BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

111 GREENHOUSE GAS RULES
SEMI-ANNUAL STATUS REPORT
DOCKET NO. 56002

GEORGIA POWER COMPANY

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

In accordance with the order of the Georgia Public Service Commission in Georgia Power Company's ("Georgia Power" or the "Company") 2025 Integrated Resource Plan ("IRP") in Docket No. 56002, Georgia Power hereby submits the 111 Greenhouse Gas ("GHG") Rules Semi-Annual Status Report ("Report"). In the Report, the Company has submitted details related to the current legal status of the 111 GHG Rules, their impact on the continued operation of Plants Bowen and Scherer, as well as the Company's actions, technical solutions, and estimated cost to comply with the rules (the "Information"). All such Information is considered 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 trade secret portions of the Information contain competitively sensitive details on the site-specific costs the Company is expected to incur to assess compliance with the 111 GHG Rules. Publicly disclosing these costs would allow bidders and vendors to tailor proposals according to the Company's expected costs to the detriment and harm of the Company and its customers. If revealed to the public, bidders and vendors could use the Information to set an artificial floor on bidding, thereby preventing the Company from conducting a proper solicitation and obtain the equipment and services at the best cost for future work. Disclosure of the Information could harm the Company and its customers in its efforts to obtain optimal pricing in current or future negotiations. In addition, the Company's competitors 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 confidentiality. Only select Georgia Power and Southern Company personnel and their legal counsel are granted access to the Information. Those personnel receive access only on a "need to know" basis. If a party outside of Georgia Power and Southern Company and their legal counsel are granted access to the Information, the party is required to sign a confidentiality agreement with respect to the Information.

Jennifer S. McNelly, first being duly sworn, deposes and states that she has reviewed the Report and that, to the best of her knowledge, the specific information designated as trade secret therein constitutes trade secrets pursuant to Article 27, Chapter 1, Title 10 of the Georgia Code.

Jennifer S. McNelly
Vice President, Environmental Affairs
Georgia Power Company

Subscribed and sworn to before me this 24th day of September 2026.

Notary Public

My Commission expires:

