**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

**GEORGIA POWER COMPANY**

**DOCKET NO. 44280**

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

**Direct Testimony in Support of the Stipulation to Extend the ARP**

**Exhibit APA/MSB-1**

**BASIS FOR THE ASSERTION THAT THE**

**INFORMATION SUBMITTED IS A TRADE SECRET**

As part of Georgia Power Company’s 2022 Rate Case filed in Docket No. 44280 (“2022 Rate Case”), Georgia Power Company (“Georgia Power” or the “Company”) submits to the Georgia Public Service Commission its Direct Testimony in Support of the Stipulation to Extend the Alternate Rate Plan (the “Direct Testimony”). As part of its Direct Testimony, the Company has provided an exhibit—Exhibit APA/MSB-1—containing detailed investment tax credit (“ITC”) amounts (the “Information”). All such Information constitutes trade secret information of the Southern Company, Georgia Power, and its affiliates and is therefore protected from public disclosure under Commission Rule 515-3-1-.11.

The Information derives economic value from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use. Specifically, the Information contains detailed data related to the Company’s estimate of ITCs to be generated by year and potentially transferred to counterparties. The prices and amounts for these tax credits are negotiated with unrelated third parties in the event of a transfer transaction. Disclosure of these amounts would grant such third parties a competitive advantage and undermine the Company’s position when negotiating such prices and amounts. If revealed to the public, third parties could use the Information to tailor their bids or proposals with the intention of pricing ITC offers that could affect the Company’s competitive position. In addition, the disclosure of the tax credits by year could provide insight into the capital investments of projects and the timing of when those projects would be placed in service. Such disclosure could unduly allow competitors to undermine the competitive bidding process, gain an unfair advantage over the Company, and ultimately harm retail customers. The Company’s competitors are generally not required to file such information.

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.