

Howatt's Tourist Mart Ltd
23357 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

Howatts Tourist Mart would formally oppose the D.P. Murphy Inc. application to build a petroleum outlet in Borden-Carleton.

We do not believe another petroleum outlet in Borden-Carleton is needed and would be damaging to our business greatly and 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 only a daily average of 4724 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**

First the "Promotion of competition". There are currently 3 stations in Borden-Carleton that have ample parking. There are EV Chargers in the community, and we are in the process of getting EV Chargers at the Shell. There is still presently an Irving in the area, and we believe there still will be if this application is declined. The application references the loyalty program and our location also take Airmiles just like the Irving so it wouldn't be adding anything to the general public and they most certainly would not be losing that loyalty program.

Second "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 2011 we sold 4,005,882 liters. In 2022 we sold 2,711,160 liters which is a 32% decrease. We believe that is the trend you will see at the other two stations. There are presently three stations sharing 4724 AADT. In the last application presented to IRAC there were 2 stations sharing over 20,000 AADT a day when Mels put in the application. Now there are 3 stations sharing 20000 which is reasonable.

Third "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 783

people. We are a community of 788 people. It is a small community and already has 3 stations that currently offer everything that has been put in their proposal. In the last application presented to IRAC there were 2 stations sharing over 10000 people when Mels put in the application. Now there are 3 stations sharing 10000 people which is reasonable.

Fourth “Trends in gasoline sales, especially, but not exclusively, among outlets in the general vicinity of the proposed location”. As said previously our liters are down 93% since 2011. As D.P. Murphy inc. application states the average volume is 2,500,000. Our liters for 2022 were 2,711,160 which is just above average. As D.P. Murphy Inc. application states, in 2013 there was 93 stations and in 2021 there are 87 so that is 5 stations that went out of business. If another station is approved, we will be below.

Fifth “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 presently in the community already. The community has 3 stations, it has a Tim Hortons, it has a 24 hour station, it has 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 it has EV chargers. The D.P. Murphy Inc. application did speak a lot about tourism and the “Predicted” increase of tourism. That’s something that can’t be controlled as we know from covid. The D.P. Murphy Inc. application states there are 2 accesses to the property both on Dickie Road which is a small quiet road that has no paved shoulders. The increased traffic would be a danger to the people living and walking on the road. The D.P. Murphy Inc. application does state it was proposing an entrance from the highway but not an exit. It is only proposed so not approved.

If this the D.P. Murphy Inc. application is approved, it will most definitely be the end of one of the three gas stations currently operating in the area. We know the Esso is a corporate site so it will still be a loss for them; although not ideal, it will not put them out of business. It would be very damaging for Ceretti’s which is the only larger grocery store in the area. If the community would lose the grocery store it would be devastating. We also carry more groceries than most c/store locations and many people depend on that. We as do Ceretti’s carry personal accounts for our customers that may not have the money to get from pay cheque to pay cheque and old age pension. That is food or fuel that they can have access to when money is tight.

In closing 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 current stations that have been welcoming tourists, business travellers and fellow Islanders for the past 55 plus years. Our location and Ceretti’s have been family owned and operated businesses that have been passed down from grandparents to parents and now their children, the current operators.

Regards

Nic Howatt
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