

Ceretti's Grocery and Hardware Ltd  
23924 Trans Canada Highway  
Borden-Carleton, PEI  
COB 1X0

Island Regulatory and Appeals Commission  
National Bank Tower  
501-134 Kent Street  
Charlottetown, PE C1A 7L1  
**Attention: Allison MacEwen, Director**

Dear Mr. MacEwen

Ceretti's Grocery and Hardware would like to formally oppose the D.P. Murphy Inc. application to build a petroleum outlet in Borden-Carleton directly adjacent to our current site.

We are certain that another petroleum outlet in Borden-Carleton is not needed or reasonable and will damage or destroy our business and negatively affect the other two stations in the area. It is our belief that there is not enough traffic to sustain 4 stations in a community of 788 residents and a daily average of less than 5000 vehicles.

Under the Island Regulatory and appeals Commission D.P Murphy Inc. must provide the following.

- 1. The promotion of competition;**
- 2. Traffic volumes and trends in the general area of the proposed location;**
- 3. Population size and trends in the general area of the proposed outlet;**
- 4. Trends in gasoline sales, especially, but not exclusively, among outlets in the general vicinity of the proposed location;**
- 5. Services presently available to the motoring public in the general area of the proposed location**

**“Promotion of competition”.** There are currently 3 stations in Borden-Carleton that have ample parking. There are also currently EV Chargers in the community, and to my knowledge, the folks at the Shell are in the process of installing chargers as well. As stated in the application, Irving has indicated that the Murphy Group would be a better fit for them and have decided not to renew a contract with us at this time. One can only assume they are confident that the Murphy project will move forward. For both parties to assume their success, it shows their confidence in uprooting surrounding current, long term fixtures in the community like myself and the Howatt brothers. The fact that Irving does not wish to supply me anymore is irrelevant. I will be able to replace their service with another supplier. The application also references the loyalty program and as you're aware, the Shell location also offer Airmiles, so D.P Murphy wouldn't be adding anything to the general public, and the public most certainly would not be losing that particular loyalty program. My new supplier would actually provide an additional loyalty program so the public will have another choice instead of 2 airmiles programs within 2 kms.

**“Traffic volumes and trends in the general area of the proposed location”.** As D.P. Murphy inc. application states the traffic has grown to 4724 AADT (Annual Average Daily Traffic) which is a growth of 941 cars a day since 2011. In 2016 we sold 2,744,743 liters. In 2022 we sold 2,191,116 which is approximately a 20 % decrease. We believe that is the trend you will see at the other two stations. There are presently three stations sharing 4724 vehicles. In the last application presented to IRAC there were 2 stations sharing over 20,000 vehicles a day when Mels put in the application. Now there are 3 stations sharing 20000 which is reasonable.

**“Population size and trends in the general area of the proposed outlet”.** The average population per retail gas station on PEI in 2019 was 1846 per site. Borden-Carleton has 3 retail gas station for a mere 788 people. We see and rely on the much needed, but very manageable bump in traffic for our short summer season. It helps carry us through the long winter months of diminished fuel sales. We are a small community that already has 3 stations within 3 kms of highway and currently offer everything that DP Murphy intends to offer. In the last application presented to IRAC there were 2 stations sharing over 10000 people when Mel's put forth their application. Now there are 3 stations sharing 10000 people which is reasonable and very manageable.

**“Trends in gasoline sales, especially, but not exclusively, among outlets in the general vicinity of the proposed location”.** Our volumes are down dramatically since 2016. As D.P. Murphy inc. application states the average volume is 2,500,000. Our liters for 2022 were 2,191,116 which is below average. As D.P. Murphy Inc. Application also states, in 2013 there were 93 fuel stations and in 2021 there were 87, so 5 stations less and volumes are still down. If another station is approved, we will lose even more sales. Trends show we need less stations, not more. This will certainly continue as more of the travelling public turn to electric vehicles.

**“Services presently available to the motoring public in the general area of the proposed location”** This was not outlined in the D.P. Murphy Inc. application. Everything in the D.P. Murphy Inc. application of services that they are going to offer are currently in the community already. The community already has 3 stations, it has a Tim Hortons, it has a 24 hour station, and we have lots of parking which is also used for extended parking for Islanders that are travelling off the Island and for teams that are needing to meet a bus, and the community has EV chargers. The D.P. Murphy Inc. application states there are 2 accesses to their property, both on Dickie Road which is a narrow road that has no paved shoulders and was not intended for major traffic. The increased traffic would be a danger to the people living and walking on the road which borders the confederation walking trail. The D.P. Murphy Inc. application does state it was proposing an entrance from the highway, but not an exit. An entrance between my driveway and the intersection would be a very hazardous.

If this D.P. Murphy Inc. application is approved, it will most definitely be the end of one, if not two of the three gas stations currently operating in the area. The Esso is a corporate site, so it will not put them out of business. It could be very damaging for Howatt's and a certain death for my business given the mere inches between my site and the proposed new one. The list of services and products we provide to the community is lengthy. If the community were to lose their grocery store it would be devastating. I currently carry over 130 personal and business accounts for our customers that may not have the money to get from pay cheque to pay cheque. Howatt's also provide this type of small town service.

The D.P. Murphy Inc. application will not benefit the community nor will it provide anything that the community presently does not have that will benefit the motoring public. After reviewing the endorsement letters from Straight Crossing and Tourism PEI I would hope that their support would also

be provided to the present stations that support them and that have been welcoming tourists, business travellers, and fellow Islanders for decades. Our location and the Howatt location are family owned and operated generational businesses that span nearly a century and offer 150 years of combined service to the community.

Respectfully,

Chad Ceretti

Owner

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