georgia Power, this document shows “the annual revenue requirements, the annual cents/kWh, and the present value of revenue requirements ... consist[ing] of total production costs plus fixed costs associated with system expansion and environmental compliance for the existing fleet.” *2025 IRP Financial Review PUBLIC DISCLOSURE* at 3, from Technical Appendix Volume 2 of Georgia Power Company's 2025 IRP Main Document Filing (Docket 56002). However, none of the scenarios “represent [Georgia Power's] full rate base ... costs included for the current generation are the variable costs only which are then added to the full cost of any additional generation needed as the system grows.” Georgia Power Response to STF-LA-1-7 Data Request Set No. 1 (attached as Exhibit 2-C).

economic value from disclosure. Nor has Georgia Power established it had adequate protections in place to maintain the secrecy of the information. GPC appears to allege:

- Georgia Power’s competitors are not required to reveal this information;
- Competitors will unfairly benefit from access and insight into planning processes and methodologies; and/or
- The market could be manipulated.⁴³

First, Georgia Power Company is a regulated monopoly without relevant competitors in this context. Its trade secret assertion here does not identify who it considers a competitor. However, other utilities *do* provide this kind of information.⁴⁴ Further, these revenue requirements would presumably function as inputs into the Georgia Public Service Commission’s ratemaking oversight of Georgia’s regulated investor-owned utility and in that specific context do not provide economic value to others.

Second, the assertion that competitors will “unfairly benefit in having access and insight into the Company’s planning processes and methodologies” is not a valid basis to assert a trade secret over this information. Not only are there no relevant competitors, but this information is too generic and high-level to reveal specific planning or processes that could have competitive value. Moreover, this particular information is specifically generated to try to address the requirements of the public Integrated Resource Planning process.⁴⁵

⁴³ *2025 IRP TS Assertion Affidavit Vol 2 Executed*, from Technical Appendix Volume 2 of Georgia Power Company’s 2025 IRP Main Document Filing (Docket 56002) (attached as Exhibit 2-B). Many of Georgia Power’s assertions of trade secret appear to rest on a market manipulation theory, though it is phrased slightly differently in each appendix. For example, in the appendix here, Georgia Power argues that competitors could “manipulate pricing and timing of supply” resulting in potentially higher prices.

⁴⁴ See, for example, net present value information provided for each resource plan evaluated by Santee Cooper’s IRP, *available at* <https://www.santeecooper.com/About/Integrated-Resource-Plan/Reports-and-Materials/Santee-Cooper-2024-IRP-Update.pdf>

⁴⁵ Georgia Power Company’s 2025 IRP Main Document (Docket 56002) at 76.

Third, the assertion that market manipulation could cause higher prices or less reliability is far too removed from the reality of the information at issue in this request. The information requested does not provide a breakdown of the revenue requirements' specific costs by any proposed resource or category of spending. Rather, it contains only general, high-level information about revenue requirements under different scenarios.⁴⁶ That is, the requested information is too general and removed from any specific cost information that suppliers might benefit from and would therefore be of little value. For this information to cause the harm asserted by Georgia Power would require a supplier or bidder to somehow deduce the underlying contribution of a single item to the overall revenue requirement, raise its bid accordingly, and then hope that all other bidders also reach the same conclusion. It is too farfetched.

Fourth, Georgia Power's assertions that only "select" personnel "receive access only on a 'need to know' basis"⁴⁷ provide no details about whether or how these personnel have been directed to maintain the secrecy of the purported trade secret information. Even a general internal non-disclosure agreement, without more, is insufficient to maintain the secrecy of trade secret information under the statute.⁴⁸

Exhibit 3-A: Large Load Forecast

Georgia Power has withheld the total number of megawatts in its yearly projected load growth caused by large load customers. As reflected in Exhibit 3-A, the large load projections that Georgia Power withholds do not identify the contribution of any specific customer. Rather, they merely reflect the output of Georgia Power's probabilistic assessment—the bottom-line number—

⁴⁶ See Exhibit 2-C, Georgia Power's Response to STF-LA-1-7 (noting multiple underlying calculations that go into the revenue requirements presented). And other revenue requirements are not marked trade secret. See Response to STF-PIA-6-21 (attached as Exhibit 20). In fact, Georgia Power publicly discloses costs by category in its demand-side management cases. See generally Georgia Power's DSM Application (Docket 56003).

⁴⁷ See, e.g., Exhibit 2-B.

⁴⁸ *Equifax Servs., Inc. v. Examination Mgmt. Servs., Inc.*, 216 Ga. App. 35, 40 (1994).

of how much of the large load “pipeline” Georgia Power projects will actually demand energy from the system. The fully redacted large load projections are perhaps the most critical component of Georgia Power’s plan.

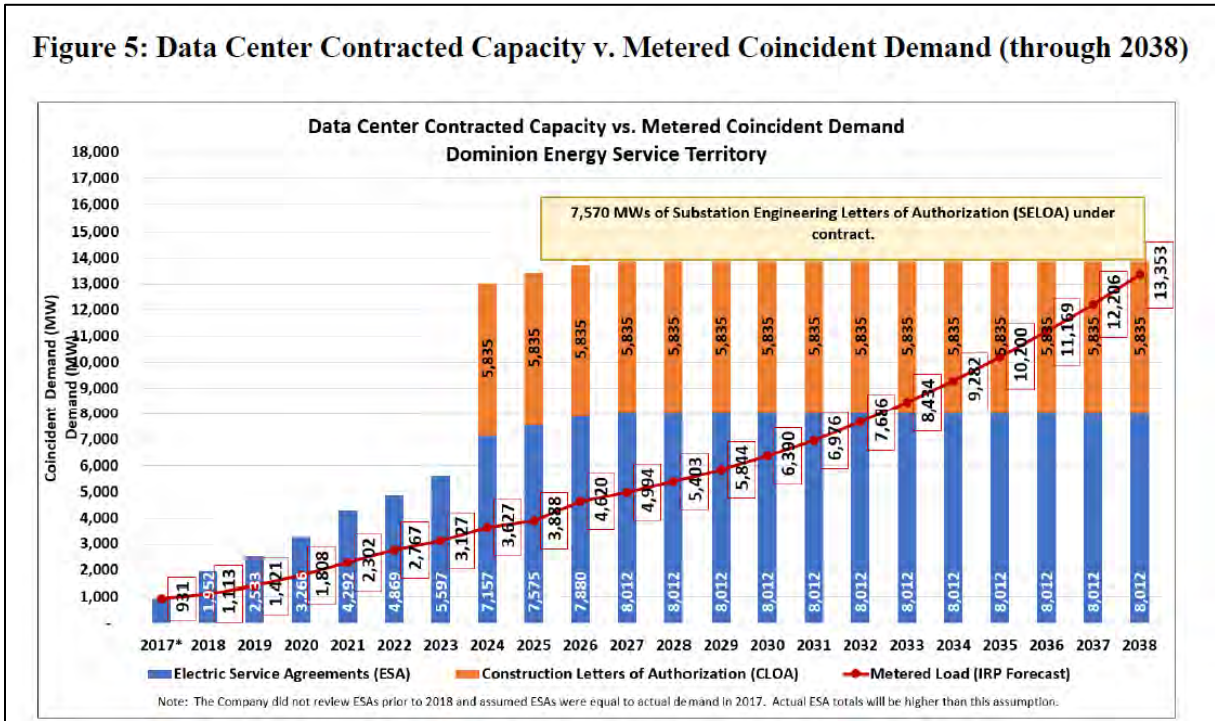
The requested information in Exhibit 3-A is not trade secret. Georgia Power has not and cannot establish how estimated large load growth information has economic value from not being generally known or how others can obtain economic value from disclosure, nor has Georgia Power established it had adequate protections in place to maintain the secrecy of the information. Georgia Power appears to allege:

- Georgia Power’s competitors are not required to reveal this information;
- Competitors will unfairly benefit from access and insight into planning processes and methodologies; and/or
- The market could be manipulated.⁴⁹

First, Georgia Power does not identify who it considers a competitor who would not be required to reveal this information or how that competitor would have an economic advantage that harms Georgia Power by knowing how much large load demand Georgia Power projects will materialize on its system. And to the extent other utilities in Georgia compete for large loads, the data reflected in Exhibit 3-A does not identify the contribution of any specific customer. Moreover, Georgia Power surely shares some growth projections with the other utilities in Georgia with whom it could compete for large load customers, because these utilities must plan—together—their transmission needs, which is guided by load growth.

⁴⁹ 2025 IRP TS Assertion Affidavit Vol 1 Executed, from Technical Appendix Volume 1 of Georgia Power Company’s 2025 IRP Main Document (Docket 56002) (attached as Exhibit 3-B).

Further, other utilities file their large load growth projections publicly. For example, Dominion publicly filed even more specific information than that requested here, identifying data center specific growth projections as shown in the following figure.⁵⁰



Second, the assertion that competitors will “unfairly benefit in having access and insight into the Company’s planning processes and methodologies” is not a valid basis upon which to assert a trade secret for the reasons discussed above. Moreover, the yearly projected growth from large loads or “short-term capacity needs” that Georgia Power seems to assert “could be [] determined” from disclosure of forecasting info is the first thing listed in the IRP Act’s definition of an integrated resource plan.⁵¹

Third, the assertion that market manipulation could cause higher prices or less reliability is far too removed from the reality of the information at issue in this request. The output of Georgia

⁵⁰ Virginia Electric and Power Company’s Report of its 2024 Integrated Resource Plan, Appendix 2A: Load Forecast Methodologies at 7 (Fig. 5), Case No. PUR-2024-00184 (Oct. 15, 2024).

⁵¹ O.C.G.A. § 46-3A-1(7).

Power's probabilistic model and its contribution to the load forecast provide no additional insight for timing of the market than the publicly available total load forecast, which reveals overall expected growth. It contains no cost or pricing information. That is, the requested information is too general and removed from any specific information that suppliers might benefit from and would therefore be of little value.

Fourth, Georgia Power repeats its boilerplate internal secrecy assertion, which is insufficient for the reasons above.

Exhibit 4-A: Customer Class Peak Demand

Georgia Power has withheld data reflecting its projected winter peak demand (in megawatts) by customer class over the next 20 years. As reflected in Exhibit 4-A, Georgia Power has also withheld its estimated demand adjustments for cogeneration and demand-side management. By redacting this information, the public does not have reliable data to understand which sectors are contributing to load growth, and to what extent.

The requested information in Exhibit 4-A is not trade secret. Georgia Power has not and cannot establish how this information derives economic value from not being generally known or how others can obtain economic value from disclosure, nor has Georgia Power established it had adequate protections in place to maintain the secrecy of the information. GPC appears to allege:

- Georgia Power's competitors are not required to reveal this information;
- Competitors will unfairly benefit from access and insight into planning processes and methodologies; and/or
- The market could be manipulated.⁵²

⁵² 2025 IRP TS Assertion Affidavit Vol 1 Executed, from Technical Appendix Volume 1 of Georgia Power Company's 2025 IRP Main Document Filing (Docket 56002) (attached as Exhibit 4-B).

First, Georgia Power Company is a regulated monopoly without relevant competitors. Its trade secret assertion here does not identify who it considers a competitor or what value they might gain from disclosure of customer class projections or demand-side savings. And other utilities *do* reveal this kind of information.⁵³

Second, the assertion that competitors will “unfairly benefit in having access and insight into the Company’s planning processes and methodologies” is not a valid basis to assert a trade secret for the reasons discussed above.

Third, the assertion that market manipulation could cause higher prices or less reliability is far too removed from the reality of the challenged information about class-specific load growth, for the same reasons discussed for Exhibit 3-A.

Fourth, Georgia Power repeats its boilerplate internal secrecy assertion, which is insufficient for the reasons discussed in the previous sections.

Exhibit 5-A: Resources Available in All-Source RFP

Georgia Power has withheld information about its all-source RFP that would help the public understand the options available to Georgia Power in determining how to provide power to the data centers it plans to serve, as well as the consequences of Georgia Power’s load forecast. This document was prepared by Georgia Power in a compromise response to a hearing request for information about the size and type of power plants Georgia Power expects, specifically the resources that are available in the pending all-source RFP approved in the 2022 IRP. It reveals the megawatts by fuel type of the resources that are still in the competitive tier and thus could be owned or operated by Georgia Power during the next ten years.

⁵³ See, e.g., Santee Cooper’s IRP Update in 2024 at 28, available at <https://www.santeecooper.com/About/Integrated-Resource-Plan/Reports-and-Materials/Santee-Cooper-2024-IRP-Update.pdf>.

The requested information in Exhibit 5-A is not trade secret. Georgia Power has not and cannot establish how this information derives economic value from not being generally known or how others can obtain economic value from disclosure. GPC appears to allege:

- Georgia Power’s competitors are not required to reveal this information;
- The market could be manipulated; and/or
- Georgia Power’s ability to negotiate the best cost resources in RFPs could be compromised.⁵⁴

First, Georgia Power Company is a regulated monopoly without relevant competitors. Its trade secret assertion here does not identify who it considers a competitor. Additionally, the IRP Act requires disclosure of “the size and type of facilities which are expected to be owned or operated in whole or in part” by Georgia Power.⁵⁵ The challenged information does not reveal the location, owner, or price of potential projects that Georgia Power may buy. Rather, the challenged information merely reveals the categories of options (i.e. batteries, combined cycles, nuclear, etc.) available to Georgia Power to meet the need it is asking the Commission to approve. It is not clear which competitors Georgia Power thinks would not be required to reveal or at least discuss up to 8,500 MW of capacity anticipated less than six years out, or how they would benefit at Georgia Power’s expense from this information.

Second, the assertion that disclosure could lead to an artificial pricing floor or cause higher prices is hypothetical and far too removed from the reality of the information at issue in this request. At the time of the request—and the disclosure—bid prices had been submitted and contract language had been pre-approved by the Commission. The information challenged here does *not*

⁵⁴ HR 1-2, Docket 56002 (attached as Exhibit 5-B).

⁵⁵ O.C.G.A. § 46-3A-1(7)(A).

include pricing information. The requested information would therefore be of little value to any potential competitor or bidder.

Third, Georgia Power again repeats its boilerplate internal secrecy assertion, which is insufficient for the reasons discussed in the previous sections.

Exhibit 6-A: Generic Supply-Side Resource Assumptions

Georgia Power has withheld cost information for generic resources that are used as inputs in Georgia Power's IRP modeling. These are basic assumptions that provide important insight into Georgia Power's modeling process, allowing the public to better understand how the company determines what it chooses to ask the Commission to approve in the IRP.

The requested information in Exhibit 6-A is not trade secret. Georgia Power has not and cannot establish how this information derives economic value from not being generally known or how others can obtain economic value from disclosure, nor has Georgia Power established it had adequate protections in place to maintain the secrecy of the information. GPC appears to allege:

- Georgia Power's competitors are not required to reveal this information;
- Competitors will unfairly benefit from access and insight into planning processes and methodologies; and/or
- The market could be manipulated.⁵⁶

First, Georgia Power is a regulated monopoly without relevant competitors. Its trade secret assertion here does not identify who it considers a competitor. Further, a number of other utilities release cost assumption information.⁵⁷

⁵⁶ 2025 IRP TS Assertion Affidavit Vol 2 Executed, from Technical Appendix Volume 2 of Georgia Power Company's 2025 IRP Main Document Filing (Docket 56002) (attached as Exhibit 6-B).

⁵⁷ See GIPLSF-Exhibit 1, from Direct Hearing, Docket No. 56002 (Mar. 25, 2025) (attached as Exhibit 9).

Second, it is unclear how Georgia Power will be economically harmed and “competitors” (if any) would “unfairly benefit” from having access into the generic cost assumptions Georgia Power uses in its Commission-required resource modeling.

Third, the assertion that market manipulation “will potentially” cause higher prices is far too removed from the reality of the information at issue in this request. The information reflected in Exhibit 6-A is generic cost and performance information regarding categories of technologies and does not include “site specific aspects of those units” in its cost assumptions.⁵⁸ That is, the requested information is too general and removed from any specific cost information that bidders might use to structure bids and would therefore be of little value. As discussed above, the protections of a competitive bidding process also weigh against Georgia Power’s trade secret assertion which rests on coordinated market manipulation.

Fourth, Georgia Power repeats its boilerplate internal secrecy assertion, which is insufficient for the reasons discussed in the previous sections.

Exhibit 7-A: Major Outage Information

Georgia Power has withheld a table describing “major outages” experienced by Georgia Power’s customers from 2022 to 2024. Georgia Power has even redacted the titles of the columns. Accordingly, we cannot further describe publicly what information is in the table.

The requested information in Exhibit 7-A is not trade secret. Georgia Power has not and cannot establish how major power outage information derives economic value from not being generally known or how others can obtain economic value from disclosure, nor has Georgia Power

⁵⁸ See, e.g., *Hearing Day 1 Transcript*, Docket No. 56002 (Mar. 25, 2025) at p. 503 (“What the generic expansion plan ... isn’t doing is catching site specific aspects of those units”) (attached as Exhibit 15); see also *id.* at p. 513, lines 3-8 (Georgia Power witness referring to this as “generic type of costs”) (attached as Exhibit 16). As described by Georgia Power, the Resource Mix Study “models generic resources and is intended to be an indicative road map of the types of resources that are cost-effective.” Response to Staff Data Request STF-JKA-5-10(b) (attached as Exhibit 17).

established it had adequate protections in place to maintain the secrecy of the information. GPC appears to allege:

- Georgia Power’s competitors are not required to reveal this information;
- Competitors will unfairly benefit from gaining specific insight into technical analysis regarding planned projects;
- The market could be manipulated; and/or
- Critical Energy Infrastructure Information (“CEII”) could be revealed.⁵⁹

First, Georgia Power Company is a regulated monopoly without relevant competitors. Its trade secret assertion here does not identify who it considers a competitor. Georgia Power admits that it does not “compete against anybody” in the state of Georgia to build transmission.⁶⁰

Second, the assertion that competitors will unfairly benefit from gaining specific insight into technical analysis regarding planned projects is not a valid basis to assert a trade secret for the reasons above. Further, the requested information does not reflect any technical process or analysis not already publicly described in Technical Appendix Vol. 3.

Third, the assertion that market manipulation is “quite likely” to cause higher prices plainly cannot apply to the power outage information at issue here.

Fourth, Georgia Power repeats its boilerplate internal secrecy assertion, which is insufficient for the reasons above. Furthermore, power outages are public events that are not a secret to Georgia Power’s customers, who experience them directly. *Major* outages, like those caused by Hurricane Helene, are the subject of significant public coverage and discussion. Documentation of these public events cannot be reasonably withheld as a trade secret.

⁵⁹ *2025 IRP TS Assertion Vol. 3*, from Technical Appendix Volume 3 of Georgia Power Company’s 2025 IRP Main Document Filing (Docket 56002) (attached as Exhibit 7-B).

⁶⁰ *Hearing Day 1 Transcript*, Docket No. 56002 (Mar. 25, 2025) at p. 545, lines 9-13 (attached as Exhibit 11).

Fifth, the requested information does not include any CEII information, which is defined as information that “gives strategic information beyond the location of the critical infrastructure.”⁶¹

Exhibit 8-A: Transmission Cost Estimates

Georgia Power has withheld the estimated total costs of transmission projects that are currently slated for construction in the next ten years, including projects that have already begun. As reflected in Exhibit 8-A, this information does not reveal itemized costs, but rather only the total estimated cost of the projects.

The requested information in Exhibit 8-A is not trade secret. Georgia Power has not and cannot establish how estimated, overall transmission project costs derive economic value from not being generally known or how others can obtain economic value from disclosure, nor has Georgia Power established it had adequate protections in place to maintain the secrecy of the information.

GPC appears to allege:

- Georgia Power’s competitors are not required to reveal this information;
- Competitors will unfairly benefit from gaining specific insight into technical analysis regarding planned projects;
- The market could be manipulated; and/or
- Critical Energy Infrastructure Information could be revealed.⁶²

⁶¹ CEII information is specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure (physical or virtual) that:

1. Relates details about the production, generation, transmission, or distribution of energy;
2. Could be useful to a person planning an attack on critical infrastructure;
3. Is exempt from mandatory disclosure under the Freedom of Information Act; and
4. Gives strategic information beyond the location of the critical infrastructure.

See <https://www.ferc.gov/ceii>.

⁶² 2025 IRP TS Assertion Vol. 3, from Technical Appendix Volume 3 of Georgia Power Company’s 2025 IRP Main Document Filing (Docket 56002) (attached as Exhibit 8-B).

In addition, in the direct hearing in this matter, Georgia Power further explained,

[T]he trade secret nature is we are going to put those projects out to bid, RFP, get people to bid on them. That's why we protect those costs, so that customers get the best benefits from those people who are wanting to do that work for us.⁶³

First, Georgia Power Company is a regulated monopoly without relevant competitors. Its trade secret assertion here does not identify who it considers a competitor. Georgia Power does not “compete against anybody” in the state of Georgia to build transmission.⁶⁴ In any event, *Georgia Power appears to be an outlier in its refusal to disclose cost estimates for transmission projects.*⁶⁵

Second, the requested information does not reflect any technical process or analysis not already publicly described in Technical Appendix Vol. 3., thus, Georgia Power’s assertion that competitors will unfairly benefit from gaining specific insight into technical analysis regarding planned projects appears to be inapplicable.

Third, the assertion that market manipulation is “quite likely” in the transmission context is unsupported here and contradicted by Georgia Power’s past disclosures. Georgia Power revealed transmission cost estimates publicly in the 2023 IRP Update, for example. Georgia Power witnesses repeatedly referred to “\$60 million worth of transmission” for Plant Yates, calling it “miniscule” and accusing intervenors of “treating it like it’s a big number.”⁶⁶ So too here, the information consists of the bottom-line cost estimate for entire projects. It does not break any costs down into component parts or line-items. Additionally, the costs for projects can change in

⁶³ *Hearing Day 1 Transcript*, Docket No. 56002 (Mar. 25, 2025) at p. 546, lines 2-6 (attached as Exhibit 11).

⁶⁴ *Id.* at p. 545, lines 9-13.

⁶⁵ *See, e.g.*, GIPLSF-Exhibits 5 & 6, from Direct Hearing, Docket No. 56002 (Mar. 25, 2025) (attached as Exhibits 12 and 13, respectively); *see also* MISO, Transmission Expansion Plans, available at <https://www.misoenergy.org>; *cf.* GIPLSF-Exhibit 3, from Direct Hearing, Docket No. 56002 (Mar. 25, 2025) (attached as Exhibit 14).

⁶⁶ *Rebuttal Hearing Transcript*, Docket No. 55378 (Mar. 27, 2024) at p. 2246, lines 5-20 (attached as Exhibit 18).

between annual Ten-Year Plans as the “cost for each project is revised through scoping, engineering, and design processes, which include but are not limited to the increase in material costs over the years.”⁶⁷ That is, the requested information is too general and removed from any specific component cost information that suppliers might use to tailor bids and would therefore be of little economic value.

Fourth, Georgia Power repeats its boilerplate internal secrecy assertion, which is insufficient for the reasons above.

**PUBLIC DISCLOSURE IS ESSENTIAL FOR GEORGIA POWER CUSTOMERS
TO ADEQUATELY ENGAGE IN THE IRP PROCESS**

It is difficult to overstate the importance of public engagement in the IRP process. An integral piece of the IRP proceedings is public comment—Georgia law indicates that at the IRP hearings, “any interested person may make comments to the commission regarding the contents and adequacy of the plan.”⁶⁸ The Commission has specifically encouraged the public to participate in the 2025 IRP, by issuing a news release earlier this year stating that the Commission makes “every effort to hear from Georgians during the IRP process,” and “read[s] all comments sent by the public and listen[s] to every public witness who takes the time to speak at the hearings.”⁶⁹ The release emphasizes that the Commission views public participation as “a vitally important part of the IRP process.”

At the conclusion of the hearings, the Commission must determine whether the plan “adequately demonstrates the economic, environmental, and other benefits to the state and to

⁶⁷ Georgia Power Response to STF-GS-2-24 (attached as Exhibit 19).

⁶⁸ O.C.G.A. § 46-3A-2(b).

⁶⁹ *PSC to Begin 6-Month IRP Process, Georgians Encouraged to Participate*, GEORGIA PUBLIC SERVICE COMMISSION (Feb. 7, 2025) (attached as Exhibit 10).

customers of the utility.”⁷⁰ And most importantly, the Commission may only approve of a utility’s IRP after determining in the hearing process that doing so “is in the public interest.”⁷¹ Commission Rules repeatedly refer to the public interest.⁷² The Commission is therefore charged with not only considering public comments regarding Georgia Power’s IRP, but also using those public comments and the other parts of the IRP proceeding to determine whether Georgia Power’s proposal is in the public’s best interest.

Inclusively engaging stakeholders is considered to be one of the essential tenets of best practices in integrated resource planning. And experts agree that the best way to do so is by allowing stakeholders to access key pieces of information: “Transparency is a priority [in integrated resource planning], with the utility sharing *all input data, modeling assumptions, scenario and sensitivity designs, modeling files, and modeling results* as they become available—as well as any other information necessary for stakeholders to have a comprehensive understanding of how the IRP was developed...[t]he utility [should] only require[] non-disclosure agreements when necessary to protect data that *is truly a utility trade secret ... to avoid unnecessarily hindering stakeholder engagement.*”⁷³

But Georgia Power’s overuse of trade secret redactions makes it so that it is impossible for stakeholders to meaningfully engage in the process and for the public to begin to understand the magnitude of Georgia Power’s request to the Commission. Without this very basic cost information, Georgia Power’s request becomes functionally meaningless to the general public. While Movants may have signed a confidentiality agreement to view this trade secret cost

⁷⁰ O.C.G.A. § 46-3A-2(b)(3).

⁷¹ Rule 515-3-4-.01(2).

⁷² Rule 515-3-4-.05(4) (“The Commission shall determine which combinations of resource options ... best serve the public interest”); Rule 515-3-4-.06(4)(d) (“A utility’s integrated resource plan shall be approved if found to be in the public interest...”).

⁷³ *Best Practices in Integrated Resource Planning*, SYNAPSE ENERGY ECONOMICS, INC. AND BERKELEY LAB (Nov. 2024), at 10-11 (emphasis added).

information, this access has no bearing on the fact that they remain unable to disclose that information during the proceedings. The inability to disclose particular numbers and figures in testimony, hearings, and cross-examinations significantly harms not only their ability to engage in the proceedings in general, but also their ability to adequately represent the interests of their members, many of whom are Georgia Power customers. And perhaps most importantly, if the public is uninformed about the cost of Georgia Power's plan, and therefore incapable of adequately commenting on whether approving the cost of the plan would be in its best interest, it is impossible for the Commission to carry out its statutory duties.

Ultimately, the Commission must make a determination at the conclusion of the IRP proceedings about whether approving Georgia Power's proposals would be in the public's best interest.⁷⁴ But given Georgia Power's trade secret redactions, the Commission will have to make that determination for the public without having heard the public's opinions. To meet the statutory requirement that the IRP process serve the best interests of the people of Georgia, the Commission should order Georgia Power to lift the trade secret designations and disclose to the public the information requested in this motion.

RELIEF SOUGHT

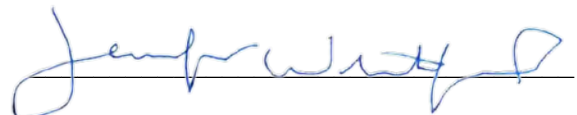
Movants request that the Commission order Georgia Power to narrow its use of the trade secret designation to only that information for which it can demonstrate compliance with Commission Rule 515-3-1-.11(7) and disclose to the public information in documents found not to be in compliance with the Commission's Rule.

⁷⁴ Rule 515-3-4-.05(4).

Specifically, Movants request that the Commission evaluate the documents identified in this motion and order Georgia Power to lift the trade secret designation on the erroneously withheld information in each of those documents, namely the redacted information found in the following exhibits:

- Estimated overall cost of expanding the electric system with the proposals in this IRP (**Exhibit 2-A**)
- How many megawatts per year Georgia Power includes in its forecast because of expected large loads (**Exhibit 3-A**)
- The specific overall contribution of different classes of customers (e.g. residential, commercial, industrial) and other high-level adjustments to the projected load forecast that forms the underlying basis of the IRP. (**Exhibit 4-A**)
- What size and type of power plants Georgia Power expects to own or operate during the next ten years, requested in part by GIPL and Southface in “HR-1-2” (**Exhibit 5-A**)
- What basic assumptions Georgia Power makes about the overall cost and value of different generic types of power production (**Exhibit 6-A**)
- Basic information about major outages experienced by Georgia Power customers during the past three years (**Exhibit 7-A**)
- Estimated costs of Georgia Power’s transmission plan which is created with other Georgia electric utilities (**Exhibit 8-A**)

Respectfully submitted on May 21, 2025.



Jennifer Whitfield
Bob Sherrier
Aradhana Chandra
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, Georgia 30309
jwhitfield@selc.org
bsherrier@selc.org
achandra@selc.org

CERTIFICATE OF SERVICE

I certify that the foregoing **Motion Challenging Georgia Power Company's Trade Secret Assertions on behalf of Georgia Interfaith Power & Light and Southface Energy Institute** was filed with the Public Service Commission in Dockets No. 56002 and 56003 by electronic delivery on the 21st of May, 2025. An electronic copy of same was served upon all parties listed below by electronic mail as follows:


Jennifer Whitfield

Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334
stanner@psc.ga.gov

Justin Pawluk
Jamie Barber
Robert Trokey
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334
jpawluk@psc.state.ga.us
jpawluk@psc.ga.gov
jamieb@psc.ga.gov
rtrokey@psc.ga.gov

Chris Collado
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334
ccollado@psc.state.ga.us
ccollado@psc.ga.gov

Steven J. Hewitson
Brandon F. Marzo
Allison W. Pryor
Troutman Pepper Hamilton Sanders, LLP
Bank of America Plaza
600 Peachtree Street, N.E.
Suite 3000
Atlanta, Georgia 30308-2216
steven.hewitson@troutman.com
brandon.marzo@troutman.com
allison.pryor@troutman.com

Jeremiah Haswell
Georgia Power Company
241 Ralph McGill Boulevard, NE
Bin 10230
Atlanta, Georgia 30308
jhaswell@southernco.com

Cheryl Johnson
Georgia Power Company
241 Ralph McGill Boulevard, NE
Atlanta, Georgia 30308-3374
cljohnson@southernco.com

Robert B. Baker
Robert B. Baker, P.C.
Resource Supply Management
2480 Briarcliff Road, NE
Suite 6
Atlanta, Georgia 30329
bobby@robertbbaker.com

Jim Clarkson
Resource Supply Management
135 Emerald Lake Road
Columbia, South Carolina 29209
jclarkson@rsmenergy.com

Charles B. Jones, III
Lloyd Avram
Georgia Association of Manufacturers
The Hurt Building
50 Hurt Plaza, Suite 1620
Atlanta, Georgia 30303
cjones@gamfg.org
lavram@gamfg.org

Jeffrey C. Pollock
J. Pollock Incorporated
14323 South Outer 40 Road, Suite 206 N
Town and Country, Missouri 63017-5734
jcp@jpollockinc.com

Simon Mahan
Southern Renewable Energy Association
11610 Pleasant Ridge Rd., Suite 103 #176
Little Rock, Arkansas 72223
simon@southernwind.org

Whit Cox
Southern Renewable Energy Association
11610 Pleasant Ridge Rd., Suite 103 #176
Little Rock, Arkansas 72223
whit@southernrenewable.org

Scott F. Dunbar
Partner, Keyes & Fox LLP
1580 Lincoln St., Suite 1105
Denver, Colorado 80203
sdunbar@keyesfox.com

Alicia Zaloga
Assistant, Keyes & Fox LLP
115 Kildaire Farm Road, Ste. 202-203
Cary, North Carolina 27511
azaloga@keyesfox.com

Anna Bella Korbatov
Fermata Energy
100 10th Street NE, #101
Charlottesville, Virginia 22902
annabella@fermataenergy.com

Steve Letendre, PhD
Fermata Energy
100 10th Street NE, #101
Charlottesville, Virginia 22902
steve@fermataenergy.com

Isabella Ariza
Dorothy E. Jaffe
Zachary M. Fabish
Sierra Club
50 F Street NW, 8th Floor
Washington, DC 20001
Isabella.ariza@sierraclub.org
Dori.jaffe@sierraclub.org
Zack.fabish@sierraclub.org

Curt Thompson
Thompson & Associates Law Firm, PC
3775 Venture Drive, D100
Duluth, Georgia 30096
curtbthompson@bellsouth.net

Maggie Shober
Southern Alliance for Clean Energy
PO Box 1842
Knoxville, Tennessee 37901
maggie@cleanenergy.org

Heather Pohnan
Southern Alliance for Clean Energy
691 John Wesley Dobbs Ave NE, Suite C
Atlanta, Georgia 30312
heather@cleanenergy.org

Eddy Moore
Southern Alliance for Clean Energy
PO Box 1842
Knoxville, Tennessee 37901
eddy@cleanenergy.org

Bryan Jacob
Southern Alliance for Clean Energy, Inc.
1455 Hampton Hill Drive
Alpharetta, Georgia 30022
bryan@cleanenergy.org

Patrick King II
Natural Resources Defense Council
1152 15th St NW #300
Washington, DC 20005
pkingii@nrdc.org

Luis Martinez
Natural Resources Defense Council
1152 15th St NW #300
Washington, DC 20005
lnmartinez@nrdc.org

Amanda Levin
Natural Resources Defense Council
1152 15th St NW #300
Washington, DC 20005
alevin@nrdc.org

Maeve Sneddon
Natural Resources Defense Council
1152 15th St NW #300
Washington, DC 20005
msneddon@nrdc.org

Alicia Brown
Capital Good Fund
333 Smith Street
Providence, Rhode Island 02908
aliciab@capitalgoodfund.org

Kimberly (“Kasey”) A. Sturm
Weissman PC
One Alliance Center, Fourth Floor
3500 Lenox Road
Atlanta, Georgia 30326
kaseys@weissman.law

Jonathan Hunt
Metropolitan Atlanta Rapid Transit
Authority
2424 Piedmont Road, NE
Atlanta, Georgia 30324
jhunt@itsmarta.com

Peter J. Andrews
Metropolitan Atlanta Rapid Transit
Authority
2424 Piedmont Road, NE
Atlanta, Georgia 30324
pandrews@itsmarta.com

Juan Estrada
Attorney At Law
Juan Estrada Law, LLC.
3675 Crestwood Parkway, Suite 400,
Duluth, Georgia 30096
Juan@JuanEstradaLaw.com

Liz Coyle
Georgia Watch
55 Marietta Street, Suite 903
Atlanta, Georgia 30303
lcoyle@georgiawatch.org

Peter Hubbard
Georgia Center for Energy Solutions
55 Leslie Street SE
Atlanta, Georgia 30317
peter@georgia-ces.org

John Joseph McNutt
Regulatory Law Counsel
U.S. Army Legal Services Agency
Office of The Judge Advocate General
9275 Gunston Road (JALS-ELD)
Fort Belvoir, Virginia 22060-5546
john.j.mcnutt.civ@anny.mil

Newton M. Galloway
Terri M. Lyndall
Galloway & Lyndall, LLP
406 North Hill Street
Griffin, Georgia 30223
ngalloway@gallyn-law.com
tlyndall@gallyn-law.com

David E. Penland
One Griffin Center
100 S. Hill Street, Suite 600
Griffin, Georgia 30223
dpenland@beckowen.com

Cordon M. Smart
Fox Rothschild LLP
230 N. Elm Street
Suite 1200
Greensboro, North Carolina 27401
csmart@foxrothschild.com

Benjamin L. Snowden
Fox Rothschild LLP
301 Hillsborough Street
Suite 1120
Raleigh, North Carolina 27603
BSnowden@FoxRothschild.com

Gerald T. Chichester
Fox Rothschild, LLP
999 Peachtree Street, NE
Suite 1500
Atlanta, Georgia 30309
GChichester@FoxRothschild.com

David Nifong
City of Decatur
Department of Public Works
2635 Talley Street
Decatur, Georgia 30030
david.nifong@decaturga.com

Mike Wharton
Athens-Clarke County Unified Government
Sustainability Office
110 Bray Street
Athens, Georgia 30601
Mike.Wharton@accgov.com

Joey Crews
Athens-Clarke County
Sustainability Office
110 Bray Street
Athens, Georgia 30601
joseph.crews@accgov.com

Mendie White
Gwinnett County
Offices of the County Administrator
75 Langley Drive
Lawrenceville, Georgia 30046
mendie.white@gwinnettcountry.com

Chandra Farley
John R. Seydel
City of Atlanta,
Office of Sustainability and Resilience
55 Trinity Ave SW
Atlanta, Georgia 30303
cfarley@atlantaga.gov
jrseydel@atlantaga.gov

Gordon Kenna
DeKalb County
Public Works
180 Sams Street
Decatur, Georgia 30030
hgkenna@dekalbcountyga.gov

Kathy Reed
DeKalb County Government
Department of Planning and Sustainability
178 Sams Street
Decatur, Georgia 30030
kdreed@dekalbcountyga.gov

Juan Estrada
Juan Estrada Law, LLC.
3675 Crestwood Parkway,
Suite 400
Duluth, Georgia 30096
Juan@JuanEstradaLaw.com

Kimberly Scott
Georgia WAND Education Fund, Inc.
250 Georgia Ave SE # 202
Atlanta, Georgia 30312
kim@georgiawand.org

Allison Kvien
Vote Solar
2810 Coliseum Centre Drive Suite 120
Charlotte, North Carolina 28217
akvien@votesolar.org

Stephen Butler
Georgia Solar Energy Industries
Association, Inc.
2451 Cumberland Parkway
Suite 3380
Atlanta, Georgia 30339
steve@connectpublicaffairs.org

Stephanie U. Eaton
Carrie H. Grundmann
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, North Carolina
seaton@spilmanlaw.com
cgrundmann@spilmanlaw.com

Steven W. Lee
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, Pennsylvania 17050
slee@spilmanlaw.com

William Bradley Carver Sr., Esq.
Hall Booth Smith, P.C.
191 Peachtree Street NE
Suite 2900
Atlanta, Georgia 30303
bcarver@hallboothsmith.com

Donald Moreland
Georgia Solar Energy Association
1199 Euclid Avenue
Atlanta, Georgia 30307
don@solarcrowdsource.com

Tyler Mauldin
Microsoft Corporation
200 17th Street NW
Atlanta, Georgia
tylermauldin@microsoft.com

Chimera N. Thompson
K&L Gates LLP
1601 K Street, N.W.
Washington, DC 20006
chimera.thompson@klgates.com

Kimberly B. Frank
K&L Gates LLP
1601 K Street, N.W.
Washington, DC 20006
kimberly.frank@klgates.com

EXHIBIT 1-A

May 8, 2025

VIA EMAIL (steven.hewitson@troutman.com; brandon.marzo@troutman.com;
allison.pryor@troutman.com)

Steven Hewitson, Brandon Marzo, and Allison Pryor
Troutman Pepper Locke
Bank of America Plaza
600 Peachtree St, NE, Suite 5200
Atlanta, GA 30308-2261

Counsel for Georgia Power Company

**RE: Request to Lift Trade Secret Designation on Information in Georgia Power
Company’s 2025 Integrated Resource Plan**

Dear Mr. Hewitson, Mr. Marzo, and Ms. Pryor,

The Southern Environmental Law Center, on behalf of Georgia Interfaith Power & Light and Southface Energy Institute—intervenor in Georgia Power Company’s 2025 Integrated Resource Plan proceeding before the Georgia Public Service Commission (Docket Nos. 56002 and 56003)—requests that Georgia Power Company promptly lift its claimed trade secret designation and disclose to the public the following information filed in the aforementioned dockets:

- Cost information in Georgia Power’s “2025 IRP Financial Review” (**Exhibit A**)
- All information except the second column from the left in Georgia Power’s “2025 IRP Volume 3 – Outages C2” (**Exhibit B**)
- Estimated cost amounts on pages 7-20 in Georgia Power’s “2024 GA ITS Ten-Year Plan (2025-2034)” (**Exhibit C**)
- Information requested by GIPL and Southface in “HR-1-2” (megawatts by fuel type of the resources that are still in the Competitive Tier of the All-Source RFP) (**Exhibit D**)
- All information in “Table 5: B2025 Technology Cost and Performance Summary” from Georgia Power’s 2025 IRP Resource Mix Study (**Exhibit E**)
- Attachment 6.0-2: Winter Coincident Demand with Adjustments MW from “Load and Energy Forecast in Tech, Appx 1” (**Exhibit F**)
- Table 7.2.1 Budget 2025 External Peak Adjustments for Large Loads from “Load and Energy Forecast” (**Exhibit G**)

Georgia Power has not met its burden to establish that the above information actually constitutes a “trade secret” as defined by the Georgia Trade Secrets Act and required by the Commission. O.C.G.A. § 10-1-761(4). When a monopoly utility such as Georgia Power files information in a proceeding before the Commission that it believes to be trade secret, it must provide the legal and factual basis for why each item claimed to be trade secret should not be disclosed to the public. Ga. Comp. R. & Regs. 515-3-1-.11(1)(c). Georgia Power has failed to establish in its Trade Secret Assertions the requisite elements for a proper trade secret claim: it has not and cannot explain why the information derives economic value from not being generally known to others, and it has failed to identify how a relevant competitor can obtain economic value from this information’s disclosure. *Id.*

Knowledge of this information relating to system performance, key assumptions, and estimated costs to billpayers of this IRP for which Georgia Power requests approval is crucial to intervenors’ and the public’s ability to adequately engage in the IRP proceedings. The inability to disclose this information in testimony, hearings, comments, and cross-examinations significantly hinders effective advocacy efforts and prevents Georgia Power customers from accurately assessing the magnitude of Georgia Power’s IRP. At the conclusion of the IRP proceedings, the Commission must determine whether approving Georgia Power’s IRP is in the best interest of the public. Ga. Comp. R. & Regs. 515-3-4-.01(2). By placing a trade secret label on crucial, high-level cost information and assumptions, Georgia Power also prevents the Commission from factoring in the public’s assessment of Georgia Power’s IRP in its calculus.

We urge Georgia Power to lift the trade secret designation on the above-listed documents to ensure a transparent and effective IRP proceeding. Please provide your response no later than **Thursday, May 15, 2025**.

Sincerely,

s/Jennifer Whitfield

Jennifer Whitfield
Bob Sherrier
Aradhana Chandra
Southern Environmental Law Center
Ten 10th Street NW, Suite 1050
Atlanta, Georgia 30309
404-521-9900

Counsel for GIPL and Southface

cc: Robert Trokey, Georgia Public Service Commission Staff (rtrokey@psc.ga.gov)
Tom Bond, Georgia Public Service Commission Staff (tbond@psc.ga.gov)

EXHIBIT 1-B

Aradhana Chandra

From: Jennifer Whitfield
Sent: Thursday, May 8, 2025 3:53 PM
To: Hewitson, Steven J.; Marzo, Brandon F.; Pryor, Allison
Cc: Aradhana Chandra; Bob Sherrier; Robert Trokey; Tom Bond
Subject: RE: Letter re Trade Secret Designations

Thanks Steve. We look forward to your response.

Best,
Jen

From: Hewitson, Steven J. <steven.hewitson@troutman.com>
Sent: Thursday, May 8, 2025 3:11 PM
To: Jennifer Whitfield <jwhitfield@selc.org>; Marzo, Brandon F. <Brandon.Marzo@troutman.com>; Pryor, Allison <Allison.Pryor@troutman.com>
Cc: Aradhana Chandra <achandra@selc.org>; Bob Sherrier <bsherrier@selc.org>; Robert Trokey <rtrokey@psc.ga.gov>; Tom Bond <tbond@psc.ga.gov>
Subject: RE: Letter re Trade Secret Designations

Jennifer –

Thanks for the letter and the opportunity to respond. Georgia Power will prepare a response for your consideration. I doubt it will be ready by May 15, but one will be provided.

-Steve

Steven J. Hewitson

Partner

troutman pepper locke

Direct: 404.885.3475 | Mobile: 404.202.7807

steven.hewitson@troutman.com

From: Jennifer Whitfield <jwhitfield@selc.org>
Sent: Thursday, May 8, 2025 1:44 PM
To: Hewitson, Steven J. <steven.hewitson@troutman.com>; Marzo, Brandon F. <Brandon.Marzo@troutman.com>; Pryor, Allison <Allison.Pryor@troutman.com>
Cc: Aradhana Chandra <achandra@selc.org>; Bob Sherrier <bsherrier@selc.org>; Robert Trokey <rtrokey@psc.ga.gov>; Tom Bond <tbond@psc.ga.gov>
Subject: Letter re Trade Secret Designations

CAUTION: This message came from outside the firm. DO NOT click links or open attachments unless you recognize this sender (look at the actual email address) and confirm the content is safe.

Steve, Brandon, and Allison,

Please find attached a letter concerning Georgia Power's trade secret designations. As reflected in the letter, we kindly request your response by next Thursday, May 15.

Best,
Jennifer

Jennifer Whitfield
Senior Attorney

Southern Environmental Law Center
10 10th St NW, Suite 1050
Atlanta, GA 30312

Office (404) 521-9900
Direct (678) 277-4821
Fax (404) 521-9909

southernenvironment.org
[Facebook](#) | [Twitter](#) | [Instagram](#)

This electronic message and any attached files are confidential and are intended solely for the use of the addressee(s) named above. This communication may contain material protected by attorney-client, work product or other privileges.

NOTICE: This e-mail (and any attachments) from a law firm may contain legally privileged and confidential information. If you received this message in error, please notify the sender and delete it. Any unauthorized reading, distribution, copying, or other use of this e-mail (and attachments) is strictly prohibited. E-mails may be monitored or scanned for security and compliance purposes. For more information, including privacy notices and policies, please visit www.troutman.com. If services are provided by Troutman Pepper Locke UK LLP, please see our London office page (www.troutman.com/offices/london.html) for regulatory information.

EXHIBIT 2-A

PUBLIC DISCLOSURE

Case	Sensitivity Description	Real Levelized ¢/KWH	Percent Above Base Case	Levelized ¢/KWH	Percent Above Base Case
0	Base Case (111 with Moderate Gas / Lower Carbon)	REDACTED		REDACTED	
1	111 with High Gas / Lower Carbon	REDACTED	23.3%	REDACTED	23.3%
2	111 with Moderate Gas / Higher Carbon	REDACTED	19.5%	REDACTED	19.5%
3	Low Gas / Lower Carbon	REDACTED	-14.0%	REDACTED	-14.0%
4	Moderate Gas / Lower Carbon	REDACTED	-7.6%	REDACTED	-7.6%
5	High Gas / Lower Carbon	REDACTED	11.6%	REDACTED	11.6%
6	Moderate Gas / Moderate Carbon	REDACTED	10.0%	REDACTED	10.0%
7	Moderate Gas / Higher Carbon	REDACTED	36.5%	REDACTED	36.5%
8	Emissions Limit	REDACTED	195.4%	REDACTED	195.3%
9	High Load	REDACTED	-3.5%	REDACTED	-3.3%
10	No Non-Dispatchable DSM	REDACTED	-8.2%	REDACTED	-8.1%
11	Advocates	REDACTED	-8.1%	REDACTED	-8.1%
12	Economy Energy Purchase	REDACTED	-7.4%	REDACTED	-7.4%

Note: Plan for 2026 through 2044

PUBLIC DISCLOSURE

0 Plan : Base Case (111 with Moderate Gas / Lower Carbon)

Item

- 1. General rate of inflation: REDACTED
- 2. Monthly AFUDC rate for plan: REDACTED
- 3. Cost of capital rate:

	Structure	Cost	After Tax Wtd. Cost
Debt	45%	REDACTED	REDACTED
Preferred	0%	REDACTED	REDACTED
Equity	55%	REDACTED	REDACTED
			REDACTED
- 4. After Tax Discount rate used in present worth calculation: REDACTED
- 5. Tax rate used in plan: 25.39%

Present Worth Calculations of Revenue Requirements

Year	Total Annual Revenue Requirement **7 (\$000's)	Total Annual GWH	Nominal Average ¢/ kWh ** 8	Real Levelized Average ¢/ kWh	Real Levelized Revenue Requirements	Levelized Average ¢/ kWh	Levelized Revenue Requirements
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
	REDACTED	REDACTED			REDACTED		REDACTED

6. Present worth of revenue requirements for the plan

** 7. Nominal revenue requirements by year

** 8. Average system rates per kWh by year

9. Overall assessment of business and financial risks associated with the plan, including the identification of appropriate financial measures.

PUBLIC DISCLOSURE

1 Plan : 111 with High Gas / Lower Carbon

Item

1. General rate of inflation:	REDACTED				
2. Monthly AFUDC rate for plan:	REDACTED				
3. Cost of capital rate:				After Tax	
		Structure	Cost	Wtd. Cost	
	Debt	45.00%	REDACTED	REDACTED	
	Preferred	0.00%	REDACTED	REDACTED	
	Equity	55.00%	REDACTED	REDACTED	
4. After Tax Discount rate used in present worth calculation:				REDACTED	
5. Tax rate used in plan:	25.39%				

Present Worth Calculations of Revenue Requirements

Year	Total Annual Revenue Requirement **7 (\$000's)	Total Annual GWH	Nominal Average ¢/ kWh ** 8	Real Levelized Average ¢/ kWh	Real Levelized Revenue Requirements	Levelized Average ¢/ kWh	Levelized Revenue Requirements
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
	REDACTED	REDACTED			REDACTED		REDACTED

6. Present worth of revenue requirements for the plan

** 7. Nominal revenue requirements by year

** 8. Average system rates per kWh by year

9. Overall assessment of business and financial risks associated with the plan, including the identification of appropriate financial measures.

PUBLIC DISCLOSURE

2 Plan : 111 with Moderate Gas / Higher Carbon

Item

1. General rate of inflation:	REDACTED				
2. Monthly AFUDC rate for plan:	REDACTED				
3. Cost of capital rate:				After Tax	
		Structure	Cost	Wtd. Cost	
	Debt	45.00%	REDACTED	REDACTED	
	Preferred	0.00%	REDACTED	REDACTED	
	Equity	55.00%	REDACTED	REDACTED	
4. After Tax Discount rate used in present worth calculation:				REDACTED	
5. Tax rate used in plan:	25.39%				

Present Worth Calculations of Revenue Requirements

Year	Total Annual Revenue Requirement **7 (\$000's)	Total Annual GWH	Nominal Average ¢/ kWh ** 8	Real Levelized Average ¢/ kWh	Real Levelized Revenue Requirements	Levelized Average ¢/ kWh	Levelized Revenue Requirements
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
	REDACTED	REDACTED			REDACTED		REDACTED

6. Present worth of revenue requirements for the plan

** 7. Nominal revenue requirements by year

** 8. Average system rates per kWh by year

9. Overall assessment of business and financial risks associated with the plan, including the identification of appropriate financial measures.

3 Plan : Low Gas / Lower Carbon

Item

1. General rate of inflation:	REDACTED				
2. Monthly AFUDC rate for plan:	REDACTED				
3. Cost of capital rate:				After Tax	
		Structure	Cost	Wtd. Cost	
	Debt	45.00%	REDACTED	REDACTED	
	Preferred	0.00%	REDACTED	REDACTED	
	Equity	55.00%	REDACTED	REDACTED	
4. After Tax Discount rate used in present worth calculation:				REDACTED	
5. Tax rate used in plan:	25.39%				

Present Worth Calculations of Revenue Requirements

Year	Total Annual Revenue Requirement **7 (\$000's)	Total Annual GWH	Nominal Average ¢/ kWh ** 8	Real Levelized Average ¢/ kWh	Real Levelized Revenue Requirements	Levelized Average ¢/ kWh	Levelized Revenue Requirements
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
	REDACTED	REDACTED			REDACTED		REDACTED

6. Present worth of revenue requirements for the plan

** 7. Nominal revenue requirements by year

** 8. Average system rates per kWh by year

9. Overall assessment of business and financial risks associated with the plan, including the identification of appropriate financial measures.

4 Plan : Moderate Gas / Lower Carbon

Item

1. General rate of inflation:	REDACTED				
2. Monthly AFUDC rate for plan:	REDACTED				
3. Cost of capital rate:				After Tax	
		Structure	Cost	Wtd. Cost	
	Debt	45.00%	REDACTED	REDACTED	
	Preferred	0.00%	REDACTED	REDACTED	
	Equity	55.00%	REDACTED	REDACTED	
4. After Tax Discount rate used in present worth calculation:				REDACTED	
5. Tax rate used in plan:	25.39%				

Present Worth Calculations of Revenue Requirements

Year	Total Annual Revenue Requirement **7 (\$000's)	Total Annual GWH	Nominal Average ¢/ kWh ** 8	Real Levelized Average ¢/ kWh	Real Levelized Revenue Requirements	Levelized Average ¢/ kWh	Levelized Revenue Requirements
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
	REDACTED	REDACTED			REDACTED		REDACTED

6. Present worth of revenue requirements for the plan

** 7. Nominal revenue requirements by year

** 8. Average system rates per kWh by year

9. Overall assessment of business and financial risks associated with the plan, including the identification of appropriate financial measures.

5 Plan : High Gas / Lower Carbon

Item

1. General rate of inflation:	REDACTED				
2. Monthly AFUDC rate for plan:	REDACTED				
3. Cost of capital rate:				After Tax	
		Structure	Cost	Wtd. Cost	
	Debt	45.00%	REDACTED	REDACTED	
	Preferred	0.00%	REDACTED	REDACTED	
	Equity	55.00%	REDACTED	REDACTED	
4. After Tax Discount rate used in present worth calculation:				REDACTED	
5. Tax rate used in plan:	25.39%				

Present Worth Calculations of Revenue Requirements

Year	Total Annual Revenue Requirement **7 (\$000's)	Total Annual GWH	Nominal Average ¢/ kWh ** 8	Real Levelized Average ¢/ kWh	Real Levelized Revenue Requirements	Levelized Average ¢/ kWh	Levelized Revenue Requirements
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
	REDACTED	REDACTED			REDACTED		REDACTED

6. Present worth of revenue requirements for the plan

** 7. Nominal revenue requirements by year

** 8. Average system rates per kWh by year

9. Overall assessment of business and financial risks associated with the plan, including the identification of appropriate financial measures.

6 Plan : Moderate Gas / Moderate Carbon

Item

1. General rate of inflation:	REDACTED				
2. Monthly AFUDC rate for plan:	REDACTED				
3. Cost of capital rate:				After Tax	
		Structure	Cost	Wtd. Cost	
	Debt	45.00%	REDACTED	REDACTED	
	Preferred	0.00%	REDACTED	REDACTED	
	Equity	55.00%	REDACTED	REDACTED	
4. After Tax Discount rate used in present worth calculation:				REDACTED	
5. Tax rate used in plan:	25.39%				

Present Worth Calculations of Revenue Requirements

Year	Total Annual Revenue Requirement **7 (\$000's)	Total Annual GWH	Nominal Average ¢/ kWh ** 8	Real Levelized Average ¢/ kWh	Real Levelized Revenue Requirements	Levelized Average ¢/ kWh	Levelized Revenue Requirements
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
	REDACTED	REDACTED			REDACTED		REDACTED

6. Present worth of revenue requirements for the plan

** 7. Nominal revenue requirements by year

** 8. Average system rates per kWh by year

9. Overall assessment of business and financial risks associated with the plan, including the identification of appropriate financial measures.

7 Plan : Moderate Gas / Higher Carbon

Item

1. General rate of inflation:	REDACTED			
2. Monthly AFUDC rate for plan:	REDACTED			
3. Cost of capital rate:				After Tax
		Structure	Cost	Wtd. Cost
	Debt	45.00%	REDACTED	REDACTED
	Preferred	0.00%	REDACTED	REDACTED
	Equity	55.00%	REDACTED	REDACTED
4. After Tax Discount rate used in present worth calculation:				REDACTED
5. Tax rate used in plan:	25.39%			

Present Worth Calculations of Revenue Requirements

Year	Total Annual Revenue Requirement **7 (\$000's)	Total Annual GWH	Nominal Average ¢/ kWh ** 8	Real Levelized Average ¢/ kWh	Real Levelized Revenue Requirements	Levelized Average ¢/ kWh	Levelized Revenue Requirements
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
	REDACTED	REDACTED			REDACTED		REDACTED

6. Present worth of revenue requirements for the plan

** 7. Nominal revenue requirements by year

** 8. Average system rates per kWh by year

9. Overall assessment of business and financial risks associated with the plan, including the identification of appropriate financial measures.

8 Plan : Emissions Limit

Item

1. General rate of inflation:	REDACTED				
2. Monthly AFUDC rate for plan:	REDACTED				
3. Cost of capital rate:				After Tax	
		Structure	Cost	Wtd. Cost	
	Debt	45.00%	REDACTED	REDACTED	
	Preferred	0.00%	REDACTED	REDACTED	
	Equity	55.00%	REDACTED	REDACTED	
4. After Tax Discount rate used in present worth calculation:				REDACTED	
5. Tax rate used in plan:	25.39%				

Present Worth Calculations of Revenue Requirements

Year	Total Annual Revenue Requirement **7 (\$000's)	Total Annual GWH	Nominal Average ¢/ kWh ** 8	Real Levelized Average ¢/ kWh	Real Levelized Revenue Requirements	Levelized Average ¢/ kWh	Levelized Revenue Requirements
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
	REDACTED	REDACTED			REDACTED		REDACTED

6. Present worth of revenue requirements for the plan

** 7. Nominal revenue requirements by year

** 8. Average system rates per kWh by year

9. Overall assessment of business and financial risks associated with the plan, including the identification of appropriate financial measures.

9 Plan : High Load

Item

1. General rate of inflation:	REDACTED				
2. Monthly AFUDC rate for plan:	REDACTED				
3. Cost of capital rate:				After Tax	
		Structure	Cost	Wtd. Cost	
	Debt	45.00%	REDACTED	REDACTED	
	Preferred	0.00%	REDACTED	REDACTED	
	Equity	55.00%	REDACTED	REDACTED	
4. After Tax Discount rate used in present worth calculation:				REDACTED	
5. Tax rate used in plan:	25.39%				

Present Worth Calculations of Revenue Requirements

Year	Total Annual Revenue Requirement **7 (\$000's)	Total Annual GWH	Nominal Average ¢/ kWh ** 8	Real Levelized Average ¢/ kWh	Real Levelized Revenue Requirements	Levelized Average ¢/ kWh	Levelized Revenue Requirements
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
	REDACTED	REDACTED			REDACTED		REDACTED

6. Present worth of revenue requirements for the plan

** 7. Nominal revenue requirements by year

** 8. Average system rates per kWh by year

9. Overall assessment of business and financial risks associated with the plan, including the identification of appropriate financial measures.

10 Plan : No Non-Dispatchable DSM

Item

1. General rate of inflation:	REDACTED				
2. Monthly AFUDC rate for plan:	REDACTED				
3. Cost of capital rate:				After Tax	
		Structure	Cost	Wtd. Cost	
	Debt	45.00%	REDACTED	REDACTED	
	Preferred	0.00%	REDACTED	REDACTED	
	Equity	55.00%	REDACTED	REDACTED	
4. After Tax Discount rate used in present worth calculation:				REDACTED	
5. Tax rate used in plan:	25.39%				

Present Worth Calculations of Revenue Requirements

Year	Total Annual Revenue Requirement **7 (\$000's)	Total Annual GWH	Nominal Average ¢/ kWh ** 8	Real Levelized Average ¢/ kWh	Real Levelized Revenue Requirements	Levelized Average ¢/ kWh	Levelized Revenue Requirements
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
	REDACTED	REDACTED			REDACTED		REDACTED

6. Present worth of revenue requirements for the plan

** 7. Nominal revenue requirements by year

** 8. Average system rates per kWh by year

9. Overall assessment of business and financial risks associated with the plan, including the identification of appropriate financial measures.

11 Plan : Advocates

Item

1. General rate of inflation:	REDACTED				
2. Monthly AFUDC rate for plan:	REDACTED				
3. Cost of capital rate:				After Tax	
		Structure	Cost	Wtd. Cost	
	Debt	45.00%	REDACTED	REDACTED	
	Preferred	0.00%	REDACTED	REDACTED	
	Equity	55.00%	REDACTED	REDACTED	
4. After Tax Discount rate used in present worth calculation:				REDACTED	
5. Tax rate used in plan:	25.39%				

Present Worth Calculations of Revenue Requirements

Year	Total Annual Revenue Requirement **7 (\$000's)	Total Annual GWH	Nominal Average ¢/ kWh ** 8	Real Levelized Average ¢/ kWh	Real Levelized Revenue Requirements	Levelized Average ¢/ kWh	Levelized Revenue Requirements
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
	REDACTED	REDACTED			REDACTED		REDACTED

6. Present worth of revenue requirements for the plan

** 7. Nominal revenue requirements by year

** 8. Average system rates per kWh by year

9. Overall assessment of business and financial risks associated with the plan, including the identification of appropriate financial measures.

12 Plan : Economy Energy Purchase

Item

1. General rate of inflation:	REDACTED				
2. Monthly AFUDC rate for plan:	REDACTED				
3. Cost of capital rate:				After Tax	
		Structure	Cost	Wtd. Cost	
	Debt	45.00%	REDACTED	REDACTED	
	Preferred	0.00%	REDACTED	REDACTED	
	Equity	55.00%	REDACTED	REDACTED	
4. After Tax Discount rate used in present worth calculation:				REDACTED	
5. Tax rate used in plan:	25.39%				

Present Worth Calculations of Revenue Requirements

Year	Total Annual Revenue Requirement **7 (\$000's)	Total Annual GWH	Nominal Average ¢/ kWh ** 8	Real Levelized Average ¢/ kWh	Real Levelized Revenue Requirements	Levelized Average ¢/ kWh	Levelized Revenue Requirements
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
	REDACTED	REDACTED			REDACTED		REDACTED

6. Present worth of revenue requirements for the plan

** 7. Nominal revenue requirements by year

** 8. Average system rates per kWh by year

9. Overall assessment of business and financial risks associated with the plan, including the identification of appropriate financial measures.

EXHIBIT 2-B

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 2, which contains certain information regarding the company’s financial data, proprietary planning processes, technology screening assumptions, technology and resource cost information, economic analyses, environmental compliance costs, including projected and current cost estimates for coal combustion residual asset retirement obligation (“CCR ARO”) ash pond closure and landfill projects, Critical Energy Infrastructure Information (“CEII”) related to the Company’s blackstart facilities, and other data of the Company (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 their disclosure or use. Specifically, the trade secret portions of the Information 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 forecasting, 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 electric system infrastructure that must be protected from public disclosure in the interests of system security and reliability. Such portions of the Information contain CEII as defined by the Code of Federal Regulations Section 388.113.

The trade secret portions of the Information contained herein also include details concerning Georgia Power’s projected environmental capital investments, cost data, and analyses, all of which have economic value that could be inappropriately leveraged by competitors, vendors, or other persons. Specifically, the trade secret portions of the Information contain competitively sensitive details on the site specific and CCR unit specific costs the Company is expected to incur to close its ash ponds and landfills as well as the timing. Publicly disclosing these costs would allow bidders and vendors to tailor proposals according to the Company’s expected costs, setting an artificial floor on bidding to the detriment and harm of the Company and its customers. Disclosure of the trade secret portions of the Information could prevent the Company from adequately soliciting and obtaining the best cost estimates for future consulting work and harm the Company’s efforts to

obtain optimal pricing in current or future negotiations. In addition, the Company's competitors are not generally required to disclose similar information, and to require the Company to do so would put it at an economic disadvantage.

Additionally, certain trade secret portions of the Information contain proprietary cost data and analysis prepared on the Company's behalf by outside consultants. These studies were prepared by paid consultants of the Company at a significant cost and thus derive economic value from not being generally known. To allow competitors to access information related to and contained in these studies would economically harm the Company in that competitors would be able to benefit from the information and analysis contained in the studies without similarly being required to expend similar resources for the analysis and intelligence.

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 Technical Appendix Volume 2 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:



EXHIBIT 2-C

Georgia Power Company
Docket Nos. 56002 & 56003
2025 Integrated Resource Plan and 2025 Demand-Side Management Application
STF-LA Data Request Set No. 1

STF-LA-1-7

Question:

Refer to the tables on pages 2 through 14 of 14.

- a.** For each scenario shown in pages 2 through 14 of 14 for each of the amounts shown in the column “Total Annual Revenue Requirement” show in detail how such amounts were calculated, including details for each rate base component, each operating income component, the return component, income taxes, and how net operating incomes were grossed-up for the revenue requirement amounts. Include Excel files with formulas intact.
- b.** Explain what the Real Levelized Average rates represent.
- c.** Why do the Real Levelized Average rates vary from year to year?
- d.** What are the “Levelized Revenue Requirements”?
- e.** Why do the “Levelized Revenue Requirements” vary from year to year?
- f.** For each scenario shown in pages 2 through 14 of 14 what are the projected annual revenue requirements without any levelization? Provide calculations in Excel.
- g.** Was any discount rate used on the tables on pages 2 through 14 of 14 for any of the columns? If so, identify what discount rate(s) was/(were) used and provide the non-discounted amounts to which the discount rate(s) were applied. Also, show in Excel with formulas intact, how the discount rates were applied.
- h.** Refer to the tables on pages 2 through 14 of 14. Which columns represent net present values?
- i.** Refer to the tables on pages 2 through 14 of 14. Which columns represent nominal non-discounted dollars?
- j.** Refer to the tables on pages 2 through 14 of 14. Do any of the amounts in the “Total Annual Revenue Requirement” columns for years 2026, 2027 and 2028 represent the Company’s current best estimates of the rate case revenue requirement increases for any of the scenarios? If not, explain fully why not. If so, which specific items on pages 2 through 14 represent the Company’s current best estimates of the rate case revenue requirement increases for years 2026, 2027 and 2028? Explain fully.

Georgia Power Company
Docket Nos. 56002 & 56003
2025 Integrated Resource Plan and 2025 Demand-Side Management Application
STF-LA Data Request Set No. 1

k. For the 2025 rate case expected to follow the 2025 IRP, does the Company expect that it will be requesting levelized revenue amounts that are based on amounts for any years beyond 2026-2028? If so, please explain.

Response:

a. Please see STF-LA-1-1 Attachment TRADE SECRET for the full calculation of each scenario. Please note, no scenarios represent the Company's full rate base and thus do not represent a total revenue requirement. The costs included for the current generation are the variable costs only, which are then added to the full cost of any additional generation needed as the system grows.

b. The Real Levelized Averages represent the average cents per kWh if the load were to grow at the rate of inflation.

c. The Real Levelized rates vary from year to year because they only measure the current year and remaining years levelized at the rate of inflation (e.g., 2026 calculates levelized 2026 through 2044, 2027 calculates levelized 2027 through 2044).

d. The Levelized Revenue Requirements represent the average cents per kWh if the load were to grow at the kWh growth projected for each scenario.

e. The Levelized Revenue Requirements vary from year to year because they only measure the current year and remaining years (e.g., 2026 calculates levelized 2026 through 2044, 2027 calculates levelized 2027 through 2044).

f. Please see STF-LA-1-1 Attachment TRADE SECRET column L of each scenario for the revenue requirements without levelization.

g. Please see STF-LA-1-1 Attachment TRADE SECRET cell P12 in each scenario page for the after-tax discount rate used to calculate Net Present Values in columns L,M,P and R on row 40. All values and calculations are provided in the attachment.

h. Please see STF-LA-1-1 Attachment TRADE SECRET. Row 40 shows the NPV for each scenario.

i. Please see STF-LA-1-1 Attachment TRADE SECRET column L. Rows 20-38 show the nominal revenue requirements.

j. No, none of the scenarios represent the Company's base rate case revenue requirements. The Company has not yet prepared its 2025 base rate case budget, which is required to be

Georgia Power Company
Docket Nos. 56002 & 56003
2025 Integrated Resource Plan and 2025 Demand-Side Management Application
STF-LA Data Request Set No. 1

filed by July 1, 2025. Information about the future base rate case will be available once the rate case has been prepared and filed. Please note, no scenarios represent the Company's full rate base and thus do not represent a total revenue requirement. The costs included for the current generation are the variable costs only which are then added to the full cost of any additional generation needed as the system grows.

k. The Company has not yet prepared its 2025 base rate case budget. Information about the future base rate case will be available once the rate case has been prepared and filed.

EXHIBIT 3-A

PUBLIC DISCLOSURE

Table 7.2.1 Budget 2025 External Peak Adjustments for Large Loads

<u>Year</u>	<u>Total</u>
2024	REDACTED
2025	REDACTED
2026	REDACTED
2027	REDACTED
2028	REDACTED
2029	REDACTED
2030	REDACTED
2031	REDACTED
2032	REDACTED
2033	REDACTED
2034	REDACTED
2035	REDACTED
2036	REDACTED
2037	REDACTED
2038	REDACTED
2039	REDACTED
2040	REDACTED
2041	REDACTED
2042	REDACTED
2043	REDACTED
2044	REDACTED

7.3 TRIANGULAR DISTRIBUTION

The triangular distribution is a continuous probability distribution with the following parameters:

- a: $a \in (-\infty, \infty)$
- b: $a < b$
- c: $a \leq c \leq b$

In the case of metered versus announced uncertainty, *a* represents the minimum metered/announced ratio, *b* represents maximum metered/announced ratio and *c* represents the most likely metered/announced ratio.

EXHIBIT 3-B

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:



EXHIBIT 4-A

PUBLIC DISCLOSURE

Attachment 6.0-2: Winter Coincident Demand with Adjustments (MW)

**Calendar Based
Budget 2025**

Year	Unadjusted Class Coincident Demand					Unadjusted Coincident Demand	Adjustments (MW)		Adjusted Peak Demand
	Res	Com	Ind	Gov Lighting	MARTA		CoGen	DSM	
2024	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	15,992
2025	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	16,264
2026	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	16,892
2027	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	18,334
2028	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	20,320
2029	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	22,168
2030	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	23,612
2031	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	24,469
2032	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	24,900
2033	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	25,213
2034	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	25,451
2035	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	25,653
2036	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	25,768
2037	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	25,987
2038	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	26,216
2039	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	26,605
2040	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	26,917
2041	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	27,295
2042	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	27,687
2043	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	28,118
2044	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED	28,544

EXHIBIT 4-B

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:



EXHIBIT 5-A

PUBLIC DISCLOSURE
Georgia Power Company
Docket Nos. 56002 & 56003
2025 Integrated Resource Plan and 2025 Demand-Side Management Application
Hearing Request Set Number 1

HR-1-2

Information requested by: Georgia Interfaith Power & Light and Southface Energy Institute – Jennifer Whitfield

Question:

Q Georgia Power, the Independent Evaluator, and Staff have agreed to provide the megawatts by fuel type of the resources that are still in the Competitive Tier of the All-Source RFP.

Response:

Please refer to the table below that identifies a summary of the resources included in the Competitive Tier of the All-Source RFP by fuel type and megawatts (“MW”).

GPC All-Source Capacity RFP for Need Years 2029-2031 – Competitive Tier	
Fuel Type	Exclusive MW (Summer)
REDACTED	REDACTED
REDACTED	REDACTED
REDACTED	REDACTED
Total	REDACTED

EXHIBIT 5-B

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

**GEORGIA POWER COMPANY
DOCKET NOS. 56002 & 56003**

Direct Hearing Request HR-1-2

**BASIS FOR THE ASSERTION THAT THE
INFORMATION SUBMITTED IS A TRADE SECRET**

As part of Georgia Power Company's 2025 Integrated Resource Plan filed in Docket No. 56002 ("2025 IRP") and Application for the Certification, Decertification, and Amended Demand Side Management Plan filed in Docket No. 56003 ("2025 DSM Application"), Georgia Power Company ("Georgia Power" or the "Company") submits to the Georgia Public Service Commission its response to Direct Hearing Request 1-2 ("Response"). In the Response, the Company has provided specific information on the Company's Request for Proposals ("RFP"). All of such information (the "Information") constitutes trade secret information of 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 information regarding proposals submitted in the Company's RFP. Should this information be shared publicly, it could lead to an artificial pricing floor in future RFP bids, which would result in the Company having to pay a price higher than it would have otherwise paid on a level playing field. This would also lead to higher prices for customers. In addition, public dissemination of the Information would compromise the Company's ability to negotiate the best cost resources in connection with these or future proposals. Finally, competitors of the Company are not generally required to disclose similar information and to require the Company to do so would put it at an economic disadvantage.

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.

EXHIBIT 6-A

PUBLIC DISCLOSURE

Table 5: B2025 Technology Cost and Performance Summary

Technology	Winter Capacity (MW)	ELCC	Average Heat Rate (Btu/kWh)	Round Trip Efficiency	Fixed Capacity Factor	Overnight Cost (2024\$/kW)	Recurring Fixed Cost ² (2024\$/kW-yr)	Variable O&M (\$/MWh)	Asset Life (Yrs)
Natural Gas Combined Cycle (NGCC)	REDACTED	100%	REDACTED			REDACTED	REDACTED	REDACTED	REDACTED
NGCC with Local CCS	REDACTED	100%	REDACTED			REDACTED	REDACTED	REDACTED	REDACTED
NGCC with Distant CCS	REDACTED	100%	REDACTED			REDACTED	REDACTED	REDACTED	REDACTED
Combustion Turbine with SCR, Oil Winter (CT w SCR)	REDACTED	100%	REDACTED			REDACTED	REDACTED	REDACTED	REDACTED
Solar Photovoltaic (PV) - Single Axis Tracker (SAT)	REDACTED	0%			REDACTED	REDACTED	REDACTED		REDACTED
Onshore Wind Power	REDACTED	35%			REDACTED	REDACTED	REDACTED		REDACTED

² Recurring fixed costs include Fixed O&M, Maintenance Capital, and Natural Gas Firm Transportation.

PUBLIC DISCLOSURE

Technology	Winter Capacity (MW)	ELCC	Average Heat Rate (Btu/kWh)	Round Trip Efficiency	Fixed Capacity Factor	Overnight Cost (2024\$/kW)	Recurring Fixed Cost ² (2024\$/kW-yr)	Variable O&M (\$/MWh)	Asset Life (Yrs)
Lithium-ion Battery Energy Storage System (BESS) - 4 Hr	REDACTED REDACTED	0-3000 MW :95% 3001-6000 MW : 75% 6001-9000 MW : 50% 9001+ MW : 25%		REDACTED		REDACTED	REDACTED	REDACTED	REDACTED
Medium Duration Energy Storage System	REDACTED REDACTED	100%		REDACTED		REDACTED	REDACTED	REDACTED	REDACTED
Nuclear (AP-1000)	REDACTED	100%				REDACTED	REDACTED		REDACTED

EXHIBIT 6-B

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 2, which contains certain information regarding the company’s financial data, proprietary planning processes, technology screening assumptions, technology and resource cost information, economic analyses, environmental compliance costs, including projected and current cost estimates for coal combustion residual asset retirement obligation (“CCR ARO”) ash pond closure and landfill projects, Critical Energy Infrastructure Information (“CEII”) related to the Company’s blackstart facilities, and other data of the Company (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 their disclosure or use. Specifically, the trade secret portions of the Information 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 forecasting, 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 electric system infrastructure that must be protected from public disclosure in the interests of system security and reliability. Such portions of the Information contain CEII as defined by the Code of Federal Regulations Section 388.113.

The trade secret portions of the Information contained herein also include details concerning Georgia Power’s projected environmental capital investments, cost data, and analyses, all of which have economic value that could be inappropriately leveraged by competitors, vendors, or other persons. Specifically, the trade secret portions of the Information contain competitively sensitive details on the site specific and CCR unit specific costs the Company is expected to incur to close its ash ponds and landfills as well as the timing. Publicly disclosing these costs would allow bidders and vendors to tailor proposals according to the Company’s expected costs, setting an artificial floor on bidding to the detriment and harm of the Company and its customers. Disclosure of the trade secret portions of the Information could prevent the Company from adequately soliciting and obtaining the best cost estimates for future consulting work and harm the Company’s efforts to

obtain optimal pricing in current or future negotiations. In addition, the Company's competitors are not generally required to disclose similar information, and to require the Company to do so would put it at an economic disadvantage.

Additionally, certain trade secret portions of the Information contain proprietary cost data and analysis prepared on the Company's behalf by outside consultants. These studies were prepared by paid consultants of the Company at a significant cost and thus derive economic value from not being generally known. To allow competitors to access information related to and contained in these studies would economically harm the Company in that competitors would be able to benefit from the information and analysis contained in the studies without similarly being required to expend similar resources for the analysis and intelligence.

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 Technical Appendix Volume 2 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:



EXHIBIT 7-A

[C2]

2022 – 2024

SYSTEM PERFORMANCE

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Major Outages

The table below lists the major outages for years 2022, 2023, and 2024 based on the outage duration measured in MVA minutes. Georgia Power is defining a major outage as an outage with event duration greater than 10,000 MVA minutes.



PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.



PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.



PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.



PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.



PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.



EXHIBIT 7-B

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

**GEORGIA POWER COMPANY
DOCKET NO. 56002**

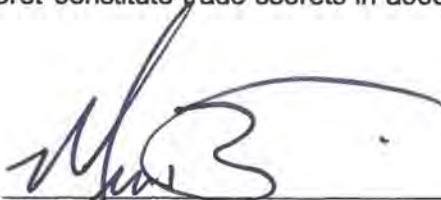
**AFFIDAVIT AND BASIS FOR THE ASSERTION THAT PORTIONS OF THE
INFORMATION SUBMITTED ARE PROTECTED TRADE SECRETS**

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 3, which contains confidential details regarding current and future transmission projects (the "Information") that is a trade secret of Georgia Power and Southern Company and their affiliates.

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 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 sensitive details concerning Georgia Power's transmission 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.

The Information is subject to substantial procedures to maintain its secrecy. Only select Georgia Power and Southern Company affiliate personnel are granted access to the Information and receive access on a "need to know" basis only. Any parties outside the Company who would be granted access to the Information would be required to sign confidentiality agreements.

Michael B. Robinson, first being duly sworn, deposes and states that he has reviewed Technical Appendix Volume 3 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 (2018).



Michael B. Robinson
Vice President, Grid Transformation
Georgia Power Company

Subscribed and sworn to before me this 6 day of Jan., 2025.



Notary Public

My Commission expires:



EXHIBIT 8-A

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

A. Georgia ITS 10 Year Expansion Plan Projects List

Table 2 Georgia ITS 10 Year Plan Project List below briefly lists projects in the 10 Year Expansion Plan (details for each project are in later sections).

Table 2 Georgia ITS 10 Year Plan Project List

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
219	2025	19523	SAV: CC - HYUNDAI MOTORS SAVANNAH AKA. PROJECT EA	1/1/2025	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2025	18670	GTC: BANKS CROSSING - POND FORK 115 KV	5/1/2025	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2025	18492	MITCHELL - NORTH TIFTON 230KV RECONDUCTOR	5/1/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2025	19676	ADAMSVILLE - JACK MCDONOUGH 230KV LINE REBUILD	6/1/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2025	18800	ECHECONNEE-WELLSTON 115KV REBUILD	6/1/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2025	19187	GRID - BREMEN - CROOKED CREEK (APC) 115 KV PROJECT	6/1/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2025	18153	GTC: BONAIRE PRI-ECHECONNEE 115 KV PARTIAL REBUILD	6/1/2025	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
218	2025	20342	GTC: CAMDEN INDUSTRIAL PARK 230/115KV NEW SUBSTATION	6/1/2025	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2025	20590	GTC: EATONTON PRIMARY - LICK CREEK 115KV LINE SWITCH REPLACEMENT	6/1/2025	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
218	2025	11821	JESUP - LUDOWICI PRIMARY 115KV REBUILD	6/1/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2025	13753	MEAG: ALCOVY ROAD - SKC 115 KV RECONDUCTOR	6/1/2025	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2025	13787	MEAG: AULTMAN ROAD - BONAIRE PRIMARY 115 KV REBUILD	6/1/2025	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
202	2025	20464	NORCROSS 230KV BUS 1-3 SERIES BUS TIE BREAKER INSTALLATION	6/1/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
216	2025	19631	PINE GROVE PRIMARY 115 KV DUAL STAGE CAPACITOR BANK	6/1/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2025	20067	SAV: DEPTFORD - MAGNOLIA 115KV RECONDUCTOR	6/1/2025	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2025	20466	SMART VALVE INSTALLATION	6/1/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
218	2025	21046	THALMANN AND COLERAIN 230 KV LINE RELAY PANEL UPGRADES	6/1/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2025	20431	VILLA RICA LOW SIDE BREAKER	6/1/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
218	2025	20684	CAMDEN INDUSTRIAL PARK (GPC)	6/1/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2025	18774	GTC: HEARD COUNTY - TENASKA 500KV (SECOND LINE)	12/1/2025	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2025	18889	JEFFERSON STREET#3 - NORTHWEST (WHITE) 115 KV RECONDUCTOR	12/1/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2025	20326	ANTHONY SHOALS STATCOM SYSTEM	12/31/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2025	20152	CC - CASS PINE- HILL VIEW 230 KV LINE- CC IMPROVEMENTS	12/31/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2025	20175	CC - PROJECT CHRONOS-SK/HYUNDAI	12/31/2025	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
215	2025	20010	GTC: ANTHONY SHOALS - WASHINGTON 115 KV LINE REBUILD	12/31/2025	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2025	17075	SAV: LITTLE OGEECHEE 230-115KV: RELAY MODERNIZATION	12/31/2025	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2026	18691	GTC: LIZARD LOPE - WESTOVER 115 KV NEW LINE	3/1/2026	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2026	20018	CC - QTS FAYETTEVILLE TRANSMISSION NEEDS	4/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
208	2026	19597	ADAMSVILLE - BUZZARD ROOST 230KV REBUILD AND JUMPER UPGRADE	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2026	18960	BLANKETS CREEK – WOODSTOCK 115KV LINE REBUILD	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2026	20243	CC - GARRETT ROAD SWITCHING STATION - TRAE LANE	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2026	20216	CC - STONEWALL TELL ROAD (TA REALTY)	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2026	18679	DU: EAST DALTON - OOSTANAULA 115KV REBUILD	6/1/2026	DU	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2026	20491	EAST POINT RELAY MODERNIZATION	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
215	2026	16007	FENWICK STREET - SAND BAR FERRY 115KV (RECONDUCTOR/REBUILD)	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2026	20516	GOAT ROCK 230KV SWITCH, JUMPER, & LINE TRAP REPLACEMENT	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2026	19618	GORDON-N DUBLIN 115KV (GORDON-ENGL MCI J) REBUILD	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2026	21139	GRADY - MORROW (WHITE) 115KV REBUILD	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2026	20474	GRADY 230/115KV RELAY MODERNIZATION	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2026	19706	GRID - GAINESVILLE #2 EQUIPMENT REPLACEMENT	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2026	21137	GTC: CONYERS - CORNISH MOUNTAIN 115KV LINE UPGRADE	6/1/2026	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2026	19334	GTC: LAGRANGE - NORTH OPELIKA 230 KV	6/1/2026	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2026	20015	GTC: MORNING HORNET 2ND 230/115 KV BANK & THUMBS UP 115KV TL	6/1/2026	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
214	2026	19999	GTC: ROBINS SPRING BUS REPLACEMENT	6/1/2026	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2026	20001	GTC: ROBINS SPRING CAPACITOR BANK INSTALLATION	6/1/2026	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2026	19636	HAMMOND - WEISS DAM 115KV LINE REBUILD	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2026	20512	KATHLEEN AREA IMPROVEMENTS	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2026	20490	KLONDIKE RELAY MODERNIZATION	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2026	19598	MEAG: DRESDEN - LAGRANGE PRIMARY 230KV UPGRADE & JUMPERS	6/1/2026	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
215	2026	20270	MEAG: RAY PLACE RD - WASHINGTON #3	6/1/2026	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
215	2026	20271	MEAG: RAY PLACE RD - WASHINGTON (WASHINGTON - WASHINGTON 3)	6/1/2026	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2026	20300	MORROW 115KV RELAY UPGRADE	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2026	18690	PALMYRA REACTOR REMOVAL	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2026	20066	SAV: BOULEVARD - DEPTFORD 115KV RECONDUCTOR	6/1/2026	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2026	19966	SAV: CC - BIG OGEECHEE 500/230KV (CC NETWORK IMPROVEMENTS)	6/1/2026	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2026	20277	SAV: MCINTOSH - PURRYSBURG 230KV REACTORS	6/1/2026	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2026	20489	SCOTTDAL REACTOR MODERNIZATION	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2026	17900	UNION CITY - YATES 230 KV WHITE LINE REBUILD	4/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
208	2026	20691	UNION CITY - YATES 230KV (WHITE) SWITCH AND TRAP REPLACEMENT	6/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2026	20223	CC - PROJECT PAYTON BAINBRIDGE	6/30/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2026	21022	OHARA BREAKER REPLACEMENT	10/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2026	20668	DRESDEN LINE PROTECTIVE RELAYING	12/1/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2026	20874	GTC: BARNESVILLE PRIMARY-BARNESVILLE #1 115KV RECONDUCTOR	12/1/2026	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2026	20273	GTC: DRESDEN 500KV BUS EXPANSION	12/1/2026	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2026	20002	GTC: GORDON - SANDERSVILLE #1 115KV LINE REBUILD	12/1/2026	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2026	20151	CC - CASS PINE 230/25 NEW SUB - QCELLS - CC IMPROVEMENTS	12/31/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2026	19287	GRADY-WEST END 115KV REBUILD	12/31/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2026	19363	MORROW - MOUNTAIN VIEW 115 KV REBUILD	12/31/2026	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2027	18832	MEAG: FORTSON 230KV SUBSTATION MODERNIZATION	1/13/2027	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2027	20509	CC - EMBLEM RIVERSIDE CUSTOMER SUB (FLEXENTIAL)	3/1/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2027	19635	GTC: HICKORY LEVEL - VILLA RICA 230KV LINE RECONDUCTOR	5/1/2027	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2027	19601	MORROW - YATES COMMON 115KV LINE UPGRADE	5/1/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2027	15879	POSSUM BRANCH - YATES COMMON 115KV REBUILD (YATES TO CLEM)	5/1/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
208	2027	20771	CC - GULLATT ROAD TRANSMISSION IMPROVEMENTS	6/1/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2027	18736	CC - MICROSOFT - SHUGART (CCO06)	6/1/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2027	20781	CC - SUMMER LAKE - VILLA RICA 230KV REBUILD (CC IMPROVMNT)	6/1/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2027	20736	CC - TA REALTY ELLENWOOD NETWORK IMPROVEMENTS	6/1/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2027	20234	DOYLE - LG&E MONROE 230KV - JACKS CREEK LOOP IN	6/1/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2027	20858	GTC: ADAMSVILLE - BUZZARD ROOST 230KV REBUILD	6/1/2027	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2027	20776	GTC: DOUGLASVILLE - VILLA RICA 230KV REBUILD (CC IMPROVEMENT)	6/1/2027	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2027	20778	GTC: DOYLE - WINDER PRIMARY 230KV LINE JUMPER REPLACEMENT	6/1/2027	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2027	19358	GTC: EAST MOULTRIE - HIGHWAY 112 230 KV LINE	6/1/2027	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2027	09662	GTC: EAST WALTON 500/230KV PROJECT	6/1/2027	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2027	20505	GTC: GARRETT RD - V. RICA 230KV LINE RECONDUCTOR (CC NET IM)	6/1/2027	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2027	19622	GTC: RIDDLEVILLE BUS REPLACEMENT	6/1/2027	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2027	19606	GTC: SKC 115KV BUS AND JUMPER REPLACEMENT	6/1/2027	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2027	20020	GTC: SOUTH HAZLEHURST - NEW LACY 230KV LINE	6/1/2027	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2027	20506	GTC: SWITCH WAY - THORNTON ROAD 230KV LINE REBUILD	6/1/2027	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
218	2027	18668	JESUP - OFFERMAN 115KV REBUILD	6/1/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
202	2027	10143	LAWRENCEVILLE - WINDER 115KV LINE REBUILD	6/1/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
202	2027	10481	LAWRENCEVILLE - WINDER PRIMARY 230KV LINE REBUILD	6/1/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
215	2027	20264	MEAG: RAY PLACE RD - WARRENTON PRIMARY	6/1/2027	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2027	19248	SANDERSVILLE #1 - WADLEY PRI. 115KV REBUILD/RECONDUCTOR	6/1/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2027	20785	SAV: GOSHEN (SAV) - KRAFT 115KV LINE REBUILD	6/1/2027	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2027	20065	SAV: GOSHEN (SAV) - MCINTOSH 115KV LINE REBUILD	6/1/2027	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2027	20717	CC - TOMOCHICHI 500/230KV SOLUTION (CC NETWORK IMPROVEMENTS)	7/15/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2027	18573	GRID - ARKWRIGHT - LLOYD SHOALS 115KV	7/30/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2027	20591	GTC: EATONTON PRIMARY (035591) - LICK CREEK 115KV REBUILD	12/1/2027	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2027	17977	ATHENA - EAST WATKINSVILLE 115 KV (REBUILD)	12/31/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2027	20150	CC - HILL VIEW & GRASSY HOLLOW SUB - CC IMPROVEMENTS	12/31/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2027	20024	DYER ROAD - EAST ROANOKE 115KV (REBUILD)	12/31/2027	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2028	19997	AULTMAN ROAD-PERRY 115KV LINE REBUILD	6/1/2028	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2028	20797	CC - EAST VILLA RICA AREA SWITCHING STATION (CC IMPROVEMENT)	6/1/2028	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2028	20774	CC - VILLA RICA UPGRADES (CC NETWORK IMPROVEMENTS)	6/1/2028	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
214	2028	21048	FITZGERALD - PITTS 115 KV LINE REBUILD	6/1/2028	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2028	08458	GTC: BARNESVILLE - SOUTH GRIFFIN 230KV PROJECT	6/1/2028	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2028	20503	GTC: BARNEYVILLE - EAST MOULTRIE 115KV NEW LINE	6/1/2028	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2028	20873	GTC: BONAIRE PRIMARY 500/230KV XFMR REPLCMNT & RELAY MOD	6/1/2028	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2028	19992	GTC: BOSTWICK - EAST SOCIAL CIRCLE 230KV RECONDUCTOR	6/1/2028	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2028	20777	JACK MCDONOUGH - NORTHWEST (BLACK) 230KV RECONDUCTOR	6/1/2028	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2028	19629	MEAG: BRUMBLEY CREEK - SOUTH BAINBRIDGE 115KV REBUILD	6/1/2028	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2028	19630	MEAG: THOMASVILLE 230/115KV AUTOBANK REPLACEMENT	6/1/2028	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2028	20482	PITTMAN ROAD - WEST POINT DAM (USA) 115KV REBUILD	6/1/2028	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2028	20656	PLANT YATES BREAKER AND HALF STATION	6/1/2028	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2028	20783	SAV: COLEMAN - DEAN FOREST 115KV LINE REBUILD	6/1/2028	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2028	20407	SAV: MAGNOLIA - TRUMAN PARKWAY 115KV REBUILD	6/1/2028	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2028	21069	SMART VALVES AT EAST VILLA RICA SWITCHING STATION	6/1/2028	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2028	20768	SOUTH MACON 115KV BUSES 1 & 2 REPLACEMENT	6/1/2028	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2028	20274	UNION CITY - YATES 230KV (BLACK) LINE REBUILD	6/1/2028	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2028	13166	FIRST AVENUE - NORTH COLUMBUS 115KV LINE REBUILD	12/1/2028	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
214	2028	20586	GTC: NORTH DUBLIN 230/115KV TRANSFORMERS AND BUS-TIE BREAKER	12/1/2028	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2029	21062	ASHLEY PARK-WANSLEY 500KV	6/1/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2029	10222	BLAKELY PRIMARY - HUCKLEBERRY 115KV REBUILD	6/1/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2029	21047	BROADWAY - ECHECONNIE 115 KV LINE REBUILD	6/1/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2029	16887	BUTLER - THOMASTON 230KV LINE CONVERSION	6/1/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2029	21036	BUZZARD ROOST - FACTORY SHOALS 230KV NEW LINE	6/1/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2029	21142	CONYERS - KLONDIKE 230 KV SECOND LINE	6/1/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2029	21138	GLENWOOD SPRINGS - PORTERDALE PRIMARY 230KV LINE SWITCH REPL	6/1/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2029	21112	GTC: BARNESVILLE PRIMARY - THOMASTON 230KV	6/1/2029	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
202	2029	10814	GTC: BAY CREEK 230/115KV SECOND AUTO TRANSFORMER	6/1/2029	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2029	21140	GTC: BONAIRE PRIMARY - EASTMAN PRIMARY 115 KV LINE REBUILD	6/1/2029	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2029	20849	GTC: CLIFTONDALE - LINE CREEK 230KV LINE	6/1/2029	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2029	19950	GTC: DRESDEN - TALBOT 500KV LINE	6/1/2029	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
202	2029	20760	GTC: HOPEWELL 230/115 KV BANK A	6/1/2029	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2029	21123	GTC: TENASKA - WANSLEY 500KV NEW LINE	6/1/2029	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
206	2029	21141	LLOYD SHOALS - PORTERDALE PRIMARY 115KV REBUILD	6/1/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2029	20285	LOWER RIVER - WEBB (APC) 115KV RECONDUCTOR	6/1/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
212	2029	19621	MCEVER ROAD - SHOAL CREEK 115KV REBUILD	6/1/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
218	2029	20346	MCMANUS - WEST BRUNSWICK 115KV REBUILD	6/1/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2029	17706	MEAG: AULTMAN ROAD - FORT VALLEY #1 115 KV REBUILD	6/1/2029	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2029	11051	MEAG: SLAPPEY DRIVE - WESTOVER 115KV LINE REBUILD	6/1/2029	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
202	2029	20757	NORCROSS - NORTH DRUID HILLS 115KV REBUILD	6/1/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2029	21006	SAV: BOULEVARD - MAGNOLIA 115 KV LINE REBUILD	6/1/2029	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2029	21023	SAV: DEAN FOREST - LITTLE OGEECHEE 230 KV REBUILD	6/1/2029	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2029	20989	SAV: RICE HOPE NEW AUTO TRANSFORMER	6/1/2029	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2029	13628	SOUTH BAINBRIDGE - SINAI (FPL) 115KV LINE RECONDUCTOR	6/1/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
202	2029	20248	BAY CREEK - CONYERS 230KV REBUILD	12/31/2029	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2030	21129	ANNISTON - HAMMOND 230KV LINE	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2030	20764	ATKINSON - NORTHSIDE DRIVE 115KV REBUILD	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2030	20761	ATKINSON - NORTHWEST 115KV REBUILD	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2030	21130	CC - NORTH GEORGIA DATA NETWORK UPGRADES	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2030	10478	CORNELIA - TALLULAH LODGE 115KV REBUILD	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2030	18669	DU: DAWSON CROSSING - NELSON (WHITE) 115 KV REBUILD	6/1/2030	DU	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2030	21097	EAST POINT - TRIBUTARY 230KV REBUILD	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
208	2030	20480	EAST POINT - UNION CITY 230KV BLACK LINE RECONDUCTOR	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2030	19627	ECHECONNEE-WELLSTON 115KV LINE REBUILD	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2030	21063	FARLEY (APC)-TAZEWELL 500KV	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2030	12120	GAINESVILLE #2 - MCEVER ROAD 115 KV REBUILD	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2030	20298	GLENWOOD SPRINGS - LAKE OCOONEE 115KV LINE REBUILD	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2030	21128	GOAT ROCK REACTORS INSTALLATION	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
215	2030	19996	GOLDENS CREEK - WARRENTON PRIMARY 230KV REBUILD	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2030	20428	GORDON-SANDERSVILLE #1 115KV LINE REBUILD (DEEPSTEP-SAND #6)	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
215	2030	21116	GOSHEN AREA STRATEGIC SOLUTION	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2030	21073	GTC: BIG SMARR - TOMOCHICHI 500KV	6/1/2030	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2030	21014	GTC: BUZZARD ROOST - CAVENDER DRIVE 230KV NEW LINE	6/1/2030	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2030	21013	GTC: CAVENDER DRIVE 500/230KV AUTOBANK	6/1/2030	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2030	20375	GTC: EAST WATKINSVILLE 230 KV STATION MODIFICATION	6/1/2030	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2030	21111	GTC: HARTWELL DAM - HARTWELL ENERGY 230KV SERIES REACTORS	6/1/2030	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2030	21113	GTC: HARTWELL ENERGY - MIDDLE FORK 230KV LINE	6/1/2030	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2030	21131	GTC: POND FORK - MIDWAY 115KV LINE	6/1/2030	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
214	2030	21077	GTC: ROCKVILLE - TIGER CREEK -WARTHEN 500KV LINES	6/1/2030	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2030	21076	GTC: TALLBOT #2 - TAZEWELL 500KV LINE	6/1/2030	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2030	21094	GTC: TIGER CREEK-ROCKVILLE-NORTH SPA 230KV PROJECT	6/1/2030	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2030	20789	JEFFERSON ROAD - WINDER PRIMARY 115KV REBUILD	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2030	20284	KETTLE CREEK PRIMARY - PINE GROVE PRIMARY 115KV REBUILD	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
215	2030	21118	MEAG: ATHENA - WARRENTON 230KV CONVERSION	6/1/2030	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2030	20857	NEW CAVENDER DRIVE - TRIBUTARY 230KV LINE	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2030	21093	NORTH SPA 230KV STRATEGIC PROJECT	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2030	19995	TALLULAH LODGE - TOCCOA 115 KV REBUILD	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
201	2030	21098	TRIBUTARY - THORNTON RD 230KV REBUILD	6/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2030	20160	THOMASTON 230 NEW BUILD SUB	11/1/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2030	18848	BAINBRIDGE TRANSMISSION: EAST RIVER ROAD, EAST BAINBRIDGE	12/31/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2030	19626	GLENWOOD SPRINGS 115KV CAP BANK	12/31/2030	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
208	2031	20690	EAST POINT - UNION CITY (WHITE) 230KV REBUILD	5/1/2031	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
202	2031	19632	AVERY - HOPEWELL 115KV RECONDUCTOR	6/1/2031	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
211	2031	10811	BOWEN #10 500/230KV AUTOBANK REPLACEMENT	6/1/2031	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
215	2031	20756	HATCH - WADLEY 500 KV LINE STRATEGIC PROJECT	6/1/2031	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
214	2031	21099	MEAG: PIO NONO 230/115KV AREA SOLUTION	6/1/2031	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
213	2032	21114	MEAG: SOUTH GRIFFIN 230/115KV BANK #5	6/1/2032	MEAG	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2032	20784	SAV: COLEMAN - MELDRIM 115KV LINE REBUILD	6/1/2032	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
214	2033	20767	ARKWRIGHT BUS AND JUMPER REPLACEMENT	6/1/2033	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
202	2033	20758	BAY CREEK - CONYERS 230KV LIMITING ELEMENT REPLACEMENT	6/1/2033	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
215	2033	20793	EVANS PRIMARY - THURMOND DAM (USA) #5 115KV REBUILD	6/1/2033	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
215	2033	20794	EVANS PRIMARY - THURMOND DAM (USA) #6 115KV REBUILD	6/1/2033	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2033	12217	GTC: CENTER PRIMARY - CLARKSBORO 230 KV REBUILD	6/1/2033	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2033	20773	GTC: CLARKSBORO - WINDER PRIMARY 230KV REBUILD	6/1/2033	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2033	12147	GTC: EAST SOCIAL CIRCLE - SNELLVILLE 230KV EQUIPMENT UPGRADE	6/1/2033	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2033	21075	GTC: EAST WALTON - MIDDLE FORK 500KV	6/1/2033	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2033	20791	GTC: SHOAL CREEK - SOUTH HALL 230KV REBUILD	6/1/2033	GTC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2033	21053	MCEVER ROAD - SHOAL CREEK 115KV REBUILD PHASE III	6/1/2033	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2033	09661	MCGRAU FORD - MIDDLE FORK 500KV LINE PROJECT	6/1/2033	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2033	20796	SAV: MELDRIM BANK D REPLACEMENT	6/1/2033	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
215	2033	14222	THOMSON PRIMARY 230/115KV SECOND TRANSFORMER	6/1/2033	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

PUBLIC DISCLOSURE

CRITICAL ENERGY INFRASTRUCTURE INFORMATION - CONFIDENTIAL. This data is confidential CEII and is subject to Regulation by CFR Sec. 388.113. Recipient should be aware that disclosure of this material and its contents shall be handled in accordance with CEII procedures. Any and all duplications of this data must contain this notification. This document contains non-public transmission information and in accordance with FERC policy, should not be disclosed to Marketing Function employees.

Zone	Year	TEAMS Number	Project Name	Need Date 2024	Project Sponsor	Estimated Cost - GPC	Estimated Cost - GTC	Estimated Cost - MEAG	Estimated Cost - DU	Totals
202	2033	20759	WINDER PRIMARY 230KV BUS 1-2 PARALLEL BUS-TIE INSTALLATION	6/1/2033	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
216	2033	10487	PINE GROVE PRIMARY - WEST VALDOSTA 115 KV RECONDUCTOR	12/31/2033	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
212	2034	18700	DAWSON CROSSING - GAINESVILLE #1 115 KV	6/1/2034	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
219	2034	20787	SAV: LITTLE OGEECHEE 230/115KV BANK REPLACEMENT	6/1/2034	SAV	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
215	2034	17993	EVANS PRIMARY - THOMSON PRIMARY 115KV REBUILD	12/31/2034	GPC	REDACTED	REDACTED	REDACTED	REDACTED	REDACTED
Total						REDACTED	REDACTED	REDACTED	REDACTED	REDACTED

EXHIBIT 8-B

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

**GEORGIA POWER COMPANY
DOCKET NO. 56002**

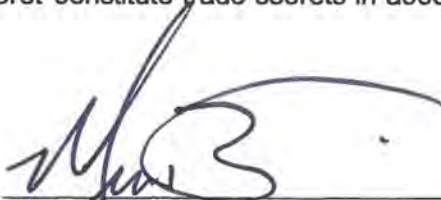
**AFFIDAVIT AND BASIS FOR THE ASSERTION THAT PORTIONS OF THE
INFORMATION SUBMITTED ARE PROTECTED TRADE SECRETS**

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 3, which contains confidential details regarding current and future transmission projects (the "Information") that is a trade secret of Georgia Power and Southern Company and their affiliates.

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 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 sensitive details concerning Georgia Power's transmission 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.

The Information is subject to substantial procedures to maintain its secrecy. Only select Georgia Power and Southern Company affiliate personnel are granted access to the Information and receive access on a "need to know" basis only. Any parties outside the Company who would be granted access to the Information would be required to sign confidentiality agreements.

Michael B. Robinson, first being duly sworn, deposes and states that he has reviewed Technical Appendix Volume 3 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 (2018).



Michael B. Robinson
Vice President, Grid Transformation
Georgia Power Company

Subscribed and sworn to before me this 6 day of Jan., 2025.



Notary Public

My Commission expires:



EXHIBIT 9

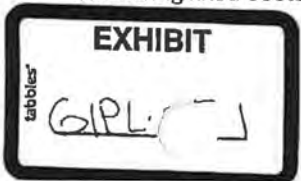


PUBLIC DISCLOSURE

Table 5: B2025 Technology Cost and Performance Summary

Technology	Winter Capacity (MW)	ELCC	Average Heat Rate (Btu/kWh)	Round Trip Efficiency	Fixed Capacity Factor	Overnight Cost (2024\$/kW)	Recurring Fixed Cost ² (2024\$/kW-yr)	Variable O&M (\$/MWh)	Asset Life (Yrs)
Natural Gas Combined Cycle (NGCC)	REDACTED	100%	REDACTED			REDACTED	REDACTED	REDACTED	REDACTED
NGCC with Local CCS	REDACTED	100%	REDACTED			REDACTED	REDACTED	REDACTED	REDACTED
NGCC with Distant CCS	REDACTED	100%	REDACTED			REDACTED	REDACTED	REDACTED	REDACTED
Combustion Turbine with SCR, Oil Winter (CT w SCR)	REDACTED	100%	REDACTED			REDACTED	REDACTED	REDACTED	REDACTED
Solar Photovoltaic (PV) - Single Axis Tracker (SAT)	REDACTED	0%			REDACTED	REDACTED	REDACTED		REDACTED
Onshore Wind Power	REDACTED	35%			REDACTED	REDACTED	REDACTED		REDACTED

² Recurring fixed costs include Fixed O&M, Maintenance Capital, and Natural Gas Firm Transportation.



PUBLIC DISCLOSURE

Technology	Winter Capacity (MW)	ELCC	Average Heat Rate (Btu/kWh)	Round Trip Efficiency	Fixed Capacity Factor	Overnight Cost (2024\$/kW)	Recurring Fixed Cost ² (2024\$/kW-yr)	Variable O&M (\$/MWh)	Asset Life (Yrs)
Lithium-ion Battery Energy Storage System (BESS) - 4 Hr	REDACTED REDACTED	0-3000 MW :95% 3001-6000 MW : 75% 6001-9000 MW : 50% 9001+ MW : 25%		REDACTED		REDACTED	REDACTED	REDACTED	REDACTED
Medium Duration Energy Storage System	REDACTED REDACTED	100%		REDACTED		REDACTED	REDACTED	REDACTED	REDACTED
Nuclear (AP-1000)	REDACTED	100%				REDACTED	REDACTED		REDACTED

**2024 Joint Integrated
Resource Plan of
Louisville Gas and Electric
Company and Kentucky
Utilities Company**



PPL companies

Case No. 2024-00326

Volume III

2024 IRP Technology Update



PPL companies

**Generation Planning & Analysis
October 2024**

CONFIDENTIAL INFORMATION REDACTED

Table 1: Fully Dispatchable Resources (2030 Installation; 2030 Dollars)

	SCCT	NGCC	SMR
Summer Capacity (MW) ²	243	645	300
Winter Capacity (MW)	258	660	300
Heat Rate (MMBtu/MWh) ³	9.5	6.3	9.2
Capital Cost (\$/kW) ⁴	1,636	2,121	9,765
Fixed O&M (\$/kW-yr) ⁵	6.9	7.8	166
Firm Gas Cost (\$/kW-yr) ⁶	19	15	N/A
Variable O&M (\$/MWh) ⁷	N/A	0.23	3.17
Start Cost (\$/Start) ⁸		N/A	N/A
Hourly Operating Cost (\$/Hour) ⁹	N/A		N/A
Fuel Cost (\$/MWh) ¹⁰			13.45
Investment Tax Credit ¹¹	N/A	N/A	40%
Earliest In-Service Year ¹²	2030	2030	2039

² Capacity is the net installed capacity ("ICAP").

³ Heat rate is the full load net heat rate.

⁴ Capital cost is the overnight capital expenditure required to achieve commercial operation. Cost of financing is modeled through construction profiles for each resource type.

⁵ Fixed operation and maintenance costs are operation and maintenance costs that do not vary with generation output. For SCCT and NGCC resources, fixed O&M includes fixed costs for a long term service agreement ("LTSA").

⁶ Firm gas transportation costs are costs associated with reserving firm gas-line capacity.

⁷ Variable operation and maintenance costs are operation and maintenance costs incurred on a per-unit-energy basis.

⁸ Start costs are starts-based variable LTSA costs for SCCT.

⁹ Hourly operating costs are hours-based variable LTSA costs for NGCC.

¹⁰ Fuel cost is the product of the unit's heat rate and the assumed cost of fuel.

¹¹ In accordance with the current tax credits, the Companies assumed nuclear SMR resources that are in-service by year 2039 would begin construction by year 2033 and receive the full credit; resources that are in-service in year 2040 would begin construction in 2034 and receive 75% of the credit; resources that are in-service in year 2041 would begin construction in 2035 and receive 50% of the credit; and resources that are in-service in year 2042 or later would begin construction in 2036 or later and not receive any tax credits. Further cost reductions may be possible by utilizing existing sites.

¹² Earliest in-service year is the first year the Companies expect a resource can be feasibly built based on permitting and construction timelines as well as lead times for electrical equipment such as generator step up transformers.

DESC IRP Stakeholder Advisory Group Session XVI

V. 2025 IRP Update



Supply-Side Inputs Candidate Resource Options

Preliminary - Still a Work In Progress

Available Resources	Capital Cost 2024 IRP Update (\$/kW)	Capital Cost 2025 IRP Update (\$/kW)	Capacity (MW)	Source Of Data
New 2x1 CC Greenfield	1,226	2,049	1309	Dominion Energy Project Construction Group
New 1x1 CC Greenfield	1,962	2,453	665	Dominion Energy Project Construction Group
New (3) 1x1 Combined Cycle 50% Shared Brownfield	NA	Pending	998	Dominion Energy Project Construction Group
New 1X0 Adv-Class Frame CT Greenfield	NA	1,494	450	Dominion Energy Project Construction Group
New 2X0 F-Class CT Greenfield	1,471	1,441	402	Dominion Energy Project Construction Group
New 4X0 Aero CT Greenfield	NA	3,205	230	Dominion Energy Project Construction Group
New 2X0 Aero CT Greenfield	2,484	4,772	305	Dominion Energy Project Construction Group
New 1x0 F-Class CT Urquhart CT #8 Brownfield	NA	Pending	301	Dominion Energy Project Construction Group
New 1X0 Aero CT Bushy Park CT #2 Brownfield	NA	Pending	52	Dominion Energy Project Construction Group
New Small Modular Reactor	12,395	12,581	274	NREL 2024 AYB
New Solar *	1,375	1,630	100	NREL 2024 AZB
New Solar PPA *	1,375	1,630	100	NREL 2024 AZB
New Solar Plus Storage *	NA	2,590	300	NREL 2024 AZB
New Battery 4 hour *	1,784	2,036	300	NREL 2024 ATB
New Battery 8 hour *	NA	4,079	300	NREL 2024 AZB
New Offshore Wind *	4,135	4,698	300	NREL 2024 AZB

* Includes Grid Interconnection

EXHIBIT 10



Contact: Tom Krause
Phone: 404-656-2316
www.psc.state.ga.us

Georgia Public Service Commission

244 Washington St S.W.
Atlanta, Georgia 30334
Phone: 404-656-4501
Toll free: 1- 800-282-5813
Fax: 404-656-2341

For Immediate Release

NEWS RELEASE

PSC to Begin 6-Month IRP Process Georgians Encouraged to Participate

Feb. 7, 2025 – (ATLANTA) The Georgia Public Service Commission received Georgia Power’s filing for the utility’s 2025 Integrated Resource Plan on Jan. 31.

The process to approve the plan will include three public hearings: March 25-28, May 27-30 and a rebuttal hearing on June 23-25. The first hour of each day’s hearing will be reserved for public comment. Members of the public can also send comments via mail, email or via the PSC’s electronic portal, available on the homepage of the PSC’s website www.psc.ga.gov.

The IRP is filed every three years to set Georgia Power energy production. Although the plan is updated every three years, the plan is a 20-year outlook of energy production amounts and methods.

“My fellow Commissioners and I make every effort to hear from Georgian’s during the IRP process,” said PSC Chairman Jason Shaw. “As we weigh evidence presented to us by expert witnesses, engineers and energy analysts, we also read all comments sent by the public and listen to every public witness who takes the time to speak at the hearings. It is a vitally important part of the IRP process.”

Now that the IRP has been filed, the PSC’s Public Interest Advocacy Staff will utilize experts in finance and energy production to analyze Georgia Power’s plan. The IRP will be litigated over the next six months where PSC staff request data from Georgia Power, expert witnesses file testimony, and the Commissioners will hold the hearing that will include witnesses and cross examination. As many as two dozen outside intervenors will join the process and are likewise able to file documents, present witnesses and cross-examine other witnesses.

On July 15, at the PSC’s regularly scheduled Administrative Session, the Commissioners will vote on the final version of the Georgia Power IRP including all changes made during the process.

This is a link to the 2025 IRP docket on the PSC’s website. It will include all information on the case: <https://psc.ga.gov/search/facts-docket/?docketId=56002>

more

This is a link to the Procedure and Scheduling Order which provides a schedule of all relevant dates including dates of filings and hearings: <https://psc.ga.gov/search/facts-document/?documentId=221169>

For more information on the Commission, see the PSC website at <https://psc.ga.gov/>

###

EXHIBIT 11

1 A. (Witness Grubb) -- it shows a project cost.
2 And then on Exhibit 6, which is the Carolinas Transmission
3 Planning Collaborative, is that total where it shows --
4 like page 63, 313, is that a total of all those projects
5 above?

6 I'm just trying to get my -- trying to get
7 oriented.

8 Q. No. This one is -- this is -- this one lists
9 an estimated cost project by project in the Carolinas
10 Collaborative Transmission Plan. So each -- it's dozens
11 of pages of specific projects with their estimated costs.

12 A. (Witness Grubb) But, again, just trying to
13 be -- so Carolinas, it's a subtotal of the projects above
14 it is what I was trying to clarify?

15 Q. Oh, no. These are two separate processes.

16 A. (Witness Grubb) Yeah. I get that -- okay. I
17 get that Domin- -- okay. I'll -- I'll wait.

18 Is it me? Okay.

19 Q. Okay. When you discuss projects as part of
20 the ITS meetings, do you discuss costs?

21 A. (Witness Robinson) We do. That is a very
22 important part of the joint planning process and it has to
23 be known so that we can assign projects based on parity
24 and we understand our parity forecast.

25 Q. Does Georgia Power compete with ITS

1 participants to build transmission in Georgia?

2 A. (Witness Robinson) We do not. We each assign
3 each other transmission or projects based on ownership.
4 And those projects are owned by each participant and taken
5 to COD, or in-service, and then they bring those actual
6 costs into parity for our parity calculation that I talked
7 about earlier. So we do not compete to build
8 transmission.

9 Q. Okay. Does Georgia Power compete against
10 anybody to build transmission?

11 A. (Witness Robinson) Not in the state of
12 Georgia --

13 Q. Okay.

14 A. (Witness Robinson) -- because of the
15 Integrated Transmission System.

16 Q. Sure.

17 A. (Witness Robinson) And that's the benefit of
18 having an Integrated Transmission System is that we're
19 jointly planning the system together and making economic
20 decisions that are in the best interest of all of our
21 customers.

22 A. (Witness Grubb) But you do get people to do
23 that work for us, which is -- from the trade secret
24 standpoint, that's what we're looking at is we're going to
25 build those projects. We don't self-build all of them.

EXHIBIT 12

**Dominion Energy South Carolina
Planned Transmission Projects \$2M and above Total
5 Year Budget**

**Queensboro - Ft Johnson 115 kV & Queensboro-Bayfront 115kV
(Queensboro-James Island Sect)**

Project ID
6807 B

Project Description
Replace the Queensboro – Ft Johnson 115 kV Line and structures as they have reached the end of life.

Project Need
This project is required due to address end of life issues.

Project Status
In Progress

Planned In-Service Date
12/31/23

Estimated Project Cost							
Previous	2024	2025	2026	2027	2028	Total*	
\$4,604,301	\$800,000	\$0	\$0	\$0	\$0	\$5,404,301	

*Total Estimated Amount applied to 2024 Rate Base Calculation



EXHIBIT 13

Appendix C Transmission Plan Major Project Listings – Reliability Projects



Project ID	Reliability Project (Previously In Plan)	Transmission Owner	Status ¹	Projected In-Service Date	Estimated Cost (\$M) ²	Initiating Study Type ⁴
E190037	Havelock 230/115 kV Banks 1 & 2, Replace	DEP	In-Service	7/23/2024	8	TPL
DFYF00152	Castle Hayne-Folkstone 230 kV Line – Porters Neck 230 kV Tap Line, Construct	DEP	In-Service	8/19/2024	38	TPL
W190286	Wateree 100 kV Line (Great Falls-Wateree), Upgrade	DEC	In-Service	12/1/2024	12	TPL
E190030	Craggy–Enka 230 kV Line, Construct	DEP	Underway	6/1/2025	93	TPL
F170628C	Rocky Mount – Battleboro 115 kV Line, Reconductor	DEP	Underway	6/1/2025	13	AS
W220125	Breaker Station on Motley 100 kV Line for New Customer, Construct	DEC	Underway	6/1/2025	16	New Loads
NP09175	Wilkes 230/100 kV Tie Station, Construct	DEC	Underway	6/1/2025	63	TPL
W200379	Island Creek 44 kV, Conversion	DEC	Underway	12/1/2025	14	New Loads
W190242	Cokesbury 100 kV Line (Coronaca–Hodges), Upgrade	DEC	Underway	12/1/2025	29	TPL
W200126	South Point 100 kV Switching Station, Construct	DEC	Underway	12/1/2025	103	TPL
E210073	Carthage (Hill Crest) 230/115 kV Substation, Construct	DEP	Underway	6/1/2026	33	TPL
E220112	Asheville Plant – Oteen 115 kV West Line (Arden), Construct	DEP	Underway	6/1/2026	12	TPL
W200030	Wylie 100 kV Line (Wylie-Arrowood Retail), Upgrade	DEC	Underway	6/1/2026	14	TPL
E200161	Castle Hayne–Folkstone 115 kV Line, Rebuild	DEP	Underway	12/1/2026	89	TPL
F170824H	Weatherspoon – LOF 115 kV Line (Maxton-Pembroke), Reconductor	DEP	Underway	12/1/2026	19	TPL
E230059	Sumter – SCEG Eastover 115 kV Line (Kings Hwy – Shaw Field – Eastover), Reconductor	DEP	Underway	12/1/2026	27	TPL
W200042	Sevier 100 kV Line (East Greenville-Verdae Retail Tap), Upgrade	DEC	Underway	12/1/2026	20	TPL
W200039	Coronaca 100 kV Line (Coronaca-Creto), Upgrade and Construct	DEC	Underway	12/1/2026	41	TPL
W200599	Davidson River 100 kV Line (North Greenville-Marietta), Upgrade	DEC	Planned	6/1/2027	19	TPL

Project ID	Reliability Project (Previously in Plan)	Transmission Owner	Status ¹	Projected In-Service Date	Estimated Cost (\$M) ²	Initiating Study Type ⁴
W230145	Hands Mill Switching Station, Construct	DEC	Underway	6/1/2027	67	New Loads
W200031	Monroe 100 kV Line (Lancaster-Monroe), Upgrade	DEC	Underway	6/1/2027	69	TPL
W220367	Boyd Switching Station, Construct	DEC	Underway	6/1/2027	94	New Loads
W230245	Messer 230 kV Line (Dixon School Rd-Customer), Construct	DEC	Planned	12/1/2027	41	New Loads
W220209	Lyle Creek Switching Station, Construct	DEC	Underway	12/1/2027	112	New Loads
W220368	Haas Creek Switching Station, Construct	DEC	Underway	12/1/2027	91	New Loads
E220380	Asheboro – Siler City 115 kV Line, Reconductor	DEP	Underway	6/1/2028	41	New Loads
W170306	North Greenville 230 kV Tie Station, Upgrade	DEC	Underway	12/1/2028	34	TPL
W200061	Page and Guilford 100 kV Lines (Greensboro-North Greensboro), Upgrade	DEC	Planned	6/1/2029	30	TPL
W200172	Morning Star 230 kV Tie Station, Upgrade	DEC	Planned	6/1/2031	39	TPL
W200590	Crab Orchard 100 kV Line (Harrisburg-Amity), Upgrade	DEC	Planned	6/1/2033	15	TPL
W200262	Sandy Ridge 230 kV Line (Newport-Morning Star), Upgrade	DEC	Planned	6/1/2033	37	TPL
W200595	Westport 230 kV Line (McGuire-Marshall), Upgrade	DEC	Conceptual	6/1/2035	53	TPL
CTPCDEP01	Durham – RTP 230 kV Line, Reconductor	DEP	Conceptual	TBD	TBD	TPL
E210145	Holly Ridge North 115 kV Switching Station, Construct	DEP	Conceptual	TBD	12	TPL
CTPCDEP02	Weatherspoon – LOF 115 kV Line (Weatherspoon- LREMC West Lumberton), Reconductor	DEP	Deferred	TBD	27	TPL
CTPCDEP03	Falls – Franklinton (Franklinton – Franklinton Novo 115 kV Feeder), Construct	DEP	Conceptual	TBD	16	TPL
W220559	Concord 100 kV Line (Concord-Concord City Del 3), Upgrade	DEC	Conceptual	TBD	2.8	TPL
W230087	Kennedy 100 kV Line (Orchard-Newton Tap), Upgrade	DEC	Conceptual	TBD	6	TPL

Project ID	Reliability Project (Previously in Plan)	Transmission Owner	Status ¹	Projected In-Service Date	Estimated Cost (\$M) ²	Initiating Study Type ⁴
W220507	Cabarrus 100 kV Line (Wildcat-Westfork), Upgrade	DEC	Conceptual	TBD	4.3	TPL
W200412	Skybrook 100 kV Line (Winecoff-Eastfield Retail), Upgrade	DEC	Conceptual	TBD	15	TPL
CTPCDEC01	Beulah 100 kV Line (Lookout-EnergyUnited Del 18), Upgrade	DEC	Conceptual	TBD	21	TPL
W230358	Hinkle 100 kV Line (Stamey-Statesville), Upgrade	DEC	Conceptual	TBD	7	TPL
W200173	Terrell 44 kV Line, Conversion	DEC	Conceptual	TBD	26	TPL
W200149	Reidsville and Wolf Creek 100 kV Lines (Dan River-Sadler), Upgrade	DEC	Conceptual	TBD	37	TPL
CTPCDEC02	Harley 100 kV Line (Tiger-Campobello), Upgrade	DEC	Conceptual	TBD	45	TPL
W230384	Oliver 230 kV Line (Marshall-Boyd), Upgrade	DEC	Conceptual	TBD	17	TPL
W200162	Dan River 100 kV Line (Dan River-North Greensboro), Upgrade	DEC	Conceptual	TBD	89	TPL
	Brush Creek, Construct STATCOM	DEP	Removed			New Loads
	Method – Millburnie 115 kV North Line, Reconductor	DEP	Removed			TPL
	Rockingham - West End 230 kV West Line, Reconductor	DEP	Removed			TPL
Subtotal	Reliability Project (Previously in Plan)				\$1,711.1	

Project ID	Reliability Project (New to Plan >= \$5M)	Transmission Owner	Status ¹	Projected In-Service Date	Estimated Cost (\$M) ²	Initiating Study Type ⁴
E210150	Havelock 230 kV Substation, Upgrade	DEP	Underway	12/1/2025	7	TPL
W200010	Cherokee 100 kV Line (Peach Valley-Enola Retail), Upgrade	DEC	Planned	6/1/2026	8	TPL
W210192	Earl 100 kV Line (Customer Tap-Customer Tap), Upgrade	DEC	Planned	6/1/2026	12	TPL
E190092	Greenville - VEPCO Everetts 230 kV Line, Reconductor	DEP	Underway	12/1/2026	30	AS
W230158	Nanny Mountain 1 44 kV Line (Structure 73.0 – Customer Delivery), Upgrade and Partial Conversion to 100 kV	DEC	Planned	12/1/2026	7	TPL
W200148	Pinewood 100 kV Line (Lawsons Fork-Una Retail), Upgrade	DEC	Planned	6/1/2027	10	TPL
E240135	Sumter - SCEG Eastover 115 kV Line (Gold Kist Tap-Kings Hwy Section), Reconductor	DEP	Underway	12/1/2027	10	TPL
W230276	Shelby 230/100/44 kV Tie, Upgrade	DEC	Planned	6/1/2028	14	TPL
W200187	Harrisburg 230/100/44 kV Tie Station, Upgrade	DEC	Planned	12/1/2028	13	TPL
W230389	Sycamore B/W 100 kV (Longview-Lyle Creek), Upgrade and Network	DEC	Planned	6/1/2029	8	TPL
W200116	Hodges 230/100/44 kV Tie, Upgrade	DEC	Planned	6/1/2029	41	TPL
W200150	Troutman 44 kV Line, Upgrade and Partial conversion to 100 kV [Modification to 0110 in 2023 Plan - Additional Scope]	DEC	Planned	6/1/2029	45	TPL
W200413	Tiger Tie Autotransformer #5 (230/100 kV) Upgrade	DEC	Conceptual	TBD	7	TPL
W200144	Oak Hollow Switching Station, Construct	DEC	Conceptual	TBD	7	TPL
W200120	Dairyhill 100 kV Line (Shelby-CUSTOMER Tap), Upgrade	DEC	Conceptual	TBD	11	TPL
W230402	Ashe Street 100 kV Line (Durham-Ashe Street), Upgrade	DEC	Conceptual	TBD	12	TPL
W200582	Bethania and Shattalon 100 kV Lines (Rural Hall-Shattalon), Upgrade	DEC	Conceptual	TBD	15	TPL
W200034	Panther 100 kV Lines (Parkwood Tie-E Durham Tie), Upgrade and Network to E Durham Tie [Modification to 0096 in 2023 Plan - Splitting into Two Projects]	DEC	Conceptual	TBD	56	TPL
Subtotal	Reliability Project (New to Plan >= \$5M)				\$313	

Project ID	Reliability Project (New to Plan <= \$5M)	Transmission Owner	Status ¹	Projected In-Service Date	Estimated Cost (\$M) ²	Initiating Study Type ⁴
E210078	Fayetteville 230/115 kV Bank #1, Upgrade 115 kV Disconnect Switches, Wave Traps, and CT Ratios	DEP	Underway	12/1/2024	3	TPL
E210227	Sutton – Castle Hayne 230 kV Line (Sutton - Wilmington Ninth & Orange), Upgrade Line Switch	DEP	Underway	12/1/2024	1	TPL
E210081	Richmond 500 kV Substation, Upgrade 230 kV Wave Trap, Disconnect Switches, and CT Ratio for the Laurinburg-Richmond 230 kV Line	DEP	Underway	6/1/2025	1.1	TPL
E220096	Sutton-Wallace 230 kV Line, (Crooked Run Solar-Wallace) Raise Section and Increase CT Ratios and Relay Settings at Wallace 230 kV Substation	DEP	Underway	6/1/2025	0.8	TPL
E230041	Richmond 500/230 kV Banks #1 & #2, Upgrade CT Ratios	DEP	Underway	6/1/2025	3.7	TSR
E190052	Jacksonville - Jacksonville City 115 kV East Line, Upgrade CT Ratio at Jacksonville	DEP	Underway	6/1/2025	0.2	TPL
W210382	Kennedy 100 kV Line, RAS (Grid Enhancing Technology) to Avoid Overloads on the Kennedy Lines	DEC	Underway	6/1/2025	0.8	TPL
W220516	Davidson River 100 kV Lines, RAS (Grid Enhancing Technology) to Avoid Overload on the Davidsons River Lines	DEC	Underway	6/1/2025	1	TPL
E230061	Henderson 230/115 kV Banks #1 & #2, Upgrade CT Ratios and Relay Settings	DEP	Underway	12/1/2025	2.9	TPL
E220408	Vanderbilt - West Asheville 115 kV Line, Upgrade 115 kV CB and Switches	DEP	Underway	12/1/2025	2	TPL
W220537	Ashe Street Switching Station, RAS (Grid Enhancing Technology) to Avoid Overloads on Delta 100 kV Line [Originally Called <i>Delta 100 kV Line</i> , RAS in November Solutions]	DEC	Underway	12/1/2025	0.5	TPL
W230368	Mooreville Tie, RAS (Grid Enhancing Technology) to Avoid Overloads on Timber and Sherrill 100 kV Lines [Originally Called <i>Timber 100 kV Line and Sherrill 100 kV Line</i> , RAS in November Solutions]	DEC	Underway	12/1/2025	0.6	TPL

Project ID	Reliability Project (New to Plan <= \$5M)	Transmission Owner	Status ¹	Projected In-Service Date	Estimated Cost (\$M) ²	Initiating Study Type ⁴
W220539	Batte 100 kV Line, RAS (Grid Enhancing Technology) to Avoid Overloads on Batte Lines	DEC	Underway	12/1/2025	1.5	TPL
W220053	Shattalon Switching Station, RAS (Grid Enhancing Technology) to Avoid Overload on Bethania and Shattalon 100 kV Lines [Originally Called Bethania and Shattalon 100 kV Lines, RAS in November Solutions]	DEC	Underway	6/1/2027	0.8	TPL
E240197	Brunswick 1 - Delco 230 kV East Line (Brunswick 1 - Southport Tap), Upgrade Switch; Reconductor Brunswick 1-Southport Tap Section	DEP	Underway	6/1/2028	3.6	TPL
E220343	Goldsboro 115 kV Switching Station, Upgrade CT Ratio and Relay Settings on the Goldsboro-Wommack 115 kV Line	DEP	Underway	6/1/2028	0.2	TPL
E240188	Brunswick 2 - Delco 230 kV West Line (Brunswick 2 - BEMC Southport), Raise Section	DEP	Underway	6/1/2029	1.9	TPL
W240008	Pinewood 100 kV Line, RAS (Grid Enhancing Technology) to Avoid Overloads on Pinewood Lines	DEC	Conceptual	TBD	0.1	TPL
W240295	Lookout Tie, RAS (Grid Enhancing Technology) to Avoid Overloads on Beulah and Hickory 100 kV Lines [Originally Called Beulah 100 kV Line, RAS in November Solutions]	DEC	Planned	12/1/2030	0.1	TPL
W240278	Central 230/100/44 kV Tie, Upgrade, Add Redundant Relaying	DEC	Planned	6/1/2031	0.7	TPL
W180359	States CTCC Bus Line 4, Construct	DEC	Planned	6/1/2031	3.8	TPL
W200592	Crest St 100 kV Lines, Raise Individual Towers	DEC	Planned	12/1/2031	2	TPL
W190390	Gastonia # 2 44 kV Line, Rebuild Clover 44kV Line to Double Circuit and Add a New Tap off the Gastonia #2 Line	DEC	Planned	6/1/2032	2.3	TPL
CTPCDEP04	Rocky Mount - Wilson 115 kV Line, Upgrade	DEP	Conceptual	TBD	TBD	TPL
W200425	Marshall 230 kV Line (Marshall-Beckerdite), Raise Individual Towers	DEC	Conceptual	TBD	0.2	TPL
W200588	Ferrell White 100 kV Line, Construct	DEC	Conceptual	TBD	0.7	TPL
W230387	E Durham 230/100 kV Tie, Construct Panther Line Terminals [Modification to 0096 in 2023 Plan - Split into Two Projects]	DEC	Conceptual	TBD	0.9	TPL

Project ID	Reliability Project (New to Plan <= \$5M)	Transmission Owner	Status ¹	Projected In-Service Date	Estimated Cost (\$M) ²	Initiating Study Type ⁴
W200168	Steam 100 kV Line (Dan River CC-Dan River Steam), Rebuild	DEC	Conceptual	TBD	1.1	TPL
W230093	Woodlawn 230/100/44 kV Tie Station, Upgrade Add 44 kV Breaker	DEC	Conceptual	TBD	1.8	TPL
W200170	Lakewood 100 kV Line (Lakewood-Remount Road Retail), Reconductor	DEC	Conceptual	TBD	2	TPL
W220474	Batte 100 kV Line (Concord-Winecoff), Reconductor	DEC	Conceptual	TBD	2.1	TPL
W210482	Madison Tie, Upgrade, Add 100/44 kV Transformer	DEC	Conceptual	TBD	2.4	TPL
W220543	Delta 100 kV Line (Research Triangle Retail-Ellis Rd Retail), Reconductor	DEC	Conceptual	TBD	3	TPL
W200146	Swepsonville 100 kV Line (Mebane-Trollingwood Retail), Rebuild	DEC	Conceptual	TBD	3.4	TPL
Subtotal	Reliability Project (New to Plan <= \$5M)				\$52.2	
Reliability Projects Total					\$2,076.3	

¹ Status: *In-service*: Projects with this status are in-service. This status was updated as of 12/1/2024.

Underway: Projects with this status range from the Transmission Owner having some money in its current year budget for the project to the Transmission Owner having completed some construction activities for the project.

Planned: Projects with this status do not have money in the Transmission Owner's current year budget; and the project is subject to change.

Conceptual: Projects with this status are not *planned* at this time but will continue to be evaluated as a potential project in the future.

Deferred: Projects with this status were identified in the 2023 Report and have been deferred beyond the end of the planning horizon based on analysis performed to develop the 2024 Collaborative Transmission Plan.

Removed: Project is cancelled and no longer in the plan

² The estimated cost is in nominal dollars which reflects the sum of the estimated annual cash flows over the expected development period for the specific project (typically 2 – 5 years), including direct costs, loadings and overheads; but not including AFUDC. Each year's cash flow is escalated to the year of the expenditures. The sum of the expected cash flows is the estimated cost.

³ For projects with a status of Underway, the project lead time is the time remaining to complete construction and place in-service.

⁴ Initiating Study Type: *New Loads*: Econ Dev and Wholesale

PP: RZEP

TPL: BES (TPL) and non-BES Reliability

TSR: Transmission Service Request

AS: Affected System

EXHIBIT 14

PUBLIC DISCLOSURE

2025 - 2034 T & D CAPACITY ADDITION EXPANSION PLAN

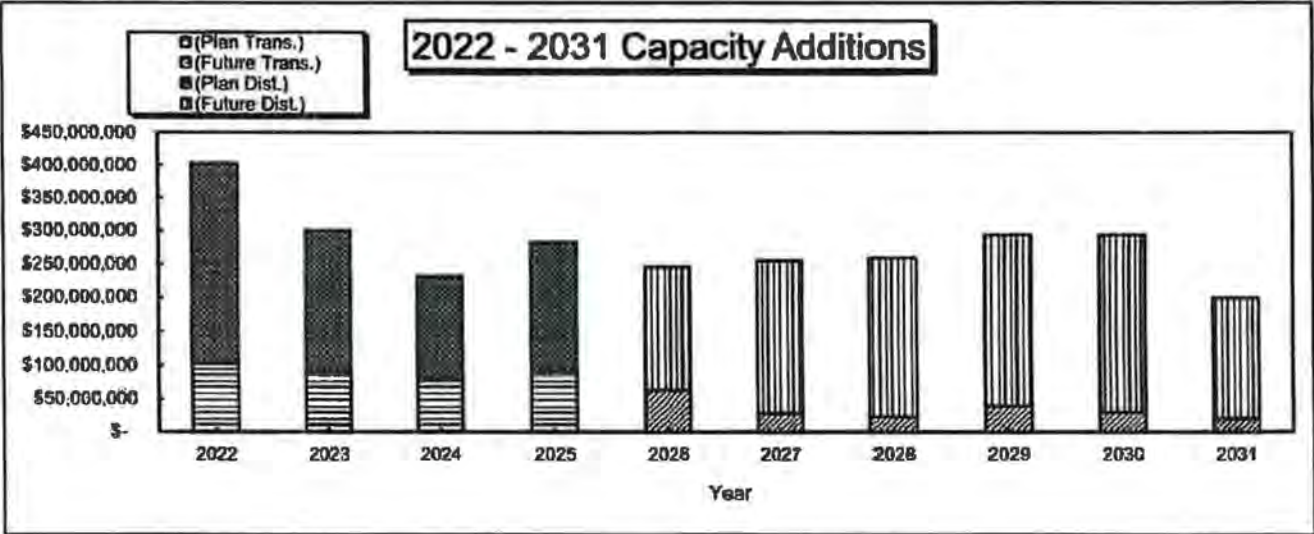
		NETWORK TRANSMISSION		LOAD SERVING DISTRIBUTION		TOTALS
		(Plan Trans.)	(Future Trans.)	(Plan Dist.)	(Future Dist.)	
1	2025	\$ 419,995,051		\$ 146,977,135		\$ 566,972,186
2	2026	\$ 623,126,504		\$ 252,011,693		\$ 875,138,197
3	2027	\$ 1,092,359,906		\$ 311,996,427		\$ 1,404,356,333
4	2028	\$ 1,518,597,793		\$ 324,134,863		\$ 1,842,732,656
5	2029	\$ 1,441,978,038		\$ 340,979,541		\$ 1,782,957,580
6	2030		\$ 1,492,447,270		\$ 352,913,825	\$ 1,845,361,095
7	2031		\$ 1,544,682,924		\$ 365,265,809	\$ 1,909,948,733
8	2032		\$ 1,598,746,826		\$ 378,050,112	\$ 1,976,796,939
9	2033		\$ 1,654,702,965		\$ 391,281,866	\$ 2,045,984,832
10	2034		\$ 1,712,617,569		\$ 404,976,732	\$ 2,117,594,301
	Total	\$ 5,096,057,293	\$ 8,003,197,555	\$ 1,376,099,659	\$ 1,892,488,345	\$ 16,367,842,851

EXHIBIT
 G1PL-SF
 Date Rpt. 3
 www.dierbook.com

EXHIBIT
 G1PL-SF-3

2022 - 2031 T & D CAPACITY ADDITION EXPANSION PLAN

	NETWORK TRANSMISSION		LOAD SERVING DISTRIBUTION		TOTALS
	(Plan Trans.)	(Future Trans.)	(Plan Dist.)	(Future Dist.)	
1 2022	\$ 103,018,676		\$ 300,103,172		\$ 403,121,848
2 2023	\$ 90,077,906		\$ 210,358,739		\$ 300,436,645
3 2024	\$ 78,455,319		\$ 153,686,775		\$ 232,142,094
4 2025	\$ 91,326,534		\$ 191,642,746		\$ 282,969,280
5 2026		\$ 62,772,213		\$ 183,809,275	\$ 246,581,488
6 2027		\$ 28,679,634		\$ 226,544,338	\$ 255,223,972
7 2028		\$ 23,459,897		\$ 235,615,058	\$ 259,074,955
8 2029		\$ 39,310,102		\$ 254,523,052	\$ 293,833,154
9 2030		\$ 29,903,889		\$ 263,838,233	\$ 293,742,122
10 2031		\$ 20,238,864		\$ 178,753,740	\$ 198,992,604
Total	\$ 362,878,435	\$ 204,364,800	\$ 855,791,432	\$ 1,343,083,695	\$ 2,766,118,162



**POWER DELIVERY CAPACITY ADDITION EXPANSION PLAN
2019-2028**

	NETWORK		LOAD SERVING		TOTALS
	(Plan Trans.)	(Future Trans.)	(Plan Dist.)	(Future Dist.)	
1 2019	\$ 75,088,456		\$ 326,244,241		\$ 401,332,696
2 2020	\$ 39,912,449		\$ 337,208,113		\$ 377,120,562
3 2021	\$ 49,388,938		\$ 360,284,747		\$ 409,673,685
4 2022	\$ 38,360,558		\$ 373,371,778		\$ 411,732,335
5 2023		\$ 49,698,352		\$ 403,460,230	\$ 453,158,582
6 2024		\$ 31,461,448		\$ 445,342,741	\$ 476,804,189
7 2025		\$ 26,563,823		\$ 475,165,483	\$ 501,729,307
8 2026		\$ 43,593,866		\$ 472,690,172	\$ 516,284,038
9 2027		\$ 28,997,821		\$ 497,192,398	\$ 526,190,220
10 2028		\$ 16,128,940		\$ 488,318,325	\$ 504,447,265
	\$ 202,750,401	\$ 196,444,251	\$1,397,108,879	\$2,782,169,349	\$4,578,472,879

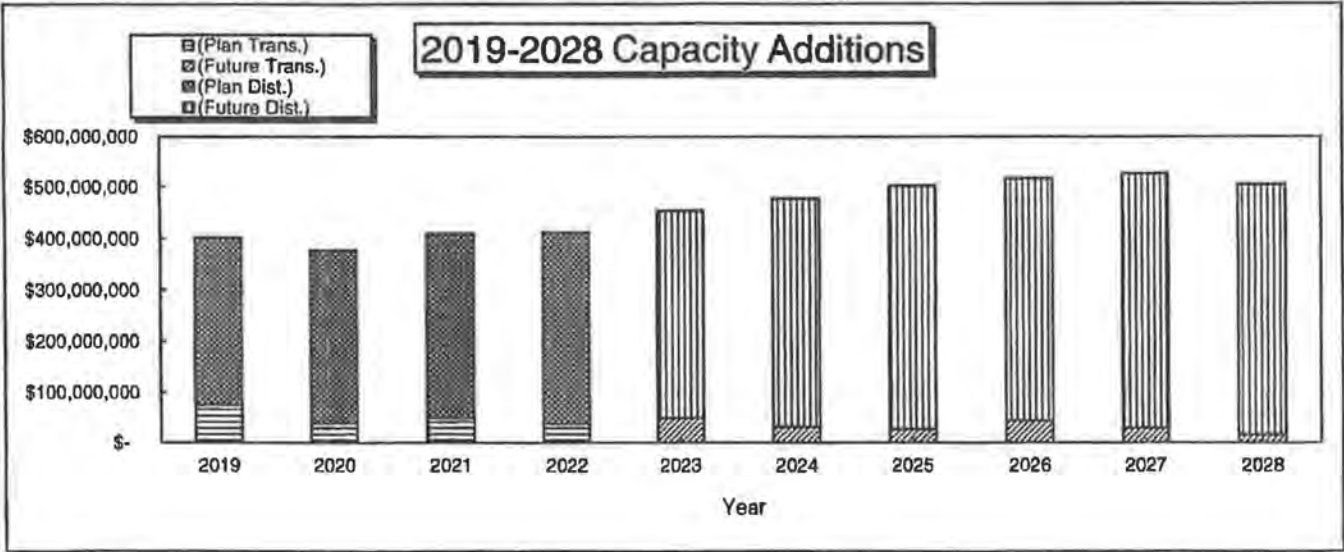


EXHIBIT 15

1 expects to procure?

2 A. (Witness Grubb) There was a lot there. So
3 let me hit a few of them. I would disagree with the
4 expansion plan not guiding the solar procurements. In the
5 '22 IRP and this IRP, that guidance of the amount we would
6 go procure in utility scale RFPs was driven by the
7 scenario of plans. It was an average across them. So
8 that's what we did in '22, and that's what we did in '25.

9 What the generic expansion plan is doing is
10 it's taking our estimates of the cost to build the
11 different technologies, and it's modeling that and picking
12 those. What it isn't doing is catching site specific
13 aspects of those units, and that's what the RFP does.
14 Whether it be generation-site specific, and that's when we
15 bring in the transmission.

16 So the expansion plan serves several roles.
17 One, is to give you an indication of what those
18 technologies are. It does not factor in transmission. We
19 do that in the RFPs. And then it also gives you the model
20 outputs to have an expected energy -- energy projections
21 for 20 to 30 years that we can do evaluations on. Without
22 that generic expansion build, you don't have enough
23 resources to meet your loads. So those are the reasons
24 for it.

25 And so what we've always said about the

EXHIBIT 16

1 A. (Witness Grubb) And we also don't --

2 A. (Witness Hubbert) -- how they express it.

3 A. (Witness Grubb) What we're looking at is a
4 repeatable -- kind of a generic non-site specific number.
5 We're not sure if theirs are site-specific or, you know,
6 limited to a certain part of the state. We look at kind
7 of a Southern system generic type of costs to guide our
8 resource mix studies.

9 Q. We agree they're significantly higher
10 numbers? The numbers.

11 A. (Witness Hubbert) They are higher than what
12 we show in our mix study, yes.

13 Q. Are you aware that the price for a combined
14 cycle unit has significantly increased since the
15 assumptions you've provided in your filing?

16 A. (Witness Hubbert) We are aware of that. So
17 the vintage of the data that supported the mix study,
18 because it had to be done to support the filing, was
19 around August, maybe September time frame. So since that
20 time frame, we are aware that costs have increased because
21 of the global demand for combustion turbines, combined
22 cycles. But we did not update the mix study, including
23 higher costs. However, we have used a higher cost when
24 making offers to customers -- large load customers and
25 incorporating it into those analyses, but we didn't redo

EXHIBIT 17

EXHIBIT 18

1 battery system four times. And looking at the net present
2 value, we don't have to do an exhaustive analysis on
3 the -- what you would choose, on a battery system versus a
4 reconductor.

5 And just a reminder to the Commission, we
6 brought forward in this case 3300-megawatts of a portfolio
7 of projects as far as resources, but only \$60 million
8 worth of transmission. That is miniscule. That is \$18
9 per KW. And I think Mr. Bush would testify, as a
10 developer, that's not a lot of transmission at all. So I
11 think a lot of the intervenors treating it like it's a big
12 number. It's really not a big number. So we are bringing
13 forward very traditional solutions that we can make happen
14 in that period of time.

15 Now, if we study -- next year, we determine
16 that a Series Compensation device may be a better
17 solution, we will choose that. But in the meantime, as we
18 were doing studies for this, it made more sense to choose
19 the projects that we did. They were more economical, we
20 could get them done in the time frame, to get them done
21 for the units that we were proposing.

22 Q. So I'm still having a hard time now
23 reconciling the way you answered the question in the
24 prefiled versus the way you're answering it now, because
25 it's in the context of considering non-wires alternatives.

EXHIBIT 19

Georgia Power Company
Docket Nos. 56002 & 56003
2025 Integrated Resource Plan and 2025 Demand-Side Management Application
STF-GS Data Request Set No. 2

STF-GS-2-24

Question:

Please explain any changes in estimated costs from the 2022 ITS Ten-Year Plan to the 2024 ITS Ten-Year Plan for the following projects:

- a. GTC: Heard County – Tenaska 500kV (Second Line)
- b. SAV: CC - Big Ogeechee 500/230kV (CC Network Improvements)
- c. CC – QTS Fayetteville Transmission Needs
- d. SAV: McIntosh – Purrysburg 230kV Reactors
- e. Union City – Yates 230kV (Black) Line Rebuild

Response:

- a. The cost provided in the 2022 Georgia Integrated Transmission System (“ITS”) Ten-Year Plan was based on Planning Grade Estimates. The cost for each project is revised through scoping, engineering, and design processes, which include but are not limited to the increase in material costs over the years. The updated cost for all projects is provided annually through the Ten-Year Plan process.
- b. Please refer to the response to subpart (a) above.
- c. Please refer to the response to subpart (a).
- d. Please refer to the response to subpart (a).
- e. Please refer to the response to subpart (a).

EXHIBIT 20

Georgia Power Company
Docket Nos. 56002 & 56003
2025 Integrated Resource Plan and 2025 Demand-Side Management Application
STF-PIA Data Request Set No. 6

STF-PIA-6-21

Question:

Please provide the present value of the total revenue requirements over the 12- year planning horizon for each of the four DSM cases.

Response:

The total revenue requirement associated with the programs in each of the four Demand Side Management (“DSM”) cases is equivalent to the sum of the total budgeted Incentive Costs, Non-Incentive Costs, Cross-Cutting Costs, Evaluation Costs, and Additional Sum amounts. Please see the table below for the present value of the total revenue requirements over 2026-2037 for each of the four DSM cases.

Present Value (PV) Total Revenue Requirements in \$millions

	Proposed	Advocacy	Capacity & Affordability	Supply-Side
MG0	5,051	5,088	1,107	4,285
111-MG0	5,051	5,088	1,107	7,000