

**California Department of Food and Agriculture's  
Proposed Changes to Mileage (distance) Calculation  
and Implementation of Actual Solids-Not-Fat Values for  
Pool Reporting and Accounting**

**For the Workshop on June 17, 2008 in Preparation  
for the July 1, 2008 Hearing**

**1. PC Miler Software Comparison to Public Utilities Commission (PUC)  
Mileage Tables**

At the beginning of the implementation of the Milk Pooling Plan for Market Milk in 1969, the PUC Mileage Table was adopted to calculate distances for milk movements. The PUC Table was regularly updated until the late 1970's. However, since the deregulation of the trucking industry in the State of California, the PUC Table has not been subsequently updated. In addition, since that time, no other alternative mileage data programs were on hand to replace the PUC Table. Therefore no changes to the system were warranted. However, with the development of the new Dairy Accounting System (DAS) that will eventually replace the aging COBOL program used in calculating the Milk Pool in California, an opportunity arose to adopt a more up-to-date method to calculate distances.

From 2006 to the present, CDFA has reviewed and evaluated several mileage data programs that could be used as a replacement for the aging PUC Mileage Table. In addition, several dairy stakeholders indicated PC Miler was the program of choice and shared their respective positive experience using the program. PC Miler was found to be the best alternative for the Department's needs and subsequently is being proposed as the replacement for the PUC Table.

Through the Department's evaluation, on average, the distances calculated by PC Miler have tended to be slightly less than the distances determined by the PUC Table. In addition, the range of differences is broad, with 49 miles greater to 64 miles less, comparing PC Miler to the PUC Table. However, the overall average difference is only 0.1 mile.

The primary reasons that many PC Miler distances are different than PUC Table miles are as follows:

- a. Additional roads and infrastructure changes have been added since the last time the PUC Tables were updated in the late 1970's.
- b. PC Miler utilizes actual distances for common trucking routes and the distances between two Global Positioning System (GPS) points. By contrast, PUC Table miles were developed using distances between

specific points established by the PUC called “basing points.” Subsequently, the mileages determined in the current Pool Plan are between these basing points. These points are “closest” locations on the PUC Table to the actual ranch or plant address. However, unlike GPS coordinates used by PC Miler, the distances obtained by the basing points are not the actual distances between the real address locations of ranch to plant.

**Distances computed by PC Miler and PUC Table and effects on Transportation Allowances**

Since distances determined by PC Miler are different from using the PUC Table, the mileage determined under PC Miler for milk movement may fall into another mileage bracket under the **Transportation Allowance system**. Since the rate is different from one mileage bracket to another, this difference may cause the amount of the allowance given to be greater or less. As mentioned, our resulting values using actual data is generally less using PC Miler than the amounts determined using the PUC Table.

CDFA has parallel tested the two mileage systems with actual Pool data for the months of January to March of 2008. The total composite Transportation Allowance effect to the Pool from using the new mileage amounts from PC Miler vs. the old PUC Mileage Table for the three months are as follows:

<b>Month</b>	<b>PUC Mileage</b>	<b>PC Miler</b>	<b>Difference</b>	<b>Percent</b>
<b>Jan. 2008</b>	\$2,445,795.12	\$2,359,233.14	-\$86,561.98	-3.54%
<b>Feb. 2008</b>	\$2,207,001.60	\$2,133,638.77	-\$73,362.83	-3.32%
<b>Mar. 2008</b>	\$2,389,859.59	\$2,306,488.20	-\$83,371.39	-3.49%

**2. Actual Solids-Not-Fat (SNF) pounds used in Accounting to the Pool**

Together with the implementation of the upgraded Dairy Accounting System, CDFA will be able to begin accounting for SNF by handlers in a more precise manner, using actual SNF pounds as determined by tests on bulk milk and milk that is utilized in processing dairy products compared to the average SNF test currently used.

To begin this process, CDFA contacted the dairy producer and processor community and received a positive response. With the July 2006 pool month, CDFA asked all handlers to report the actual SNF components received and the actual SNF utilized in their plants and bulk milk shipments out.

Under the current accounting system, for those handlers who do not purchase farm milk (milk from Co-ops and other handlers), their SNF pounds are accounted for in all classes processed and the milk received using the

Statewide Average Solids-Not-Fat factor (.08934715) to skim. For proprietary handlers who purchase from producers (non Co-op), the SNF is determined by the SNF test of the producer's milk acquired during the month. This SNF test is applied to the skim of all classes of milk processed by the handler.

CDFA's proposal will account for handlers in the Pool, the actual SNF contained in the milk received from all sources and account for SNF in the milk utilized, on an actual basis, rather than the averages used in the current system.

While CDFA has collected actual SNF tests on utilization from handlers since July 2006, we have not implemented those values in the Pool calculation. With the improved Dairy Accounting System it will be possible to replace the SNF values using average tests with these more accurate actual tests.

# Analysis of Transportation Allowance Proposals

June 17, 2008 Workshop  
In Preparation for the July 1, 2008 Hearing

## Methodology

The alternative proposals for the transportation allowance system were analyzed using data from May 2007 to April 2008. The data was based on actual milk movements during this one year time period.

Estimated costs were generated by applying the rates and criteria effective September 1, 2006. The costs of each alternative were arrived at by applying the proposed rates, brackets and criteria presented in the petition and alternative proposals to historic milk movements.

The changes included:

- Changing the rates for the allowances in select receiving areas
- Changing the mileage brackets in some receiving areas
- Adding Del Norte and Humboldt counties as separate supply counties for shipments to the Southern California receiving area

This methodology assumes that historic patterns of milk movement, and eligibility would have remained unchanged under the new proposals.

## Results

As summarized from Table 1 on page 3, for the 12 months ending April 2008 and using PUC Table miles, the average monthly cost of the transportation allowance system would have been:

- \$2.50 million dollars under the current system
- \$2.87 million dollars under the DI proposal, an increase of \$0.37 million (+14.8%)
- \$3.15 million dollars under the DFA proposal, an increase of \$0.65 million (+26.0%)
- \$2.95 million dollars under the CDI proposal, an increase of \$0.45 million (+18.0%)
- \$2.51 million dollars under the Humboldt proposal, an increase of \$0.01 million (+0.4%)

**PROPOSED CHANGES TO TRANSPORTATION ALLOWANCES: Ranch-to-Plant**

	CONSTRUCTIVE		Current since September 2006	CDI Proposal	Dairy Institute Proposal	Humboldt Proposal	DFA Proposal		
	MILES								
<i>In Dollars Per Hundredweight</i>									
<b>Bay Area Receiving Area <sup>1/</sup></b>	0	to 99	\$0.27	\$0.31	\$0.31	\$0.27	\$0.37		
	99	to 199	\$0.34	\$0.38	\$0.38	\$0.34	\$0.45		
	199	+	\$0.36	\$0.40	\$0.40	\$0.36	\$0.47		
<b>North Bay Receiving Area <sup>2/</sup></b>	0	to 44	\$0.19	\$0.19	\$0.23	\$0.19	\$0.19		
	44	to 99	\$0.29	\$0.29	\$0.33	\$0.29	\$0.35		
	99	+	\$0.34	\$0.34	\$0.38	\$0.34	\$0.44		
<b>Sacramento Receiving Area</b>	0	to 59	\$0.15	\$0.15	\$0.19	\$0.15	\$0.15		
	59	+	\$0.20	\$0.17	\$0.24	\$0.20	\$0.25		
<b>Shasta Receiving Area <sup>3/</sup></b>	0	to 29	\$0.13	\$0.13	\$0.13	\$0.13	\$0.13		
	29	to 49	\$0.16	\$0.16	\$0.16	\$0.16	\$0.16		
	49	+	\$0.19	\$0.19	\$0.19	\$0.19	\$0.19		
<b>San Diego Receiving Area</b>	0	to 89	\$0.11		\$0.15	\$0.11	\$0.11		
	89	to 139	\$0.43		\$0.43	\$0.43	\$0.43		
	139	+	\$0.70		\$0.80	\$0.70	\$0.70		
	0	to 87		\$0.15					
	87	to 127		\$0.43					
	127	+		\$0.80					
<b>Southern California Receiving Area <sup>4/</sup></b> from San Bernardino and Riverside counties	0	to 89	\$0.11		\$0.15	\$0.11			
	89	+	\$0.37		\$0.43	\$0.37			
	0	to 87		\$0.15			\$0.15		
	87	+		\$0.43			\$0.46		
	From Humboldt and Del Norte counties			All milk	\$0.70	\$0.80	\$0.80	\$3.50	\$0.84
	from all other counties			0	to 89	\$0.11	\$0.15	\$0.11	
				89	to 109	\$0.37	\$0.43	\$0.37	
				109	to 139	\$0.56	\$0.63	\$0.56	
				139	+	\$0.70	\$0.80	\$0.70	
				0	to 87		\$0.15		\$0.15
			87	to 107		\$0.43		\$0.46	
			107	to 127		\$0.63		\$0.67	
			127	+		\$0.80		\$0.84	

1/ Alameda, Contra Costa, San Francisco, San Mateo, Santa Clara, and Santa Cruz Counties.

2/ Marin, Solano and Sonoma counties.

3/ Transportation Allowances for the Shasta Receiving Area have not been used since mid 1996.

4/ Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties.

Shaded area indicates rate change or mileage bracket change

## Analysis of Transportation Allowance Proposals

- 1) Costs for Tables 1 and 2 below are based on historic milk movements as reported to the Milk Pooling Branch for the twelve months of May 2007 through April 2008.
- 2) Current costs were calculated by applying rates and receiving areas in effect September 1, 2006, and applying them to actual milk movements.
- 3) The estimated costs for proposals were calculated using the proposed new rates and the proposed changes to mileage brackets (using PUC Table miles). Both were applied to historic milk shipments. In analyzing the Humboldt proposal, the rates were changed to reflect the county of origin (supply counties).

**Table 1. Per Proposal, Monthly Average Estimated Cost of Transportation Allowances by Receiving Area, May 2007 through April 2008 (Utilizing PUC Table miles)**

	Current	Institute	DFA	CDI	Humboldt
BAY AREA	\$ 249,891	\$ 284,608	\$ 338,905	\$ 284,608	\$ 249,891
NORTH BAY	\$ 122,208	\$ 141,774	\$ 141,365	\$ 122,208	\$ 122,208
SACRAMENTO	\$ 22,635	\$ 28,219	\$ 24,329	\$ 22,635	\$ 22,635
SAN DIEGO	\$ 5,689	\$ 6,555	\$ 6,206	\$ 6,555	\$ 5,689
SOUTHERN CA	\$ 2,100,361	\$ 2,411,901	\$ 2,641,225	\$ 2,516,263	\$ 2,110,677
<b>TOTAL</b>	<b>\$ 2,500,784</b>	<b>\$ 2,873,057</b>	<b>\$ 3,152,030</b>	<b>\$ 2,952,269</b>	<b>\$ 2,511,100</b>

**Table 2. Per Proposal, Change in Average Monthly Estimated Cost by Receiving Area, May 2007 through April 2008 (Utilizing PUC Table miles)**

	Institute	DFA	CDI	Humboldt
BAY AREA	\$ 34,717	\$ 89,014	\$ 4,717	\$ 0
NORTH BAY	\$ 19,566	\$ 19,157	\$ 0	\$ 0
SACRAMENTO	\$ 5,584	\$ 1,694	\$ 0	\$ 0
SAN DIEGO	\$ 866	\$ 517	\$ 866	\$ 0
SOUTHERN CA	\$ 311,540	\$ 540,864	\$ 415,902	\$ 10,316
<b>TOTAL</b>	<b>\$ 372,273</b>	<b>\$ 651,246</b>	<b>\$ 451,485</b>	<b>\$ 10,316</b>

Tables 3 and 4 below show the estimated costs per proposal for each receiving area for April 2008, and the change in cost from the current rates and brackets. Mileages used in these tables were from the PUC Table.

**Table 3. Per Proposal Estimated Cost of Transportation Allowances  
by Receiving Area for April 2008 (Utilizing PUC Table miles)**

	<b>Current</b>	<b>Institute</b>	<b>DFA</b>	<b>CDI</b>	<b>Humboldt</b>
BAY AREA	\$ 251,741	\$ 286,287	\$ 340,757	\$ 286,287	\$ 251,741
NORTH BAY	\$ 127,266	\$ 147,520	\$ 147,807	\$ 127,266	\$ 127,266
SACRAMENTO	\$ 11,204	\$ 13,936	\$ 12,162	\$ 11,204	\$ 11,204
SAN DIEGO	\$ 7,956	\$ 8,272	\$ 7,956	\$ 8,272	\$ 7,956
SOUTHERN CA	\$ 1,972,664	\$ 2,274,222	\$ 2,488,388	\$ 2,373,147	\$ 1,999,162
<b>TOTAL</b>	<b>\$ 2,370,831</b>	<b>\$ 2,730,237</b>	<b>\$ 2,997,070</b>	<b>\$ 2,806,176</b>	<b>\$ 2,397,329</b>

**Table 4. Per Proposal, Estimated Change in Cost by Receiving Area  
for April 2008 (Utilizing PUC Table miles)**

	<b>Institute</b>	<b>DFA</b>	<b>CDI</b>	<b>Humboldt</b>
BAY AREA	\$ 34,546	\$ 89,016	\$ 34,546	\$ 0
NORTH BAY	\$ 20,254	\$ 20,542	\$ 0	\$ 0
SACRAMENTO	\$ 2,732	\$ 958	\$ 0	\$ 0
SAN DIEGO	\$ 316	\$ 0	\$ 316	\$ 0
SOUTHERN CA	\$ 301,558	\$ 515,723	\$ 400,483	\$ 26,498
<b>TOTAL</b>	<b>\$ 359,406</b>	<b>\$ 626,239</b>	<b>\$ 435,345</b>	<b>\$ 26,498</b>

**Notes for Tables 1, 2, 3 and 4**

The Shasta Receiving Area has been inactive since mid 1996.

Utilizing the PUC Table miles, Table 5 below shows the pounds of milk received at eligible Transportation Allowance receiving plants in each area, and segmented by 10 mile mileage brackets for the period May 2007 through April 2008. Table 5 also shows the percent of milk in each bracket.

**Table 5. Using PUC Table miles, Annual Summary of Qualifying Milk (in 1,000's of Pounds) Moved by Mileage Bracket, and Receiving Area with Percent by Bracket May 2007 through April 2008**

mile bracket	BAY AREA		NORTH BAY		SACRAMENTO		SAN DIEGO		SOUTHERN CA	
		%		%		%		%		%
Zero to 9	967	0%	25,874	4%	774	0%	-	0%	12,728	0%
10 to 19	-	0%	118,585	20%	8,271	5%	-	0%	123,826	3%
20 to 29	-	0%	160,982	27%	66,173	39%	-	0%	322,761	7%
30 to 39	-	0%	20,906	4%	44,482	27%	-	0%	165,344	3%
40 to 49	-	0%	13,804	2%	6,809	4%	-	0%	155,205	3%
50 to 59	17,579	2%	6,285	1%	374	0%	-	0%	26,129	1%
60 to 69	5,737	1%	2,892	0%	19,988	12%	318	1%	100,767	2%
70 to 79	289,768	28%	8,036	1%	6,936	4%	8,124	37%	63,757	1%
80 to 89	294,157	28%	30,450	5%	2,819	2%	-	0%	65,352	1%
90 to 99	166,817	16%	8,070	1%	5,513	3%	12,962	59%	43,355	1%
100 to 109	101,992	10%	54,879	9%	5,036	3%	-	0%	137,202	3%
110 to 119	17,039	2%	40,203	7%	-	0%	-	0%	73,810	2%
120 to 129	7,103	1%	40,210	7%	354	0%	-	0%	512,951	11%
130 to 139	67,947	7%	42,751	7%	-	0%	-	0%	682,372	14%
140 to 149	4,750	0%	1,218	0%	-	0%	-	0%	315,496	7%
150 to 159	15,492	1%	11,783	2%	-	0%	-	0%	402,561	8%
160 to 169	31,996	3%	29	0%	-	0%	-	0%	125,902	3%
170 to 179	19,073	2%	-	0%	-	0%	-	0%	238,513	5%
180 to 189	820	0%	-	0%	-	0%	-	0%	198,825	4%
190 to 199	-	0%	-	0%	-	0%	-	0%	519,346	11%
200 +	278	0%	-	0%	-	0%	463	2%	560,236	12%
<b>Total</b>	<b>1,041,516</b>		<b>586,957</b>		<b>167,530</b>		<b>21,868</b>		<b>4,846,436</b>	

Utilizing the PUC Table miles, Table 6 below shows the cost of milk qualifying for Transportation Allowances in each area, by 10 mile mileage brackets, for the period May 2007 through April 2008. Table 6 also shows the percent of cost for each bracket.

**Table 6. Using PUC Table miles, Cost of Transportation Allowances for Each Receiving Area, May 2007 through April 2008**

mile bracket	BAY AREA		NORTH BAY		SACRAMENTO		SAN DIEGO		SOUTHERN CA	
		%		%		%		%		%
Zero to 9	\$2,610	0%	\$49,160	3%	\$1,161	0%	\$0	0%	\$14,000	0%
10 to 19	\$0	0%	\$225,312	15%	\$12,407	5%	\$0	0%	\$136,209	1%
20 to 29	\$0	0%	\$305,865	21%	\$99,259	37%	\$0	0%	\$355,037	1%
30 to 39	\$0	0%	\$39,721	3%	\$66,723	25%	\$0	0%	\$181,878	1%
40 to 49	\$0	0%	\$35,167	2%	\$10,213	4%	\$0	0%	\$137,908	1%
50 to 59	\$47,464	2%	\$18,227	1%	\$561	0%	\$0	0%	\$28,742	0%
60 to 69	\$15,489	1%	\$8,386	1%	\$39,977	15%	\$350	1%	\$110,844	0%
70 to 79	\$782,373	26%	\$23,304	2%	\$13,872	5%	\$8,937	13%	\$70,132	0%
80 to 89	\$794,224	26%	\$88,305	6%	\$5,638	2%	\$0	0%	\$71,887	0%
90 to 99	\$450,406	15%	\$23,404	2%	\$11,026	4%	\$55,737	82%	\$160,414	1%
100 to 109	\$346,772	12%	\$186,589	13%	\$10,073	4%	\$0	0%	\$507,649	2%
110 to 119	\$57,934	2%	\$136,689	9%	\$0	0%	\$0	0%	\$393,729	2%
120 to 129	\$24,151	1%	\$136,714	9%	\$707	0%	\$0	0%	\$2,846,567	11%
130 to 139	\$231,021	8%	\$145,354	10%	\$0	0%	\$0	0%	\$3,820,968	15%
140 to 149	\$16,152	1%	\$4,141	0%	\$0	0%	\$0	0%	\$2,092,270	8%
150 to 159	\$52,673	2%	\$40,061	3%	\$0	0%	\$0	0%	\$2,817,928	11%
160 to 169	\$108,786	4%	\$100	0%	\$0	0%	\$0	0%	\$843,967	3%
170 to 179	\$64,848	2%	\$0	0%	\$0	0%	\$0	0%	\$1,669,591	7%
180 to 189	\$2,788	0%	\$0	0%	\$0	0%	\$0	0%	\$1,391,775	6%
190 to 199	\$0	0%	\$0	0%	\$0	0%	\$0	0%	\$3,631,184	14%
200 +	\$1,001	0%	\$0	0%	\$0	0%	\$3,243	5%	\$3,921,652	16%
<b>Total</b>	<b>\$2,998,691</b>		<b>\$1,466,500</b>		<b>\$271,619</b>		<b>\$68,266</b>		<b>\$25,204,330</b>	

Table 7 below shows qualifying milk vs. non-qualifying milk moving by county of origin, and the weighted average PUC miles the milk was moved.

**Table 7. Qualifying vs. Non-qualifying Milk, 1,000's of Pounds and PUC Miles Moved, May 2007 Through April 2008**

County	QUALIFYING		NON-QUALIFYING	
	Pounds	Average Miles	Pounds	Average Miles
Butte	257	100	4,787	29
Del Norte	-	-	53,714	75
Fresno	2,053	252	2,718,230	28
Glenn	112,702	142	277,387	71
Humboldt	4,646	680	161,790	24
Imperial	1,336	213	105,862	4
Kern	2,441,592	148	1,390,502	67
Kings	91,836	215	3,797,965	30
Los Angeles	44,243	94	1,009	71
Madera	40,480	174	1,611,111	61
Marin	166,364	51	37,423	170
Mendocino	32,067	107	49	106
Merced	260,272	157	5,254,904	26
Monterey	15,501	101	5,740	108
Placer	-	-	14,710	99
Riverside	430,122	51	588,523	37
Sacramento	78,256	31	279,190	62
San Benito	-	-	13,431	78
San Bernardino	810,917	54	887,647	32
San Diego	71,653	115	11,854	120
San Joaquin	399,618	73	2,063,231	41
San Luis Obispo	-	-	5,232	109
Santa Barbara	2,132	161	40,960	158
Solano	70,233	29	18,239	129
Sonoma	451,367	57	84,255	110
Stanislaus	216,530	103	3,784,821	19
Sutter	-	-	13,433	92
Tehama	13,578	143	30,399	30
Tulare	892,665	200	9,535,455	19
Unidentified	9,402	1	44,084	1
Yolo	69	36	9,706	102
Yuba	4,415	43	65,141	115
<b>Total</b>	<b>6,664,306</b>		<b>32,910,784</b>	

**Table 8. Milk (in Pounds) Shipped to Southern California, Qualifying vs. Non-qualifying plants, by PUC mileage bracket, May 2007 through April 2008**

Southern California		
Bracket	Qualifying	Non-qualifying
Zero to 9	12,727,577	291,105,818
10 to 19	123,825,942	241,488,193
20 to 29	322,760,574	109,787,640
30 to 39	165,343,549	468,349,297
40 to 49	155,205,091	351,429,795
50 to 59	26,129,146	21,926,696
60 to 69	100,766,836	6,452,705
70 to 79	63,756,589	42,963,180
80 to 89	65,351,762	39,601,711
90 to 99	43,355,006	14,209,992
100 to 109	137,202,431	3,840,934
110 to 119	73,810,198	6,379,383
120 to 129	512,951,045	22,512,965
130 to 139	682,371,631	8,473,960
140 to 149	315,495,714	24,789,157
150 to 159	402,561,107	821,143
160 to 169	125,902,367	21,238,306
170 to 179	238,512,933	22,904,972
180 to 189	198,825,070	29,532,654
190 to 199	519,345,590	5,800,039
200 +	560,235,965	80,457,578
<b>Total</b>	<b>4,846,436,123</b>	<b>1,814,066,118</b>

**Table 9. Ranch-to-Plant Milk (in Pounds) Shipped To Qualifying Southern California Receiving Plants, and Cream Shipped From Same Plants to Northern California for May 2007 to April 2008**

Qualifying Ranch-to-Plant Milk Received in Southern California, Cream from Same Plants Shipped to Northern California		
County	Milk Received	Cream to N. CA
Los Angeles	3,958,605,093 lbs.	83,843,234 lbs.
Orange, Riverside, San Bernardino, Ventura	887,831,030 lbs.	5,916,060 lbs.

## Analysis for Proposed Adoption of PC Miler

The following analysis is related to the proposed adoption of PC Miler as the means for calculating Transportation Allowances. The analysis uses data from March 2008.

For Table 1 below, estimated costs for each receiving area were computed using mileages computed by PC Miler and applying the current rates along with the alternative proposal rates for each area. The costs for the first column were computed using mileages from the PUC Table, applying current rates. The remaining columns were computed using PC Miler mileages, and applying the current or proposed mileages and rates.

As summarized from Table 1 below, for March 2008, using PC Miler mileages, the cost of the transportation allowance system would have been:

- \$2.29 million dollars under the current rates and mileage brackets
- \$2.88 million dollars under the DFA proposal, an increase of \$0.59 million (+25.8%)
- \$2.69 million dollars under the CDI proposal, an increase of \$0.40 million (+17.5%)
- \$2.65 million dollars under the DI proposal, an increase of \$0.36 million (+15.7%)
- \$2.31 million dollars under the Humboldt proposal, an increase of \$0.02 million (+0.9%)

**Table 1. Cost by Receiving Area Using Various Proposed Rates And Mileage Computations, March 2008**

<b>Rates →</b>	<b>Current</b>	<b>Current</b>	<b>DFA</b>	<b>CDI</b>	<b>DI</b>	<b>Humboldt</b>
<b>Miles From →</b>	<b>PUC</b>	<b>PCM</b>	<b>PCM</b>	<b>PCM</b>	<b>PCM</b>	<b>PCM</b>
<b>Receiving area ↓</b>						
<b>BAY AREA</b>	\$255,787	\$247,483	\$336,841	\$282,648	\$282,648	\$247,483
<b>NORTH BAY</b>	\$138,515	\$138,369	\$162,643	\$138,369	\$159,718	\$138,369
<b>SACRAMENTO</b>	\$11,709	\$11,705	\$12,640	\$11,705	\$14,577	\$11,705
<b>SAN DIEGO</b>	\$7,979	\$2,558	\$2,558	\$3,488	\$3,488	\$2,558
<b>SOUTHERN CA</b>	\$1,976,075	\$1,890,499	\$2,365,221	\$2,251,010	\$2,185,971	\$1,907,958
<b>Total</b>	<b>\$2,390,064</b>	<b>\$2,290,614</b>	<b>\$2,879,902</b>	<b>\$2,687,220</b>	<b>\$2,646,401</b>	<b>\$2,308,073</b>

Analysis for Proposed Adoption of PC Miler  
For June 17, 2008 Workshop

Table 2 below compares the amount of qualifying milk (in pounds) in various mileage brackets using PUC Table miles and PC Miler mileages. To protect proprietary information, the Bay Area and North Bay receiving areas were combined.

**Table 2: Qualifying Milk (in Pounds) By Mileage Bracket Comparing PC Miler and PUC For March 2008**

Receiving Area Bracket	Southern Calif.			Bay Area & North Bay		
	PCM	PUC	difference	PCM	PUC	difference
Zero to 9	2,943,236	648,164	2,295,072	1,536,428	2,403,178	(866,750)
10 to 19	7,654,205	13,220,470	(5,566,265)	4,267,585	10,405,236	(6,137,651)
20 to 29	43,727,577	38,778,005	4,949,572	9,824,970	11,467,698	(1,642,728)
30 to 39	43,842,703	30,019,616	13,823,087	10,771,785	2,142,432	8,629,353
40 to 49	6,473,848	20,691,917	(14,218,069)	2,972,841	1,495,172	1,477,669
50 to 59	1,646,142	3,600,336	(1,954,194)	8,654,808	1,791,676	6,863,132
60 to 69	20,416,250	12,366,802	8,049,448	26,306,286	451,391	25,854,895
70 to 79	4,129,235	7,497,585	(3,368,350)	17,286,771	22,867,553	(5,580,782)
80 to 89	3,351,759	6,244,141	(2,892,382)	12,747,077	26,198,277	(13,451,200)
90 to 99	11,942,879	4,094,525	7,848,354	11,487,934	13,874,373	(2,386,439)
100 to 109	28,290,493	11,072,133	17,218,360	5,795,310	19,204,012	(13,408,702)
110 to 119	39,058,218	6,716,720	32,341,498	10,461,774	6,307,673	4,154,101
120 to 129	62,006,666	43,306,560	18,700,106	4,071,123	4,876,076	(804,953)
130 to 139	18,069,100	53,805,599	(35,736,499)	7,298,169	12,373,934	(5,075,765)
140 to 149	23,471,127	30,523,746	(7,052,619)	2,213,089	340,924	1,872,165
150 to 159	14,872,889	38,853,907	(23,981,018)	536,019	1,573,368	(1,037,349)
160 to 169	17,556,648	12,653,992	4,902,656	3,466,037	2,663,631	802,406
170 to 179	26,078,023	16,340,241	9,737,782	1,463,747	732,821	730,926
180 to 189	24,204,073	19,903,935	4,300,138	39,628	114,409	(74,781)
190 to 199	5,419,735	25,920,385	(20,500,650)	82,453	0	82,453
200 +	20,576,607	29,472,634	(8,896,027)	0	0	0
<b>Total</b>	<b>425,731,413</b>	<b>425,731,413</b>	<b>0</b>	<b>141,283,834</b>	<b>141,283,834</b>	<b>0</b>