GEORGIA PUBLIC SERVICE COMMISSION

In Re: Sandersville Railroad Company's Petition For Approval to Acquire Real Estate by Condemnation	**Docket No.: 45045**

REBUTTAL TESTIMONY OF ARNIE PITTMAN

September 28, 2023

L. Craig Dowdy
Georgia Bar No. 227810
Steven L. Jones
Georgia Bar No. 639038
TAYLOR ENGLISH DUMA, LLP
1600 Parkwood Circle
Suite 200
Atlanta, Georgia 30339
Telephone: (770) 434-6868
Facsimile: (770) 434-7376
cdowdy@taylorenglish.com
sjones@taylorenglish.com

Robert S. Highsmith Jr.
Georgia Bar No. 352777
Laura E. Flint
Georgia Bar No. 635203
HOLLAND & KNIGHT LLP
1180 West Peachtree Street NW
Suite 1800
Atlanta, Georgia 30309
Telephone: (404) 817-8500
Facsimile: (404) 881-0470
robert.highsmith@hklaw.com
laura.flint@hklaw.com

Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.

A. My name is Louie Arnold ("Arnie") Pittman, III. I am the President of Pittman Construction Company ("Pittman Construction"). My business address is 1487 Farmer Road NW, P.O. Box 155, Conyers, Georgia 30012-7016.

Q. HAVE YOU PREVIOUSLY TESTIFIED IN THIS PROCEEDING?

A. Yes, I testified on behalf of Sandersville Railroad Company in the Company's direct case, via written direct testimony pre-filed on July 21, 2023.

Q. DO YOU HAVE ANY CORRECTIONS OR CHANGES TO YOUR DIRECT TESTIMONY PRE-FILED ON JULY 26, 2023?

A. No.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. The purpose of my testimony is to show why it is not viable for Pittman Construction to receive liquid asphalt (delivered via the CSXT system) at a transload facility in Hancock County that is not located at the Hanson Quarry, transload that liquid asphalt to trucks, and then truck that liquid asphalt over public roads to our Sparta facility. Frankly, that is not a financially viable solution for our business.

We currently ship liquid asphalt by rail to our APS facility in Lithonia, which is on the CSXT system. We then transload the liquid asphalt to trucks at Lithonia and then truck it to our Sparta facility, which is located at the Hanson Quarry.

If the Hanson Spur is built, we will not need to transload liquid asphalt in Lithonia and then truck it over public roads to our Sparta facility. Instead, we will ship liquid asphalt directly to our Sparta facility via the CSXT system and then the Hanson Spur. This will eliminate any need for trucking liquid asphalt on public roads in the movement of liquid asphalt from the refinery to our Sparta facility.

Faced with the decision of whether to transload at an off-site facility in Hancock County or continue to transload at the APS facility in Lithonia, we would continue to transload at our APS facility in Lithonia. The benefit of Sandersville Railroad's switching service over the Hanson Spur from the CSXT system is that we obviate the need for trucking inbound liquid asphalt over public roads and thereby lower our transportation costs. By constructing and operating the Hanson Spur, Sandersville Railroad will open a new channel of trade for us, which avoids the need to transport in-bound liquid asphalt by truck on public roads.

Q. SO, YOU WOULD NOT EXPECT TO ENGAGE IN LONG-TERM BUSINESS RELATIONS WITH SANDERSVILLE RAILROAD IF THE RAILROAD COULD NOT OFFER YOU DIRECT SWITCHING SERVICES AT YOUR SPARTA PLANT?

A. That is correct.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re: Sandersville Railroad Company's Petition For Approval to Acquire Real Estate by Condemnation	**Docket No.: 45045**

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing **REBUTTAL TESTIMONY OF ARNIE PITTMAN** upon the following persons by causing electronic copies of the same to be transmitted to each party that has supplied a valid email address and upon all other parties via first class mail with adequate postage affixed thereon and deposited in the United States Mail addressed as follows:

Sallie Tanner*
Executive Secretary
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
stanner@psc.ga.gov

Rob Trokey
Director, Electric Unit
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
rtrokey@psc.ga.gov

Nancy G. Gibson
Georgia Public Service Comm.
244 Washington Street, SW
Atlanta, GA 30334
ngibson@psc.ga.gov

Jamie Rush
Malissa Williams
Miriam Gutman
The Southern Poverty Law Center
150 E. Ponce de Leon Avenue
Suite 340
Decatur, Georgia 30030
jamie.rush@splcenter.org
malissa.williams@splcenter.org
miriam.gutman@splcenter.org

Robert Highsmith
Laura Flint
HOLLAND & KNIGHT LLP
1180 West Peachtree Street NW
Suite 1800
Atlanta, Georgia 30309
robert.highsmith@hklaw.com
laura.flint@hklaw.com

Don and Sally Garrett
1335 Shoals Road
Sparta, Georgia 31087
sallygarrett45@yahoo.com

Blaine and Diane Smith
823 Chatsworth Drive
Accokeek, MD 20607
wbs10408@aol.com
hdianesmith@gmail.com

Grant E. McBride
Smith Welch Webb & White
2200 Keys Ferry Court
McDonogh, GA 30523
gmcbride@smithwelchlaw.com

Elizabeth L. Sanz
Renee D. Flaherty
Institute for Justice
901 N. Glebe Road
Suite 900
Arlington, Virginia 22203
bsanz@ij.org
rflaherty@ij.org

Marvin and Pat Smith
15500 Avery Road
Rockville, MD 20855
marvin.smithjr@yahoo.com
pjsmax@hotmail.com

William R. Maurer
Institute for Justice
600 University Street
Suite 1730
Seattle, WA 98101
wmaurer@ij.org

Verne Kennedy Hollis
373 Hamilton St.
Sparta, Georgia 31087
vkenn41@yahoo.com

Thomas Ahmad Lee
821 Brookriver Drive, Suite 246
Dallas, Texas 75247
tlee1827@yahoo.com

Sally G. Wells
140 Dunn Road
Sparta, Georgia 31087
sllywells@yahoo.com

Leo Briggs
Georgia Briggs
4500 Hidden Stream Drive
Loganville, Georgia 30052
lgbriggs@earthlink.net

Joel Reed
Kathy Reed
5 Dogwood Lane
Chatsworth, Georgia 30705
Jbreed48@yahoo.com

Herus Ellison Garrett
111 Brookwood Court
Eatonton, Georgia 31024

Donna N. Garrett
154 Lakeview Drive
Sparta, Georgia 31087
ngarrett64@yahoo.com

No Railroad in Our Community Coalition
c/o Janet P. Smith and David Mark Smith
929 Shoals Road
Sparta, Georgia 31087

Robert B. Baker
Robert B. Baker, PC
2480 Briarcliff Road, NE
Suite 6
Atlanta, Georgia 30329
bobby@robertbbaker.com

L. Craig Dowdy
Steven L. Jones
TAYLOR ENGLISH DUMA, LLP
1600 Parkwood Circle Suite 200
Atlanta, Georgia 30339
cdowdy@taylorenglish.com
sjones@taylorenglish.com

This 28th day of September 2023.



L. Craig Dowdy
Georgia Bar No. 227810
Steven L. Jones
Georgia Bar No. 639038

Counsel for Petitioner Sandersville Railroad Company

TAYLOR ENGLISH DUMA LLP
1600 Parkwood Circle, Suite 200
Atlanta, GA 30339
Telephone: (770) 434-6868
Facsimile: (770) 434-7376
cdowdy@taylorenglish.com
sjones@taylorenglish.com