

February 13, 2025

Carr, Stevenson & MacKay  
65 Queen Street  
Charlottetown, PE C1A 4A5

Attention: Nicole M. McKenna

Dear Ms. McKenna:

**Re: Retail Petroleum Outlet License from D.P. Murphy Inc.**  
**Our File Reference: 24329-001dk**

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Please be advised that we are writing to you as legal counsel for Ceretti's Grocery & Hardware Ltd. (Ceretti's), an intervener in this particular matter.

In responding to the above noted application, Ceretti's engaged a report prepared by MRSB Group ("MRSB"), which has previously been filed with the Commission and circulated to the Applicant and other recognized Intervener.

However, given the sensitive financial, commercial and personal matters contained in the MRSB report, we are requesting that the MRSB report not form part of the public record, and that it not to be placed on the IRAC website for public consumption.

As the MRSB report has already been provided, you, as counsel for the Commission, and the Commission itself, would be well aware that the MRSB report contains sensitive financial data by way of projected financial statements, showing income, expenses, taxes, net income, salaries, etc. Based upon the nature of the Application, this information is, in our opinion, required in order for Ceretti's to properly respond to the Application.

In considering a balancing of effected interests, it should be noted that the Applicant does not have to substantiate a business case as part of its Application, such that detailed financial information is not required to be submitted on its behalf. The same does not hold true for Ceretti's as an intervener, such that we would respectfully submit that the MRSB report be made available to the parties to the proceeding, though it would not otherwise be circulated publicly or form part of the public record. An Order requiring the Applicant or other intervenor to comply with such direction can be issued by the Commission.

In balancing the requirement to file a proper response in this particular matter, we would submit that the above noted approach allows the material to be before the Commission, and allows the parties to this particular matter to have access to the information as may be needed. However, we submit that there is no public interest served in having the MRSB report form part of the public

record, and that any such further disclosure would not benefit the public at large, and only be prejudicial to Ceretti's.

We believe that the above noted submission provides the information required for the Commission to consider this particular matter, in accordance with its Rules of Practice and Procedure, but should any other questions arise, please do not hesitate to contact the undersigned at your convenience.

Yours very truly,

**KEY MURRAY LAW**

A handwritten signature in blue ink, appearing to read 'Ryan MacDonald', with a stylized, looping flourish extending to the right.

Ryan MacDonald  
RM/jlg

c.c.: Client