

STAFF TESTIMONY BEFORE THE PENNSYLVANIA MILK BOARD
COST REPLACEMENT HEARING – MILK MARKETING AREA 3
November 5, 2025

Good morning. My name is Joseph Wilson, and I serve as the staff accountant for the Pennsylvania Milk Board. Today, I will be providing testimony related to Staff Exhibit 1.

Staff Exhibit 1

A group of 19 dealers has voluntarily agreed to participate in an expanded monthly data collection conducted by Board staff. These dealers are referred to as "cross-section dealers" and represent a sub-population of all licensed dealers. For each Milk Marketing Area, a subset of the 19 cross-section dealers is selected. The data from these selected dealers is used to perform cost replacement calculations specific to that Area.

The sampling technique used for this analysis was purposeful, or judgmental, sampling—selected to meet the specific needs of the study. Because participation is voluntary, our analysis is based on the representativeness of the sample as determined by informed judgment. By establishing specific selection criteria prior to sampling, this method helps ensure that the data collected is as accurate and representative as possible for cost replacement calculations, given that a random sample is not feasible.

For consistency purposes and because there were no significant changes in Area 3, we used the same cross-section as we used in previous years. This cross section remains representative of the dealers doing business in Area 3.

Of the 19 cross-section dealers, 16 sell into Area 3. Among these, five dealers of the 16 who sell into Area 3 were selected as a sample based off the specific needs of the study. Overall, the sales distribution for the Area 3 CRH cross-section closely mirrors that of all dealers.

Staff Exhibit 1 demonstrates that the product-level sales data for the Area 3 CRH cross-section dealers is closely aligned with that of all dealers selling into Area 3, particularly when considering the top five selling products.

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Good morning. My name is Gary Gojsovich. I am employed by the Pennsylvania Milk Board as an Audit Supervisor. This morning I will be testifying to Staff Exhibits 2 through 14.

Staff Exhibit 2

This exhibit provides information about the average weighted cost for processing, packaging and delivering milk for the Area 3 cross-section milk dealers. For each of the major cost centers we have matched the expenses associated with the cost center with the volume of milk or other products that flowed through that cost center. The volumes are stated in points (where a point equals a quart or quart equivalent). All costs and points are weighted using the sales weighting method. For example, if a dealer has 25% of their sales in Area 3 then we include 25% of their costs and 25% of their points in the Area 3 cost centers.

Staff recommends that the Board replace the costs in the current Order with those costs in this exhibit.

Staff Exhibit 3

This exhibit provides information on the cost of containers for the cross-section dealers. We initially use the costs of the cross-section dealers for plastic containers, paper containers and resin as of April 2025 to calculate weighted cost per units. As has been done in previous hearings, we are using controlled container sales volumes for the previous year. We are therefore pairing current costs with the weighted units sold in the previous year to arrive at the most current weighted cost per unit available. Where the market has both paper and plastic containers, like the pint container, we have provided a combined paper/plastic price. After we established a cost for each container type in Column E, we are updating those April 2025 costs to the costs observed in our most current container surveys in Column F (October 2025). In Column G we are applying factors for container shrinkage. Column H adds the shrinkage factor to the updated container cost in Column F.

Staff recommends that the Board replace the base container costs with those found in Column C and the base weighted units with those in Column D and continue to update these costs using the audited surveys submitted by the cross-section dealers.

Staff also recommends that the Board continue the practice of providing separate plastic and paper half-pint prices through a plastic add-on.

Staff further recommends that the Board replace the current container costs with the costs found in column E.

Staff Exhibit 4

This exhibit provides information on the cost of ingredients added to the various milk products like chocolate powder and sugar used in chocolate milk. This exhibit pairs Year 2024 sales activity with April 2025 costs to get current weighted costs.

Staff recommends replacing the current ingredient costs with those in this exhibit. Staff further recommends the continuance of updating chocolate and sweetener costs quarterly.

Staff Exhibit 5

Dealers typically sell off excess bulk milk and cream they are unable to use in their own plants and they will recognize either a profit or a loss on these sales. Dealers also lose small amounts of milk as it moves through the plant; this loss is called shrinkage.

Row 1 shows the calculation for shrinkage cost. Column G shows the weighted costs using the sales weighting method.

Rows 2, 3 and 5 show calculations for determining profits and/or losses on diverted or transferred sales of bulk milk and cream. Dealers incur additional costs to process and sell transferred milk and cream (Column E). We add these additional processing costs to the producer costs in Column D to determine if the dealers made a profit or loss on the transactions.

The costs in the top panel are summarized in Column H. We divide these costs by the number of pounds of product sold or manufactured by the dealers (net of purchased packaged products) in Column I. By dividing the costs in Column H by the pounds in Column I we arrive at a weighted cost per pound in Column J.

Staff recommends that the Board use the costs and profits in this exhibit to replace those in the existing Order.

Staff Exhibit 6

This exhibit summarizes the costs of the milk components. We are using the most current announced milk prices available prior to the submission date for the Initial Exhibits. The current fat and skim prices for Class I products are in the top panel. In the lower panel we show the actual pounds of the Class I products (Columns A and B) sold by the cross-section dealers in this Area. We have labeled the columns A through K and show how we arrive at the cost per pound for each of the products in the table.

Staff recommends that the Board continue to use this method for establishing the before-bottling costs.

Staff Exhibit 7

In this exhibit we compare the costs and related plant volumes for three significant categories (labor, utilities, and insurance) for the 1st half of Year 2025 with the 1st half of 2024 to update the cost per point from Staff Exhibit 2. We use bottling points as the denominator as they are a good measure of the plants' overall volume or activity. In columns A and B, we list the first half-year costs for 2025 and 2024 for each of the cost categories. In the next two columns, we list the bottling points for 2025 and 2024 for the first half-year. By dividing the costs by the points in columns E and F, we can compare the cost increase or decrease per point in column G.

Staff recommends replacing the first half cost adjustment in the current Order with the adjustment in this exhibit.

Staff Exhibit 8

In this exhibit we update diesel fuel costs from the previous year (Year 2024) by indexing to diesel prices for the most current month (August 2025). Line 1 shows the weighted cost for diesel fuel for the cross-section dealers for Year 2024. Line 2 is the Year 2024 average On-Highway diesel price per gallon as posted by the Energy Information Administration (EIA). Line 3 is the current EIA On-Highway diesel price. Line 4 shows the percentage of change in the diesel price from Year 2024 to the current price. Line 5 shows the current presumed diesel cost. By subtracting line 1 from line 5 we find the changed diesel cost on line 6. And by dividing the changed diesel cost on line 6 by the weighted delivery points of the cross-section dealers, we find the changed cost per point on line 8.

Staff recommends that the Board continue to include this adjustment in the cost replacement process. Staff also recommends that the Board replace the Year 2023 points and costs with the Year 2024 points and costs found in this exhibit.

Staff Exhibit 9

Staff has calculated the current heating fuel add-on using the same methodology as in Staff Exhibit 8 except here we are using Standardization and Pasteurization points and the Pennsylvania Natural Gas Industrial price as posted by the EIA. Staff recommends that the Board continue to include this adjustment in the cost replacement process. Staff also recommends that the Board replace the 2023 points and costs with the 2024 points and costs found in this exhibit.

Staff Exhibit 10

The container efficiency adjustments are made to account for the cost efficiencies of bottling and handling milk in larger size containers than in smaller size containers. Board Staff updated these adjustments by replacing Year 2023 container sales with Year 2024 container sales (Column B) and by also replacing the Year 2023 processing costs per points for the Bottling, Cold Room and Delivery cost centers with those for Year 2024.

Staff recommends that the Board replace the container efficiency adjustments per the existing Order with those found in column E of this exhibit.

Staff Exhibit 11

This exhibit summarizes the information from the previous exhibits to arrive at proposed wholesale prices which are shown in Column K.

Staff Exhibit 12

This exhibit calculates our proposed retail prices which are shown in Column G. The starting point for this exhibit is the proposed wholesale prices per Staff Exhibit 11 to which adjustments are made for discounts, in-store handling and retail profit.

Staff Exhibit 13

This exhibit shows the effect this cost replacement hearing will have on the wholesale minimum price of a gallon of Reduced Fat (2%) milk. It compares the proposed wholesale price per Staff Exhibit 11 with the current (or existing) price per that same exhibit. The overall result will be an increase of \$0.1564 with the majority of the increase being attributed to a \$0.1000 increase in processing costs. An increase of this amount is not unusual and reflects normal year to year changes in various cost categories.

Staff Exhibit 14

This exhibit shows the effect this cost replacement hearing will have on the wholesale minimum price of a paper ½ Pint of Flavored Reduced Fat milk. It compares the proposed wholesale price per Staff Exhibit 11 with the current (or existing) price per that same exhibit. The overall result will be an increase of \$0.0112 with the majority of the increase being attributed to a \$0.0062 increase in processing costs. An increase of this amount is not unusual and reflects normal year to year changes in various cost categories.

Thank you. I'd be happy to answer any questions pertaining to my exhibits.