**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

**GEORGIA POWER COMPANY**

**DOCKET NO. 55931**

Data Request No. STF-PIA-3-R1-1d

**Basis for the Assertion that Redacted Portions of the Information Submitted**

**are Protected Trade Secrets**

In response to Data Request STF-PIA-3-R1-1d in Georgia Public Service Commission Docket No. 55931, Georgia Power Company (“Georgia Power” or the “Company”) has provided sensitive financial information, official communications with contractors, planning and audit information, and documentation regarding the construction of Plant Yates Units 8-10 such as metrics reports, schedule information and analyses, presentations, and other updates and status reports (the “Information”). Certain portions of the Information are trade secrets of Georgia Power, Southern Company, and their affiliates and contractors and are therefore protected from 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. Public disclosure of the trade secret portions of the Information could give other utilities, competitors, and vendors an unfair advantage by showing the Company’s individual components of costs, schedule and project configuration, analyses, forecasts, plans, strategies, commercial terms, and models and could interfere with the Company’s ability to negotiate for the best cost from vendors and suppliers. The resulting economic harm could in turn impair the Company, Company’s affiliates and contractors, and the Company’s customers. In addition, other vendors and suppliers could arbitrarily price their products, equipment, and services based on the Company’s expected cost rather than the best cost to the detriment of the Company and its customers.

More specifically, public release of the trade secret portions of the Information could have adverse economic consequences for the Company. Public release of the trade secret portions of the Information could expose the Company’s internal proprietary methods for assessing cost and schedule, and would reveal proprietary methods for analyzing and reporting project performance, giving potential competitors a detailed picture of the Company’s and its contractors’ internal management and evaluation process details, which could result in the competitors gaining a competitive advantage to the disadvantage of the Company and its customers. Georgia Power’s competitors are not required to disclose their respective project schedule information and to require the Company to do so would place it at an economic disadvantage.

Disclosure of the trade secret portions of the Information could also make potential vendors unwilling or unable to conduct business with the Company. By causing the vendors’ proprietary information to be publicly available, even fewer vendors might be willing to contract with the Company, thus, reducing the opportunity for the Company to procure the best options for meeting its customers’ needs and potentially compelling the Company to deal with a vendor that does not offer the best cost option. This result could cause significant added costs to the Company and ultimately to Georgia Power’s customers.

Additionally, the trade secret portions of the Information are subject to extensive efforts to maintain their confidentiality. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to the trade secret portions of the Information. Those personnel receive access only on a “need to know” basis. Before a party outside of Georgia Power and Southern Company and their legal counsel are granted access to the trade secret portions of the Information, the party is required to sign a confidentiality agreement with respect to the trade secret portions of the Information.