DECISION

IN THE MATTER OF a review of Maximum Retail Margins, Maximum Delivery Costs, and Maximum Full Service Charge for Petroleum Products under the authority of subsection 14(1) of the *Petroleum Products Pricing Act*, S.N.B. 2006, c. P-8.05.

(Matter No. 485)

May 13, 2021

NEW BRUNSWICK ENERGY AND UTILITIES BOARD

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NEW BRUNSWICK ENERGY AND UTILITIES BOARD:

Acting Chairperson:	François Beaulieu
Members:	Michael Costello
	Patrick Ervin
	John Patrick Herron
Board Counsel:	Katherine McBrearty
Counsel for Board Staff:	Matthew Letson
Chief Clerk:	Kathleen Mitchell

INTERVENERS:

Atlantic Convenience Stores Association:	David Knight
Canadian Independent Petroleum Marketers Association:	Michelle Coates Mather
Clark Oil Co. (2010) Ltd.:	Peter Clark

Highlands Fuel Delivery G.P.:	Matthew Manderson
Liberty Utilities (Gas New Brunswick) LP:	Paul Volpé
Oil Heat Association of New Brunswick:	Matthew LeRoy
Park Fuels Ltd.:	Bill LeRoy
The Scholten Group:	Chris Scholten Jerry Scholten
PUBLIC INTERVENER:	Heather Black

A. Introduction

[1] Pursuant to subsection 14(1) of the *Petroleum Products Pricing Act*, S.N.B. 2006, c. P-8.05 (Act), the New Brunswick Energy and Utilities Board (Board) initiated a review of the maximum retail margins and delivery costs, and the maximum full service charge. This review applies to motor and heating fuels to ensure that the margins, costs and charges are justified. A previous review (Matter 444) was held in 2019.

[2] A hearing was conducted by video conference from March 24 to March 26, 2021. A Partial Decision was delivered on April 20, in which the Board made adjustments to the maximum retail margins for motor fuels and furnace oil and the maximum delivery costs for motor fuels. This Decision provides the background and the Board's reasons for the adjustments set out in the Partial Decision.

[3] To assist in the current review, Gardner Pinfold Consultants Inc. (Gardner Pinfold) was engaged by the Board to carry out an analysis of the factors affecting motor and heating fuels maximum retail margins, maximum delivery costs and the full service charge. Gardner Pinfold was required to produce a report to document whether current values are justified, and provide the Board with recommendations.

[4] In December 2020, Gardner Pinfold filed a report on retail motor fuel and heating fuel, and a subsequent addendum regarding the motor fuel delivery charge (Retail Report). Mr. Michael Gardner, President of Gardner Pinfold and Mr. Gregor MacAskill, a Partner of Gardner Pinfold, appeared as witnesses at the hearing and were declared experts in the field of economics of market structure and competitive behaviour in regulated industries.

[5] Ms. Heather Black, the Public Intervener, filed a report of Mr. Robert Knecht, Principal of Industrial Economics, Incorporated (Knecht Report). Mr. Knecht was engaged to evaluate the recommendations contained in the Retail Report for their consistency with sound regulatory policy and past Board practice. He was declared an expert in the practical application of economics and finance theory to the regulation of the energy industry.

[6] As the Retail Report did not address the retail propane margin, Mr. Knecht limited his review to motor fuels and furnace oil.

[7] The Atlantic Convenience Stores Association (ACSA) is a not-for-profit association, representing the interests of members operating convenience stores throughout Atlantic Canada. The ACSA filed evidence and was represented by Mr. David Knight, senior consultant for the ACSA. The witness panel also included Mr. Mike Hammoud, President of the ACSA; Mr. Joel Doucette, Vice-President of Supply and Wholesale at Wilson Fuel Company; and Mr. Keith King, a regional director of Fuel Operations and Car Wash for Alimentation Couche-Tard Inc.

[8] The Scholten Group also filed evidence in redacted and confidential formats. Chris Scholten, President of The Scholten Group, and Jerry Scholten, its Chief Operating Officer, appeared as witnesses.

[9] The Canadian Independent Petroleum Marketers Association (CIPMA), as represented by Ms. Michelle Coates Mather, presented final arguments during the proceeding.

[10] Mr. Peter Clark, President of Clark Oil Co. (2010) Ltd., and Mr. Matthew LeRoy, a Director of the Oil Heat Association of New Brunswick also presented final arguments.

[11] Highlands Fuel Delivery G.P., Park Fuels Ltd., and Liberty Utilities (Gas New Brunswick) LP were registered as interveners. They did not appear at the hearing.

[12] Eight letters of comment were received from members of the public, and two public forums were held on March 18 by video conference. The letters of comment and the submissions of those who attended the public forums form part of the record in this proceeding. The Board appreciates their contributions.

[13] A review of this nature requires industry participation to provide the Board with evidence and submissions to assist in making an informed decision. The Board appreciates the contributions of the retailers who supplied data to the Board or Gardner Pinfold.

B. Legislative Framework

[14] The following provisions of the Act are relevant to this proceeding:

> **1.1** The Board shall, when making a decision under this Act respecting prices, margins, delivery costs or full service charges, consider the fact that

consumers should benefit from the lowest price possible without jeopardizing the continuity of supply of petroleum products.

4(4) Notwithstanding that a maximum margin is set for a wholesaler and a retailer, if the wholesaler and the retailer agree in writing, they may apportion the total allowed margin between them in such manner as they see fit.

14(1) The Board may, on its own motion, conduct a review of maximum margins, maximum delivery costs or the maximum full service charge to ensure that they are justified, and may order such margins, costs or charge to be adjusted after the review is completed.

[15] The following provisions of the *General Regulation – Petroleum Products Pricing Act*, N.B. Regulation 2006-41 (Regulation) are also relevant:

9(1) Where an application has been made to the Board under section 12 of the Act for a change in the maximum margin that may be charged by a wholesaler or retailer, the Board shall consider the following:

(a) whether, since the maximum margin was last set, an adjustment would be justified as a result of a change to

(i) the costs of transporting heating fuel or motor fuel from New York Harbor or, in the case of propane, from Sarnia to the province,

(ii) volume of sales,

(iii) storage costs,

(iv) inventory turnover rates, and

(v) applicable levies and insurance costs; and

(b) any other factors that the Board considers relevant.

11 Where an application has been made to the Board to adjust the maximum delivery costs that may be charged by a wholesaler or retailer under section 13 of the Act, the Board shall consider

(a) fuel costs,

(b) insurance costs,

(c) capital costs,

(d) volume of sales

(e) in the case of an application for delivery costs that are particular to the applicant, the cost effectiveness of the applicant's operation, and

(f) any other factors that the Board considers relevant.

12 Where the Board conducts a review under section 14 of the Act, the Board shall consider the same factors that apply under section 9, in the case of a review of maximum margins, and under section 11, in the case of a review of maximum delivery costs.

C. Issues and Analysis

[16] The issues are whether the current maximum retail margins, delivery costs and full service charge are justified for motor and heating fuels, considering the factors set out in sections 9 and 11 of the Regulation.

[17] The Retail Report included two levels of analysis: (a) a macro analysis of fuel margins in other jurisdictions as a frame of reference; and (b) a micro analysis of changes in operating costs at the retailer level and how those affected industry-wide margins.

[18] To support its analysis, Gardner Pinfold relied on various sources of data, including:

a. Volume data submitted by motor and heating fuels retailers to the Board and volume data provided by the New Brunswick Department of Finance and Statistics Canada;

b. Expense data submitted directly to the Board by retailers of motor and heating fuels;

c. Published data from the period of 2017 to 2019 on unit prices of key inputs, such as, minimum wage and average wages, fuel prices and utility rates;

d. Expense and volume data submitted directly to Gardner Pinfold in Matter 444; and

e. Expense and volume data submitted directly to Gardner Pinfold by the interveners.

[19] The Retail Report was based on data for the three years 2017-2019, using 2017 as the base year.

1. Motor Fuels

a. Maximum Retail Margin

[20] Gardner Pinfold evaluated data from 123 motor fuel retailers and determined that only data from 99 retailers were considered usable. To be included in the analysis, a retailer must have submitted useable data for both 2017 and 2019. The principal reason for excluding 24 retailers from the analysis was the absence of data from either the base year of 2017 or from 2019. Six retailers had reported a significant increase in wage costs, leading Gardner Pinfold to conclude that there was a significant change in operations, such that those data could not be reasonably evaluated. Accordingly, the margin impact of changing costs was based on the operating experience of 93 retailers.

[21] Gardner Pinfold observed that the sample included a broad range of retailers by geography and sales volume. It noted that the sample represented 22 percent of provincial retailers and 34 percent of total provincial sales volumes, and concluded that the sample was reasonably representative.

[22] As with Matter 444, corporately-owned retailers dominated the survey responses at 70 percent. Corporately-owned retail outlets, however, represent roughly 30 percent of the total number of retail outlets, with the remainder being independent retail outlets. Gardner Pinfold acknowledged that this over-representation could alter the conclusions, if the corporate and independent stores had different cost structures.

[23] The ACSA submitted that this represents a significant failing of the Retail Report and its recommendations. The ACSA's concerns are two-fold. Firstly, owing to economies of scale, it is likely that corporately-owned retail outlets would have lower costs than independently operated retail outlets. As a result, the costs from the sample group may not reflect cost increases faced by the retailers across the province.

[24] Secondly, both the ACSA and The Scholten Group submitted that a breakdown of the sample between corporate and independent retail outlets revealed significant problems with the independent sample. According to that sample, costs decreased between 2017 and 2019, contrary to their understanding of the industry in general.

[25] A more detailed analysis by The Scholten Group suggested that the independent data contained errors. It recommended that the Board eliminate all the data from independent retail outlets, and instead use the cost information from The Scholten Group's seven outlets as a proxy for all independent retail outlets. During final argument, Mr. Scholten submitted that this would increase the retail margin by 1.07 cents per litre (cpl).

[26] Gardner Pinfold reviewed the Scholten Group's analysis and discovered an error in the data compilation in the Retail Report. Gardner Pinfold filed revised evidence, indicating that the independent retailer group's costs had increased by approximately four percent, rather than decreasing.

[27] Cost information from The Scholten Group provides additional evidence that costs for independent retail outlets had increased during the review period, and that an increase in the retail margin is warranted.

[28] The Board concludes that the revised Gardner Pinfold cost information from the sample is the best available evidence, and is reasonably representative of provincial retailers.

[29] Another issue relates to sales volumes included in the sample data, which reported a decrease between 2017 and 2019. Adjusting the cost data in the sample for these volume changes would result in a greater margin increase. Both the ACSA and The Scholten Group argued that the Board should adjust the margin to reflect the overall decrease in volume of the sample group.

[30] Gardner Pinfold, however, recommended against making any margin adjustment to reflect the change in volume. Mr. Gardner testified that the sample's volume decrease was largely the effect of a new large-volume retailer in the Moncton area, whose data was not in the sample. He submitted that this creates a downward bias in the sample volume. He also testified that, given the relatively small volume change at the provincial level, the volume from the sample should be ignored when making adjustments to maximum retail margin. The Board agrees that average provincial retail sales volumes have remained stable.

Accordingly, sample volume of sales will not be considered to make further adjustments to the margin in this proceeding.

[31] Mr. Gardner concluded that the retail margin should be increased by 7.8 percent. Applied to the current margin of 6.80 cpl, this would result in an increase of 0.53 cpl, for a total margin of 7.3 cpl (rounded).

[32] In her closing argument on behalf of CIPMA, Ms. Mather stated that her primary concern relates to the data sample. In her view, to inform the margin review process, a more robust data sample is required, as it would provide the Board with a better view of the current realities within the marketplace.

[33] The Knecht Report outlined the following concerns about Gardner Pinfold's survey methodology: (a) 55 percent of the survey results are related to a single retailer; (b) the survey results are "at best" loosely representative of the retail population; (c) costs associated with motor fuel sales cannot be readily separated from other costs; (d) survey responses are not available to the Public Intervener or other interveners; and (e) under the regulatory model, retailers purchase supplies at the maximum wholesale price set by the Board. As a result, Mr. Knecht testified that he was unable to make any recommendation to the Board.

[34] Ms. Black submitted, however, that Mr. Knecht continued to be wary of the sample results for both corporate and independent retailers, and that he questioned Gardner Pinfold's reliance on provincial volumes as opposed to sample volumes. Notwithstanding, Ms. Black agreed that Gardner Pinfold's recommendations were justified, based on the evidence.

(1) Board Conclusion

[35] The data sample showed increases in four of the five cost categories under review. Significantly, wages, which represent the bulk of operating costs for a retail outlet, increased by 7.8 percent. Insurance was the only cost category that declined between 2017 and 2019 and represents only a small percentage of a retailer's total costs.

[36] The Board recognizes there may be other factors that may support a larger increase than the Gardner Pinfold recommendation. For example, the Scholten Group's confidential cost information indicates that a higher margin increase could be justified. In addition, a volume

adjustment, as discussed above and recommended by some interveners, supports a larger increase.

[37] The retail margin is intended to cover the costs of supplying motor fuels, including a return on investment. The evidence shows that such costs have increased during the review period.

[38] The Board's obligation, however, is to balance this increase with the fact that consumers should benefit from the lowest price possible without jeopardizing the continuity of supply of petroleum products. There is no evidence that continuity of supply would be jeopardized by limiting the increase in the retail margin by 0.53 cpl.

[39] After considering the evidence and submissions, the Board concludes that an increase in the retail margin for motor fuels by 0.53 cpl from 6.80 cpl to a total of 7.33 cpl, is justified.

b. Maximum Full Service Charge

[40] The Act allows retailers to charge an additional amount for dispensing motor fuels by a pump island attendant. Approximately 15 percent of New Brunswick retailers operate either a full service or split service operation. Full service is mainly provided by independent retailers located in smaller communities and rural areas.

[41] Gardner Pinfold observed that most of these retailers set their full service charge under 3.0 cpl to be competitive with self service outlets. The Retail Report concluded that maintaining the full service charge of 3.0 cpl is reasonable.

[42] In the absence of evidence, the current value of 3.00 cpl will be maintained.

c. Maximum Delivery Costs

[43] Concerning motor fuels, the Act defines "delivery costs" as "the costs of delivering the fuel within the Province from a site used by a wholesaler to an outlet used by a retailer." Retailers may recover only the actual amount charged by wholesalers to deliver motor fuels to their outlet, up to the maximum amount as set by the Board.

[44] Gardner Pinfold observed that the current maximum delivery cost of 3.0 cpl is inadequate for approximately 5 to 6 percent of retailers, where the delivery cost for gasoline and/or

diesel exceeds the maximum. The Retail Report shows that a number of retail outlets incurred delivery charges at or over 3.0 cpl for both gasoline and diesel. Gardner Pinfold recommended an increase of 0.5 cpl to the maximum delivery charge, which would establish a new maximum of 3.5 cpl.

[45] The ACSA supported Gardner Pinfold's recommendation.

[46] Mr. Knecht took no position with respect to maximum delivery costs. In final argument, Ms. Black agreed that the current maximum delivery charge was inadequate. She agreed with Gardner Pinfold's recommendation.

[47] In making a determination concerning delivery costs, the Board must consider the factors set out in section 11 of the Regulation and section 1.1 of the Act. The evidence demonstrates that, for smaller retail sites operating with relatively low volumes of sales, non-recoverability of delivery costs over 3.0 cpl presents an additional burden. This adds to the challenge for retailers to secure a supplier, thereby increasing a risk to the continuity of supply, especially in rural areas.

[48] The Board finds that the current 3.00 cpl maximum delivery cost is inadequate. The Board concludes that an increase of 0.50 cpl is justified and establishes a new maximum of 3.50 cpl for delivery costs.

2. Heating Fuels

a. Furnace Oil

(1) Maximum Retail Margin

[49] Gardner Pinfold evaluated data from two urban and six rural retailers in its review of the adequacy of the maximum retail margin for furnace oil retailers. It noted that this represents about 25 percent of the New Brunswick market by volume. Gardner Pinfold further noted that "[if] the eight are representative of the industry, it would be by coincidence, since they constitute 20-25% of the total number of dealers and are not randomly selected."

[50] The Retail Report noted that retailers are struggling to control costs in the face of stable or declining volumes. It further noted that the risk of not allowing a margin increase could result in a loss of supply in areas of the province where delivery costs are highest.

[51] Gardner Pinfold further observed that volume was not a factor in the 2017 to 2019 margin review, as sales volumes have been stable since 2016, in the 140 million litre range, since 2016. Gardner Pinfold recommended that the retail margin should be increased by 12.2 percent, increasing the current maximum retail margin by 2.562 cpl to 23.6 cpl.

[52] In their closing arguments, Mr. Clark supported the recommended increase and Mr. LeRoy supported it at a minimum.

[53] In his report, Mr. Knecht expressed concerns with Gardner Pinfold's approach. He concluded, however, that he did not have a sufficient basis to either support or oppose the Gardner Pinfold recommendation.

[54] In her closing argument, Ms. Black submitted that an increase would be justified if the Board assigns sufficient probative value to the sample cost data.

[55] The evidence indicates that costs have increased. The Retail Report noted that two categories, that account for approximately 70 percent of operating costs, have increased significantly. Vehicle fuel and maintenance costs increased by approximately 41 percent, and wages and salaries operations increased by approximately 19 percent between 2017 and 2019.

[56] Mr. Clark submitted that these wage increases reflect the challenge of retaining qualified and experienced drivers.

[57] Another factor that must be considered is volume of sales. In the case of furnace oil, an upward volume adjustment would reduce the recommended margin increase. As provincial sales volumes have stabilized since the previous review period, he recommended that no adjustment is warranted. The Board agrees.

[58] The Board continues to be challenged by the absence of representative samples. Although the sample is small, not randomly selected and may not be representative, the evidence shows that the retailers are struggling to control costs in the face of stable or declining furnace oil volumes. The Board finds that the risk of not allowing retailers a margin increase could impact continuity of supply, especially in areas of the province where delivery costs are highest.

[59] The Board is satisfied that increased costs justify a margin adjustment. The Board accepts the above recommendation to increase the current retail margin of 21.0 cpl for furnace oil by 2.56 cpl, for a total of 23.56 cpl.

(2) Maximum Delivery Costs

[60] The Act defines "delivery costs" for heating fuel (furnace oil and propane) as "the costs of delivering the fuel within the Province from a site used by a wholesaler to the consumer."

[61] The current maximum delivery cost for furnace oil is 5.0 cpl, which was initially set in 2006.

[62] Gardner Pinfold did not provide any recommendation, and no party proposed an adjustment in the maximum delivery costs.

[63] The Board determines that there will be no adjustment to the maximum delivery costs for furnace oil.

b. Propane

(1) Maximum Retail Margin and Delivery Costs

[64] Only one submission was received from the retail propane sector. Gardner Pinfold was unable to recommend a margin or delivery costs adjustment on that basis.

[65] There will be no adjustment to the maximum retail margin and delivery costs for propane, as insufficient evidence has been submitted to justify such adjustments.

3. Miscellaneous Issues

a. New York Harbour to Saint John Rack Price Spread

[66] The Retail Report states that the "posted refinery gate price (rack price) is used as a local reference price to set wholesale selling prices." The Retail Report adds that the rack price:

> […] is a useful guide to general conditions in markets for refined product […], but an imperfect guide to the actual marketing margin because limited volumes may actually trade at the rack price. Sales to large volume customers would be subject to a discount (rack-minus), while sales to smaller customers would be subject to a premium (rack-plus).

[67] In response to interrogatories, Gardner Pinfold outlined the implications of changes in the New York Harbour (NYH) and the Halifax rack price, which Mr. Gardner indicated is also applicable to New Brunswick. Gardner Pinfold stated that "[…] this widening of the spread [between NYH and Halifax rack between 2018 and 2020] has reduced the marketing margin (the sum of the wholesale and retails [sic] margins) by an equivalent amount in cpl […]." Gardner Pinfold recommended that the Board conduct a review of the spread pertaining to regulated price setting.

[68] The ACSA was concerned with the trend of an increasing spread between the NYH benchmark price and the Saint John rack price. In its view, it is a "material issue negatively affecting both wholesale and retail margins" and urged the Board to hold a hearing into the issue.

[69] The Knecht Report stated that historical trends regarding actual wholesale prices relative to rack price are not available. The pricing arrangements for those who "opt out" of the regulated margins may include other terms and considerations. Mr. Knecht further stated that if retailers "opt out" of regulation, it can be inferred that they are effectively able to get a greater margin than that prescribed by regulation.

[70] The Board considered the issue of the NYH to Saint John rack spread in two previous matters.

[71] In its Decision of May 5, 2017 (Matter 338), the Board referred to a widening spread "in recent years" which, in Mr. Gardner's opinion, would have the effect of reducing retail margins for retailers whose cost was tied to a fixed relationship with the rack price.

[72] On this point, the Board stated in paragraph 28 that "[it] is important to note that when resellers chose to purchase product on a fixed variable to the rack price, they have generally decided to 'opt out' of regulation," in accordance with subsection 4(4) of the Act.

[73] In the same decision, the Board posed the question of whether it should even consider the impact of the NYH to Saint John spread as a relevant factor in any margin review. The Board concluded that this issue should be left to a future review, when both the wholesale and retail margins are being examined.

[74] In its Decision of November 6, 2019 (Matter 444), the Board stated:

> [48] In relation to retailers who have not entered into an apportionment agreement with a wholesaler under subsection 4(4) of the Act, any increase in the spread between NYH and the rack price does not affect the maximum regulated price at which the product is purchased from the wholesaler. In such cases, any increase in the spread affects only the wholesaler, whose rack pricing is constrained by the regulated maximum wholesale margin. As noted above, the Board received no evidence or submissions from wholesalers on this issue.
>
> [49] In addition, the Board has no basis for treating the SJ Rack as a representative rack price under which New Brunswick retail outlets obtain their inventories. The SJ Rack, as set out in the Gardner Pinfold evidence, is based on the published price for only one supplier, Suncor, at one location, Saint John.

[75] The criteria referred to in section 11 of the Act are contained in subsection 9(1) of the Regulation. Section 12 of the Regulation states that these criteria also apply to the current review under section 14 of the Act.

[76] As stated by the Board in Matter 444, any increase in the spread between NYH and the rack price does not affect the maximum regulated price at which the product is purchased from the wholesaler, in the case of retailers who have not entered into an apportionment agreement with a wholesaler.

[77] Matter 338 contemplated that this issue should be evaluated in the future when wholesale and retail margins are considered at the same proceeding. Despite the Board's best efforts to initiate a review of wholesale margins, there has been insufficient participation from industry to initiate a wholesale margin review. Unfortunately, the consideration of wholesale and retail margins in the same hearing has not yet been able to occur.

[78] Accordingly, the Board will undertake to review this issue and directs Board staff to provide a report prior to the next retail review proceeding.

b. Participation of Retailers

[79] In its Decision in Matter 444, the Board noted how the lack of significant sample responses from motor and heating fuels industries has been an issue in both that review and previous margin reviews. The Board stated that, in any effort to improve the process, industry cooperation is critical. That continues to be true.

[80] In his report, Mr. Knecht retained the view that regular Board cost surveys are a superior approach to prior practice. He stated that it is probably too early to tell whether such an approach will increase retailer participation and improve the representativeness of the sample. During the hearing, Mr. Gardner stated that the survey should not be onerous. He submitted that the challenge is to achieve the cooperation of the retailers.

[81] The participation of the interveners in this proceeding have been valuable. Continued usage of the templates for annual data collection should make data analysis less challenging in future reviews and will provide consistent historical data.

[82] The participation of retailers who submit data provides fundamental evidence to the Board. Greater industry participation is essential to obtaining a statistically significant sample. This informs the Board of the factors in considering whether current values are justified.

D. Conclusion

[83] The following table summarizes the current maximum retail margins, delivery costs and full service charge for motor and heating fuels. It also reflects the adjustments to the maximum retail margins for motor fuels and furnace oil, and the maximum delivery costs for motor fuels, in accordance with the Board's Partial Decision, dated April 20, 2021. The adjustments are effective as of April 22, 2021.

Margin, Cost or Charge (not including HST)*	Prior to Hearing	Adjustment	Current
Retail Margins:			
Maximum Retail Margin – Motor Fuels	6.80	0.53	7.33
Maximum Retail Margin – Furnace Oil	21.00	2.56	23.56
Maximum Retail Margin – Propane	25.00	-	25.00
Delivery Costs:			
Maximum Delivery Costs – Motor Fuels	3.00	0.50	3.50
Maximum Delivery Costs – Motor Fuels (Grand Manan)	5.00	-	5.00
Maximum Delivery Costs – Furnace Oil	5.00	-	5.00
Maximum Delivery Costs – Furnace Oil (Grand Manan)	5.00	-	5.00
Maximum Delivery Costs – Propane	10.00	-	10.00
Maximum Delivery Costs – Propane (Grand Manan)	10.00	-	10.00
Full Service Charge:			
Full Service Charge – Motor Fuels	3.00	-	3.00

*cents per litre

Dated in Saint John, New Brunswick, this 13th day of May, 2021.

François Beaulieu
Acting Chairperson

Michael Costello
Member

Patrick Ervin
Member

John Patrick Herron
Member