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The Island Regulatory and Appeals Commission

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November 3, 2017

IRAC
National Bank Tower
5th Floor, Suite 501
P.O. Box 577
134 Kent Street
Charlottetown, PE C1A 7L1

Attention: Allison MacEwen, Director of Regulatory Services

Dear Mr.: MacEwen:

Re: Parkland Fuel Corporation Application for a Retail Petroleum Outlet License

As owner of the premises located at 25 Trans Canada Highway, North River, Prince Edward Island, and leased to Petro Canada, I am of the position that a license for a retail petroleum outlet should not be granted to Parkland Fuel Corporation with the proposed location being in the Maypoint Area of Charlottetown, Prince Edward Island.

For 28 years, the retail petroleum outlet operated by Petro Canada and located at 25 Trans Canada Highway in North River, Prince Edward Island, has provided exemplary convenient, safe, competitive service to the public. This outlet includes a convenience store as well as a car wash next to it. The name of the car wash is Wash World.

Presently, there are six (6) petroleum outlets within five (5) kilometers of the proposed retail outlet, all of which have convenience stores and some of which sell diesel fuel. As well, there are currently two (2) large car wash operations within two (2) kilometers of the proposed development. They are located at Trans Canada Highway and North River Road. Further, there are a number of convenience stores serving the public, as well as numerous fast food outlets in the area. I have included for your review, a series of photographs which depict these operations.

Safety Concerns

The Petro Canada Petroleum Outlet is located on the Trans Canada Highway, where the speed limit is sixty (60) kilometers per hour. The outlet providing safe entrance and a safe exit, especially when the majority of the public going west drive by when returning home from work, or leaving the City of Charlottetown. I suggest that the proposed access point by Parkland Fuel Corporation on Capital Drive poses a safety concern as traffic would be slowing to enter the site, as well as leaving. The high volume of traffic going through the roundabout would have to reduce speed to avoid collisions with traffic entering and exiting the proposed site, increasing the possibility of rear end collisions.

Accessibility

The developer states "...the two existing gas stations located on either side of the Trans Canada Highway between North River and Maypoint are only now accessible from one side of the highway." This is in reference to the new roundabout located at North River Corner.

In actuality, the roundabout has resulted in few, if any, changes in accessibility. Customers have traditionally stuck to their own side of the highway to purchase gasoline. However, the proposed location will be far more difficult to access and egress because of its proposed proximity to the very busy round about.

D.P. Murphy Inc.

We have reviewed the letter of support from D.P. Murphy Inc. dated April 28, 2017. It is important to consider that D.P. Murphy Inc. is the owner of the lands upon which the proposed outlet would be built. D.P. Murphy Inc. therefore has a vested financial interest in this proposal and may therefore not be objective.

Demand

Statistics Canada confirms that demand for gasoline has decreased in every year since 2012, except for the year 2016. The year 2016 was also a banner year for tourism. That level of tourism may not be sustainable over the long term. In addition, the use of public transit has increased dramatically over the past five years in the Cornwall/Charlottetown area. We anticipate that demand for gasoline will decrease with the increasing use of public transit and the adoption of the use of the electric automobile.

I have already addressed the large number of gasoline retailers in the area. It is also worthwhile to note that the Shell Station in North River is located just west of the proposed development. It has undergone a major

renovation in just the past few years. It has tripled the number of its pumps and it does sell diesel.

View

In closing, it would be very worthwhile for the Commission members to take a view of the proposed site and the surrounding area before making any decision. Such a view will reveal that the public is well served in this area and an additional retail petroleum outlet is not needed or necessary. The public will continue to be well served in the future.

Thank you for your kind attention to this matter.

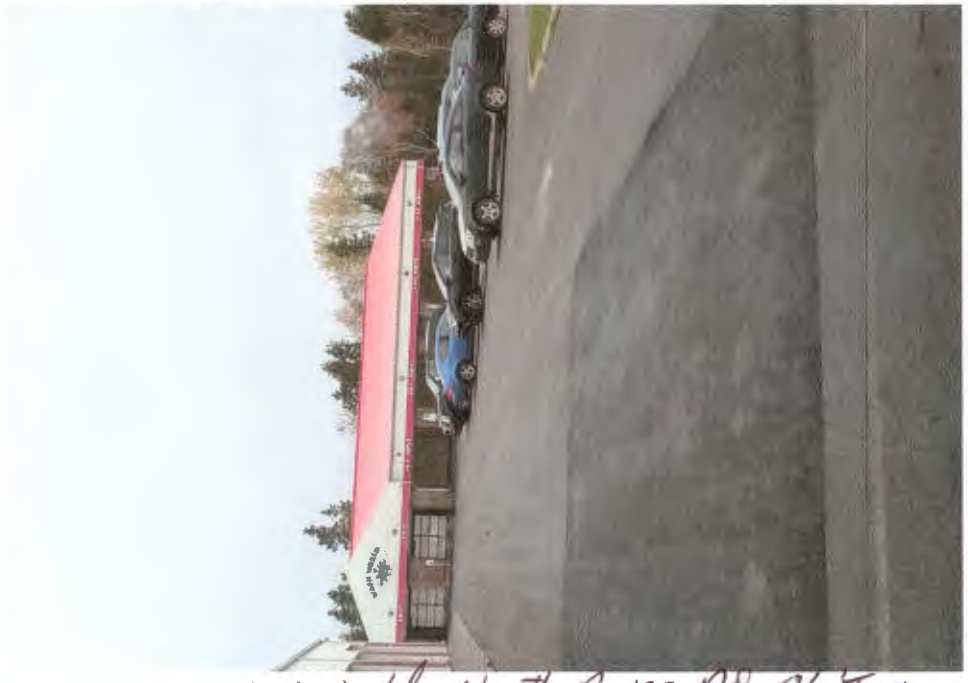
Yours truly,

FERNE MacPHAIL

Washworld TCH Cornwall

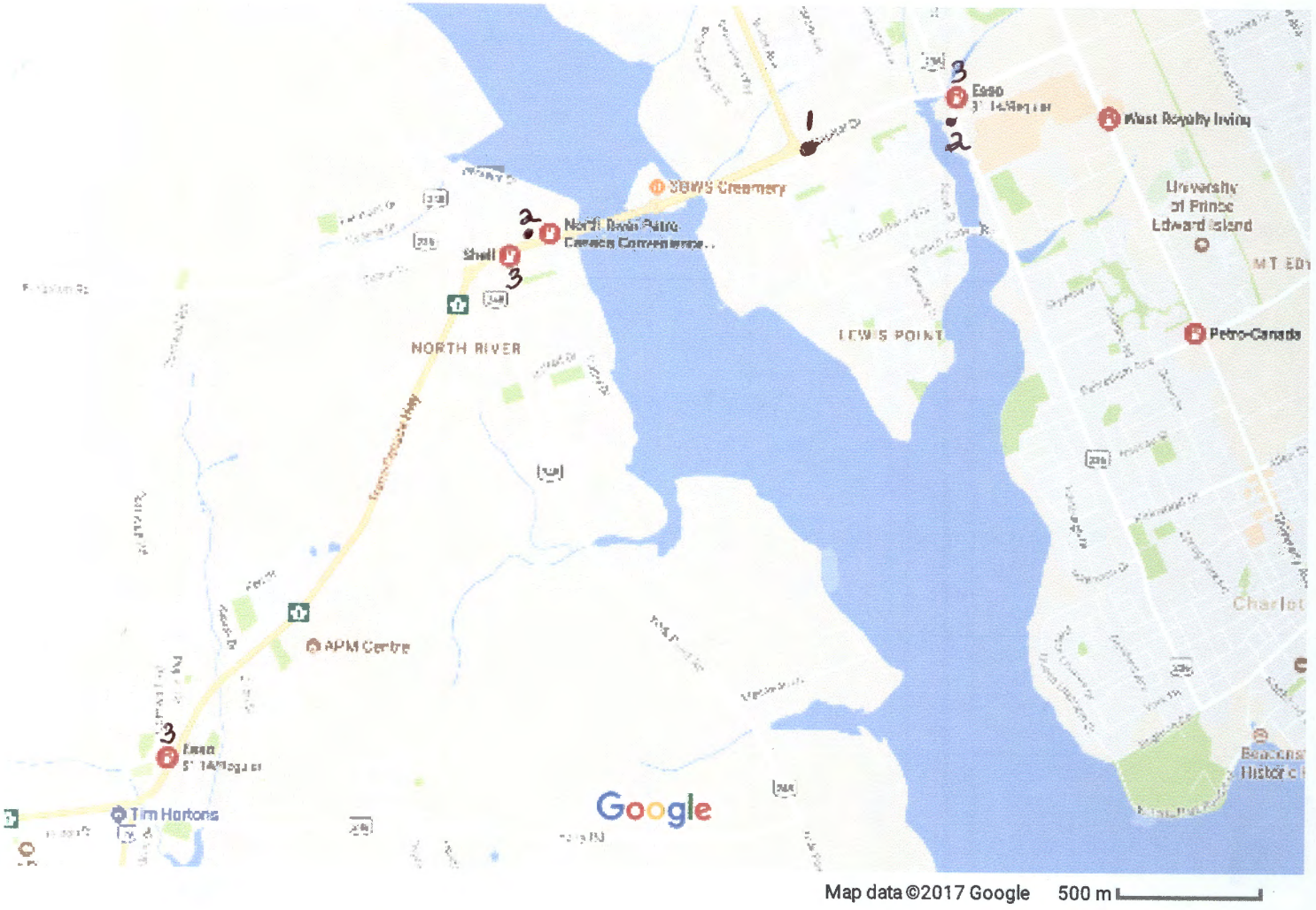
Shell TCH Cornwall

PetroCon TCH Coornwall



Washworld North River Rd Ch Town

Google Maps gas stations pei



1. PROPOSED ULTRAMAR LOCATION
2. EXISTING CAR WASHES
3. RETAIL LOCATIONS SELLING DIESEL FUEL

RED DOTS INDICATE RETAIL FUEL OUTLETS, ALL OF WHICH HAVE CONVENIENCE STORES.

Statistics Canada

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Related tables: Energy consumption and disposition, Petroleum products, Transportation by road.

Sales of fuel used for road motor vehicles, by province and territory (Newfoundland and Labrador, Prince Edward Island, Nova Scotia, New Brunswick)

	2012	2013	2014	2015	2016
	thousand litres				
Canada					
Net sales of gasoline	40,444,101	41,449,632	41,418,428	42,559,913	40,920,479
Gross sales of gasoline	42,032,522	42,902,507	42,651,789	44,577,016	43,518,970
Net sales of diesel oil	17,455,650	17,893,224	18,118,660	17,989,045	16,570,956
N.L.					
Net sales of gasoline	700,449	700,063	741,509	717,483	783,282
Gross sales of gasoline	710,752	709,837	753,748	731,608	835,017
Net sales of diesel oil	266,750	312,260	316,566	360,213	349,145
P.E.I.					
Net sales of gasoline	203,670	198,920	199,500	201,838	211,439
Gross sales of gasoline	208,586	202,122	201,891	207,399	215,642
Net sales of diesel oil	40,938	37,611	39,880	48,447	46,616
N.S.					
Net sales of gasoline	1,174,963	1,182,460	1,183,836	1,200,200	1,137,405
Gross sales of gasoline	1,203,213	1,187,817	1,197,193	1,228,092	1,175,784
Net sales of diesel oil	387,458	401,030	401,662	389,215	384,649
N.B.					
Net sales of gasoline	1,070,276	1,058,603	1,054,921	1,088,993	1,100,832
Gross sales of gasoline	1,111,923	1,109,314	1,107,392	1,154,578	1,183,883
Net sales of diesel oil	427,456	370,677	381,275	428,083	405,455

Notes:
On November 14, 2016, the data for 2015 have been revised for British Columbia as part of an unplanned revision.
Sales on which tax was paid at road-use rates.
Gross sales represents total sales of all road grades of gasoline for all uses, including off-road activities such as farming, forestry, construction or mining.
Net sales refer to the sale of gasoline, diesel, and liquefied petroleum gas on which taxes were remitted at road-use rates. These net figures represent, with minor exceptions, the amount of taxable fuel actually consumed on public roads in Canada.
Source: Statistics Canada, CANSIM, table 405-0002.
Last modified: 2017-10-23.

Find information related to this table (CANSIM table(s); Definitions, data sources and methods; *The Daily*; publications; and related Summary tables).