PENNSYLVANIA FOOD MERCHANTS ASSOCIATION AREA 6 REBUTTAL EXHIBITS COST REPLACEMENT HEARING NOVEMBER 5, 2014

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INTRODUCTION

The Pennsylvania Food Merchants Association (hereafter "PFMA") conducted an analysis of instore handling costs related to fluid milk in 2008. The study was conducted utilizing stores located in the Pennsylvania Milk Marketing Board (hereafter "PMMB") Area 6 being studied. Raw data was obtained by PMMB and PFMA. PFMA has analyzed the raw data. The Cost Replacement Hearing exhibits data has been supervised by Thomas J. Price, CPA.

DEFINITIONS

<u>In-store handling costs</u> - In-store handling costs are defined as costs incurred from the time store personnel receive milk deliveries until the milk product is purchased and checked out at the check-out counter.

The total in-store handling cost is comprised of four separate components, which are personnel costs, building costs, equipment costs, and other operating costs.

<u>Personnel costs</u> - Costs relative to personnel, including salaries, wages, payroll taxes, fringe benefits and group insurance.

<u>Building costs</u> - Costs are comprised of rent, depreciation, and repairs.

<u>Equipment costs</u> - Costs are comprised of rent, depreciation, and repairs.

Other operating costs - Costs are comprised of utilities, telephone, insurance, advertising, bags, supplies, vehicle expense, business taxes, license fees, professional services, bad checks, cash loss, inventory and cash adjustments, G&A allocated from central headquarters, and miscellaneous expenses.

CROSS-SECTION

Stores included in the study are the same stores utilized by the PMMB in its cross-section. These stores are deemed to be representative of stores in PMMB Area 6 (see Table 1).

SCOPE OF WORK

The Kirkland formula was used to calculate the in-store handling cost. Table 2 presents the Kirkland method of calculating the in-store handling cost for a fictitious, example store.

April 2008 financial information was accumulated for each store in the cross-section and prepared in accordance with Generally Accepted Accounting Principles. The month of April is considered to be a representative month for the industry. Table 3 presents the results of the study for the entire cross-section of surveyed stores.

METHOD OF CALCULATION

Financial information was collected and analyzed on a store-by-store basis. The in-store handling cost has two components; a milk handling expense component and a checkout expense component. Each component is calculated by applying allocations based on store area used to store, display and sell milk as well as an allocation of checkout costs based on milk sales as a percentage of total sales.

Milk sales in the cross-section stores selling above the state minimum retail price have been restated to the minimum retail price based on the actual volume and packages sold by the stores. The restatement to the minimum retail price is considered necessary to avoid capturing costs due to any of the stores selling milk at levels higher than the state allowed minimum retail prices.

CURRENT COST BASED ON CONSUMER PRICE INDEX

The cost of handling milk in retail outlets is constantly changing as the personnel, building, equipment and other costs are all subject to change over time. The changes in costs are both a normal and ongoing part of doing business as a retail outlet. We have used the Consumer Price Index for All Urban Consumers (CPI-U) to calculate the change in costs over time and recommend that the CPI-U be used to adjust the in-store handling cost on a monthly basis. We have presented this calculation for the period from November 2013 to August 2014 (see Table 4). The CPI is the most widely used measure of price change. It is both a timely and reliable source of price change data.

The CPI is released monthly about two weeks after the end of the month. Therefore, it should be updated monthly to provide a current and accurate calculation of the cost of handling milk. In Area 6, the PMMB has adopted a policy to adjust the cost using a two-month delay. This means that the index for August would be used to calculate the October cost. The delay is acceptable to allow for timely, accurate calculations each month by the staff of the PMMB.

DEPARTMENTAL GROSS MARGIN COMPARISONS TO MILK

The graph (see Table 5) presents the gross margin by department of a variety of retail stores ranging from single store companies to multi-store companies for the 2013 reporting period representing a geographical area covering 38 states. Data was taken from the 2014 "Independent Grocers Financial Survey" report compiled by the National Grocers Association. Information from the study is presented with the gross margins realized by Area 6 retailers purchasing and selling at the minimum wholesale and retail prices.

STORES INCLUDED IN THE AREA 6 SURVEY FOR IN-STORE HANDLING COSTS

Giant – Eagle #54 Red Apple Kwik Fill,

Somerset Johnstown

Stem's Clover Leaf Quick Shop, Uni-mart, Johnstown Pleasant Gap

Kondak's, Grocery Stretcher,

Clarendon Bradford

Martin's General Store, Fezzel's Market, Alexandria Punxsytawny

Weis Market, Nittany Oil Mini Market,

State College Port Matilda

Quality #626,

Kane

PENNSYLVANIA FOOD MERCHANTS ASSOCIATION PENNSYLANIA MILK MARKETING BOARD AREA 6

COST FOR HANDLING MILK IN RETAIL OUTLETS KIRKLAND METHOD - EXAMPLE STORE

IN-STORE HANDLING COST - INPUT INFORMATION		
TOTAL SQ. FT. OF BUILDINGS	78,000	Α
TOTAL SQ. FT. OF MILK DISPLAYS	60	В
TOTAL SQ. FT. DRY STORAGE FOR MILK	40	C
TOTAL SQ. FT. CHECK-OUT SPACE	2,200	D
TOTAL SQ. FT. MILK COLD STORAGE	130	E
TOTAL STORE LABOR HOURS (MONTHLY)	30,000	F
TOTAL MILK HANDLING HOURS (MONTHLY)	600	G
TOTAL CHECK-OUT HOURS (MONTHLY)	3,500	Н
QUARTS DELIVERED (MONTHLY)	130,000	J
UNITS DELIVERED (MONTHLY)	43,000	K
UNITS SCANNED (MONTHLY)	2,300,000	Į,
TOTAL DOLLAR SALES (MONTHLY)	\$ 6,000,000	М
TOTAL MILK SALES IN \$'S (MONTHLY)	\$ 125,000	N
MILK LABOR COSTS - INCLUDING FRINGES	\$ 9,000	O
CHECKOUT LABOR COSTS	\$ 28,000	P
EQUIPMENT COSTS (MONTHLY)	\$ 42,000	Q
BUILDING COSTS (MONTHLY)	\$ 20,000	R
OTHER COSTS (MONTHLY)	\$ 1,400,000	S
TOTAL OPERATING EXPENSES	\$ 1,499,000	T

		IN-STO	RE	HA	NDLING COS	ST - COMPU	ГАТ	ION FORM	ULA					
		Sq. Ft.					Sales				M	ilk Handling		
PERSONNEL EXPENSE:		Expense			Allocation			Allocation				Expense		Expense
CHECKOUT EXPENSE	\$	28,000	Р	Х	1.000000		х	0.018696	K/L	=			\$	523.48
MILK HANDLING EXPENSE	\$	9,000	0	Х	1.000000		X	1,000000			\$	9,000.00	·	VA2, 10
BUILDING EXPENSE:														
CHECKOUT EXPENSE	\$	20,000	R	Χ	0.028205	D/A	Х	0.018696	K/L	=			\$	10.55
MILK HANDLING EXPENSE	\$	20,000	R	Х	0.002949	(B+C+E)/A	Х	1.000000		=	\$	58.97		
EQUIPMENT EXPENSE:														
CHECKOUT EXPENSE	\$	42,000	Q	Χ	0.028205	D/A	Х	0.018696	K/L	=			\$	22.15
MILK HANDLING EXPENSE	\$	42,000	Q	X	0.002949	(B+C+E)/A	X	1.000000		=	\$	123.85		
OTHER EXPENSE;														
CHECKOUT EXPENSE	\$	1,400,000		Χ	0.028205	D/A	X	0.018696	K/L	=			\$	738.24
MILK HANDLING EXPENSE	\$	1,400,000	S	Х	0,002949	(B+C+E)/A	X	1.000000		=	\$	4,128.21		
										٠				
TOTAL EXPENSES:						CHECKOUT MILK HAND					\$	13,311.03	\$	1,294.42
						WILL TIME	, ETTA	J ENF CHAL			Ф	12,311.03		
DIVIDED BY:						UNITS DELI							К	43,000
						QUARTS DE	LIVE	EKED		J _		130,000		
CHECKOUT COST PER CONT.													\$	0.0301
MILK HANDLING COST PER O	QUA	RT:								=	\$	0.1024		
											Per	Container	P	er Quart
TOTAL COST PER QUART CO	NTA	INER:					J+	-K		=	\$	0.1325		0.1325
TOTAL COST PER HALF GALI	LON	CONTAIN	ER	!			(J	*2)+K			\$	0.2349	\$	0.1174
TOTAL COST PER GALLON CO	TNO	'AINER:					Œ	*4)+K		-	\$	0.4397	\$	0.1099
							(3	17.18		=	ψ	0,4397		U. 1U77
AVERAGE COST PER QUART	· AL	L CONTAI	NEI	₹S									\$	0,1200

PENNSYLVANIA FOOD MERCHANTS ASSOCIATION PENNSYLANIA MILK MARKETING BOARD AREA 6

COST FOR HANDLING MILK IN RETAIL OUTLETS FOR THE MONTH OF APRIL, 2008 KIRKLAND METHOD - ALL CROSS-SECTION STORES

IN-STORE HANDLING COST - INPUT INFORMA	TION	
TOTAL SQ. FT. OF BUILDINGS		187,820
TOTAL SQ. FT. OF MILK DISPLAYS		385
TOTAL SQ. FT. DRY STORAGE FOR MILK		127
TOTAL SQ. FT. CHECK-OUT SPACE		4,094
TOTAL SQ. FT. MILK COLD STORAGE		502
TOTAL STORE LABOR HOURS (MONTHLY)		54,196
TOTAL MILK HANDLING HOURS (MONTHLY)		458
TOTAL CHECK-OUT HOURS (MONTHLY)		14,641
QUARTS DELIVERED (MONTHLY)		158,688
TOTAL DOLLAR SALES (MONTHLY)	\$	8,278,464
TOTAL MILK SALES IN \$'S (MONTHLY)	\$	145,317
MILK LABOR COSTS - INCLUDING FRINGES	\$	4,984
CHECKOUT LABOR COSTS	\$	143,961
EQUIPMENT COSTS (MONTHLY)	\$	57,932
BUILDING COSTS (MONTHLY)	\$	111,308
OTHER COSTS (MONTHLY)	\$	1,314,314
TOTAL OPERATING EXPENSES	\$	1,632,499

11	l-STO	RE HANDL	ING	COST - CO	MPL	TATION FO	ORN	4UL	A		
				Sq. Ft.		Sales		M	ilk Handling	(Checkout
***************************************		Expense		Allocation		Allocation			Expense		Expense
PERSONNEL EXPENSE:											
CHECKOUT EXPENSE	\$	143,961	X	1.000000	X	0.020337	=			\$	2,927.77
MILK HANDLING EXPENSE	\$	4,984	X	1.000000	Х	1.000000	=	\$	4,983.79		
BUILDING EXPENSE:											
CHECKOUT EXPENSE	\$	111,308	X	0.023845	X	0.020337	=			\$	53.98
MILK HANDLING EXPENSE	\$	111,308	Х	0.006556	X	1.000000	=	\$	729.69		
EQUIPMENT EXPENSE:											
CHECKOUT EXPENSE	\$	57,932	Х	0.021316	Х	0.020337	===			\$	25.11
MILK HANDLING EXPENSE	\$	57,932	Х	0.004743	Х	1.000000	=	\$	274.75	•	
OTHER EXPENSE:											
CHECKOUT EXPENSE	\$	1,314,314	Х	0.024122	х	0.020337	=			\$	644.77
MILK HANDLING EXPENSE			X	0.005896	X	1.000000	===	\$	7,748.63	Ψ	044.77
		.,,							.,,,,,,,,,		
TOTAL EXPENSES:				CHECKOUT	EXP	ENSE				\$	3,651.63
				MILK HAND	LIN	3 EXPENSE		\$	13,736.86	•	4,001/00
DIVIDED BY:				UNITS DELI	()ER	ED					55,630
D., 15 45 51.				QUARTS DE					158,688		33,030
OVERVOVE COST DED COVE		_									
CHECKOUT COST PER CONT		••						_		\$	0.0656
MILK HANDLING COST PER	QUAR	T;						\$	0.0866		
								Per	Container	P	er Quart
TOTAL COST PER QUART CO	NTAII	NER;					:	\$	0.1522	\$	0.1522
TOTAL COST PER HALF GAL	LON C	ONTAINE	R:					\$	0.2388	\$	0.1194
TOTAL COOT DED CALLOY C	ONITS 1	INDD					•		0.444-	-	
TOTAL COST PER GALLON C	ONTA	INEK;					=	\$	0.4119	\$	0.1030
AVERAGE COST PER QUART	- ALL	CONTAINI	ERS							\$	0.1249

TABLE 4

PENNSYLVANIA FOOD MERCHANTS ASSOCIATION
PENNSYLVANIA MILK MARKETING BOARD AREA 6

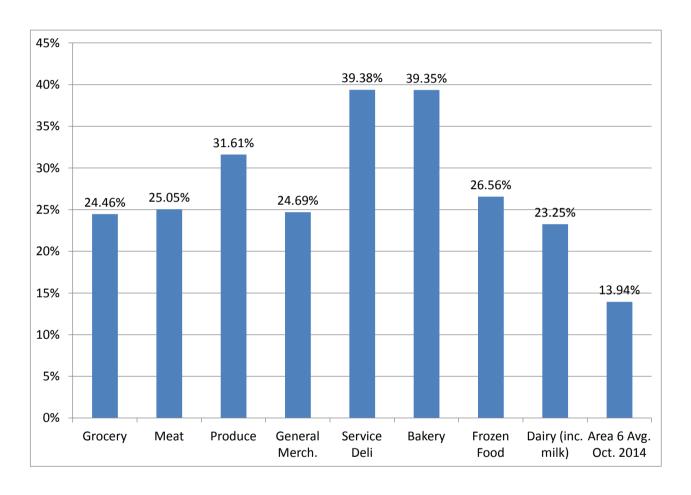
COST FOR HANDLING MILK IN RETAIL OUTLETS FOR THE NINE MONTHS ENDED AUGUST 2014

				In-Store		
				Handling Cost		
				Per PMMB		
				Ord	er A- 954	
Milk expense per quart:	November 2013	233.069		\$	0.1355	
Divided by CPI-U Index:						
Multiplied by CPI-U Index:	December 2013	233.049	=	\$	0.1355	
	January 2014	233.916	=	\$	0.1360	
	February 2014	234.781	=	\$	0.1365	
	March 2014	236.293	=	\$	0.1374	
	April 2014	237.072	=	\$	0.1378	
	May 2014	237.900	=	\$	0.1383	
	June 2014	238.343	=	\$	0.1386	
	July 2014	238.250	=	\$	0.1385	
	August 2014	237.852	=	\$	0.1383	

PENNSYLVANIA MILK MARKETING BOARD MILK MARKETING AREA 6

DEPARTMENTAL GROSS MARGIN COMPARISONS TO MILK OCTOBER 2014

DEPARTMENTS OF INDEPENDENT RETAILERS



Calculation for "Area 6 Avg. Oct. 2014"

Current Wholesale Price (per quart)	1.2491		
Deepest Discount (12.5%)	(0.1561)		
		Current Retail Price	1.27
Current Cost Less Discount	1.0930		(1.0930)
		Gross Profit	0.1770
		Gross Profit %	13.94%

Thomas J. Price, CPA Curriculum Vitae

EDUCATION

Bloomsburg University – B.S. Degree in Accounting (1981)

EMPLOYMENT

Herbein + Company, Inc.

October 1994 to Present:

Partner

July 1989 to December 1991:

Manager of Accounting and Auditing Department

July 1986 to July 1989:

Supervisor of Accounting and Auditing Department

July 1984 to June 1986:

Senior of Accounting and Auditing Department

December 1982 to July 1984:

In-Charge of Accounting and Auditing Department

June 1981 to December 1982:

Staff Accountant

PROFESSIONAL AND CIVIC ASSOCIATIONS AND DESIGNATIONS

CPA – Commonwealth of Pennsylvania (February 1984)

Member – American Institute of Certified Public Accountants

Member – Pennsylvania Institute of Certified Public Accountants

Member – Reading Chapter of Certified Public Accountants

Finance Chairman - Frieden's Lutheran Church

Board Member - Frieden's Lutheran Church

Board Member – Thrivent Financial for Lutherans

SPECIFIC RELATED EMPLOYMENT EXPERIENCE

Assisted In the original development of the methodology of analyzing in-store handling costs.

Supervised in-store handling costs studies for Pennsylvania Food Merchants for the period 1987 to 1998.

I have spent over 33 years providing various accounting and tax services for retail manufacturing and service businesses including food industry manufacturers and distributors.