

Closing Submission:

Canadian Fuels Association

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The Canadian Fuels Association (CFA) would like to thank the PEI Regulatory & Appeals Commission (IRAC) for the opportunity to participate in the public hearing and to submit these brief closing submissions in matter PMC2201 – IRAC's Petroleum Margin Review. As noted in our July 13, 2023 comments, CFA fully endorses Gardner Pinfold's Recommendation #1. During the hearing, CFA believes Mr. Gardner articulated why IRAC should continue to use the Charlottetown rack price as the benchmark for making weekly price adjustments. CFA also specifically endorses Recommendations #2, 5, and 9.

With respect to Recommendation #7, Mr. Gardner noted during the hearing that this was a conditional recommendation. As noted in our July 13, 2023 comments, CFA does not believe a change is necessary and could introduce a complication that does not exist. Accordingly, CFA submits that implementation of a furnace oil and commercial diesel margin split is not required at this time. If IRAC believes it should proceed with the change, the CFA recommends further analysis prior to implementation since there is limited back-up information to support the chosen split of 3.0 cpl as the appropriate wholesale margin.

Thank you for the opportunity to submit these written comments on behalf of our members.

Bill

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