



Matter No. PMC25-01

ISLAND REGULATORY AND APPEALS COMMISSION

INTERVENER REQUEST

In Relation to: A proceeding initiated by the Island Regulatory and Appeals Commission with respect to a review of the pricing model and margins for petroleum products, including the Clean Fuel Regulations.

In Accordance with: Section 27 of the *Petroleum Products Act*.

To: The Island Regulatory and Appeals Commission

The Convenience Industry Council of Canada (CICC) makes this Intervener Request in accordance with Sections 14, 15 and 16 of the Commissions' Rules of Practice & Procedure. The CICC is requesting status as an Added Party Intervener.

The CICC states that it has a meaningful interest in the above-noted proceeding and intends to participate actively and responsibly in the proceeding.

1. The CICC is a national, not-for-profit trade organization representing retail owners, operators and suppliers in Canada's convenience channel. Convenience retailers in Prince Edward Island operate the majority of the province's gasoline and diesel retail outlets. As such, the sector is directly impacted by regulated margins, compliance cost treatment, and the methodology used to establish retail petroleum prices. The outcome of this review has material implications for the operational viability, competitiveness, and sustainability of motor fuel retailers across the province.

2. The CICC's Atlantic Canada division has participated as a recognized intervener in past IRAC motor fuel related matters and hearings while the CICC, and its predecessor, the Atlantic Convenience Stores Association, have participated in numerous motor fuel related matters, reviews and hearings in Nova Scotia, New Brunswick and Newfoundland and Labrador.

3. The CICC seeks intervener status to ensure that the perspective of the convenience and motor fuel retail sector is fully represented in the proceeding. The CICC's interests include, but are not limited to:

- The adequacy and fairness of retail margins in relation to operating costs, inflation, and regulatory compliance burdens.

- The appropriateness of the Charlottetown rack price as the benchmark for Island-wide pricing, including its alignment with actual supply-chain realities for PEI retailers.
- The treatment, calculation, and pass-through of Clean Fuel Regulations compliance costs, which have significant operational and financial impacts on retailers.
- The implications of the Commission’s interruption policy on inventory management, price stability, and retailer risk exposure.
- The accuracy, transparency, and applicability of the findings and recommendations made by Signal Energy Consulting in its April 2026 report.

4. The CICC will review the evidence filed in the proceeding by the Commission’s consultant and will participate in other aspects of the hearing schedule subject to the association’s review of the evidence and the evidence/comments of other parties.

The authorized representatives of the CICC are:

David Knight, Senior Consultant
Convenience Industry Council of Canada
PO Box 1531, Charlottetown, PE C1A 7N3
902.626.6905
dknight@convenienceindustry.ca

Mike Hammoud, Vice President – Atlantic Canada
Convenience Industry Council of Canada
PO Box 1302, Station K, Toronto, ON M4P 3J4
902.880.9733
mhammoud@convenienceindustry.ca

DATED the 28th day of May 2026.

Convenience Industry Council of Canada



David Knight, Senior Consultant

