**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 updated Minimum Filing Requirements for the Historical Period Fuel Data and Information ("MFRHs") in accordance with Commission Rule 515-2-1-.04(6). The MFRHs include considerable amounts of data, including, but not limited to, schedules for plant maintenance and descriptions of planned and unplanned outages including cost of replacement power; generation and capacity by plants including availability and heat rate; fuel procurement and transportation strategies; strategies and gains/losses related to natural gas hedging; and purchased power and off-system sales. The information included in each of the MFRHs (collectively the "Information") constitutes trade secrets of the Southern Company, Georgia Power, and certain of its affiliates 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 costs and a vast amount of confidential volume and cost 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 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.

Kyung Y. Kim, first being duly sworn, deposes and states that he has reviewed the MFRHs 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.

Kyung Y. Kim
Regulatory Accounting Manager
Georgia Power Company

Subscribed and sworn to before me this 1 day of May 2026.

Notary Public

My Commission expires:

