BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

Georgia Power Company
Docket No. 56310
Certification of 2028-2031 Supplemental Resources
Supplemental Filing

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

As part of Georgia Power Company's Application for the Certification of Capacity Supplemental Resources, Docket No. 56310, Georgia Power Company ("Georgia Power" or the "Company") submits to the Georgia Public Service Commission its Supplemental Filing ("Supplemental Filing"). In the Supplemental Filing, the Company has provided the executed work authorization II, development transfer agreement, and amendment to the existing solar power purchase agreement ("PPA") for the Wadley Battery Energy Storage System ("BESS") project (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 specific contractual terms that were negotiated between the Company and counterparties. The Information contains negotiated terms related to the development transfer agreement, which outlines a contractual agreement between the Company and a counterparty to sell and purchase assets and property for specific amounts. The Information also contains the executed work authorization details pursuant not the master EPC agreement for this and other projects, including (but not limited to) work scopes, pricing information, labor rates, wiring instructions, and other terms, conditions, and requirements. Finally, the Information contains negotiated terms for an amendment to the existing Wadley Solar PPA, which includes pricing, performance security, liquidated damages, contracted energy amounts, technical specifications, and other parameters specific to a project already under contract with Georgia Power. The framework, including the implementing contractual terms, for adding a self-build BESS project on site and connected to a third party owned and operated solar facility is highly confidential and competitively sensitive information to Georgia Power and its contract counterparties.

Public dissemination of these terms could hinder or compromise the Company's ability to procure resources that provide the best value to customers in the future. Third parties, including competitors, vendors, and service providers, could use the Information to set a floor for prices as they construct their own bids, offers, and fees, 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. In addition, parties, including the Company, have agreed to maintain the confidentiality of these terms. Disclosure of the Information could have a chilling effect on the competitiveness and participation in future procurements. Competitors

are not required to disclose similar customer information and to require Georgia Power 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.

Jeffrey R. Grubb, first being duly sworn, deposes and states that he has reviewed Georgia Power Company's Supplemental Filing and all other related documents including in this filing in Docket No. 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 of Resource Planning
Georgia Power Company

Subscribed and sworn to before me this 16th day of October, 2025.

Notary Public

My Commission expires: 9/25/29

