BEFORE THE PUBLIC SERVICE COMMISSION

GEORGIA POWER COMPANY
DOCKET NOS. 56298 & 56310

Georgia Power Company's Direct Testimony of Kristin W. Curylo, Jeffrey R. Grubb, and M. Brandon Looney

Georgia Power Company's Direct Testimony of Michael A. Bush and Robert B. Hayes

BASIS FOR THE ASSERTION THAT THE INFORMATION SUBMITTED AS TRADE SECRET

Georgia Power Company ("Georgia Power" or the "Company") submits to the Georgia Public Service Commission its Direct Testimony in Support of the Application for the Certification of the Capacity from the All-Source Request for Proposals ("RFP") in Docket No. 56298 and the Application for Certification of Capacity Supplemental Resources in Docket No. 56310 (collectively, "Direct Testimony"). In the Direct Testimony, the Company has provided confidential data and project specific information related to including non-public pricing information, economic analyses, and resource cost information (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 contained herein include detailed, project specific information regarding certain Company-owned proposals, including sensitive pricing information and assumptions, and confidential terms and conditions included within the Company's EPC and equipment supply contracts. If the trade secret portions of the Information were released, it is likely that future counterparties would use this information to set a floor for prices as they construct their own offers, thus artificially and inefficiently setting a market price and affecting other contract terms, resulting in agreements that may not be representative of the best cost resources that the market could offer. The release of such information would undermine the competitiveness of the Company's RFPs and hinder Georgia Power's ability to meaningfully participate in the same. In addition, if revealed to the public, a supplier or vendor could use the trade secret portions of the Information to tailor proposals with the intention of pricing products to match the Company's expected costs or recently approved costs, limiting Georgia Power's ability to secure the best cost resources for customers. Such disclosure could unfairly allow suppliers, vendors, and service providers to manipulate the market and ultimately harm retail customers through higher rates. Georgia Power's ability to negotiate the optimum price and contract terms for equipment and services for the benefit of customers would be undermined if suppliers, vendors, and service providers had access to the trade secret portions of the Information. Lastly, the Company's competitors are not required to publicly disclose their respective forecast information.

The trade secret portions of the Information also 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 resource analyses, and other confidential details including data supporting resource economic evaluations. Public dissemination of the trade secret portions of the Information would allow Georgia Power's competitors and suppliers to have access to such processes, strategies, and resource evaluations and thereby gain an unfair competitive advantage in the marketplace. Competitors and RFP participants could obtain an unfair advantage because they are not required to reveal similar information and could utilize such trade secret portions of the Information to manipulate pricing, timing of supply, and bid information based on the Company's expectations rather than market forces to the disadvantage of Georgia Power and its customers.

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 the Direct Testimony and all other related documents included in this filing in Docket Nos. 56298 & 56310, and that the specific information designated as trade secret constitutes trade secrets in accordance with O.C.G.A. § 10-1-761 (2019).

Jeffrey R. Grubb
Director, Resource Policy and Planning
Georgia Power Company

Subscribed and sworn to before me this 15 day of August, 2025.

Notary Public

