**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**

**GEORGIA POWER COMPANY**
**DOCKET NO. 56765 (FCR-27)**

**BASIS FOR THE ASSERTION THAT CERTAIN REDACTED PORTIONS OF THE MINIMUM FILING REQUIREMENTS ARE PROTECTED AS TRADE SECRETS**

As part of its Fuel Cost Recovery Rate (FCR-27) Application in Georgia Public Service Commission (the "Commission") Docket No. 56765, Georgia Power Company ("Georgia Power") has submitted to the Commission Minimum Filing Requirements for the Test Year / Projected Fuel Data and Information ("MFRPs") in accordance with Commission Rule 515-2-1-.04(6). The MFRPs include considerable amounts of projected data, including, but not limited to, the following: (1) fuel supply and transportation contracts including plant inventory targets; (2) schedules for plant maintenance and descriptions of planned and unplanned outages including cost of replacement power; (3) generation and capacity by plants including availability and heat rate; (4) data involving environmental compliance and cost of emission purchases; (5) fuel procurement and transportation strategies including railcar leases and maintenance cost; (6) strategies and gains/losses related to natural gas hedging; (7) purchased power and off-system sales; (8) detailed fuel inventory and cost by plant and fuel type; (9) operating spinning reserves; (10) retail sales by customer class and voltage level; and (11) fuel price workshop presentations and other fuel market updates detailing the forecast of fuel prices. The information included in each of the MFRPs, except for that provided in MFRP-1.1, MFRP-1.2, MFRP-2, MFRP-3.3, MFRP-5, MFRP-8, MFRP-9, MFRP-10, MFRP-13.3, and MFRP-15, (collectively the "Information") constitutes trade secrets of the Southern Company, Georgia Power, and certain of its affiliates (the "Company") and is therefore protected from 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, revealing the Information would give competitors a competitive advantage in the marketplace by revealing the Company's projected costs and a vast amount of confidential cost and volume details regarding the Company's fuel procurement, use, and operational strategies. If the Information was disclosed to the public, a competitor could use the Information to tailor proposals with the intention of targeting certain groups of customers, thereby undermining the Company's market position. Competitors could also use the Information in determining the Company's costs of operation, including the Company's marginal costs. Such information would enable competitors to undercut bids to win both wholesale and retail customers. In addition, such Information could reveal the Company's commodity needs in the short term and allow future fuel vendors to artificially adjust and artificially inflate their offers, which could result in economic harm to the Company and its customers. Potential future vendors could also use the Information to their advantage in future negotiations to the Company's detriment. Competitors of the Company are not generally required to disclose similar information and to require the Company to do so would put it at an economic disadvantage.

The Information is subject to extensive efforts to maintain its secrecy. Only select Company personnel are granted access to the Information. Those personnel receive access only on a "need to know" basis. If parties outside the Company are granted access to the Information, they are required to sign confidentiality agreements with respect to the Information.

Adam D. Houston, first being duly sworn, deposes and states that he has reviewed the MFRPs included in this filing in Docket No. 56765, and that to the best of his knowledge the specific information designated as trade secret constitutes trade secrets in accordance with O.C.G.A. § 10-1-761.

Adam D. Houston
Vice President and Comptroller
Georgia Power Company

Subscribed and sworn to before me this __ day of February 2026.

Notary Public

My Commission expires:
02/01/2028

