BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

Sandersville Railroad Company Hancock County, Georgia **In re: Sandersville Railroad Company's Petition for Approval to Acquire Real Estate by Condemnation**	Docket No.: 45045

FIRST DATA REQUEST TO SANDERSVILLE RAILROAD COMPANY

TO: L. CRAIG DOWDY
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COMES NOW the Georgia Public Service Commission Staff ("Staff") and, pursuant to the authority vested in it by the Georgia Public Service Commission ("Commission") pursuant to O.C.G.A § 46-2-57, herein propounds the following data requests, to be answered by designated representatives or agents of Sandersville Railroad Company ("Sandersville Railroad"). Responses to these Data Requests are expected from Sandersville Railroad Company within twenty (20) days of service hereof.

Please provide responses on or before 4:00 p.m. on August XX, 2023.

INSTRUCTIONS

a) These requests shall be deemed to be continuing. Sandersville Railroad is obliged to change, supplement, and correct all answers to requests to conform to available information, including such information as first comes available to the Sandersville Railroad after the answers are hereto filed.

b) The answers provided should first restate the question asked and also identify the person(s) supplying the information.

c) All information is to be divulged that is within the knowledge, possession, control, or custody of the Sandersville Railroad or may be reasonably ascertained thereby.

d) As used herein the "document" included, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, work sheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium including computerized memory or magnetic media.

Docket No. 45045
Amended Petition for Approval to Acquire Real Estate by Condemnation
DATA REQUESTS

1. Please identify and describe all entities providing funds to construct the proposed Hanson Spur. Please provide any documents related to or relied upon in providing your answer.

2. Please identify each customer Sandersville Railroad expects to use the Hanson Spur. Please also provide a copy of any contracts, memorandum of understanding, written commitment, promises, or other similar documents memorializing the intent or obligation of any customer to use the Hanson Spur, including any drafts of such documents.

3. Has Sandersville Railroad or any other entity conducted a market survey for each customer expected to use the Hanson Spur? If so, please provide a copy of any such survey in your possession or control, as well as any documents relied upon or supporting such a survey.

4. For each customer Sandersville Railroad expects to use the Hanson Spur, please identify and describe the estimated volume of material each customer will move along the Hanson Spur. Please provide any documents related to or relied upon in providing your answer.

5. For each customer Sandersville Railroad expects to use the Hanson Spur, please identify the specific destination market or markets for materials moved along the Hanson Spur. Please provide any documents related to any customer's expected destination market or markets.

6. For each customer Sandersville Railroad expects to use the Hanson Spur, please identify and describe all rail services that each customer will need relating to the Hanson Spur. Your answer should include, but not be limited to, information as to the frequency of service and extra switching services. Please provide copies of any documents relating to the rail services needed for each customer.

7. For materials expected to be moved along the Hanson Spur, please identify and describe any analysis, study, or communications regarding the economic feasibility of using trucks, as opposed to rail, to move such materials. Please also provide copies of any such materials and related documents.

8. In Paragraph 3 of the Amended Petition, Sandersville Railroad states that the Hanson Spur "will permit (a) Heidelberg Materials to send by rail approximately five hundred thousand (500,000) additional tons of aggregate per year from the Hanson Quarry." Please identify and describe the factual basis for this assertion. Your answer should include information regarding the current tonnage output from the Hanson Quarry and whether, or to what extent, the production of such additional tons is dependent on an expansion of Hanson Quarry. Please provide any documents related to this statement or the basis of this statement.

9. Does Benjamin Tarbutton or any shareholders, owners, or officers of Sandersville Railroad own stock, shares, bonds, or other interests in Southern Chips LLC (or any other timber producers indicated in Paragraph 3 of the Amended Petition); Pittman Construction Company; Heidelberg Materials; Veal Farms Transload, LLC; Revive Millings, LLC; or any of the "other shipper[s] on property adjacent to the Hanson Spur" discussed in the Amended Petition or identified as a potential customer since the Amended Petition was filed? If the answer is "yes," please describe the nature and amount of such interest for each person identified.

10. Identify and describe which of the potential customers noted in Paragraph 3 of the Amended Petition, as which of any potential customers identified since the Amended Petition was filed, will be able to load products directly to rail using the Hanson Spur, at what locations along the Hanson Spur such potential customers will be able to load their products, and the expected markets for such products. Please also provide a copy of any documents related to or relied upon to provide your answer.

11. Identify and describe the factual basis for your assertion in Paragraph 3 of the Amended Petition that the Hanson Spur will reduce the number of trucks that would otherwise be required to move products on Hancock County roads. Please provide any documents related to or relied upon to provide your answer.

12. Identify and describe the factual basis for your assertion in Paragraph 4 of the Amended Petition that the train providing Sandersville Railroad's switching service will make approximately one round trip daily between CSXT and the Hanson Quarry during normal business hours, and that the train will travel less than 20 miles per hour. Please provide any documents related to or relied upon to provide your answer.

13. Identify and describe the factual basis for your assertion in Paragraph 5 of the Amended Petition that the Hanson Spur will create at least one and a half million dollars ($1,500,000.00) in annual direct economic impact in Hancock County. Please provide any documents related to or relied upon to provide your answer.

14. Identify the Project Parcels which Sandersville Railroad has in fact acquired or has written or verbal agreements to acquire. Please provide any documents related to or relied upon to provide your answer.

15. Please identify and describe any analysis Sandersville Railroad has conducted regarding the historical importance of each of the Project Parcels. Please provide any documents related to or relied upon to provide your answer.

16. Please identify and describe any analysis Sandersville Railroad has conducted regarding the benefit of the Hanson Spur versus the concomitant disruption of the status quo. Please provide any documents related to or relied upon to provide your answer.

17. Please identify and describe any analysis Sandersville Railroad has conducted on the health effects of the Hanson Spur on the residents of Hancock County, Georgia. For purposes of this data request, the phrase "health effects" includes, without limitation, any

physical or psychological effects caused by the Hanson Spur. Please provide any documents related to or relied upon to provide your answer.

18. Please identify and describe any communications with residents of Hancock County to come onto their land to survey for the construction of the Hanson Spur. Please provide any documents related to or relied upon to provide your answer.

19. Please identify and describe any services or improvements, including but not limited to modifications or improvements to tracks, property, or other rail services, CSXT must make that will be necessary for the successful operation of the Hanson Spur. Please provide any documents related to or relied upon to provide your answer.

20. Please provide any feasibility analysis, study, or communications produced or analyzed for the Hanson Spur project. Please provide any documents related to or relied upon to provide your answer.

21. Please provide a copy of all communications with each owner or person having an ownership or any other property interest in each of the Project Parcels.

22. Please produce a copy all documents relating to the determination of the selected route for the Hanson Spur, including but not limited to relating to the considerations asserted on Page 2 of the Memorandum attached to the Amended Petition as Exhibit A (it "conform[s] with railroad design standards, minimize[s] impacts to wetlands and streams, avoid[s] environmentally sensitive areas near the upper Ogeechee River northeast of the planned route, and [] give[s] wide berth to occupied dwellings") as well as any change or changes to the selected route of the Hanson Spur since the inception of the project.

23. Please provide any documents concerning the construction, design, cost, and effects of the Hanson Spur project, including but not limited to the proposed berms described in page 2 of the Memorandum attached to the Amended Petition as Exhibit A, and the proposed "at grade crossing" described in Paragraph 8 of the Amended Petition.

24. Please provide any documents concerning the effect of the Hanson Spur on the environment of Hancock County, including, without limitation, any effects on water, wetlands, soil, pollutants, litter, and light pollution.

25. Please provide any documents concerning the prevention, mitigation, evacuation, and clean-up plans in the event of a derailment or accident on the Hanson Spur.

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of July, 2023, a copy of the foregoing *First Data Request to Sandersville Railroad* has been served via electronic mail and U.S. First-Class Mail on the following pursuant to GA. COMP. R. & REGS. 515-16-16-.02; 515-2-1-.04(4)(b), (3):

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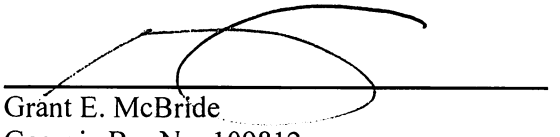
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DATED this 25th day of July, 2023.



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