#### **AREA 6**

# COST REPLACEMENT HEARING DEALER REBUTTAL EXHIBITS D1 - D4, D6 - D10 AND DEALER REVISED REBUTTAL EXHIBITS D5, D11-A AND D11-B

**February 2, 2022** 

#### FEBRUARY 2, 2022 COST REPLACEMENT HEARING

#### **INDEX OF REBUTTAL EXHIBITS**

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

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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
Revised Rebuttal Exhibit D5	Weighted Cost of Shrinkage and Weighted Costs and Revenues from Bulk Cream and Bulk Milk
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Rebuttal Exhibit D7	Cost Increases (Decreases) for Labor, Insurance and Utility Costs
Rebuttal Exhibit D8	Changes in Diesel Fuel Costs
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Rebuttal Exhibit D10	Adjustments for Container Efficiencies Due to Container Size
Revised Rebuttal Exhibit D11A	Calculation of Minimum Wholesale Price Gallon Reduced Fat Milk (2%)
Revised Rebuttal Exhibit D11B	Calculation of Minimum Wholesale Price Half Pint Flavored Nonfat Milk

(Skim)

#### Jed Davis

#### Curriculum Vitae

#### **EDUCATION**

Youngstown State University – B.S. Degree in Accounting, (1988)

#### **EMPLOYMENT**

#### Herbein + Company, Inc., Reading, PA

#### 2021 to present

Senior Consultant - Dairy Consulting

- Cost benchmarking
- Milk shrinkage reduction projects
- Dairy accounting seminars
- Regulatory issues PA Milk Marketing Board, Federal Milk Marketing Orders, other state regulatory agencies
- Mergers and acquisitions
- Specialized financial reporting for dairy businesses
- Dairy cost accounting for basic and complex products

#### Dean Foods Company, Dallas, TX

#### 2002 - 2021

Regional General Manager – West Atlantic Central

- Managed a multi facility region with full P & L responsibility
- Set business strategy through collaboration with corporate and regional resources
- Led and supervised a team of 7 professionals with focus on executing against our strategic goals
- Negotiated long term supply agreements with customers and suppliers
- Drove operational and commercial efficiencies to strengthen the bottom line

#### 1997 - 2002

Group Controller – PA Dairies

- Directed the accounting and finance departments of four dairies within Dean Foods Company
- Provided business analysis, forecasting, strategic planning and budgeting support to General Managers
- Guided strategic initiatives to improve the accuracy of monthly forecasting.
- Consolidated the accounting and back office functions of four divisions into one shared service center.
- Led a team of accounting professionals focusing on timely and accurate financial reporting.

#### **Jed Davis**

1990 - 1997

Controller / Asst Controller / Accountant ( Dean Dairy Products )

- Led the accounting and finance department with budgeting and financial reporting
- Assisted the General Manager with pricing strategies
- Provided business analysis
- Developed standard product costs for each manufactured item to support pricing decisions
- Effectively directed sales, purchasing, personnel, distribution, maintenance, and accounting functions

#### Universal Rundle Inc., New Castle, PA

1988 - 1990

Cost Accountant

- Maintained standard cost systems for 3 manufacturing facilities
- Prepared monthly production and inventory reports
- Prepare annual budget and operating plan
- Support department managers with variance analysis

#### PROFESSIONAL AND CIVIC ASSOCIATIONS AND DESIGNATIONS

Board of Directors – Pennsylvania Association of Milk Dealers

Board of Directors - Dairy Industry Association of Western PA

Shenango Valley Chamber of Congress – Board member

New York State Dairy Association – Board member

Shenango Valley Jaycees – Secretary Treasurer

#### FEBRUARY 2, 2022 COST REPLACEMENT HEARING

## PROCESSING, PACKAGING AND DELIVERY COSTS/POINT (WEIGHTED AVERAGE BASED ON SALES IN AREA 6)

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

Cost Center	Total 2020 Points in PMMB Area 6 (1)	U	Average 2020 t/Point (1)
Receiving, lab and field work	70,575,025	\$	0.0180
Standardization and pasteurization	84,705,058		0.0195
Bottling	83,318,248		0.0554
Cold room	92,641,651		0.0440
Delivery	91,300,508		0.1788
Selling	87,698,370		0.0192
		\$	0.3349

<sup>(1)</sup> Reflects points (and related cost/point) for sales in PMMB Area 6 for the cross-section dealers.

# PMMB AREA 6 FEBRUARY 2, 2022 COST REPLACEMENT HEARING

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

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

	2020 Weighted Average Cost/Point	2019 Cost/Point Included in Existing Order (1)	Increase (Decrease)
Receiving, lab and field work	\$0.0180	\$0.0197	(\$0.0017)
Standardization and pasteurization	0.0195	0.0213	(0.0018)
Bottling	0.0554	0.0569	(0.0015)
Cold room	0.0440	0.0412	0.0028
Delivery	0.1788	0.1690	0.0098
Selling	0.0192	0.0229	(0.0037)
Sub total	\$0.3349	\$0.3310	\$0.0039
Add: 2020 Cost increase (decrease) adjust	tment - Exhibit D7		0.0009
Less: 2019 Cost (increase) decrease adjust	tment (1)		(0.0065)
Net change			(\$0.0017)

<sup>(1)</sup> Per General Order No. A-956 (CRO 10).

# PMMB AREA 6 FEBRUARY 2, 2022 COST REPLACEMENT HEARING

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

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, 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)	\$ 0.2217	\$ 0.0564	\$ 0.2781	1.98%	\$ 0.0055	\$ 0.2836
1/2 gallon - plastic 1/2 gallon - paper 1/2 gallon - blended (5)	0.1812 (3) 0.1812	0.0293	0.2105	1.97%	0.0041	0.2146
Quart - plastic Quart - paper Quart - blended (5)	0.2323 0.0905 0.2313	(0.0256)	0.2057	1.57%	0.0032	0.2089
Pint - plastic Pint - paper Pint - blended (5)	0.1677 0.0584 0.1664	0.0048	0.1712	1.62%	0.0028	0.1740
Twelve ounce	(3)					
Ten ounce	(3)					
1/2 pint - plastic (5)	(3)	-	-	0.92%	-	-
1/2 pint - paper (5)	0.0288	0.0013	0.0301	0.85%	0.0003	0.0304
Four ounce - paper	0.0276		0.0276	1.53%	0.0004	0.0280
Dispenser	0.1409		0.1409	1.30%	0.0018	0.1427

- (1) For containers not purchased in April 2020 the most recent invoice was used.
- (2) November 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.

# PMMB AREA 6 FEBRUARY 2, 2022 COST REPLACEMENT HEARING

### ADJUSTED CONTAINER COSTS COMPARED TO CURRENT MONTH CONTAINER COSTS – DECEMBER 2020

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

Container Size	Adjusted Container Costs from Exhibit D3		Container Costs in Current Prices (1)		Difference		
Gallon (2)	\$	0.2836	\$	0.2829	\$	0.0007	
Half Gallon (2)		0.2146		0.1973		0.0173	
Quart (2)		0.2089		0.2326		(0.0237)	
Pint (2)		0.1740		0.1697		0.0043	
1/2 pint - plastic (2)		0.0537		0.0537		-	
1/2 pint - paper (2)		0.0304		0.0310		(0.0006)	
Four ounce - paper		0.0280		0.0255		0.0025	
Dispenser (per quart)		0.1427		0.1340		0.0087	

<sup>(1)</sup> Per General Order No. A-956 (CRO 10) as updated.

<sup>(2)</sup> These container costs to be updated monthly.

<sup>(3)</sup> Difference between plastic ½ pint and paper ½ pint is \$0.0233. PMMB resale price schedules show the ½ pint paper price. \$0.0233 is the plastic add-on.

#### FEBRUARY 2, 2022 COST REPLACEMENT HEARING

# SUMMARY OF INGREDIENT COSTS (WEIGHTED AVERAGE BASED ON ACTUAL SALES IN AREA 6)

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

	April 2021
	Ingredient
	Cost Per Pound
	(1)
G. 1 1	Φ.0000
Standard	\$.0000
Reduced fat (2%) milk	.0001
Low fat (1%) milk	.0001
Non fat (skim) milk	.0005
Flavored milk	.0359
Flavored reduced fat milk	.0403
Flavored nonfat milk	.0325
Buttermilk	.0279
Eggnog	.1454

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

# PMMB AREA 6 FEBRUARY 2, 2022 COST REPLACEMENT HEARING COST REPLACEMENT ADJUSTMENTS FOR INGREDIENTS

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

	2020 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)	0.0005	0.0005	0.0000
Flavored milk (2)	0.0359	0.0356	0.0003
Flavored reduced fat milk (2)	0.0403	0.0389	0.0014
Flavored nonfat milk (2)	0.0325	0.0345	(0.0020)
Buttermilk	0.0279	0.0403	(0.0124)
Eggnog	0.1454	0.1642	(0.0188)

<sup>(1)</sup> Per General Order OGO A-956 (CRO 10) as updated for flavored milks on October 1, 2021.

<sup>(2)</sup> 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.

PMMB AREA 6
FEBRUARY 2, 2022 COST REPLACEMENT HEARING

#### WEIGHTED COST OF SHRINKAGE AND WEIGHTED COSTS AND REVENUES FROM BULK CREAM AND BULK MILK

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

PMMB Area 6	_	Costs	R	Revenues		ighted Net t (Revenue)	Weighted Pounds	(Re	ghted Cost venue) Per Pound
Shrinkage	\$	566,041			\$	566,041			
Bulk milk revenue minus milk costs Bulk milk cost center costs & freight Net bulk milk cost (revenue)		249,876		194,086		55,790			
Bulk cream revenue minus milk costs Bulk cream cost center costs Net bulk cream cost (revenue)		60,056		121,049		(60,993)			
Total	\$	875,973	\$	315,135	1				
Net cost (net revenue) - calendar year 2	020				\$	560,838	130,357,259	\$	0.0043
Net cost (net revenue) in current order -	calen	dar year 2019	9		\$	702,066	139,911,665		0.0050
Net change - cost increase (cost reduction	on)				\$	(141,228)		\$	(0.0007)

PMMB AREA 6

FEBRUARY 2, 2022 COST REPLACEMENT HEARING

BUTTERFAT CONTENT OF PRICE CONTROLLED PRODUCTS

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

	2020 Weighted Average Butterfat Test	Butterfat Test included in Existing Order (1)	Increase (Decrease)
Standard milk	3.2837%	3.2928%	-0.0091%
Reduced fat milk (2%)	1.9140%	1.9392%	-0.0252%
Lowfat milk (1%)	0.9520%	0.9448%	0.0072%
Nonfat milk (skim)	0.1246%	0.1138%	0.0108%
Flavored milk	3.2817%	3.2781%	0.0036%
Flavored reduced fat milk	1.1295%	1.0998%	0.0297%
Flavored nonfat milk	0.1529%	0.1369%	0.0160%
Buttermilk	1.0359%	1.0192%	0.0167%
Eggnog	6.1838%	6.3382%	-0.1544%

<sup>(1)</sup> Per General Order No. A-956 (CRO 10)

PMMB AREA 6

#### FEBRUARY 2, 2022 COST REPLACEMENT HEARING

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

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

		enses for the Six ed June 30 (1)	Weighted Poi Months Ende	nts for the Six d June 30 (1)	Cost Po	er Point	Increase (Decrease)
Type of Expense	2021	2020	2021	2020	2021	2020	Per Point
Labor and fringe benefits	\$ 10,134,077	\$ 10,334,575	40,747,922	40,938,013	\$ 0.2487	\$ 0.2524	(\$0.0037)
Utilities	459,994	465,800	40,747,922	40,938,013	0.0113	0.0114	(0.0001)
Insurance	433,321	239,888	40,747,922	40,938,013	0.0106	0.0059	0.0047
					\$0.2706	\$0.2697	\$0.0009

<sup>(1)</sup> Weighted based on sales in PMMB Area 6

#### FEBRUARY 2, 2022 COST REPLACEMENT HEARING

#### **CHANGES IN DIESEL FUEL COSTS**

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

Diesel fuel costs – calendar year 2020 (1)	\$2,055,621
Delivery points – calendar year 2020 (1)	91,300,508
Diesel fuel cost per point delivered	\$0.0225
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 December 2021	32.93%
Increase (decrease) in diesel fuel cost per point delivered	\$0.0074

- (1) Costs of cross-section dealers weighted by sales in Area 6.
- (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.

#### FEBRUARY 2, 2022 COST REPLACEMENT HEARING

#### **CHANGES IN HEATING FUEL COSTS (NATURAL GAS)**

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

Heating fuel costs – calendar year 2020 (1)	\$157,141
Standardization & pasteurization points – calendar year 2020 (1)	84,705,058
Heating fuel cost per point pasteurized	\$0.0019
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	(\$0.0001)

- (1) Costs of cross-section dealers weighted by sales in Area 6.
- (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.

PMMB AREA 6

#### FEBRUARY 2, 2022 COST REPLACEMENT HEARING

#### ADJUSTMENTS FOR CONTAINER EFFICIENCIES DUE TO CONTAINER SIZE

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

<u>Container Size</u>	Container Quantities Sold by Cross-Section Dealers in 2020 in Area 6		Impact on ross-Section aler Revenue	Container Efficiency Adjustments in Current Order (1)	Impact on Cross-Section Dealer Revenue
Gallon	7,114,162	\$ (0.1013) \$	(720,665)	\$ (0.1121)	\$ (797,498)
Half Gallon	7,456,899	(0.0424)	(316,173)	(0.0457)	(340,780)
Quart	1,405,517	0.1052	147,860	0.0958	134,649
Pint	2,153,690	0.1319	284,072	0.1260	271,365
Half Pint	25,441,117	0.0241	613,131	0.0226	574,969
4 oz.	760,167	0.0351	26,682	0.0353	26,834
Dispenser (per quart)	1,384,078	(0.0260)	(35,986)	0.0151	20,900
Net impact on cross-section dealer revenues	•	<u>\$</u>	(1,079)		\$ (109,561)

<sup>(1)</sup> Per OGO A-956 (CRO 10) as updated.

#### **REVISED REBUTTAL EXHIBIT D11-A**

#### PMMB AREA 6

#### FEBRUARY 2, 2022 COST REPLACEMENT HEARING

## CALCULATION OF WHOLESALE MINIMUM PRICE GALLON REDUCED FAT MILK (2%) FOR DECEMBER 2021

DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

	Proposed		Current	
	Reference	<u>Order</u>	<u>Order (2)</u>	<b>Change</b>
Butterfat test	D6	1.9140%	1.9392%	-0.0252%
Butterfat price as announced by PMMB	(1)	\$ 2.1611 per lb.	\$ 2.1611 per lb.	
Extended butterfat value		\$ 0.0414 per lb.	\$ 0.0419 per lb.	
Skim price as announced by PMMB	(1)	\$ 16.92 per cwt.	\$ 16.92 per cwt.	
Extended skim value		\$ 0.1660 per lb.	\$ 0.1659 per lb.	
Total milk value at announced prices		\$ 0.2073 per lb.	\$ 0.2078 per lb.	\$ (0.0005)
Ingredient cost	D4	0.0001	0.0001	
Cost of shrinkage / bulk milk & cream	D5	0.0043	0.0050	
Total milk cost per pound		\$ 0.2117 per lb.	\$ 0.2129 per lb.	\$ (0.0012)
Pounds per gallon (conversion)		8.62	8.62	
Total milk cost per gallon		\$ 1.8249	\$ 1.8352	\$ (0.0103)
Container cost (adjusted for shrinkage)	D3	0.2836 each	0.2829 each	0.0007
Cost center costs	D2	1.3396	1.3240	0.0156
1st half 2021 to 1st half 2020 adjustment	D7	0.0036	0.0260	(0.0224)
Container efficiency adjustment	D11	(0.1013)	(0.1121)	0.0108
Percentage discount adjustment	(3)	0.0152	0.0152	-
Diesel fuel adjustment	D8	0.0296	0.0104	0.0192
Heating fuels adjustment	D9	(0.0004)	(0.0004)	
		\$ 3.3948 each	\$ 3.3812 each	\$ 0.0136
Dealer profit at 3.4%	(2)	0.1195	0.1190	\$ 0.0005
Subtotal		\$ 3.5143 each	\$ 3.5002 each	\$ 0.0141
Less: average delivery cost	(2)	(0.5640)	(0.5640)	
Add: high cost delivery	(2)	0.9864	0.9864	
Wholesale minimum price		\$ 3.9367 each	\$ 3.9226 each	\$ 0.0141

- (1) As announced for December 2020 by PMMB on November 19, 2020.
- (2) Per OGO A-956 (CRO 10) as updated.
- (3) Per OGO A-972 "Price Adjustments to Account for Interaction of Milk Prices and Wholesale Percentage Discounts."

#### **REVISED REBUTTAL EXHIBIT D11-B**

#### PMMB AREA 6

#### FEBRUARY 2, 2022 COST REPLACEMENT HEARING

# CALCULATION OF WHOLESALE MINIMUM PRICE HALF PINT FLAVORED NONFAT MILK (SKIM) FOR DECEMBER 2021

## DFA Dairy Brands Fluid, LLC - Sharpsville, Galliker Dairy Company, Ritchey's Dairy, Inc., Turner Dairy Farms, Valley Farms Dairy LLC

	Reference	Proposed <u>Order</u>	Current Order (2)	<u>Change</u>
Butterfat test	D6	0.1529%	0.1369%	0.0161%
Butterfat price as announced by PMMB Extended butterfat value	(1)	\$ 2.1611 per lb. \$ 0.0033 per lb.	\$ 2.1611 per lb. \$ 0.0030 per lb.	
Skim price as announced by PMMB Extended skim value	(1)	\$ 16.92 per cwt. \$ 0.1689 per lb.	\$ 16.92 per cwt. \$ 0.1690 per lb.	
Total milk value at announced prices		\$ 0.1722 per lb.	\$ 0.1720 per lb.	\$ 0.0002
Ingredient cost Cost of shrinkage / bulk milk & cream Total milk cost per pound	D4 D5	0.0325 0.0043 \$ 0.2090 per lb.	0.0345 0.0050 \$ 0.2115 per lb.	\$ (0.0025)
Pounds per gallon (conversion) Total milk cost per half pint		0.50 \$ 0.1045	0.50 \$ 0.1058	\$(0.0013)
Container cost (adjusted for shrinkage)	D3	0.0304 each	0.0310 each	(0.0006)
Cost center costs 1st half 2021 to 1st half 2020 adjustment	D2 D7	0.0837 0.0002	0.0828 0.0016	0.0009 (0.0014)
Container efficiency adjustment	(2)	0.0241	0.0226	0.0015
Percentage discount adjustment	(3) D8	0.0010	0.0010 0.0006	0.0001
Diesel fuel adjustment Heating fuels adjustment	D8 D9	0.0019	0.0000	0.0013 (0.0000)
Treating rates adjustment	2)	\$ 0.2458 each	\$ 0.2454 each	\$ 0.0004
Dealer profit at 3.4% Subtotal	(2)	0.0087 \$ 0.2545 each	0.0086 \$ 0.2540 each	\$ 0.0001 \$ 0.0005
Less: average delivery cost	(2)	(0.0353)	(0.0353)	
Add: high cost delivery  Wholesale minimum price	(2)	0.0617 <b>\$ 0.2809</b> each	0.0617 <b>\$ 0.2804</b> each	\$ 0.0005

- (1) As announced for December 2020 by PMMB on November 19, 2020.
- (2) Per OGO A-956 (CRO 10) as updated.
- (3) Per OGO A-972 "Price Adjustments to Account for Interaction of Milk Prices and Wholesale Percentage Discounts."