**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-2**

**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-2—containing detailed rate base, requested rate of return, earnings requirements, and other sensitive revenue requirement information and amounts (the “Information”). All such Information constitutes trade secret information of the Southern Company, Georgia Power, and its affiliates and is therefore protected from public disclosure under Commission Rule 515‑3‑1‑.11.

The Information derives economic value from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use. Specifically, the Information contains detailed data related to the Company’s projected rate base and earnings for future years not previously disclosed to the public. The Information provides insight into the Company’s financials and expected level of operations for future years, including future capital and other investments as well as the level of revenues and expenses expected to materialize. If disclosed, the Information can be used by competitors and others to determine the Company’s strategies and plans, which could in turn be used to the Company’s detriment. Competitors could use the Information to create artificial floors or ceilings in competitive markets, which would prevent the Company from obtaining the best costs for goods and services. Investors could use the Information to gain access to sensitive financial information to make decisions to the detriment of the Company and customers. Further, potential rate case intervenors could use the Information to determine and establish rate case strategies and plans, undermining the benefits and value of a fully litigated proceeding before the Commission. 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.