# AREA 2

## COST REPLACEMENT HEARING DEALER REBUTTAL EXHIBITS

March 2, 2022

## MARCH 2, 2022 COST REPLACEMENT HEARING

## **INDEX OF REBUTTAL EXHIBITS**

Rebuttal Exhibit D1	Alexandra Albright, CPA Curriculum Vitae
Rebuttal Exhibit D2	Processing, Packaging and Delivery Costs/Point
Rebuttal Exhibit D2-A	Cost Replacement Adjustments for Processing, Packaging and Delivery Costs
Rebuttal Exhibit D3	Summary of Current Container Costs with Adjustments for Shrinkage and Loss and Update to Current Month
Rebuttal Exhibit D3-A	Adjusted Container Costs Compared to Current Month Container Costs
Rebuttal Exhibit D4	Summary of Current Ingredient Costs
Rebuttal Exhibit D4-A	Cost Replacement Adjustments for Ingredients
Rebuttal Exhibit D5	Weighted Cost of Shrinkage and Weighted Costs and Revenues from Bulk Cream and Bulk Milk
Rebuttal Exhibit D6	Butterfat Content of Price Controlled Products
Rebuttal Exhibit D7	Cost Increases (Decreases) for Labor, Insurance and Utility Costs
Rebuttal Exhibit D8	Changes in Diesel Fuel Costs
Rebuttal Exhibit D9	Changes in Heating Fuel Costs (Natural Gas)
Rebuttal Exhibit D10	Adjustments for Container Efficiencies Due to Container Size
Rebuttal Exhibit D11A	Calculation of Minimum Wholesale Price Gallon Reduced Fat Milk (2%)
Rebuttal Exhibit D11B	Calculation of Minimum Wholesale Price Half Pint Flavored Nonfat Milk (Skim)

## Alexandra Albright, CPA *Curriculum Vitae*

## **EDUCATION**

Mercyhurst University – B.A. Degree in Accounting and Finance

## **EMPLOYMENT**

Herbein + Company, Inc., Reading, PA

## 2020 to present

Manager – Dairy Consulting

- Cost benchmarking
- Milk shrinkage reduction projects
- Dairy accounting seminars, including Dairy 101, for private clients and industry
- Regulatory assistance with PMMB, USDA and other state agencies
- Financial reporting for dairy businesses subject to dairy price regulation
- Dairy cost accounting for basic and complex products
- Preparation of cost replacement exhibits

## MicroStrategy, Inc., Tysons Corner, VA

2019 – 2020

Internal Auditor

- Performed risk evaluations for audit areas
- Performed operational, financial, and IT compliance audits
- Drafted audit reports
- Help to implement Workiva (an audit tool)

## SEK, Inc., Chambersburg, PA

2017 – 2019

Staff accountant – Audit

- Performed audits, compilations, reviews, and tax engagements
- Prepared 990s, 1065s, 1040s, 1120s, and Schedule Ks
- Summarized census data and investment activity for pension department

## AJARALA Holsteins, Landisburg, PA

2001-2011

Grew up on dairy farm, milking and caring for cows and the facility

## PROFESSIONAL AND CIVIC ASSOCIATIONS AND DESIGNATIONS

CPA – Commonwealth of Pennsylvania

Firm Member – Allinial Global

Member – American Institute of Certified Public Accountants (AICPA)

Member – Pennsylvania Institute of Certified Public Accountants (PICPA)

## MARCH 2, 2022 COST REPLACEMENT HEARING

## PROCESSING, PACKAGING AND DELIVERY COSTS/POINT (WEIGHTED AVERAGE BASED ON SALES IN AREA 2)

## Clover Farms Dairy Co., DFA Dairy Brands Fluid, LLC - Lebanon, DFA Dairy Brands Fluid, LLC - Schuylkill Haven, Milk Industry Management Corp. T/A Balford Farms, Monroe County Milk Producers Coop Assoc. dba Pocono Mountain Dairies, Turkey Hill LP dba Turkey Hill Dairy, Valley Farms Dairy LLC

Cost Center	Total 2020 Points in PMMB Area 2 (1)	-	ted Average ost/Point (1)
Receiving, lab and field work	65,880,694	\$	0.0180
Standardization and pasteurization	93,435,298		0.0198
Bottling	88,083,662		0.0465
Cold room	99,674,266		0.0417
Delivery	69,748,128		0.1181
Selling	73,242,159		0.0233
		\$	0.2674

(1) Reflects points (and related cost/point) for sales in PMMB Area 2 for the cross-section dealers.

## MARCH 2, 2022 COST REPLACEMENT HEARING

## COST REPLACEMENT ADJUSTMENTS FOR PROCESSING, PACKAGING AND DELIVERY COSTS

_	2020 Weighted Average Cost/Point	2019 Cost/Point Included in Existing Order (1)	Increase (Decrease)
Receiving, lab and field work	\$0.0180	\$0.0147	\$0.0033
Standardization and pasteurization	0.0198	0.0198	0.0000
Bottling	0.0465	0.0452	0.0013
Cold room	0.0417	0.0407	0.0010
Delivery	0.1181	0.1261	(0.0080)
Selling	0.0233	0.0199	0.0034
Sub total	\$0.2674	\$0.2664	\$0.0010
Add: 2021 Cost increase (decrease) adjustr	0.0015		
Less: 2020 Cost (increase) decrease adjustr	(0.0055)		
Net change			(\$0.0030)

## PMMB AREA 2 MARCH 2, 2022 COST REPLACEMENT HEARING

# SUMMARY OF CURRENT CONTAINER COSTS WITH ADJUSTMENT FOR SHRINKAGE AND LOSS AND UPDATE TO CURRENT MONTH

## Clover Farms Dairy Co., DFA Dairy Brands Fluid, LLC - Lebanon, DFA Dairy Brands Fluid, LLC - Schuylkill Haven, Milk Industry Management Corp. T/A Balford Farms, Monroe County Milk Producers Coop Assoc. dba Pocono Mountain Dairies, Turkey Hill LP dba Turkey Hill Dairy, Valley Farms Dairy LLC,

Container Size	April 2021 Container Cost (1)	Adjust from April 2021 to December 2021 - Current (2)	Subtotal	Calculated Shrinkage and Loss (4)	Shrinkage Cost	Total Container Cost
Gallon (5)	\$ 0.2189	\$ 0.0469	\$ 0.2658	1.55%	\$ 0.0041	\$ 0.2699
1/2 gallon - plastic 1/2 gallon - paper 1/2 gallon - blended (5)	0.1618 (3) 0.1618	0.0300	0.1918	1.22%	0.0023	0.1941
Quart - plastic Quart - paper Quart - blended (5)	0.1557 0.0898 0.1540	0.0359	0.1899	1.57%	0.0030	0.1929
Pint - plastic Pint - paper Pint - blended (5)	0.1110 0.0540 0.1089	0.0171	0.1260	1.62%	0.0020	0.1280
Twelve ounce	(3)					
Ten ounce	(3)					
1/2 pint - plastic (5)	0.0953	(0.0001)	0.0952	0.92%	0.0009	0.0961
1/2 pint - paper (5)	0.0339	(0.0076)	0.0263	0.85%	0.0002	0.0265
Four ounce - paper	0.0299		0.0299	1.53%	0.0005	0.0304
Dispenser	0.0611		0.0611	1.30%	0.0008	0.0619

(1) For containers not purchased in April 2021 the most recent invoice was used.

(2) October 2021 container costs were used by the PMMB to establish minimum resale prices for December 2021.

- (3) Container not packaged in this Area.
- (4) Calculated based on actual container loss from a state-wide cross section of processing dealers for controlled containers used during the period January – March 2009. This state-wide cross section is composed of every processing dealer that participates in a cost replacement hearing.
- (5) Current container costs would replace these costs monthly when the PMMB minimum resale prices are announced.

## MARCH 2, 2022 COST REPLACEMENT HEARING

## ADJUSTED CONTAINER COSTS COMPARED TO CURRENT MONTH (DECEMBER 2021) CONTAINER COSTS

Clover Farms Dairy Co., DFA Dairy Brands Fluid, LLC - Lebanon, DFA Dairy Brands Fluid, LLC - Schuylkill Haven, Milk Industry Management Corp. T/A Balford Farms, Monroe County Milk Producers Coop Assoc. dba Pocono Mountain Dairies, Turkey Hill LP dba Turkey Hill Dairy, Valley Farms Dairy LLC,

Container Size	Adjusted Container Costs from Exhibit D3		Container Costs in Current Prices (1)		Difference
Gallon (2)	\$	0.2699	\$	0.2676	\$ 0.0023
Half Gallon (2)		0.1941		0.1968	(0.0027)
Quart (2)		0.1929		0.1886	0.0043
Pint (2)		0.1280		0.1240	0.0040
1/2 pint - plastic (2)		0.0961		0.0963	(0.0002)
1/2 pint - paper (2)		0.0265		0.0251	0.0014
Four ounce - paper		0.0304		0.0266	0.0038
Dispenser (per quart)		0.0619		0.0551	0.0068

(1) Per General Order No. A-953 (CRO 12) as updated.

(2) These container costs to be updated monthly.

## MARCH 2, 2022 COST REPLACEMENT HEARING

## SUMMARY OF INGREDIENT COSTS (WEIGHTED AVERAGE BASED ON ACTUAL SALES IN AREA 2)

## Clover Farms Dairy Co., DFA Dairy Brands Fluid, LLC - Lebanon, DFA Dairy Brands Fluid, LLC - Schuylkill Haven, Milk Industry Management Corp. T/A Balford Farms, Monroe County Milk Producers Coop Assoc. dba Pocono Mountain Dairies, Turkey Hill LP dba Turkey Hill Dairy, Valley Farms Dairy LLC,

	April 2021 Ingredient Cost Per Pound (1)
Standard	\$.0000
Reduced fat (2%) milk	.0001
Lowfat (1%) milk	.0001
Nonfat (skim) milk	.0004
Flavored milk	.0368
Flavored reduced fat milk	.0317
Flavored nonfat milk	.0284
Buttermilk	(2)
Eggnog	.2277

(1) For ingredients not purchased in April 2021 the most recent invoice was used.

(2) Buttermilk is not processed and packaged by any of the Area 2 cross-section dealers.

## MARCH 2, 2022 COST REPLACEMENT HEARING

#### COST REPLACEMENT ADJUSTMENTS FOR INGREDIENTS

## Clover Farms Dairy Co., DFA Dairy Brands Fluid, LLC - Lebanon, DFA Dairy Brands Fluid, LLC - Schuylkill Haven, Milk Industry Management Corp. T/A Balford Farms, Monroe County Milk Producers Coop Assoc. dba Pocono Mountain Dairies, Turkey Hill LP dba Turkey Hill Dairy, Valley Farms Dairy LLC,

-	April 2021 Weighted Average Cost/Pound	Cost/Pound included in Existing Order (1)	Increase (Decrease)
Standard milk	\$0.0000	\$0.0000	\$0.0000
Reduced fat milk (2%)	0.0001	0.0001	0.0000
Lowfat milk (1%)	0.0001	0.0001	0.0000
Nonfat milk (skim)	0.0004	0.0003	0.0001
Flavored milk (2)	0.0368	0.0357	0.0011
Flavored reduced fat milk (2)	0.0317	0.0314	0.0003
Flavored nonfat milk (2)	0.0284	0.0241	0.0043
Buttermilk	(3)	(3)	
Eggnog	0.2277	0.2297	(0.0020)

(1) Per General Order OGO A-953 (CRO 12) as updated for flavored milks on December 1, 2021.

- (2) Ingredient costs to be updated on a quarterly basis for flavored milk, flavored reduced fat milk and flavored nonfat milk. Updates should be effective on January 1, April 1, July 1 and October 1.
- (3) Buttermilk is not processed and packaged by any of the Area 2 cross-section dealers.

Weighted Cost

## PMMB AREA 2 MARCH 2, 2022 COST REPLACEMENT HEARING WEIGHTED COST OF SHRINKAGE AND WEIGHTED COSTS AND REVENUES FROM BULK CREAM AND BULK MILK

PMMB Area 2		Costs	R	evenues	ghted Net (Revenue)	Weighted Pounds (1)	(Rev	enue) Per Pound
Shrinkage	\$	401,279			\$ 401,279			
Bulk milk revenue minus milk costs Bulk milk cost center costs & freight Net bulk milk cost (revenue)		112,197		117,143	(4,946)			
Bulk cream revenue minus milk costs Bulk cream cost center costs Net bulk cream cost (revenue)		104,675		214,636	 (109,961)			
Total	\$	618,151	\$	331,779				
Net cost (net revenue) - calendar yea	r 202	20			\$ 286,372	126,633,573	\$	0.0023
Net cost (net revenue) in current ord	er - c	alendar yea	r 20	19	\$ 319,681	128,100,182	\$	0.0025
Net change - cost increase (cost redu	ction	)			\$ (33,309)		\$	(0.0002)

#### MARCH 2, 2022 COST REPLACEMENT HEARING

## **BUTTERFAT CONTENT OF PRICE CONTROLLED PRODUCTS**

Clover Farms Dairy Co., DFA Dairy Brands Fluid, LLC - Lebanon, DFA Dairy Brands Fluid, LLC - Schuylkill Haven, Milk Industry Management Corp. T/A Balford Farms, Monroe County Milk Producers Coop Assoc. dba Pocono Mountain Dairies, Turkey Hill LP dba Turkey Hill Dairy, Valley Farms Dairy LLC,

	2020 Weighted Average Butterfat Test	Butterfat Test included in Existing Order (1)	Increase (Decrease)
Standard milk	3.2657%	3.2670%	-0.0013%
Reduced fat milk (2%)	1.9738%	1.9868%	-0.0130%
Lowfat milk (1%)	0.9857%	0.9807%	0.0050%
Nonfat milk (skim)	0.0718%	0.0745%	-0.0027%
Flavored milk	3.2556%	3.2456%	0.0100%
Flavored reduced fat milk	0.9697%	0.9678%	0.0019%
Flavored nonfat milk	0.0240%	0.0495%	-0.0255%
Buttermilk	(2)	(2)	
Eggnog	7.1196%	7.1689%	-0.0493%

(1) Per General Order No. A-953 (CRO 12)

(2) Buttermilk is not processed and packaged by any of the Area 2 cross-section dealers.

## MARCH 2, 2022 COST REPLACEMENT HEARING

## COST INCREASES (DECREASES) FOR LABOR, INSURANCE AND UTILITY COSTS

Clover Farms Dairy Co., DFA Dairy Brands Fluid, LLC - Lebanon, DFA Dairy Brands Fluid, LLC - Schuylkill Haven, Milk Industry Management Corp. T/A Balford Farms, Monroe County Milk Producers Coop Assoc. dba Pocono Mountain Dairies, Turkey Hill LP dba Turkey Hill Dairy, Valley Farms Dairy LLC,

	Weighted Expenses for the Six Months Ended June 30 (1)		Weighted Poi Months Ende	nts for the Six d June 30 (1)	Cost Pe	er Point	Increase (Decrease)	
Type of Expense	2021	2020	2021	2020	2021	2020	Per Point	
Labor and fringe benefits	\$6,786,544	\$7,143,786	47,521,546	49,386,225	\$ 0.1428	\$ 0.1447	(\$0.0019)	
Utilities	\$327,222	\$342,128	47,521,546	49,386,225	0.0069	0.0069	0.0000	
Insurance	\$300,009	\$158,492	47,521,546	49,386,225	0.0063	0.0032	0.0031	
					\$0.1560	\$0.1548	\$0.0012	

(1) Weighted based on sales in PMMB Area 2

#### MARCH 2, 2022 COST REPLACEMENT HEARING

## **CHANGES IN DIESEL FUEL COSTS**

Diesel fuel costs – calendar year 2020 (1)	\$542,652
Delivery points – calendar year 2020 (1)	69,748,128
Diesel fuel cost per point delivered	\$0.0078
Average diesel price – calendar year 2020 (2)	\$2.806
Average diesel price – October 2021 (2) (3)	\$3.730
Increase (decrease) from year 2020 to month October 2021	32.93%
Increase (decrease) in diesel fuel cost per point delivered	\$0.0026

- (1) Costs of cross-section dealers weighted by sales in Area 2.
- (2) On-highway diesel prices per gallon for the Central Atlantic Region as published by the U.S. Energy Information Administration.
- (3) October 2021 diesel fuel costs were used by the PMMB in establishing minimum prices for December 2021.

## MARCH 2, 2022 COST REPLACEMENT HEARING

## CHANGES IN HEATING FUEL COSTS (NATURAL GAS)

Heating fuel costs – calendar year 2020 (1)	\$84,996
Standardization & pasteurization points – calendar year 2020 (1)	93,435,298
Heating fuel cost per point pasteurized	\$0.0009
Average heating fuel costs – calendar year 2020 (2)	\$7.99
Average heating fuel costs – August 2021 (2) (3)	7.58
Increase (decrease) from year 2020 to month August 2021	-5.13%
Increase (decrease) in heating fuel cost per point pasteurized	\$0.0000

- (1) Costs of cross-section dealers weighted by sales in Area 2.
- (2) Industrial natural gas prices for Pennsylvania in dollars per thousand cubic feet as published by the U.S. Energy Information Administration.
- (3) August 2021 natural gas costs were used by the PMMB in establishing minimum prices for December 2021.

Container

## PMMB AREA 2 MARCH 2, 2022 COST REPLACEMENT HEARING

## ADJUSTMENTS FOR CONTAINER EFFICIENCIES DUE TO CONTAINER SIZE

## Clover Farms Dairy Co., DFA Dairy Brands Fluid, LLC - Lebanon, DFA Dairy Brands Fluid, LLC - Schuylkill Haven, Milk Industry Management Corp. T/A Balford Farms, Monroe County Milk Producers Coop Assoc. dba Pocono Mountain Dairies, Turkey Hill LP dba Turkey Hill Dairy, Valley Farms Dairy LLC,

<u>Container Size</u>	Container Quantities Sold by Cross-Section Dealers <u>in 2020 in Area 2</u>	Proposed Container Efficiency <u>Adjustments</u>	Impact on Cross-Section Dealer Revenue	Efficiency Adjustments in Current <u>Order (1)</u>	Impact on Cross-Section Dealer Revenue Without Adjustment
Gallon	7,876,968	\$ (0.0754)	\$ (593,923)	\$ (0.0828)	\$ (652,213)
Half Gallon	7,235,199	(0.0142)	(102,740)	(0.0251)	(181,603)
Quart	2,523,203	0.0556	140,290	0.0363	91,592
Pint	1,854,097	0.0554	102,717	0.0381	70,641
Half Pint - Plastic	364,456	0.0257	9,367	0.0395	14,396
Half Pint - Paper	11,825,885	0.0257	303,925	0.0214	253,074
4 oz.	247,875	0.0394	9,766	0.0336	8,329
Dispenser (per quart)	936,172	0.1401	131,158	0.1000	93,617
Net impact on cross-section de	ealer revenues		<u>\$                                    </u>		\$ (302,167)

(1) Per OGO A-953 (CRO 12) as updated.

## MARCH 2, 2022 COST REPLACEMENT HEARING

## CALCULATION OF WHOLESALE MINIMUM PRICE

#### GALLON REDUCED FAT MILK (2%) FOR OCTOBER 2019

#### Clover Farms Dairy Co., DFA Dairy Brands Fluid, LLC - Lebanon,

## DFA Dairy Brands Fluid, LLC - Schuylkill Haven, Milk Industry Management Corp. T/A Balford Farms, Monroe County Milk Producers Coop Assoc. dba Pocono Mountain Dairies,

Turkey Hill LP dba Turkey Hill Dairy, Valley Farms Dairy LLC,

	•	Proposed	Current	
	<u>Reference</u>	<u>Order</u>	<u>Order (2)</u>	<b>Change</b>
Butterfat test	D6	1.9738%	1.9868%	-0.0130%
Butterfat price as announced by PMMB	(1)	\$ 2.1607 per lb.	\$ 2.1607 per lb.	
Extended butterfat value		\$ 0.0426 per lb.	\$ 0.0429 per lb.	
Skim price as announced by PMMB	(1)	\$ 16.88 per cwt.	\$ 16.88 per cwt	
Extended skim value		\$ 0.1655 per lb.	\$ 0.1654 per lb.	
Total milk value at announced prices		\$ 0.2081 per lb.	\$ 0.2084 per lb.	\$(0.0003)
Ingredient cost	D4	0.0001	0.0001	
Cost of shrinkage / bulk milk & cream	D5	0.0023	0.0025	
Total milk cost per pound		\$ 0.2105 per lb.	\$ 0.2110 per lb.	\$(0.0005)
Pounds per gallon (conversion)		8.62	8.62	
Total milk cost per gallon		\$ 1.8145	\$ 1.8188	\$(0.0043)
Container cost (adjusted for shrinkage)	D3	0.2699 each	0.2676 each	0.0023
Cost center costs	D2	1.0696	1.0656	0.0040
1st half 2021 to 1st half 2020 adjustment	t D7	0.0048	0.0220	(0.0172)
Container efficiency adjustment	D10	(0.0754)	(0.0828)	0.0074
Percentage discount adjustment	(3)	0.0212	0.0212	-
Diesel fuel adjustment	D8	0.0104	0.0056	0.0048
Heating fuels adjustment	D9		(0.0004)	0.0004
		\$ 3.1150 each	\$ 3.1176 each	\$(0.0026)
Dealer profit at 3.5%	(2)	0.1130	0.1131	\$(0.0001)
Subtotal		\$ 3.2280 each	\$ 3.2307 each	\$(0.0027)
Less: average delivery cost	(2)	(0.3356)	(0.3356)	
Add: high cost delivery	(2)	0.9364	0.9364	
Wholesale minimum price		<b>\$ 3.8288</b> each	<b>\$ 3.8315</b> each	\$(0.0027)

- (1) As announced for December 2021 by PMMB on November 18, 2021.
- (2) Per OGO A-953 (CRO 12) as updated.
- (3) Per OGO A-972 "Price Adjustments to Account for Interaction of Milk Prices and Wholesale Percentage Discounts."

## PMMB AREA 2 MARCH 2, 2022 COST REPLACEMENT HEARING

## CALCULATION OF WHOLESALE MINIMUM PRICE HALF PINT FLAVORED NONFAT MILK (SKIM) FOR OCTOBER 2019 Clover Farms Dairy Co., DFA Dairy Brands Fluid, LLC - Lebanon,

## DFA Dairy Brands Fluid, LLC - Schuylkill Haven, Milk Industry Management Corp. T/A Balford Farms, Monroe County Milk Producers Coop Assoc. dba Pocono Mountain Dairies,

Turkey Hill LP dba Turkey Hill Dairy, Valley Farms Dairy LLC, Wawa Beverage Company

	Proposed			Current		
	<u>Reference</u>			<u>Order (2)</u>		<u>Change</u>
Butterfat test	D6	0.0240%		0.0495%		-0.0255%
Butterfat price as announced by PMMB	(1)	\$ 2.1607	per lb.	\$ 2.1607	per lb.	
Extended butterfat value		\$ 0.0005	per lb.	\$ 0.0011	per lb.	
Skim price as announced by PMMB	(1)	\$ 16.88	per cwt.	\$ 16.88	per cwt.	
Extended skim value		\$ 0.1688	per lb.	\$ 0.1687	per lb.	
Total milk value at announced prices		\$ 0.1693	per lb.	\$ 0.1698	per lb.	\$(0.0005)
Ingredient cost	D4	0.0284		0.0270		
Cost of shrinkage / bulk milk & cream	D5	0.0023	-	0.0025	_	
Total milk cost per pound		\$ 0.2000	per lb.	\$ 0.1993	per lb.	\$ 0.0007
Pounds per gallon (conversion)		0.50	_	0.50	_	
Total milk cost per half pint		\$ 0.1000	-	\$ 0.0997	-	\$ 0.0003
Container cost (adjusted for shrinkage)	D3	0.0265	each	0.0251	each	0.0014
Cost center costs	D2	0.0669		0.0666		0.0003
1st half 2021 to 1st half 2020 adjustment	D7	0.0003		0.0014		(0.0011)
Container efficiency adjustment	D10	0.0257		0.0226		0.0031
Percentage discount adjustment	(3)	0.0013		0.0013		-
Diesel fuel adjustment	D8	0.0007		0.0004		0.0003
Heating fuels adjustment	D9		-	-	_	_
		\$ 0.2214	each	\$ 0.2171	each	\$ 0.0043
Dealer profit at 3.5%	(2)	0.0080	_	0.0079	_	\$ 0.0001
Subtotal		\$ 0.2294	each	\$ 0.2250	each	\$ 0.0044
Less: average delivery cost	(2)	(0.0210)		(0.0210)		
Add: high cost delivery	(2)	0.0585	_	0.0585	_	
Wholesale minimum price	:	\$ 0.2669	each	\$ 0.2625	each	\$ 0.0044

(1) As announced for December 2021 by PMMB on November 18, 2021.

(2) Per OGO A-953 (CRO 12) as updated.

(3) Per OGO A-972 "Price Adjustments to Account for Interaction of Milk Prices and Wholesale Percentage Discounts

Submitted: February 16, 2022