

MANITOBA PUBLIC UTILITIES BOARD

Re: MANITOBA PUBLIC INSURANCE CORPORATION (MPI)  
GENERAL RATE APPLICATION  
2014/15

Before Board Panel:

Karen Botting - Chair  
Regis Gosselin - Board Chair  
The Hon. Anita Neville - Board Member

HELD AT:

Public Utilities Board  
400, 330 Portage Avenue  
Winnipeg, Manitoba  
October 15, 2013  
Pages 1831 to 2020



“When You Talk - We Listen!”



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1 --- Upon commencing at 9:35 a.m.

2

3 THE CHAIRPERSON: Good morning,  
4 everyone. We're going to begin our proceedings again  
5 today. And I hope you all had a happy Thanksgiving.  
6 And I will say we're thankful for all those that  
7 worked hard during the weekend to prepare for the  
8 hearings in the next couple days as we close.

9 What we'd like to do first, we have  
10 two (2) undertakings that will be filed by Ms.  
11 Kalinowsky. So would you like to take the floor?

12 MS. KATHY KALINOWSKY: Good morning.  
13 These are two (2) undertakings. Undertaking number  
14 39 should be marked as MPI Exhibit number 55.

15

16 --- EXHIBIT NO. MPI-55: Response to Undertaking  
17 39

18

19 MS. KATHY KALINOWSKY: And  
20 Undertaking number 40, also by Mr. Robinson, should  
21 be marked as MPI Exhibit number 56.

22

23 --- EXHIBIT NO. MPI-56: Response to Undertaking  
24 40

25

1 THE CHAIRPERSON: Thank you very  
2 much. Now I'm going to call upon Ms. Grammond to  
3 continue with her cross-examination. Thank you.

4 MS. CANDACE GRAMMOND: Thank you,  
5 Madam Chair.

6

7 MPI PANEL, RESUMED:

8 MARILYN MCLAREN, Resumed

9 HEATHER REICHERT, Resumed

10 LUKE JOHNSTON, Resumed

11

12 CONTINUED RE-CROSS-EXAMINATION BY MS. CANDACE

13 GRAMMOND:

14 MS. CANDACE GRAMMOND: I just have a  
15 few questions for the panel, and I think, in  
16 particular, you, Mr. Johnston, all arising on, thank  
17 you, actuarial matters and, in particular, three (3)  
18 undertakings that were filed last week. They're  
19 Undertakings 22, 24, and 26, which are Exhibits 49,  
20 52, and 53 respectively. So I think everybody has  
21 those. So I'll start with Undertaking 22, which is  
22 Exhibit 49.

23 So the -- the Corporation in its  
24 response to this undertaking has cited sections of  
25 the standard that refer to the time value of money.

1 Am I correct in understanding that  
2 this relates to the discounting of cashflows in  
3 accordance with accepted actuarial practice in  
4 Canada?

5 MR. LUKE JOHNSTON: Correct.

6 MS. CANDACE GRAMMOND: Now, in the  
7 second-last paragraph of this answer the Corporation  
8 has stated there at the first line that:

9 "The estimated investment income  
10 earned using the approach described  
11 above..."

12 Et cetera. Again, is this a reference  
13 to the discounting of cashflows in accordance with  
14 accepted actuarial practice in Canada?

15 MR. LUKE JOHNSTON: Yes, it is.

16 MS. CANDACE GRAMMOND: And continuing  
17 on in that paragraph, the Corporation goes on to  
18 state that this estimated investment income earned is  
19 less than what is assumed in the GRA.

20 Is that correct?

21 MR. LUKE JOHNSTON: It is. The only  
22 think I'd add is that it -- it's our expectation that  
23 that is the case.

24 MS. CANDACE GRAMMOND: Thank you.

25 Now, after -- after this, the Corporation concludes

1 that, as a result of that expectation, a rate  
2 indication calculated in accordance with accepted  
3 actuarial practice in Canada would be greater than  
4 that proposed in the GRA.

5 Is that right?

6 MR. LUKE JOHNSTON: Yes. Based  
7 purely on the wording used in the standard and  
8 knowing how we allocate investment today, our  
9 expectation is that the investment income component  
10 would be lower using accepted actuarial practice.

11 MS. CANDACE GRAMMOND: Thank you.  
12 Now, in the last paragraph of this answer the  
13 Corporation has concluded that either retained  
14 earnings would grow as a result of implementing a  
15 rate change in accordance with accepted actuarial  
16 practice in Canada or else the Corporation would,  
17 quote, "Either have increasing" -- oh, sorry, one (1)  
18 moment. Sorry, I'm at the wrong . . .

19 If we look at the second-last line  
20 there, the Corporation has stated that it would have  
21 to develop an approach to create an offset to the  
22 actuarial rate to achieve the breakeven net income  
23 target in the rating period.

24 Wouldn't it be the case that this  
25 latter approach is exactly what is intended by the



1 profit provision referenced in the standards?

2 MR. LUKE JOHNSTON: I think that's --  
3 that's true. I -- the -- I guess the issue we're --  
4 we're dealing with here is how do you -- let's say  
5 you do have additional investment income that you  
6 want to use to produce a break even rate, we're not  
7 sure how exactly that would be allocated. One (1) --  
8 one (1) method would be an across-the-board profit  
9 provision, negative per -- perhaps, for all classes.  
10 But there are other ways that we might want to  
11 consider, possibly considering that certain classes  
12 may earn -- earn different amounts of investment  
13 income based on the types of claims they have.

14 MS. CANDACE GRAMMOND: Thank you. So  
15 would it be right to say that the rate indication  
16 derived in accordance with accepted actuarial  
17 practice in Canada would include such an offset?

18 MR. LUKE JOHNSTON: That would be my  
19 expectation, based on how we set rates in Manitoba to  
20 -- to break even in the -- in the rating period.

21 MS. CANDACE GRAMMOND: And would you  
22 agree that this offset would include recognition of  
23 the expected return on investment on the asset  
24 supporting the Basic retained earnings?

25 MR. LUKE JOHNSTON: Yes.

1 MS. CANDACE GRAMMOND: And would you  
2 agree that this calculation, in accordance with  
3 accepted actuarial practice in Canada, would be done  
4 on an underwriting year basis, i.e. for the policies  
5 issued over the twelve (12) month period commencing  
6 for this application on March 1st, 2014?

7

8 (BRIEF PAUSE)

9

10 MR. LUKE JOHNSTON: On an  
11 underwriting basis, I'm -- I'm not certain. If --  
12 again, the methodology we have in place today is to  
13 break even over the -- the fiscal year. So it's not  
14 something we've looked at yet, but we can. We can  
15 perform the calculations that way. That's not -- not  
16 an issue. But again, my expectation is we'd produce  
17 a rate indication that continues to produce the  
18 breakeven net income over the fiscal year periods as  
19 we do today.

20 MS. CANDACE GRAMMOND: Just a moment,  
21 Madam Chair, if I may?

22

23 (BRIEF PAUSE)

24

25 MS. CANDACE GRAMMOND: Mr. Johnston,

1 just to clarify that exchange, we're talking about  
2 the rate indication in accordance with the actuarial  
3 standards as opposed to the GRA approach.

4 So would that change your answer?

5 MR. LUKE JOHNSTON: Yes, that's  
6 helpful. So, again, we've committed to producing  
7 that rate indication, and then discussions will  
8 follow in terms of how we want to adjust that rate  
9 indication to reflect the situation in Manitoba.

10 So, again, that's mainly dealing with  
11 how to -- how to deal with the excess investment  
12 income that we have on our existing asset portfolio.  
13 And, again, our -- our breakeven mandate, which is  
14 over the -- the fiscal year rating periods.

15 MS. CANDACE GRAMMOND: Thank you.  
16 I'm going to go, then, to Undertaking 24, which is  
17 Exhibit 52. I do have a couple of questions about  
18 that. So Undertaking 24 asked the Corporation to  
19 provide the model of the impact on investment returns  
20 and net income based on a perfect match scenario.  
21 And the Corporation did that, providing some  
22 narrative and an attachment as well.

23 So my first question is this. I  
24 understand that in both of these scenarios duration  
25 matching was achieved by the end of the current year,

1 2013/'14, by reducing cash and increasing the holding  
2 in higher duration marketable bonds.

3 Is that right?

4 MS. HEATHER REICHERT: Yes, that's  
5 correct.

6 MS. CANDACE GRAMMOND: Now from the  
7 attachment, we see that net income in 2013-14  
8 decreases by about 1.4 million in the April scenario  
9 and by about 9.3 million in the September scenario.  
10 So I'm looking at the attachment to this undertaking  
11 with the revised numbers.

12 And so under the April heading we see  
13 the one point three-eight-three (1.383) difference  
14 and under the September heading we see the one (1) --  
15 or the nine point two-seven-three (9.273) difference.

16

17 Can you comment on why there is a  
18 negative impact on net income in 2013/'14, and why  
19 the impacts are so different between the two (2)  
20 scenarios?

21

22 (BRIEF PAUSE)

23

24 MS. HEATHER REICHERT: Okay, I'm  
25 going to start and then if I -- Mr. Johnston may jump

1 in. So the reasons that it's negative during the  
2 2013/'14 year is because as we are moving --  
3 actually, let me answer the second question first.

4           The reason that the September adjusted  
5 standard interest rate scenario shows a greater loss  
6 is because the interest -- interest rates are higher  
7 in that September adjusted scenario. All right. The  
8 forecast interest rates are higher and therefore are  
9 more negatively impacted when we move to duration  
10 matching. So there's a bigger benefit at the higher  
11 interest rates when you've got that duration band of  
12 one point eight (1.8) years.

13           When you reduce that band, then that  
14 negatively impacts the investment income results,  
15 because of the duration matching. So because the  
16 interest rates are higher in that second scenario,  
17 the impact, the negative impact is greater. So  
18 that's why the -- the September is worse than the  
19 April interest rate scenario.

20           And the decrease in the year, like the  
21 negative impact in the year, both of these scenarios  
22 include the results for the -- the actual results for  
23 the first half of the fiscal year. So the first half  
24 of the fiscal year are -- results were not exactly on  
25 budget. We were a bit behind budget. So that's

1 reflected in the negative impact in 2013/'14.

2

3

(BRIEF PAUSE)

4

5

MS. CANDACE GRAMMOND: Thank you.

6

Now if we go to the table on page 3 of this

7

undertaking response. So go back two (2) pages, we

8

see that the interest rate forecast in the April

9

scenario increases by a hundred and eighty-six (186)

10

basis points. That's from 2 percent at the fourth

11

quarter of 2013/'14 up to 3.86 percent at the fourth

12

quarter of 2017/'18.

13

So I'm looking at the -- the 2 percent

14

there for 2013/'14 compared with three point eight-

15

six (3.86) for 2017/'18. We also see that the

16

interest rate forecast in this September scenario

17

increases by a hundred and ninety-two (192) basis

18

points over the same period. That's from the two

19

point seven (2.7) for the Q4 of 2013/'14, to the four

20

point six-two (4.62) for Q4 of 2017/'18.

21

Would it be fair to say that the

22

overall in -- overall increase in the forecasted

23

interest rate over this period is quite close between

24

the two (2) scenarios, although the September

25

scenario increases faster initially?

1 MS. HEATHER REICHERT: Yes, I agree  
2 that the overall increase in the two (2) are -- are  
3 similar. What impacts the results of the Corporation  
4 is what happens in -- at the end of each year. So  
5 the growth from the end of one (1) year to the end of  
6 the next year is what will impact the value of your  
7 assets, right, because they're revalued as at the end  
8 of our fiscal year. And if the end of fiscal year  
9 rate is significantly higher than the end of the  
10 prior fiscal year, then again, with the duration that  
11 we currently have, the duration bandwidth that we  
12 currently have, the -- that's favourable to the  
13 Corporation.

14 So as an example, if you were to look,  
15 for instance, at quarter 4 for 2014/'15, where it's -  
16 - for April it's two point three-two (2.32), and you  
17 look at the end of quarter 4 for 2015/'16, where it's  
18 two point six-seven (2.67), that's an increase in  
19 that year of thirty-five (35) basis points. It's  
20 only an increase of three point one-eight (3.18) to  
21 three point four-four (3.44), which is twenty-six  
22 (26) basis points.

23 So even though there is an overall  
24 increase from the beginning of this forecast period  
25 that are you looking at, the quarter 4 2013/'14, to

1 the end of 2017/'18, the impact that is going to  
2 impact -- the impact that it's going to have on the  
3 Corporation is as a result of what happens during the  
4 rating periods, end-of-year rating period of one (1)  
5 to end-of-year rating period of another. Okay.  
6 Where there you see -- there's like a thirty (30) --  
7 as I said, thirty-five (35) basis points versus  
8 twenty-six (26) basis points. Almost -- well, yeah,  
9 ten (10) basis points different.

10 MS. CANDACE GRAMMOND: Can you  
11 comment on given the -- the similarity again in the  
12 overall period that we talked about from 2013/'14 to  
13 2017/'18, why it is that the April scenario reduces  
14 net income by 30.4 million over the four (4) years  
15 compared to 41 million for the September scenario?

16 So why the difference in impact?

17 MS. HEATHER REICHERT: Again, it's --  
18 it's as I was just trying to explain, it's not the  
19 overall from the beginning of a four (4) year period  
20 to the end of a four (4) year period. It's what  
21 happens in the intervening years. When you revalue  
22 your assets at the end of every year that is what is  
23 being reflected in the model at the end of each year.  
24 And so that is why you'll see the differing amounts  
25 in each year based on the differing growth from the



1 one (1) year to the next year.

2 It's not just from the beginning of  
3 the forecast of '13/'14 to the end of the forecast  
4 '17/'18. It's important and it matters what happens  
5 at the end of each fiscal year within the forecasting  
6 period.

7 MS. CANDACE GRAMMOND: And -- and  
8 thank you. I -- I appreciate that. Can you comment  
9 on the effect of the duration matching in place over  
10 the time period?

11

12 (BRIEF PAUSE)

13

14 MS. HEATHER REICHERT: Can you repeat  
15 the question, please?

16 MS. CANDACE GRAMMOND: Sure. I asked  
17 you about the -- the difference in impact on results,  
18 given the increase in interest rates, or the  
19 forecasted increase in interest rates over the two  
20 (2) different time periods. and why even though the  
21 increase in interest rates is similar, the impact is  
22 different. That is, the impact on the bottom line is  
23 different.

24 And so I appreciate your answer about  
25 it being year to year and -- and so forth. Can you

1 say, or tell us whether it is true that the assets  
2 and liabilities are not equally sensitive to changes  
3 in interest rates? Maybe that's a better way to ask  
4 the question.

5

6 (BRIEF PAUSE)

7

8 MR. LUKE JOHNSTON: That -- that  
9 statement is correct. On Undertaking 24 there's --  
10 the middle of the page, the second bullet, we do note  
11 that -- in that bullet, that the Corporation's fixed  
12 income assets are assumed to be duration match to  
13 corporate claim liabilities.

14 And just moving forward a bit, Basic  
15 claim liabilities have a longer duration than  
16 corporate claim liabilities, so we -- we do the  
17 duration matching on a corporate basis. But Basic on  
18 its own will continue to have a longer duration and,  
19 therefore, be more interest rate sensitive than Basic  
20 assets even though on an overall corporate basis  
21 we're matched.

22 MS. CANDACE GRAMMOND: So is it fair  
23 to say then that even with the durations matched, the  
24 cashflows underlying the assets and liabilities are  
25 different?

1 MR. LUKE JOHNSTON: By 'different',  
2 do you mean different sensitivity to interest rates?

3 MS. CANDACE GRAMMOND: Yes.

4 MR. LUKE JOHNSTON: Agreed. The --  
5 one (1) potential way around that would be to -- to  
6 start matching only to Basic. There's other things  
7 we can look into, but right now, it's -- the policy  
8 is of a corporate matching.

9 MS. CANDACE GRAMMOND: Thank you.

10

11 (BRIEF PAUSE)

12

13 MS. CANDACE GRAMMOND: Just a moment,  
14 Madam Chair. Thank you. Would you agree that  
15 matching average durations between the fixed income  
16 portfolio and the claims liabilities does not equate  
17 to immunizing net income against interest rate  
18 shifts?

19 MR. REGIS GOSSELIN: I wonder if, for  
20 my benefit, if you could repeat the question, please.

21

22 CONTINUED BY MS. CANDACE GRAMMOND:

23 MS. CANDACE GRAMMOND: Absolutely.  
24 The question was: Would the Corporation agree that  
25 matching average durations between the fixed income

1 portfolio and the claims liabilities does not equate  
2 to immunizing net income against interest rate  
3 shifts?

4 MR. LUKE JOHNSTON: It doesn't do it  
5 perfectly. That's -- that's true. But to -- the  
6 closer the durations are together, the greater  
7 matching you'll -- you'll get. In -- in the past,  
8 we've -- we've talked about matching at the 75, 80,  
9 85 percent. But perfectly immunized from chan --  
10 immunized from changes? No.

11 MS. CANDACE GRAMMOND: So can you  
12 give us a sense of the extent to which average  
13 duration matching fails to immuna -- immunize net  
14 income against interest rate shifts?

15 MR. LUKE JOHNSTON: Not -- not with  
16 any specific -- specific details. But considering  
17 the -- the very significant magnitudes that we've  
18 discussed at the hearings, if we -- if we can achieve  
19 a significant matching, I think that's the best we  
20 can hope for given the uncertainty in the -- the  
21 cashflows.

22 It is important to note that -- that  
23 the claims do have a different cashflow pattern than  
24 -- the assets. That's -- that's true. We don't have  
25 assets that extend thirty (30), forty (40) years into

1 the future, so duration -- duration matching is a  
2 approximation. But again, if we -- if we keep them  
3 fairly close we should have relatively good offsets  
4 and the asset and liability side.

5 MS. CANDACE GRAMMOND: Thank you, Mr.  
6 Johnston. So I'm going to go then to a couple of  
7 questions on Undertaking 26, which is MPI Exhibit 53.  
8 This was an undertaking where the Corporation was  
9 asked to quantify the dollar value of the one (1) in  
10 twenty (20) to one (1) in one hundred (100)  
11 referenced in the Application, and also provide some  
12 situational potential actions based on solely a  
13 number.

14 And on page 2 of the response the  
15 Corporation has indicated that it believes it would  
16 be appropriate and more operationally efficient if  
17 the Board did not order a rebate of less than 10  
18 percent of written vehicle premiums.

19 Can you please elaborate on this  
20 suggestion and perhaps include some context for the  
21 choice of 10 percent as the threshold? And that --  
22 I'm reading from the first written paragraph  
23 underneath the numerical chart.

24

25

(BRIEF PAUSE)

1 MS. MARILYN MCLAREN: If I can, Ms.  
2 Grammond, the context of the 10 percent for the most  
3 part is history. I don't think the Board has ever  
4 ordered a rebate lower than that in the past.  
5 Nothing specifically ma -- magical or -- or -- we're  
6 -- we're not, you know, strongly tied to that. But  
7 it really is just as a reflection of the history as  
8 we understand it.

9 MS. CANDACE GRAMMOND: Thank you.  
10 Can you comment on the types of costs that are  
11 incurred when a rebate is issued, both hard and soft  
12 costs, and, if you can, the -- give us a general  
13 sense of the dollar amount in terms of magnitude?

14 MS. MARILYN MCLAREN: We would have  
15 to -- what we would probably do is refer back to  
16 information that was filed here in the past quite a  
17 while ago with respect to the actual hard dollar  
18 value costs of issuing rebates. I think it was  
19 somewhere -- and, I mean, it's not onerous. It's not  
20 \$8 million or anything, but I think it was a couple  
21 of million.

22 Postage is the biggest, systems  
23 changes; we have to put overtime in the call centre  
24 because we get lots of questions about people calling  
25 to understand how their rebate was calculated. Those

1 are the three (3) big categories, would be IT costs,  
2 postage, and extra staff time to respond to  
3 questions.

4 MS. CANDACE GRAMMOND: Just so that  
5 we're clear, what are the IT costs for? Is that  
6 generating the cheques, or is it -- is it doing the  
7 actual calculations on the amounts?

8 MS. MARILYN MCLAREN: It would be  
9 both.

10

11 (BRIEF PAUSE)

12

13 MS. CANDACE GRAMMOND: Just a moment,  
14 Madam Chair, if I may?

15

16 (BRIEF PAUSE)

17

18 MS. CANDACE GRAMMOND: Madam Chair, I  
19 do have one (1) additional question on Undertaking  
20 24, if we can just go back to that for a moment; and,  
21 in particular, page 3 with the interest rates  
22 forecast that we were looking at.

23 So if we look at the comparison  
24 between the Q4 of 2013/'14, and the Q4 of 2014/'15,  
25 we see the difference between April and September in

1 2013/'14 is seventy (70) basis points. The  
2 difference between April and September in 2014/'15 is  
3 -- is that an additional fifteen (15) basis points.

4 Am -- am -- are we reading that right?

5 MS. HEATHER REICHERT: Sorry, which  
6 two (2) lines are you looking at again?

7 MS. CANDACE GRAMMOND: We see at Q4  
8 of 2013/'14, if we look across the row, we see a  
9 change from April to September which gives rise to a  
10 70 percent, or a seventy (70) basis point, change.  
11 And then if we look across the same line for Q4 of  
12 2014/'15, we see an 85 percent, or eighty-five (85)  
13 basis point, change.

14 So I -- the question is, is whether  
15 the -- if we take the -- the seventy (70) basis  
16 points from 2013/'14 and compare it with the eighty-  
17 five (85) for 2014/'15, is that really seventy (70)  
18 plus eighty-five (85)? Or is it seventy (70) plus  
19 fifteen (15), for a total of eighty-five (85)?

20 MS. HEATHER REICHERT: Seventy (70)  
21 plus fifteen (15), for a total of eighty-five (85).

22 MS. CANDACE GRAMMOND: Thank you. So  
23 the net income impact from Q4 of 2013/'14 to Q4 of  
24 2014/'15 would be equivalent to fifteen (15) basis  
25 points?



1 MS. HEATHER REICHERT: In comparing  
2 these two (2) different scenarios, yes. But in  
3 looking at each scenario in and of itself, you've got  
4 April with a thirty-two (32) basis point increase,  
5 and September with a forty-eight (48) basis point  
6 increase, which that's -- that's the significance in  
7 what is reflected in the scenarios that are on the  
8 last page.

9 MS. CANDACE GRAMMOND: Thank you.  
10 Okay. So, Madam Chair, I do believe I've completed  
11 my cross on behalf of the Board. I don't believe  
12 there's any other cross from the Intervenor, but  
13 perhaps we can just confirm that in a moment. And I  
14 would just take this opportunity to say thank you to  
15 Ms. McLaren. That was our last exchange, as I  
16 understand it, on the record. And you've been a  
17 great witness all these years, and I do appreciate  
18 it. Thank you.

19 MS. MARILYN MCLAREN: Thank you very  
20 much.

21 THE CHAIRPERSON: Thank you, Ms.  
22 Grammond. Now I believe you're going to begin with  
23 your closing remarks?

24 MS. CANDACE GRAMMOND: Yes, that is  
25 my intention as long as none of the Intervenor have

1 any further cross for the panel.

2 THE CHAIRPERSON: Mr. Oakes...?

3 MR. RAYMOND OAKES: No, Madam Chair.

4 MS. MEGHAN MENZIES: I would like to  
5 just call Mr. Williams to confirm that if -- is that  
6 all right?

7 MS. CANDACE GRAMMOND: We can take a  
8 two (2) minute break, Madam Chair, if -- so Ms.  
9 Menzies can do that.

10 THE CHAIRPERSON: Yes, that would  
11 work fine.

12 MS. MEGHAN MENZIES: Thank you.

13

14 --- Upon recessing at 10:05 a.m.

15 --- Upon resuming at 10:13 a.m.

16

17 THE CHAIRPERSON: Okay, we're ready  
18 to resume. First, Mr. Williams has no cross-  
19 examination at this time. So this completes our  
20 cross-examination for these hearings. Now I would  
21 like to call upon Ms. Grammond to give her closing  
22 comments.

23

24 (PANEL STANDS DOWN)

25

1 CLOSING COMMENTS BY MS. CANDACE GRAMMOND

2 MS. CANDACE GRAMMOND: Thank you,  
3 madam chair. So we have now completed the  
4 evidentiary part of this public hearing with respect  
5 to the 2014/'15 General Rate Application, or GRA,  
6 filed by Manitoba Public Insurance. The Board will  
7 soon deliberate upon the Application for base rates  
8 and premiums charged for compulsory vehicle and  
9 driver insurance to take effect on March 1st, 2014.

10 As counsel for the Board, I take no  
11 position on the merits of any part of the Application  
12 or the positions taken by any of the parties. My  
13 role is to summarize the matters that are before the  
14 Board and discuss matters that it may wish to  
15 consider in making its decisions.

16 MPI is seeking approval for rates that  
17 will constitute an overall 1.8 percent increase in  
18 Basic insurance premiums. MPI is also seeking the  
19 Board's approval for the use of the DCAT methodology  
20 to determine the Basic RSR based on the chief  
21 actuary's final DCAT report, filed as Exhibit MPI-31  
22 in this proceeding. And 'DCAT' of course stands for  
23 Dynamic Capital Adequacy Testing.

24 The Corporation also asks that if the  
25 Board deems necessary a range around the recommended

1 RSR target, which is the rate stabilization reserve  
2 target, that the range be based on actuarial  
3 guidelines of a one (1) in twenty (20) to a one (1)  
4 in one hundred (100) probable event.

5 In addition, MPI has asked that the  
6 Board no longer require that it file the exponential  
7 and linear forecasts, which the Board has required  
8 since Order 174/'92, which was issued in late 1992.

9 MPI is seeking approval for Basic  
10 rates effective March 1st, 2014, for the 2013 and  
11 2014 insurance years, for the new insurance uses  
12 collector, passenger vehicle, and collector truck,  
13 announced by the Province on July 12th, 2013.

14 The Corporation seeks no changes to  
15 driver licensing premiums or vehicle premium  
16 discounts and does not propose any changes to service  
17 or transaction fees, permit and certificate fees,  
18 fleet rebates or surcharges, or the discount for  
19 after-market and manufacturer or dealer installed  
20 anti-theft devices.

21 The average rate adjustment proposed  
22 by MPI for each major vehicle class is as follows:  
23 for the private passenger class, an increase of 2  
24 percent; for the commercial class, a decrease of 1.8  
25 percent; for the public class, an increase of 4.6

1 percent; for motorcycles, a decrease of 6 percent;  
2 for the trailer class, an increase of 7.8 percent;  
3 and for off-road vehicles, a decrease of 12.9  
4 percent.

5                   These adjustments taken together lead  
6 to the overall proposed rate increase of 1.8 percent.  
7 If the Corporation's proposal is accepted, actual  
8 vehicle premiums charged will vary depending on the  
9 claims experience and driving record of the  
10 registered owner, their insurance use, territory, and  
11 vehicle rate group.

12                   After consideration of insurance use  
13 and territory and capping and balancing for  
14 experience rate adjustments, the results were  
15 modelled by the Corporation to assess the impact of  
16 various rate and classification changes. In total,  
17 the vehicle population for the year of the  
18 Application is one million, forty-nine thousand, four  
19 hundred and nine (1,049,409) vehicles, which includes  
20 sixty-two thousand, one hundred (62,100) off-road  
21 vehicles, to which the proposed rate would be applied  
22 as follows.

23                   Seven hundred and seven thousand,  
24 ninety (707,090) vehicles, or 67 percent of the  
25 overall fleet, would receive a rate increase, the

1 majority of which would be \$19 or less. Two hundred  
2 and fifty-nine thousand, eighty-five (259,085)  
3 vehicles, or 25 percent of the overall fleet, would  
4 receive a rate decrease. And eighty-three thousand,  
5 two hundred thirty-four (83,234), or 8 percent of the  
6 fleet, would receive no change in rates.

7                   The Corporation has provided to the  
8 Board its actual financial results with respect to  
9 the 2012/'13 year, as well, for the first six months  
10 of the current year, 2013/'14. For the 2012/'13  
11 fiscal year the financial results are found at pro  
12 forma 2, or PF2, which is at Tab 7 of the Board's  
13 book of documents. That reflects that Basic had a  
14 net loss of 72.2 million for rate-setting purposes,  
15 compared with a forecasted net loss of 4.7 million at  
16 last year's GRA.

17                   With respect to the current year,  
18 2013/'14, at last year's GRA MPI forecast for Basic a  
19 net loss of 5.6 million for rating purposes, revised  
20 to a net income of 5.4 million in this GRA.

21                   For the first six (6) months of the  
22 current Basic has had a net income of 21.8 million.  
23 And the second quarter report for MPI is Exhibit --  
24 MPI Exhibit 33. And the Corporation as a whole has  
25 had net income of 41.9 million for the first two (2)

1 quarters of this year.

2                   This improvement was due primarily to  
3 a gain of 55.6 million on the sale of US equities  
4 held in a passively managed fund. And the reference  
5 for that is page 306 of the transcript.

6                   The evidence reflects that interest  
7 rates have increased since MPI prepared its GRA  
8 earlier this year. And MPI has advised that if  
9 interest rates do not change through the end of  
10 2013/'14, it expects a Basic net income of 30.3  
11 million for 2013/'14.

12                   MPI has not, however, revised its  
13 forecast for Basic through the end of the current  
14 year on the basis of the actual results achieved in  
15 the second quarter of this year. Rather, MPI asks  
16 that the Board rely upon the forecast filed within  
17 the GRA, which is found at pro forma 1, or PF1, Tab 6  
18 of the Board's book of documents.

19                   MPI is forecasting for 786.6 million  
20 in total earned revenues, 647.2 million in net claims  
21 incurred, 110.6 million in claims expenses, 12.4  
22 million in road safety expenses, 125.3 million in  
23 operating expenses, and 114.5 million in investment  
24 income for a net income for the year of 5.4 million,  
25 as I stated previously.

1 MPI's projections for the outlook  
2 period from the year of the Application through  
3 2017/'18 are reflected at PF1, which is, again, at  
4 Tab 6 of the Board's book of documents. MPI has  
5 advised that it continues to seek to break even over  
6 a two (2) year period. It is projecting a \$7.5  
7 million loss for the year of the Application and a  
8 net income of 2.2 million for the following year,  
9 2015/'16, which averages to a breakeven position.

10 MPI is also forecasting growth in its  
11 total earned revenues over the outlook period due to  
12 the volume and upgrade factor increases as well as  
13 the 1.8 percent overall premium increase being  
14 applied for.

15 With respect to the rate stabilization  
16 reserve, or RSR, the Corporation has confirmed again  
17 this year that the stated purpose of the RSR is to  
18 protect motorists from rate increases made necessary  
19 by unexpected events or losses arising from  
20 nonrecurring events or factors.

21 Per the GRA filing, total Basic  
22 retained earnings were 1 point -- pardon me, were  
23 141.5 million at the 2012/'13 year end, including  
24 accumulated other comprehensive income, or AOCI.  
25 Total equity in Basic was 225.8 million as at



1 February 28th, 2013. As at August 31st, 2013, total  
2 Basic retained earnings were 163.3 million.  
3 Pursuant to the GRA filing, total  
4 Basic retained earnings are forecast to be 146.9  
5 million at the 2013/'14 year end, and 139.4 million  
6 at the 2014/'15 year end. Both of these forecasts  
7 exclude AOCI and consideration of the 2013/'14 actual  
8 second quarter results. Overall corporate equity as  
9 at February 29th, 2013, including AOCI was 430  
10 million, which increased slightly to 430.7 million as  
11 at August 31st, 2013.

12 As I mentioned previously, MPI is  
13 seeking the Board's approval for the use of the DCAT  
14 methodology to determine the Basic RSR target. At  
15 present, the methodology by which the RSR is set is  
16 on the basis of tre -- of 10 percent to 20 percent of  
17 gross written premium. The existing RSR range is  
18 82.6 million to 164.9 million, which is forecasted to  
19 grow to 88.1 million to 175.8 million in 2014/'15.

20 The Corporation's DCAT was prepared  
21 internally by MPI's chief actuary, Mr. Luke Johnston.  
22 And the DCAT states that the Corporation's financial  
23 condition is satisfactory if, throughout the forecast  
24 period, it is able to meet all of its future  
25 obligations under all plausible adverse scenarios and

1 under the base scenario that meets the minimum  
2 regulatory capital requirement.

3                   Based on this definition, Mr. Johnston  
4 concluded that Basic's future financial condition was  
5 not satisfactory at the current approved regulatory  
6 maximum RSR target level. Based on the results of  
7 the DCAT analysis, the Corporation has determined  
8 that the Basic RSR target level should be 172  
9 million.

10                   In last year's Order number 157/'12,  
11 the Board stated its belief that the DCAT methodology  
12 is an improved approach for determining the target  
13 for the Basic RSR over the current methodology.  
14 However, the Board stated that further analysis and  
15 discussion was needed, particularly in relation to  
16 the adverse scenarios used in the DCAT and the  
17 methodology construct before such an approach should  
18 be utilized for rate-setting purposes.

19                   The Board ordered MPI to hold a  
20 technical conference in early 2013 to discuss, as  
21 between the parties to the GRA, the adverse scenarios  
22 and methodology construct being utilized by the  
23 Corporation within the DCAT, with a view to refining  
24 the adverse scenarios and gaining a better  
25 understanding of the DCAT modelling process.

1                   That technical conference began in  
2 April 2013, at which time a useful discussion was  
3 had. MPI agreed to make certain changes to its DCAT  
4 methodology, and to include the modelling of its  
5 balance sheet. MPI repeated its commitment to do so  
6 at this GRA, and we look forward to receipt of that  
7 modelling and the continuation of the DCAT technical  
8 conference to consider that modelling in detail.

9                   MPI's external appointed actuary, Mr.  
10 Cheng, has reviewed the current DCAT report and has  
11 restated his recommendation from last year that he  
12 supports the inclusion of AOCI in the RSR threshold,  
13 stay -- stating, quote:

14                                 "I believe the threshold for  
15                                 failing this test should include  
16                                 monies available under accumulated  
17                                 other comprehensive income section  
18                                 of total equity, not just the RSR."

19                   End quote. MPI disagrees with that  
20 statement. Both Mr. Cheng and MPI have stated  
21 that AOCI should be a consideration when deciding on  
22 rebates and surcharges. And the reference for that  
23 is page 1,598 of the transcript. MPI maintains that  
24 AOCI should not be considered for the purposes of  
25 setting the RSR target.

1                   A proposed overall rate level  
2 adjustment of a 1.8 percent increase is based on the  
3 same fundamental methodology employed by the  
4 Corporation for Basic rate setting for many years.  
5 The Corporation acknowledged that this rate  
6 indication was not prepared in accordance with  
7 accepted actuarial practice in Canada, as defined by  
8 a relatively new standard of practice of the Canadian  
9 Institute of Actuaries, and indicated that complete  
10 disclosure in this regard will be forthcoming with  
11 the next GRA.

12                   In establishing Basic rates, the Board  
13 has stated in the past that it looks to the overall  
14 financial wellness of the Corporation. MPI has  
15 expressed disagreement with this approach and has  
16 asked that the Board look at Basic's retained  
17 earnings only, as it is a mandatory line of business  
18 that has to stand on its own financially, though MPI  
19 acknowledges that the Basic Compulsory Program  
20 comprises the vast majority of the Corporation's  
21 operations.

22                   The Corporation has, as of year end  
23 2012/'13, 325.4 million in retained earnings  
24 including the 141.4 million in Basic that I mentioned  
25 earlier, as well as 177.2 million in Extension and

1 SRE, and 6.7 million in the Extension Development  
2 Fund.

3 MPI has exceeded its retained earnings  
4 targets in Extension and SRE by over 105 million, but  
5 has not advised of a strategy to deal with the excess  
6 retained earnings in those lines of business. MPI  
7 does not agree that this Board should consider the  
8 overall financial well-being of the Corporation for  
9 setting Basic rates.

10 We know that the Corporation's  
11 investment income is a major component of its income  
12 and offsets its annual underwriting losses. This  
13 year the Board heard evidence from Assistant Deputy  
14 Minister to the Department of Finance, Mr. Gary  
15 Gibson, with respect to MPI's investments.

16 Mr. Gibson co-chairs, together with  
17 Ms. Heather Reichert, the Investment Committee  
18 Working Group of MPI. This working group is  
19 comprised of members of MPI and the Department of  
20 Finance and discusses aspects of the Corporation's  
21 investment portfolio, including investment policy,  
22 investment income, investment rebalancing, and the  
23 retainer and monitoring of external investment  
24 managers.

25 Although pursuant to legislation, the

1 Minister of Finance is responsible for MPI's  
2 investment portfolio, the Minister has delegated that  
3 responsibility to Mr. Gibson for execution. Mr.  
4 Gibson and his group manage the fixed-income  
5 portfolio of MPI on an independent basis, though they  
6 do seek MPI's input with respect to bonds. And that  
7 reference is page 1,278 of the transcript.

8 MPI's investment department does the  
9 vast majority of background work and research on  
10 equity fund managers and real estate investments.  
11 The evidence reflects that MPI's investment for --  
12 portfolio exceeded 2.3 billion as at February 28th,  
13 2013, and that the funds available for investment are  
14 primarily in support of unearned premium reserves and  
15 unpaid claims reserves.

16 The investment portfolio supports --  
17 supports both the payment of accident claims as well  
18 as the pension obligations of the Corporation. The  
19 size of the Corporation -- of the Corporate  
20 investment portfolio for the year of the Application  
21 is projected to be 2.438 billion, comprised of 61  
22 percent in long-term bonds, 20 percent in equities, 3  
23 percent in cash and short-term investments, 10  
24 percent in real estate, and 5 percent in  
25 infrastructure. And that breakdown is found at the

1 investment income section of the filing; in  
2 particular, an excerpt at Tab 9 at the Board's book  
3 of documents.

4           The Corporation's investment portfolio  
5 is expected to grow to almost 2.8 billion by  
6 2017/'18. MPI is projecting investment income of  
7 approximately 73.7 million for 2014/'15 of which 63  
8 million, or 85.8 percent -- pardon me, 85.5 percent  
9 is Basic's share.

10           MPI's investment portfolio has a  
11 significant waiting in long-term bonds of over 61  
12 percent. The return -- the returns on the bond  
13 portfolio are susceptible to changes in interest  
14 rates. Current average yields on long-term bonds are  
15 approximately 5 percent. An increase in interest  
16 rates would result in a reduction in the value of the  
17 bond portfolio and would negatively impact returns on  
18 bonds.

19           MPI has presented to the Board this  
20 year a new methodology for forecasting investment  
21 income, which includes changes to the calculation of  
22 interest rate impacts on the market value of the bond  
23 portfolio, the addition of marketable bond and equity  
24 turnover assumptions, a spread assumption for new  
25 marketable bond purchases, and new rebalancing rules

1 within the model.

2                   Pursuant to the new method, MPI can  
3 forecast the impact that changes in interest rates  
4 will have on the value of the fixed income portfolio  
5 and claims liabilities. MPI has advised that it  
6 continues to utilize an asset/liability matching  
7 program to duration match the portfolio returns with  
8 the payment of its obligations, attempting to match  
9 the approximate average cashflow of assets to  
10 liabilities, though at present there is an  
11 intentional mismatch in place in order that the  
12 Corporation can take advantage of expected future  
13 interest -- increases in interest rates.

14                   A forecast of increasing interest  
15 rates is favourable to the Corporation, given this  
16 mismatch of assets and liability duration. If,  
17 however, an increase in interest rates as predicted  
18 does not occur, the Corporation has advised that the  
19 downside would be significant.

20                   In particular, due to the duration  
21 mismatch between claims and the fixed income  
22 portfolio, for every fifty (50) basis points that  
23 interest rates are lower than forecast MPI estimates  
24 that this will have a net negative variance of  
25 approximately 27.7 million. And the reference for



1 that is page 817 of the transcript.

2                   The five (5) major banks and Global  
3 Insight have been forecasting increasing interest  
4 rates and, over the last number of years, those  
5 forecasts have been higher than what the actual rates  
6 were. MPI has advised that it would be accepting too  
7 high a level of interest rate risk if it continued to  
8 use the same method for forecasting interest rates  
9 that it has used in the past. And that's at page 61  
10 of the transcript.

11                   MPI is concerned that the forecasters  
12 may not be right and states that the negative impact  
13 on MPI's financial condition and rate stability is  
14 too great to continue to rely upon these forecasts.  
15 The GRA interest rate forecast combines an MPI  
16 devised methodology where the five (5) year growth  
17 rate forecast interest rates from the forecasters  
18 were assumed to occur over a ten (10) year period,  
19 effectively cutting the interest rate growth change  
20 forecast in half.

21                   MPI has asked the Board to accept this  
22 interest rate methodology as it would protect MPI  
23 from some down side financial impact if interest rate  
24 increases do not materialize. MPI has proposed the  
25 use of this low growth interest rate scenario for

1 years 1, 2, and 3 and the Conference Board of  
2 Canada's April 2013 interest rate forecast for years  
3 4 and 5; and the reference for that is at the  
4 investment income section 1.2 of the filing.

5           The low growth interest rate scenario  
6 impacts the rate application years, but the proposed  
7 methodology does not recognize the seventy (70) basis  
8 point increase in interest rates that has occurred on  
9 ten (10) year Government of Canada bonds since the  
10 end of August 2013.

11           MPI has provided a corporate wide  
12 capital ex -- expenditure forecast. The projected  
13 capital expenditures are 37 million for 2013/'14, 30  
14 million for 2014/'15, and 25.3 million for 2015/'16;  
15 so over \$92 million in the next three (3) years.

16           The majority of the capital spending  
17 is on IT-related projects. The disaster recovery and  
18 human resource management system projects are  
19 forecast to be completed in 2013/'14. And the  
20 physical damage re-engineering project is the major  
21 project currently under way and is slated to be  
22 completed in 2016/'17. And the reference for that is  
23 PUB/MPI-2-33 in the attachment.

24           I also have some comments about  
25 information technology expenses. MPI incurs

1 significant annual costs to support its information  
2 technology. Annual IT expenses have grown from 24.7  
3 million in 2005/2006 to over 50 million in 2012/'13;  
4 a compound annual growth rate of 10.6 percent.

5                   The budget for 2013/'14, as presented  
6 within the GRA, is 53.5 million, which will be spent  
7 primarily on data processing and compensation. MPI  
8 is forecasting to spend 60.6 million in 2014/'15 and  
9 59 million in 2015/'16 on information technology.

10                   MPI has advised that its operations  
11 are very technology intensive and that it uses  
12 technology extensively to provide services to  
13 Manitobans. MPI has given evidence that, due to the  
14 extent of the upgrades and maintenance that are  
15 required to its IT systems, significant expenditures  
16 are required.

17                   Total basic expenses were 193.6  
18 million in 2012/'13, up from 187.2 million in  
19 2011/'12, and are forecast to be 193.1 million in  
20 2013/'14. Thereafter, basic expenses are forecast to  
21 grow to 203.3 million in the year of the application.

22                   A major component of basic expenses  
23 are operating expenses which were forecast to be 66.8  
24 million in the current year and are forecast to be  
25 69.9 million in 2014/'15. Salaries and benefits are

1 a major component of the operating expenses of the  
2 Corporation, representing over 55 percent of the  
3 total operating expenses in the year of the  
4 application.

5                   From 2008/'09 to 2012/'13, Basic's  
6 compensation expenses increased by over 36 percent.  
7 Compensation has grown from 83.4 million in 2008/'09  
8 to 113/8 million in 2012/'13, a compound annual  
9 intere -- annual increase of 8.1 percent in excess of  
10 annual inflation. And that's at PUB/MPI-2-30  
11 attachment.

12                   MPI has attributed the increase above  
13 inflation to be due to the needs of its various  
14 improvement initiative projects and operational  
15 requirements. MPI is now forecasting a reduction in  
16 compensation expenses of 3.5 percent in 2013/'14, and  
17 increases of 4 percent in 2014/'15, and 4.2 percent  
18 in 2015/'16; which forecasts are in excess of  
19 inflation at 2 percent. And that reference is  
20 PUB/MPI-2-29A attachment.

21                   The collective agreement between MPI  
22 and the Manitoba Government and General Employees  
23 Union, or MGEU, which covers 90 percent of MPI's work  
24 force, expired on September 22nd, 2012. The main  
25 terms of the new collective agreement include no

1 monetary increases in year 1 or year 2, followed by  
2 increases of 2.75 percent in years 3 and 4. The four  
3 (4) year contract is in effect for the period from  
4 September 23rd, 2012 to September 17th, 2016. There  
5 was also a 0.8 percent provided for benefit  
6 improvements effective in year 3. And that's at  
7 PUB/MPI-1-75B.

8                   Normal staffing levels increased from  
9 seven hundred and thirty-two (732) FTE, or full time  
10 equivalents, in 2008/'09, to eigh -- eighteen hundred  
11 ninety-four point seven (1,894.7) full time  
12 equivalents in 2012/'13.

13                   I -- I may have misspoken, so I'll --  
14 I'll just back up a minute.

15                   What I meant to say was that normal  
16 staffing levels increased from seventeen hundred  
17 thirty-two (1,732) FTEs -- I may have said seven  
18 hundred and thirty-two (732), so I apologize. It  
19 should be seventeen hundred and thirty-two (1,732).  
20 That's in 2008/'09. Increased to eighteen hundred  
21 and ninety-four point seven (1,894.7) full time  
22 equivalents in 2012/'13.

23                   The majority of the change relates to  
24 FTEs absorbed back into MPI's normal operations once  
25 special projects had been completed. The overall,

1 corporate staffing level of nineteen hundred and  
2 fifty-one point two (1,951.2) FTEs for 2013/'14,  
3 included nineteen hundred and thirty-four point seven  
4 (1,934.7) FTEs for normal operations and sixteen  
5 point-five (16.5) FTEs for improvement initiative  
6 staff, and was an increase from nineteen hundred  
7 eleven point eight (1,911.8) FTEs in 2012/'13.

8                   We have also heard a significant  
9 amount of evidence this year with respect to road  
10 safety matters. MPI is forecasting to spend 12.4  
11 million in Basic road safety and loss prevention  
12 programs this year and 11.6 million in 2014/'15.  
13 Within the 2013/'14 Basic road safety and loss pro --  
14 loss prevention program budget, the largest component  
15 is spending on the driver education program which  
16 includes the high school driver education program.  
17 And that's approximately 4.3 million, or 37.5 percent  
18 of the overall budget.

19                   Auto crime prevention strategies are  
20 the second largest expenditure at 3 million, or 25.6  
21 percent of the overall budget. The balance of the  
22 road safety programs relate to advertising and  
23 sponsorships, road safety programming, and road  
24 watch, which is, in essence, increased enforcement.

25                   The Corporation is in the process of

1 considering significant changes to the high school  
2 driver education program and, to that end, the Board  
3 heard evidence from Allen and Brett Robinson of  
4 ADTSEA, which is the American Driver and Traffic  
5 Safety Education Association, with respect to their  
6 recommendations for a higher order, or second phase,  
7 driver education program.

8           Such a program would include two (2)  
9 stages of driver education, in which basic driving  
10 skills are taught in the first stage, followed by  
11 driving time with parents or guardians, after which  
12 the students are brought back to class to discuss the  
13 situations that they encountered and their behaviour  
14 in those situations. Such a program has been  
15 implemented in the State of Michigan and has met with  
16 success.

17           MPI has advised that it is in the  
18 process of considering the report prepared by the  
19 Robinsons and has not yet brought to this Board its  
20 suggestions for improvement to the high school driver  
21 education program or the corresponding costs.

22           The Board also heard evidence from Ms.  
23 Mavis Johnson of the Canadian Traffic Safety  
24 Institute with respect to the safe system approach to  
25 road safety, which Ms. Johnson believes should be

1 implemented in Manitoba. This approach would require  
2 cooperation from the Province of Manitoba, law  
3 enforcement agencies, as well as the Corporation, and  
4 others. Ms. Johnson also commented on existing MPI  
5 programs and her views on assessing the effectiveness  
6 of those programs. In particular, Ms. Johnson  
7 testified that it is critical to assess the costs and  
8 return on every program, and questioned whether MPI  
9 is getting an appropriate bang for its buck at  
10 present.

11 MPI also questioned whether MPI --  
12 pardon me, Ms. Johnson also questioned whether MPI  
13 should continue to spend some \$3 million dollars per  
14 year on anti-theft initiatives.

15 In conclusion, Madam Chair, I have  
16 attempted to comment on the main issues that arose  
17 this year. I would like to thank the Board, the  
18 Interveners, and MPI for their cooperation throughout  
19 the hearing and, subject to any questions that the  
20 Board may have, those are my comments.

21 THE CHAIRPERSON: Thank you very  
22 much, Ms. Grammond. That -- we appreciate the work  
23 you've done. Mr. Gosselin, did you have a question?  
24 No questions at this time. I guess that would  
25 conclude your closing remarks, and I'm going to call



1 upon Mr. Oakes to give his closing remarks at this  
2 time.

3

4 FINAL SUBMISSIONS BY CMMG:

5 MR. RAYMOND OAKES: Thank you, Madam  
6 Chair. As I have recounted previously during the  
7 course of this GRA and, by way of background,  
8 motorcyclists have been victims of excessive rate  
9 hikes through the 1990s and the first decade of this  
10 millennium. The evidence, previously, has been that  
11 over the course of a decade that increases amounted  
12 to 227 percent.

13 We are now in a period where the  
14 Corporation is undertaking significant back-peddalling  
15 in terms of rate reductions for motorcyclists.  
16 Unfortunately there is a continued, conservative  
17 bias. And that's a conservative bias that is  
18 affecting negatively all motorists in Manitoba. We  
19 saw that, previously, in the necessary release of  
20 \$250 million dollars in re -- in case reserves. And  
21 we see that now in a stated need by the Corporation  
22 for \$172 million in RSR.

23 Despite never having those types of  
24 swings, despite calculations ranging from one (1) in  
25 twenty (20) years to one (1) in a hundred (100) years

1 and, certainly, not one justified by common sense.

2                   With respect to the loss ratios that  
3 the Corporation has provided by way of evidence in  
4 this years GRA we see that the actual loss ratios for  
5 both cars and motorcycles, we see them substantially  
6 under 85 percent. We see them often being some two-  
7 thirds (2/3) of the rate forecast produced by the  
8 actuarial department of MPI.

9                   When we reviewed CMMG Information  
10 Request 1-2 and 2-1, after pages 1,059 of the  
11 transcript of following, we saw only three (3) out of  
12 eight (8) years' loss -- actual loss ratios being  
13 over 80 percent. Too often the -- the loss  
14 experience is less than half of the forecast.

15                   And we saw that in 2002, 2004 and  
16 2005. We saw that in 2011, 2012. We saw in 2012  
17 that their losses were \$4.2 million dollars, but  
18 they're looking for \$13 million dollars in -- of  
19 premium in that year; and similarly 2011, 2012. 2011  
20 was six million, one hundred and eighty-five  
21 thousand, nine hundred and ten dollars (\$6,185,910)  
22 of losses, and in 2012 reducing down to four million,  
23 two hundred and eighteen thousand, three hundred and  
24 twenty-three (4,218,323); again, some \$13 million  
25 dollars of premium.

1                   How do we deal with the years when we  
2 may have one (1) or two (2) significant motorcycle  
3 accidents? Well I think the analogy with respect to  
4 the RSR is important. The Corporation tells us we  
5 need -- need to have these massive amounts of money:  
6 \$173 million dollars for a one (1) in twenty (20) or  
7 one (1) in hundred (100) year event. And the  
8 difficulty with that type of thinking is that  
9 motorists that are paying today and may be paying all  
10 of their driving lives for events that don't happen  
11 within their driving lifetimes. And we're see the  
12 situation in -- in the motorcycle insurance where  
13 we're asked to collect for accidents that may cost a  
14 couple million dollars but may not occur this year,  
15 next year, three (3) years from now. And so I -- I  
16 think we have to look at actuarial methodology that  
17 caps serious losses, looks at the expectations, that  
18 those will occur within the year that insurance is  
19 being collected.

20                   So a review of those loss ratio shows  
21 that the current methodology is not accurate. The  
22 result is almost always collecting too much premium.  
23 And that's over and above the padding that the  
24 Corporation does on case reserves, developmental  
25 factors, PFADs for interest rates, PFADs for

1 collection on receivables, and a number of other  
2 padding of the funds that they take in. The result  
3 is anything but elegant, I would suggest.

4                   And it's too easy, I think, for the  
5 Board and others asked to look at complex  
6 calculations that, frankly, other than actuaries, no  
7 one understands and look at them and -- and say that,  
8 Well, that's obviously a very impressive system that  
9 we -- because we can't understand it.

10                   It's somewhat like going to a Parisian  
11 restaurant and have the waiter insult you in French  
12 and saying: Well, French is the language of love.  
13 That sounded wonderful.

14                   So I think the Board should look at  
15 increases, that MPI comes before them, with some  
16 skepticism. It should look at the applied for  
17 reduction in motorcycle rates as not going far enough  
18 based on those loss -- actual loss ratios.

19                   And it's -- really we're at this  
20 juncture because the Board should have held the  
21 increases in the '90s and the first decade of 2000s  
22 well below the 15 percent that was imposed at that  
23 time. And at the time, the CMMG was arguing that  
24 it's ludicrous to have a rate shock limit of 15  
25 percent in an era of 1 or 2 percent inflation. And,

1 certainly, we're held as a voice in the wilderness  
2 and I think that time will bear us out one (1) more  
3 time.

4                   So that systematic overcharging is  
5 something that the Board has a chance to address at  
6 this time and I would suggest that the appropriate  
7 amount of the reduction in the motorcycle rates would  
8 be approximately 10 percent on this year. It also  
9 suggests, in terms of the RSR, that that should be  
10 held at \$100 million.

11                   Moving on from areas apart from rates,  
12 I want to speak briefly about some discrimination in  
13 the motorcycle insurance provided by MPI. Obviously,  
14 motorcyclists pay basic insurance; don't get fire and  
15 theft in their basic insurance. MPI's in a position  
16 where it can create significant profits in fire and  
17 theft with no review by this Board. And so a -- what  
18 should be a basic part of insurance is without  
19 regulation. MPI can charge what they like. There's  
20 effectively no competition on that basis.

21                   The problem's further exacerbated  
22 because motorcyclists have other vehicles that  
23 they're paying insurance that sit on the driveway  
24 while they drive the motorcycles. We're asking this  
25 Board to consider in the future recommendations to

1 the government of the day to extend transferable  
2 plates.

3                   We would ask that, similar to the ICBC  
4 Collector Car Program, that there are the similar  
5 considerations at work. And collector cars, people  
6 have one (1) or more, don't drive them all the time,  
7 have their main transportation, and when they're in  
8 their collector car their main transportation sits.  
9 It's similar to the motorcycle situation.

10                   With respect to very issue --  
11 important issue of road safety, I repeat the  
12 disappointment, that it was -- it wasn't -- we  
13 weren't able to convene a road safety conference;  
14 disappointed in the response of MPI in terms of such  
15 a collaborative and coopera -- cooperative event.  
16 And, again, overall in consideration of MPI's Road  
17 Safety Program, both in terms of motorcycles,  
18 specifically and generally. I would suggest to this  
19 Board that they get a failing grade with respect to  
20 road safety.

21                   We noted, on examination, there's  
22 nobody at the Corporation charged with the  
23 responsibility of doing research into motorcycle  
24 causation or other safety issues of that type; no use  
25 of hot mapping, which is a standard tool in road

1 safety. I think that our -- the witness Ms. Johnson  
2 talked about it as the 'black spot' type of analysis.  
3 We saw both exports (sic) come before this Board this  
4 year and said that it was unacceptable that MPI had  
5 no goals stated in terms of a reduction of -- of the  
6 losses that should occur as a result of an effective  
7 road safety program.

8                   We saw that same disappointing  
9 response evident in the wildlife area. We have a  
10 Corporation that has demonstrated only complacency.  
11 It has no plan. It has no objectives. It has no  
12 initiatives. It has no measuring sticks. And this  
13 is a \$30 million annual problem to Man -- Manitoba  
14 motorists. We are seeing a loss of life of  
15 Manitobans every second year with respect to wildlife  
16 collisions and we have a Corporation that has thrown  
17 up its hands.

18                   We know, as we sit here, that the  
19 Manitoba government is going to twin Highway 1  
20 through the Whiteshell. I would suggest to you that  
21 it's incumbent on MPI to get involved in that  
22 planning to ensure that there is opportunities, where  
23 possible, to ensure that there isn't wildlife  
24 interaction with motorists along that new highway.  
25 Certainly this is the time to do that before it's

1 built.

2                   And we get into the issue of cost-  
3 benefit. Very disappointed with the evidence of Ms.  
4 Johnson; her presentation and her evidence in her  
5 report was to the extent that the social cost should  
6 be considered in the cost-benefit analysis of  
7 initiatives. And Board member Gosselin picked up on  
8 this inconsistency. And it gets down to the question  
9 of: How much is it worth to save a life?

10                   We know that Manitobans are dying one  
11 (1) every two (2) years with respect to wildlife  
12 interactions. And the Corporation has very briefly  
13 looked at the cost of initiatives like fencing  
14 corridors, this kind of thing. But is it worth a  
15 million dollars to save a life?

16                   Should we be looking at the cost of  
17 not only the construction with respect to these  
18 initiatives, but the time in hospital? Should we be  
19 looking at the loss to other family members when a  
20 driver is killed on the highway? Should we be  
21 looking at the loss of an employee at work and the  
22 contribution to the economy? And I'd suggest that we  
23 consider all of those things in doing cost-benefit  
24 analysis.

25                   Perhaps the coming years will show new



1 leadership by MPI. I would indicate to this Board  
2 that I've always been impressed with all of the  
3 executive at MPI. I think that we've had a very  
4 effective leadership and one (1) that Manitobans can  
5 be proud of, but certainly more has to be done in the  
6 area of road safety.

7                   We need a new mentality with respect  
8 to road safety. We heard Ms. Johnson give what I  
9 would suggest is an archaic and outmoded view. And  
10 Dr. Robinson is probably not the right architect to  
11 take us where we have to be as well. And where is  
12 that? I'd suggest that the new leadership of MPI in  
13 the area of road safety should be socially conscious,  
14 should be not compartmentalized, but integrated.

15                   I'd suggest it wouldn't be piecemeal.  
16 We wouldn't hear, It's not my job, it's not in the  
17 legislation, it's somebody else's job. We would have  
18 someone who would work effectively in the design of  
19 highways. We would have a Corporation that was  
20 interested in performing safety audits. They'd be  
21 interested in intersection safety. They would be hot  
22 mapping those intersections, looking for reasons why  
23 there's accidents at that area continually. They  
24 wouldn't be resisting road safety technical  
25 conferences and involving stakeholders. They

1 wouldn't be excluding cyclists. They wouldn't be  
2 seeing road -- vulnerable road users like  
3 motorcycles, pedestrians, and bicyclists that are not  
4 worth bothering with, because they're approximately 5  
5 percent of the vehicle population.

6           This Corporation today, MPI can afford  
7 to work on behalf of all Manitobans for road safety.  
8 They can meet and participate in safety audits that  
9 look at the issues. They can engage researchers.  
10 They can be kept abreast of road safety issues. They  
11 can produce wildlife initiatives. They can review  
12 new highway developments. And they can look at the  
13 social cost to Manitobans of those accidents and work  
14 at proactive ways of reducing those injuries.

15           And I suggest to you that MPI, with  
16 its cash-rich position and the fact that it occu --  
17 occupies the waterfront as a monopoly of government  
18 insurance in this province, can do all of those  
19 things and do them effectively.

20           And those are my comments.

21           THE CHAIRPERSON: Thank you very  
22 much, Mr. Oakes. Were there any questions of Mr.  
23 Oakes?

24           MR. REGIS GOSSELIN: Mr. Oakes, you -  
25 - you suggested that the RSR be \$100 million. On

1 what basis did you arrive at that number?

2 MR. RAYMOND OAKES: Mr. Chairman  
3 (sic), I've heard for twenty (20) years fights over  
4 the RSR. We've heard expert testimony. We've had it  
5 calculated in different ways, DCAT. We've had rough  
6 guidelines. I think that at the end of the day,  
7 while there are -- is perhaps an advantage in looking  
8 at the results of various actuarial tests, at the end  
9 of the day it's a commonsense approach.

10 And you look at the expectation, you  
11 look at the history; how often have we had to use it,  
12 in what circumstances have we had to use it. And  
13 frankly, 100 million is probably too much. But it's  
14 prudent, of course, to -- to ballpark some number.  
15 Ten (10), fifteen (15) years ago parties would have  
16 been laughed out of this room for suggesting \$172  
17 million.

18 The environment hasn't changed. The  
19 business practice hasn't changed. The climate hasn't  
20 changed. I frankly think that we're being buffaloed  
21 into a cash-rich corporation and Manitobans are  
22 paying the freight and not getting the benefit.

23

24

(BRIEF PAUSE)

25

1 THE CHAIRPERSON: Well, thank you  
2 very much, Mr. Oakes. We appreciate the work you do  
3 for the CMMG and we'll take your comments into  
4 consideration as we make our deliberations. I  
5 believe I'll call upon Ms. Peters to make any closing  
6 comment.

7

8 FINAL SUBMISSIONS BY CAA:

9 MS. LIZ PETERS: Thank you, Madam  
10 Chair. Thanks everyone for letting CAA participate  
11 as an Intervenor in this process once again. It's  
12 our nineteenth (19th) year doing so and we do always  
13 appreciate the opportunity, albeit in an  
14 observational role. As always, our closing comments  
15 will be short.

16 My president and CO, Mike Mager, does  
17 send his regrets for not able to be -- not being able  
18 to attend today. But he did ask me to pass along my  
19 best wishes to you, Ms. McLaren, as you begin the  
20 next chapter of your life. He said he applauds your  
21 strong leadership that you've provided over the years  
22 and wishes you well.

23 Our reasons for participating are  
24 similar to the other Intervenors here today. We wish  
25 to ensure that the rates set for Manitoba drivers are

1 fair and are reasonable, whether you drive a car, or  
2 a truck, an SUV, or -- or a motorcycle.

3                   The overall operations of the  
4 Corporation should be efficient in order to achieve  
5 those fair and reasonable rates. That said, of  
6 particular interest this year for CAA (Manitoba) was  
7 the road safety discussion and the various  
8 initiatives and how they can and do impact claims  
9 incurred and then, in turn, the rates that we pay.

10                   The 1 percent rate increase that's  
11 been proposed by -- has been proposed by the  
12 Corporation, while in years past CAA (Manitoba) has  
13 not supported rated increases and has even advocated  
14 for -- advocated for large rebates and reductions  
15 instead of -- to instead be granted, this year  
16 although we don't support the rate increase because  
17 we think retained earnings in the RSR are still at  
18 unnecessarily high levels, we are open-minded about a  
19 small increase if it were to mean a greater focus  
20 could be put towards some of the idea discussed last  
21 week.

22                   In regards to the two (2)  
23 presentations by experts brought by MPI and CAC,  
24 while each provided the Board and Intervenors with a  
25 lot of valuable information. What -- what each also

1 succeeded in doing was raising a lot more questions  
2 about the direction of road safety initiatives  
3 undertaken by the Corporation in past -- in years  
4 past, but also its plans for the future.

5                   On the high school driver education  
6 program, the Corporation's largest annual safety  
7 expenditure, the main question that kept coming up  
8 was that there has been no bench marking to measure  
9 results of the current program. We heard it from  
10 both experts. How do you know if you've been  
11 successful if you don't first establish where you  
12 want to go and what that success looks like? There  
13 has been no analysis to whether students who have  
14 taken the MPI training program versus those who have  
15 not are better or safer drivers down the road.

16                   Manitoba -- or CAA (Manitoba)  
17 continues to support the Corporation subsidizing this  
18 program in order to make it more -- more accessible  
19 for students, but we also believe the current program  
20 shouldn't be changed or funded differently in any way  
21 until fur -- further analysis is done to determine  
22 how well the current program is actually working.

23                   The statement about setting goals to  
24 know what success looks like was also something that  
25 Ms. Johnson's presentation spoke to. The que -- the

1 question was actually posed by Ms. Johnson, How much  
2 money do you think MPI should invest in road safety  
3 initiatives? To which she replied something along  
4 the lines of whether you spend 5 million or fifty  
5 thousand dollars (\$50,000), if you're not spending it  
6 well it doesn't matter how much you spend.

7                   So it's questions like these that  
8 prevent CAA (Manitoba) from fully -- from -- from  
9 fully supporting the rate -- the rate increase this  
10 year. And it raises other questions like, Are the  
11 monies currently allocated to road safety initiatives  
12 enough? If it is, in fact, deemed to be enough, is  
13 the way the money is distributed among the various  
14 road safety initiatives getting the most bang for our  
15 buck when talking about reducing claims?

16                   If it is decided a greater investment  
17 is necessary to execute a different approach to some  
18 road safety initiatives such as the high school  
19 driver education program, or maybe a rural awareness  
20 program, how much is necessary and how will those  
21 monies be collected? Does this money come from more  
22 rate increases to the Basic insurance? Or is it  
23 perhaps rationale for the Board to grant the rate  
24 increase proposed this year or, maybe, increases in  
25 the years ahead?

1                   Anecdotally speaking, Manitoba rate  
2 payers do want their insurance rates to be as low as  
3 possible. Even with several years of no increases  
4 and rebate cheques coming in the mail, more often  
5 than not, I think people are going to say rates could  
6 always be lower.

7                   But in surveys that CAA (Manitoba) has  
8 conducted in recent years, and we do conduct these  
9 semi-annually asking questions such as these, the  
10 tone has been a bit different when it comes to road  
11 safety program. We've asked that question and we do  
12 think that there is a little bit to be welcomed of  
13 increases in road safety investments if it could save  
14 lives. And that's the way that Manitobans are  
15 looking at these things.

16                   Last year in these closing comments,  
17 CAA (Manitoba) commended the Corporation's efforts to  
18 integrate programming in implementation with partners  
19 like the Winnipeg police and others, including  
20 ourselves, but last year we also posed the question  
21 if more could be done to collaborate, even more  
22 strategically with those partners, or if other  
23 strategic partners and new init -- could help create  
24 new and innovative road safety programming.

25                   After this year's hearings, and



1 especially after the testimony of Ms. Johnson, that  
2 sentiment is one (1) that CAA (Manitoba) still  
3 strongly believes should be an important role of the  
4 Corporation's future road safety planning. In our  
5 opinion, with MPI at the helm as strategic leader of  
6 Manitoba's road safety initiatives, working  
7 effectively through partn -- partners should be more  
8 important than it is today.

9                   Growing issues like distracted driving  
10 and continuing concerns like speeding and impaired  
11 driving really haven't improved in recent years, at  
12 least not according to historical numbers presented  
13 during this hearing. Something needs to change.  
14 Goals need to be set in concrete. Improvements needs  
15 to be sought. This is the same feedback that CAA  
16 (Manitoba) actually gave to the Corporation two (2)  
17 years ago, when we met with them as part of the  
18 Comprehensive road safety consultation they  
19 conducted.

20                   So, in conclusion, I know we've really  
21 only touched on the road safety side of the rate  
22 setting process, but I do trust that you'll take our  
23 thoughts into consideration when making your decision  
24 about this rate increase. With that said, Madam  
25 Chair, thank you very much. We w -- wish to thank

1 the Board, and the other Intervenors, and the counsel  
2 for allowing us to participate. And we will, as  
3 always, continue to act on behalf of Manitobans in  
4 the rate setting process. Thank you.

5 THE CHAIRPERSON: Thank you very  
6 much, Ms. Peters. Does anybody have any other  
7 questions for Ms. Peters? Well, again, we thank you  
8 very much and appreciate the work you do representing  
9 CAA and we will take your comments into consideration  
10 as we do our deliberations. Thank you very much.

11 I believe that will end the morning  
12 session at this time, unless -- were there any other  
13 comments? Yes -- yes, Mr. Delaurier? Mr. Delaurier  
14 -- I'll just check with our executive director.

15 MS. CANDACE GRAMMOND: Madam Chair,  
16 might I suggest we just take a very brief break and  
17 we'll determine the next step regarding Mr. Delaurier  
18 and then we'll go from there?

19 THE CHAIRPERSON: Would that be okay,  
20 Mr. Delaurier? We have certain procedures we have to  
21 do. Thank you.

22

23 --- Upon recessing at 11:07 a.m.

24 --- Upon resuming at 11:12 a.m.

25

1 MR. ALCIDE DELAURIER: Okay. Like I  
2 said the first time --

3 THE CHAIRPERSON: Well, just a  
4 moment, Mr. Delaurier. We'll -- I'm sure everybody,  
5 I think, received copies of the documentation.  
6 Thank you. So we will give you ten (10) minutes to  
7 make your comments. Thank you.

8

9 PRESENTATION BY MR. ALCIDE DELAURIER:

10 MR. ALCIDE DELAURIER: Okay. As you  
11 can see, there's -- this is my driving record, I  
12 guess, and all these 100 percenters, you see how --  
13 how I'm responsible for all these accidents. And,  
14 like, I've been in seven (7) accidents and you can  
15 see that there's November 24th, 2011. And then right  
16 at the bottom 20 -- pardon, November 25th, 2011,  
17 they're duplicated. And like I said the first time,  
18 that they're trying to hide all these accidents.  
19 That's what it seems, because you can see on the --  
20 when I went to the AutoPac agency it didn't have  
21 nothing there at all, then this appeared.

22 So I would like an investigation on  
23 everything. I'd like to get -- get some answers. On  
24 my dog, he -- he got ran over. I want -- and I ended  
25 up spending five hundred and fifty bucks (\$550) on

1 vet bills. And I want an investigation. Is that  
2 possible? Or -- because these accidents, he said  
3 last time he was going to answer my questions, but  
4 none of my questions have been answered and I'm still  
5 suffering.

6 Like I had two (2) -- seven (7)  
7 accidents. Do you want to hear how -- you're here.  
8 I can shoot them off if you want? Would you like to  
9 hear?

10 THE CHAIRPERSON: Just briefly if you  
11 could. Thank you.

12 MR. ALCIDE DELAURIER: Okay. Well,  
13 there was the bicycle accident where I got hit twice  
14 -- actually three times. Should have three (3)  
15 claims on that one. And I got a rear end job -- got  
16 rear ended. And -- and then I got into an accident  
17 with my brother. And then I -- I was driving. I hit  
18 a parked car -- a parked truck. I guess that's 100  
19 percent my fault because the windshield wash, it was  
20 empty and it was -- and it was smeared and I ended up  
21 pas -- hitting up that truck, writing off a car.

22 And that car, my brother got quite a  
23 bit of cash for it, but then I don't know how many  
24 months later or whatever, we got into another  
25 accident where he had a nicer car and he got peanuts

1 for it. Peanuts for the car. And he could have --  
2 could have complained about it, but he had to -- I  
3 don't know, it was too much work. He has to do it in  
4 writing or whatever, but I'll get back to the  
5 accidents. And two (2) deer. I wrote off the car --  
6 my ex-girlfriend's car and my son was in it and now  
7 he's got back problems. And how many accidents is  
8 that?

9 THE CHAIRPERSON: And I think covered  
10 year seven (7).

11 MR. ALCIDE DELAURIER: Did it?

12 THE CHAIRPERSON: Thank you.

13 MR. ALCIDE DELAURIER: That's it?  
14 Okay, well. Are we going to do an investigation?  
15 Because, you know what, a lot of strange things like  
16 my name. They want money to put my name back the way  
17 it's supposed to be. Do you want to hear what my  
18 name's supposed to be? So you can -- might be able  
19 to fix that, or what?

20 THE CHAIRPERSON: That's fine. Go  
21 ahead.

22 MR. ALCIDE DELAURIER: It's Alcide  
23 Joseph Raymond Delaurier, my dad's name. And I've  
24 been having a heck of a time trying to get that  
25 changed. I got the birth certificate and I've got --

1 an -- what do you call it there -- my social sec --  
2 or my medical card, medical number. I've got the  
3 name on the back with Raymond. So I'd like to get  
4 that change fixed. I made it -- they put the -- they  
5 put a collections agency after me because I owed them  
6 money.

7                   Like -- how -- how much suffering do I  
8 have to do here? I've been out of work for how many  
9 years? And they want their money -- their -- they  
10 want a pay hike. Pay me -- pay me off. Doesn't that  
11 seem fair? What, am I supposed to suffer the rest of  
12 my life? Am I supposed to be going back on welfare?  
13 Like, this gentleman here I think it was, last time  
14 he gave me a card to go on welfare. Excuse me.

15                   MR. HOLLIS SINGH: He's not here  
16 today.

17                   MR. ALCIDE DELAURIER: Oh, okay.  
18 Sorry. But I'm supposed to go back -- go back on  
19 welfare? And I went on welfare once, or actually  
20 twice, but the last time I was on it I ended up --  
21 the collections agency was -- I had to pay everything  
22 back. So -- okay. And -- what else. Oh, so can you  
23 get an investigation on that?

24                   THE CHAIRPERSON: I'll have to -- we  
25 don't -- this isn't part of our proceedings, but I

1 will refer you to Mr. Hollis will talk to you  
2 following this to discuss that issue.

3 MR. ALCIDE DELAURIER: It's going to  
4 be like last time and then I'm going to have to wait  
5 another year to see you guys.

6 THE CHAIRPERSON: I think things will  
7 proceed faster if you'd just -- after you've finished  
8 we'd take this into evidence, just as we did with  
9 everybody else, and then we listen to it and Mr.  
10 Hollis will deal with you after that, if that's okay  
11 with you?

12 MR. ALCIDE DELAURIER: Okay, I think  
13 so. I think that's about it. Oh, and this letter  
14 here: I want to get fixed up. I want to go to  
15 physio. My doctor gave me a physio thing -- whatever  
16 you -- a majiggy -- prescription. And you can read  
17 what it says there. Basically, they're slapping me  
18 in the face. Because I'd -- I'd like to -- I'd love  
19 to go back to work. But my knees are pretty buggered  
20 and I don't think I can do it. Do you th -- do you  
21 think I could do it after seven (7) accidents? Oh,  
22 and, the last car accident was with a deer and that's  
23 the one that buggered me up. Like all my -- all my -  
24 - I guess, too many knocks.

25 THE CHAIRPERSON: Excuse me. Have

1 you finished with your testimony now? We --

2 MR. ALCIDE DELAURIER: I don't know.

3 I guess so.

4 THE CHAIRPERSON: We really  
5 appreciate you coming and taking the time. We --

6 MR. ALCIDE DELAURIER: Oh, and my  
7 dog. You want to see my dog? His back, how he got  
8 ran over?

9 THE CHAIRPERSON: I think that's  
10 okay. We -- we'll leave that right now, but we  
11 understand that would be a very difficult time for  
12 you. But that would complete your testimony. Mr.  
13 Hollis will now talk with you privately and we thank  
14 you very much again for being part of these.

15 MR. ALCIDE DELAURIER: Oh, and -- and  
16 one (1) more thing about -- oh, sorry. One (1) more  
17 thing.

18 THE CHAIRPERSON: Okay, one (1) more  
19 thing. And then we'll finish.

20 MR. ALCIDE DELAURIER: About my  
21 medication, I -- I gave him all the -- the receipts.  
22 The thing is she wanted me to do all the paperwork,  
23 but I can't do that because my head: it's -- it's  
24 aching, and I'm supposed to remember exactly what the  
25 pain was for -- painkillers were for, for what pain.



1 That was how many years ago? And now I'm not even on  
2 -- on Tylenol 3s no more.

3 So I don't know what to do there  
4 because I can't really afford my medication because  
5 I'm not on social assistance because I got to pay  
6 this out my own pocket.

7 THE CHAIRPERSON: Okay. Thank you.  
8 And thank you again for speaking with us. And Mr.  
9 Hollis will now take you and -- and talk about the  
10 other follow-up.

11 MR. ALCIDE DELAURIER: How -- can I  
12 get some comments, or no?

13 THE CHAIRPERSON: Pardon me?

14 MR. ALCIDE DELAURIER: Can I get some  
15 comments?

16 THE CHAIRPERSON: I will ask if  
17 people would like to ask any questions of Mr.  
18 Delaurier.

19 MR. ALCIDE DELAURIER: Well.

20 THE CHAIRPERSON: Okay. Thank you.  
21 No, not right now, but thank you very much. We have  
22 --

23 MR. ALCIDE DELAURIER: No, but --

24 THE CHAIRPERSON: -- have it  
25 recorded.

1 MR. ALCIDE DELAURIER: So when do I  
2 find out when I can get my answers done?

3 THE CHAIRPERSON: Well, I'd like you  
4 to speak with Mr. Hollis and he will follow up with  
5 you. Okay? Thank you.

6 MR. ALCIDE DELAURIER: Okay. Thank  
7 you.

8 THE CHAIRPERSON: Okay, that will end  
9 our proceedings for this morning. And we will return  
10 at 12:30 with closing remarks by Mr. Williams. Thank  
11 you very much.

12

13 --- Upon recessing at 11:24 a.m.

14 --- Upon resuming at 12:34 p.m.

15

16 THE CHAIRPERSON: Good afternoon.  
17 We're going to begin this afternoon with Mr. Williams  
18 from CAC, who will be giving his closing submissions.

19

20 FINAL SUBMISSIONS BY CAC (MANITOBA):

21 MR. BYRON WILLIAMS: Thank you, Madam  
22 Chair. And just for your -- I'm not sure if the word  
23 is 'benefit' or not, but for the Board's information,  
24 there should be two (2) documents on your desk. One  
25 (1) is an outline of closing submissions. That would

1 be the one that we'll be spending most of our with,  
2 so it -- and then if you could keep at hand the  
3 supporting materials.

4 I wouldn't suggest that it be marked  
5 as an exhibit. It's not evidence. The outline is  
6 not evidence, and the supporting materials are on the  
7 record about three (3) or four (4) different times in  
8 many cases. So I would just -- if -- just suggest  
9 that we not mark them as ev -- evidence, but I  
10 certainly would take advice from My Learned Friend,  
11 Ms. Grammond, if she has any different perspective.

12 MS. CANDACE GRAMMOND: I'm sorry. I  
13 was busy getting a copy of your document and I didn't  
14 hear what you said.

15 MR. BYRON WILLIAMS: I suggested it  
16 not be marked as evidence, Ms. Grammond.

17 MS. CANDACE GRAMMOND: I agree.

18 MR. BYRON WILLIAMS: And, Madam  
19 Chair, I certainly did wish to thank the Board staff.  
20 We had some logistical challenges at our office this  
21 morning. So Board staff filled in, and I think some  
22 MPI staff filled in as well, with some of the  
23 photocopying, so I'll express my appreciation.

24 And before starting, there are --  
25 there is one (1) sad note that my client and

1 certainly I felt that we should bring to the Board's  
2 attention. And that is that Mr. Dave Brett, who was  
3 a very gifted lawyer on behalf of Centra Gas for many  
4 years, certainly in the 1990s was part of his heyday,  
5 has passed away just over the -- over the weekend.  
6 And certainly he made a very valuable contribution to  
7 the Public Utilities Board for a lengthy period of  
8 time and certainly will be missed.

9                   And secondly, it's -- it's really kind  
10 of happy/sad, we'll -- I'll have some comments right  
11 at the end in terms of Ms. McLaren's retirement. So  
12 we're -- we're sad to see her go. But we wish,  
13 certainly on behalf of CAC (Manitoba), wish her much  
14 joy with her grandchildren and with -- with her  
15 family as she moves on to -- to hopefully slightly  
16 more relaxing pastures.

17                   Madam Chair, I -- I neglected to  
18 introduce my client last Friday. Ms. Desorcy was --  
19 has been intimately involved with the road safety  
20 issue for a number of years; has led the focus groups  
21 and advisory groups that CAC (Manitoba) has held on  
22 these issues over the past years; and was very  
23 instrumental in the choice of retaining Ms. Johnson.  
24 So I was pleased that she was able to attend on  
25 Friday. She's here again.

1                   And certainly CAC (Manitoba) would  
2 like to acknowledge both the presence of CAA and Bike  
3 Winnipeg, who have been thoughtful advisors in terms  
4 of road safety issues. I want to make it clear that  
5 any representations in our -- our sub -- in our  
6 closing are the position of CAC (Manitoba), and CAC  
7 (Manitoba) alone. But CAC certainly appreciates the  
8 input both from the focus group and from a var -- a  
9 number of community organizations.

10                   Madam Chair, and good morning -- good  
11 afternoon members of the panel as well. I shouldn't  
12 devote all my attention to you. My client always  
13 asks me to remind you what CAC (Manitoba) is about.  
14 And at -- at page 1 of the outline our client has  
15 flagged the key -- the -- the key perspectives that  
16 CAC brings to this -- this hearing in terms of the  
17 consumer rights that it seeks to uphold and advance,  
18 including the right to be informed, the right to be  
19 heard, the right to consumer education, and the right  
20 to participate in marketplace decision making.

21                   And certainly in this hearing, when  
22 there's been such a focus on issues relating to road  
23 safety and drivers' education, CAC (Manitoba) is  
24 particularly honoured to participate.

25                   On the rest of page 1, I won't -- I

1 won't spend a lot of time on that because that's  
2 really a reiteration of what was presented in our  
3 opening statement. And certainly, from our client's  
4 perspective, the balancing ratepayers and the  
5 monopoly equitimy -- equity among ratepayers, and  
6 just and reasonable rates, constitute, in essence, a  
7 kind of substantive checklist of the questions that  
8 my client explores as it looks at any rate  
9 application. And it's certainly the approach that  
10 our client would recommend to the PUB in this  
11 proceeding, as well.

12 I don't always do this, but there's a  
13 lot of substantive good stuff to come, I assure you,  
14 but I thought you might want to know what the end of  
15 the story is from the perspective of CAC (Manitoba).  
16 And in terms of the rate that is to be determined by  
17 the Public Utilities Board, on pages 2 and 3 of this  
18 outline I highlight our client's advice to the Public  
19 Utilities Board.

20 And we'll start with an essential  
21 issue, which is reliability of forecasts. At the  
22 very start of this hearing, Ms. Reichert clearly  
23 flagged this as a critical issue in this hearing, and  
24 our client agrees with her. Our client will be  
25 taking the position though that the proposed interest

1 rate forecasting methodology for this application put  
2 forward by Manitoba Public Insurance, in our client's  
3 view, is -- is not appropriate or reliable, whether  
4 in the short or long-term.

5           In terms of forecasting, our client  
6 also has some concerns with the Corporation's  
7 estimate of ultimate claims incurred. And, in  
8 particular, they have grounds for concern that the  
9 IBNR -- IBNR for the court reporter, incurred but not  
10 reported for accident benefit weekly indemnity and  
11 accident benefit other may be overstated.

12           In terms of the necessity and prudence  
13 of the Corporation's current and forecast costs, our  
14 client makes the observation, which they believe is  
15 supported by the weight of evidence in this  
16 proceeding, that the Corporation continues to  
17 experience challenging with -- challenges with  
18 information technology cost control and business  
19 process management.

20           From our client's perspective, based  
21 upon their review of the evidence, the forecast  
22 information technology expenditures do not appear to  
23 deliver sufficient value to ratepayers, certainly in  
24 terms of staffing savings.

25           In our client's view, the Corporation

1 has not demonstrated that its management of operating  
2 and claims costs, which are growing significantly  
3 faster than inflation, is prudent and reasonable.  
4 And finally under this category, the Corporation has  
5 not demonstrated that its Road Safety Program is  
6 ideally optimized to reduce collision and claims  
7 costs.

8                   In terms of the sufficiency of  
9 retained earnings for -- for reasonable reserves, our  
10 client would be the first to acknowledge that we've  
11 made a lot of progress in terms of the DCAT, or  
12 Dynamic Capital Adequacy Testing. But it is our  
13 client's view that the DCAT should not be approved  
14 for the purposes of setting the RSR reserve until the  
15 adjourned technical com -- conference is completed  
16 and important issues relating to risk tolerance, the  
17 balance sheet, and the financial model are addressed.

18                   Now, it may be that they're not  
19 determined on a consensus basis. But from our  
20 client's perspective, those are important issues on  
21 the checklist that were not completed when the first  
22 cut of the technical conference was adjourned.

23                   The client notes the consulting  
24 actuary's most recent opinion, which appears to  
25 suggest that the issue of AOCI also should be --



1 should be considered in for the purposes of the DCAT.  
2 And certainly they will be proposing that that issue  
3 be considered in the adjourned technical conference -  
4 - in the resumed technical conference.

5                   Leaving aside AOCI, CAC (Manitoba)  
6 takes the position that the Corporation would appear  
7 to have sufficient reserves in the RSR. If AOCI were  
8 included, it would appear the Corporation may have  
9 excess reserves.

10                   Now, to the \$14 million question, or  
11 in that range: Is the proposed rate increase by MPI  
12 just and reasonable? CAC (Manitoba) takes the  
13 position that the proposed 1.8 percent ren -- rate  
14 increase is not reasonable and necessary.

15                   When it came to the second bullet, CAC  
16 struggled a bit more. Certainly, in its view, based  
17 on the evidence, a rate increase of between zero and  
18 1 percent could be justified. And CAC (Manitoba)  
19 certainly spent a -- a modest bit of time considering  
20 a 1 percent rate increase, recognizing that there has  
21 not been a rate increase for Manitoba Public  
22 Insurance for some period of time.

23                   But in balancing all the factors and  
24 given the challenges experienced on the cost control  
25 side by MPI, CAC (Manitoba) is recommending that a

1 zero percent rate increase be mandated. And in their  
2 view, CA -- a zero percent rate increase would send a  
3 strong and appropriate message to the Corporation in  
4 terms of eff -- efficiency.

5                   Turning to page 4 of the outline. My  
6 client continually reminds me that I am not Dave  
7 Letterman and that my -- that I rarely display a  
8 nimble sense of humour. But we did decide to do some  
9 intellectual plagiarizing from Mr. Letterman and --  
10 and flag from our client's position the top five (5)  
11 reasons the investment forecast of MPI should not be  
12 relied upon.

13                   First, there were pref -- preferable  
14 mechanisms endorsed by the PUB for rate setting in  
15 terms of interest forecasting that my client prefers.  
16 Second, our client is concerned with the proposed  
17 methodology of Manitoba Public Insurance in that it  
18 relies exclusively upon the Corporation's judgment  
19 for the application year; and this in an area,  
20 interest rate forecasting, in which the Corporation  
21 acknowledges it has no particular expertise.

22                   Our client also objects to the  
23 Corporation's propod -- proposed methodology in that  
24 it has not been updated. It is not current to  
25 reflect the most recent forecasts.

1                   Our client takes the perspective that  
2 given the interest rate forecast and the choice of  
3 MPI for proposed Canadian equity re -- return, it is  
4 a conservative estimate rather than a best estimate.  
5 And our client notes that the RSR is in place to  
6 protect against unanticipated low interest rate  
7 scenarios.

8                   Looking out beyond this Application,  
9 our client is concerned that given the overwhelming  
10 reliance on corporate judgment, it does not form the  
11 foundation for -- for the future for a reliable  
12 forecast of -- of interest rates.

13                   Turning to page 5 of the outline.  
14 Obviously, the standard interest rate forecast has  
15 not been endorsed by MPI for this -- this hearing,  
16 but my client did want -- wish to offer a couple of  
17 comments.

18                   As our client understands this  
19 approach, for both the current year and the test  
20 year, the Corporation employees six (6) different  
21 forecasts for each quarter. Under that standard  
22 approach, at a certain point in time there's a sharp  
23 -- sharp switch going from the median of six (6)  
24 forecasters to total reliance on one (1) forecaster.  
25 And certainly from our client's perspective, that

1 switch might be criticized as abr -- as abrupt in  
2 moving from one (1) to six (6) -- or excuse me, from  
3 six (6) to one (1). And, certainly, if there is  
4 consideration to continuing with the standard  
5 approach, our client would be -- we would be looking  
6 to temper that sharp movement after year 2 of the  
7 standard methodology.

8                   So what's the issue, turning to page 6  
9 in the outline, in terms of interest rates? Well, we  
10 know that everyone expects, at some point in time,  
11 interest rates are going to rise. Mr. Gibson said  
12 it. MPI said it in its opening statement and in its  
13 pre-filed evidence. And certainly it's the  
14 Corporation's view that interest rates are expected  
15 to rise from current levels over the next three (3)  
16 years.

17                   But as Ms. Reichert accurately stated,  
18 the challenge is to accurately predict how fast and  
19 when. And certainly there can be no doubt that the  
20 Corporation has relied upon banks and Global Insight,  
21 who have been over-optimistic in recent years. And  
22 our client acknowledges that and -- and as the Board  
23 will be aware, our client has been raising similar  
24 concerns both in Centra Gra -- Gas proceedings and in  
25 Hydro proceedings in terms of over-optimism in terms

1 of forecasting for the past few years.

2                   Our client does note, though, that one  
3 would expect professional forecasters to respond to  
4 what appears to be a bias in their forecasting by  
5 adjusting their algorithms. And MPI, they note, did  
6 not seek to ascertain what if any changes had been  
7 made by these professional forecasters to adjust for  
8 changing evidence in changing circumstances.

9                   At page 7, I don't have a colourful  
10 title for this -- for this presentation, for which I  
11 apologize. But maybe I have a colourful subheading.  
12 And our client actually thinks it's an important  
13 question. Is forecasting an evolutionary art or a  
14 revolutionary art? Because our client understands  
15 perfectly the dissatisfaction of MPI with -- with its  
16 reliance on the standard forecast over the coup --  
17 last few years. It echoes what my client has been  
18 saying in other proceedings.

19                   But then the question becomes,  
20 recognizing some dissatisfaction, what type of  
21 adjustment does one make? Does one make an  
22 evolutionary departure? An evo -- evolutionary  
23 change? Or does one make a sharp break from past  
24 practice? And in a different context I had a bit of  
25 a discussion on that subject with my -- with -- I --

1 I can't call him 'My Friend', because he's not a  
2 lawyer, but with Mr. Johnston who I certainly have  
3 the utmost respect for.

4 And I -- I discussed with him, is --  
5 is the forecasting process an evolutionary process?  
6 And he had a careful, nuanced answer:

7 "If by 'evolutionary' you mean that  
8 we're getting -- constantly getting  
9 new information and new data and  
10 deciding how to use that, yes."

11 And certainly in that discussion, and  
12 I urge the -- the Board to go back to it if I would  
13 have been courteous enough to po -- provide the page  
14 reference. There was a discussion with Mr. -- Mr.  
15 Johnston in terms of the fact that any forecast,  
16 there will be a deviation in terms of the actual  
17 results. And that is the art of forecasting, the  
18 professional forecaster, to examine the results and  
19 make adjustments.

20 And our client notes that if you think  
21 back to the challenges with the IBNR and you think  
22 back to what the Corporation did, it adopted an  
23 evolutionary approach to making adjustments to its  
24 forecast rather than a sharp break from practice.

25 And certainly our clients would expect

1 no less when we are looking at an area where the  
2 Corporation has less expertise, interest rate  
3 forecasting, and one would have expected, given its  
4 dissatisfaction with the standard forecast, that the  
5 Corporation would have -- would have tried to build  
6 on the strengths of the standard forecast rather than  
7 walk away from it. Which, in my client's respectful  
8 submission, is what they did.

9           At page 3 of the supporting material,  
10 if the Board wishes to turn there -- and again the  
11 photocopying is not great. But there is a helpful  
12 excerpt from the Board's recent decision in the  
13 Centra Gas proceeding. Board Order 85/'13. And  
14 under Section 5.2.5, you see a thoughtful discussion  
15 by the Board in that very first paragraph, starting  
16 with an acknowledgement that there have been  
17 challenges in forecasting infra -- interest rate in  
18 this -- in this interest rate environment and -- and  
19 giving advice on how to respond to that.

20           And I'll -- I'll take your eyes away  
21 from that page and pull you back to page 8 of the  
22 outline, which I hope faithfully reflects that  
23 discussion. But it's there if you don't trust me to  
24 -- for -- for your illumination.

25           And a starting point is to -- is to

1 remind MPI and the Board that this issue of  
2 variations from interest rate forecast is not new to  
3 the PUB. As I indicated just earlier, we've dealt  
4 with it in the two (2) most recent Hydro GRAs and  
5 also the two (2) most recent Centre Gas GRAs. And  
6 the PUB, in our client's respectful sub --  
7 submission, have developed a nuanced, evolutionary  
8 approach to dealing with it.

9           First of all, given volatility, a  
10 consensus-based forecast using forecasters is  
11 appropriate. Secondly, we should be mindful and  
12 incorporate the most current information. Third,  
13 recognizing the challenges with -- with recent bias,  
14 it is reasonable to correct an upward bias by  
15 removing the highest forecaster.

16           And you don't need to turn to it, but  
17 we would also note that the PUB, in Centra Order  
18 125/'08, also had prudent advice, more of a long term  
19 perspective, saying that there should be a pro -- a  
20 process to retroactively test the accuracy of  
21 forecasts to assess their inclusion in future  
22 forecasts, highlighting the -- the importance of  
23 using only statistically independent forecasts, and  
24 recommending a proposed process to update the  
25 forecasts in advance of the hearing if warranted,



1 i.e. when interest rate forecasts are evolving.

2                   And as we turn to page 9 of our  
3 client's outline, our client takes a lot of comfort  
4 in the PUB's approach. From our client's perspective  
5 this -- the approach set out in the Centra Order  
6 85/'13 is preferable to the MPI approach. It's  
7 evolutionary, as opposed to revolutionary, in that it  
8 makes improvements to existing modelling. It adjusts  
9 for recent bias.

10                   And a very important point, given  
11 challenges in forecasting, it is not primarily  
12 reliant upon any one (1) approach, which, in our  
13 client's perspective is helpful. It tempers the  
14 chance that you might choose to rely upon an outlier.

15  
16                   It also, by relying upon consensus,  
17 avoids the risk that a utility will simply pick a  
18 number out of an air -- out of the air to further its  
19 own agenda. And our client is not suggesting this in  
20 the case of MPI in this proceeding. MPI is clearly  
21 responding to adverse experience with the standard  
22 forecast. But our client is -- is pointing out the  
23 importance of having forecasting methodology that is  
24 sustainable for the long term. In our client's view,  
25 relying upon the judgment of any monopoly is -- is

1 not a good forecasting methodology when there are  
2 alternatives which -- which could give one more  
3 comfort.

4                   And again, the Centra order, in our  
5 client's view, is preferable to the MPI approach  
6 because it relies upon the most recent information.

7                   Perhaps at risk of being accused of  
8 gilding the lily, I'll outline from my client's  
9 perspective why it believes that the MPI-preferred  
10 approach in this hearing is not consistent with the -  
11 - the approach taken by the PUB in Order number  
12 85/'13.

13                   I've already pointed out that it  
14 didn't seek advice from the exi -- existing  
15 forecasters. But from our client's perspective if  
16 you compare it to the standard forecast, MPI  
17 essentially went from relying on six (6) forecasters  
18 in the test year to zero. And then it went to a  
19 totally new forecaster for the last three (3) years  
20 of its forecast, the Conference Board of Canada. And  
21 certainly from our client's perspective, that's not a  
22 evolutionary approach. And it's -- it is one (1)  
23 that our client would not recommend to the Board.

24                   Our client wishes to highlight --  
25 because really the MPI-preferred approach relies so

1 much upon its judgment, but here are the admissions  
2 of MPI in terms of its own expertise in interest rate  
3 forecasting. That's set out at page 11.

4           The Corporation does not purport to  
5 have special expertise in forecasting interest rates.  
6 It agrees that it has no specialized models for  
7 forecasting interest rates. It does not purport to  
8 have special knowledge of macro-economic factors that  
9 influence interest rates and it does not purport to  
10 have special know -- specialized knowledge of  
11 financial matters that may influence interest rates.

12           And the -- turning to page 12, our  
13 client wishes to highlight a concern it had, that for  
14 the test year, the MPI approach seems to rely  
15 primarily upon its judgment. And I perhaps misspoke  
16 earlier in my submissions because I think said  
17 'exclusively'. I think a better phrase would be  
18 'primarily'.

19           And My Learned Friend, Ms. Grammond,  
20 at page 810 of the transcript asks:

21                   "Can you tell us whether this  
22                   decision to reduce the standard  
23                   interest rate forecast by one-half  
24                   (1/2) was based on any particular  
25                   analysis or whether it was selected

1 through judgment?"

2 Now, Ms. Reichert had a lengthy answer  
3 to this, but her first intuitive response I thought  
4 was helpful and instructive to the Board. And she  
5 suggested it was selected through judgment. And  
6 certainly you can see an excerpt from the transcript,  
7 page 934, my do -- no doubt less able cross-  
8 examination than that of Ms. Grammond when I suggest  
9 to Mr. Reichert:

10 "As compared to the standard pro --  
11 process, you have gone from six (6)  
12 professional forecasters for the  
13 test year to zero."

14 And again, she -- she provides a  
15 lengthy answer, which I recommend to the Board and  
16 MPI for reading. But in our -- in our view, she --  
17 she makes it clear that they did not base it on -- on  
18 any professional interest rate forecaster. And in  
19 our client's view, that is an unsafe methodology upon  
20 which to build interest rate forecasts.

21 At page 13 of the outline our client  
22 makes the argument that the forecast is skewed  
23 downward. Now, Ms. Reichert takes issue with this  
24 suggestion. She said they've -- she suggested  
25 they've chosen an -- an appropriate middle mark

1 between the Conference Board position and the -- and  
2 the standard forecast, but our client disagrees.

3           And from our client's perspective,  
4 they certainly interpret the MPI action as responding  
5 to what it perceived as a greater downside risk and  
6 skewing its forecast down. And if you go to the  
7 middle of page 13 you'll see again an able question  
8 by My Learned Friend, Ms. Grammond, in -- in which  
9 she points out that even the Conference Board of  
10 Canada selection was really an outlier compared to  
11 the bank and Global Insight forecast, and perhaps  
12 suggesting some conservatism in the estimate.

13           Equally important is, if you turn to  
14 page 14 -- and I don't want to dwell on this point  
15 because I think it is well canvassed in the cross-  
16 examination of the Board at pages 757. But in our  
17 client's view, there can be no doubt that the  
18 Corporation's forecast is skewed down by the  
19 selection of a conservative methodology for  
20 forecasting Canadian equities.

21           And as -- as our client understands  
22 it, certainly our client understood the -- the  
23 direction from PUB Order 157/'12 from last year to be  
24 -- to -- to be using the 5th percentile of the twenty  
25 (20) year return as a minimum.

1 MPI had a different interpretation  
2 and, in essence, has, for this year's proceeding,  
3 used the 1st percentile of the twenty (20) year  
4 return as a minimum. And in our client's  
5 perspective, this is an indicia of excessive  
6 conservatism.

7 And the impact on retained earnings is  
8 not immaterial over the two (2) year period in the  
9 range of 3.5 million. But perhaps more importantly,  
10 it reinforces our client's perception that the  
11 selection of the interest rate forecast by the  
12 Corporation is skewed downwards.

13 There can be no doubt that the  
14 Corporation's forecast is weakened by the absence of  
15 more current information. And we've just, on page  
16 15, put an example showing just the difference if you  
17 use July interest rates and the standard forecast.  
18 That's just as an example.

19 Page 16, our client just points to the  
20 RSR and -- and to give MPI credit, in this proceeding  
21 MPI has done some really interesting things with its  
22 DCAT. And they've -- they -- they were, for the  
23 first time, able to incorporate a low interest rate  
24 scenario. And they modelled the risk associated with  
25 the low interest rate scenario, and we set out its

1 conclusions of MPI at page 16.

2                   And the simple point our client makes  
3 is that the risk of unusually low interest rates is  
4 already captured in the pro -- proposed RSR reserve.  
5 In our client's view, there is no need to exaggerate  
6 this risk by double-counting it in the investment  
7 income report. And our client quite understands the  
8 caution of the Corporation.

9                   Our client would have endorsed a -- a  
10 proposal to mute historic bias in the standard  
11 forecast by re -- removing the -- the top forecast  
12 for each quarter. But, in our client's view, the MPI  
13 has -- has presented what is not a best estimate, but  
14 a conservative estimate, one (1) that is already  
15 safeguarded to some degree within the rate  
16 stabilization reserve.

17                   So what is the solution? If I've not  
18 said so already, our -- our client thought there was  
19 a tremendous value added to this proceeding by a  
20 series of PUB Information Requests, PUB-2-15 and 16,  
21 PUB Pre-ask 2 and 3, which set out a number of  
22 scenarios for recalculating this very material  
23 interest rate forecast.

24                   And the one that our client has  
25 considerable support for is one that's, in essence,

1 replicates the Centra Gas Order 85/'13, using the  
2 standard forecast, but dropping the highest inter --  
3 interest rate forecast in each quarter. And PUB Pre-  
4 ask 2 has an extensive discussion of that.

5                   As we understand it, if one used that  
6 forecast methodology and assumed a 1 percent  
7 increase, the net income for MPI for the 2013/'14  
8 year would be just under \$50 million. The net income  
9 for the 2014/'15 year would be a loss of around 1.7  
10 million, with a net income of -- for the 2015/'16  
11 year being a -- a very modest four hundred and  
12 twenty-seven thousand (427,000). In essence, about  
13 as close to break even as one could come.

14                   And just for the Board's information,  
15 if you want to see that calculation presented in the  
16 supporting materials at page 4. And Ms. Grammond  
17 went through this in her cross-examination. But  
18 towards the bottom of the page you'll see that Pre-  
19 ask 2(b), the adjusted standard. And you'll see the  
20 49 million point -- 49.5 million for the 2013/'14  
21 year, and the 1.7 million loss for the 2014/'15 year,  
22 and the four hundred and twenty-seven thousand  
23 (427,000) gain for the net income for the 2015/'16  
24 year.

25                   So from our client's perspective, set



1 out at page 18 is our client's recommendation in  
2 terms of the interest rate forecast. Our client  
3 would recommend that the PUB reject the MPI proposal  
4 as -- primarily based upon judgment.

5                   Like the PUB in -- in the Centra  
6 order, recognizing volatility, it believes a  
7 consensus-based forecast -- using forecast is  
8 appropriate, and that the most current information  
9 should be utilized, given the upward bias in our --  
10 in our client's view, is reasonable to correct by  
11 removing the highest forecaster for each quarter.

12                   In addition, our client believes that  
13 for Canadian equity it should be based on the 5th  
14 percentile twenty (20) year -- year return which our  
15 client believes is consistent with PUB Order 157/'12  
16 at page 33.

17                   There's been a bit of a dialogue in  
18 both Hydro and Centra proceedings about improving how  
19 we approach future proceedings in terms of interest  
20 rate forecasts. And certainly our client would be  
21 supportive going forward of some of the following  
22 approaches.

23                   For years beyond the current year and  
24 the test year, our client would suggest that the  
25 Public Utilities Board consider the inclus --

1 conclusion -- inclusion of more than one (1)  
2 forecaster to avoid the risk of an outlier. They  
3 certainly think, perhaps not annually, but there  
4 should be an ongoing process of retroactively testing  
5 the accuracy of forecasts to assess their inclusion  
6 in future forecasts. And that may very well involve a  
7 dialogue or a consideration of whether, over time,  
8 the Conference Board or the Global Insights is a  
9 preferable choice.

10                   Again, consistent with other  
11 proceedings, our client would recommend the use of  
12 only statistically independent forecasts, and  
13 certainly a proposed process to update the forecast  
14 in advance of the hearing if warranted. And we've  
15 certainly seen, from our client's perspective in this  
16 hearing, when one compares the interest rate forecast  
17 from April to Ju -- July, or to the current time,  
18 certainly from our client's perspective, they're  
19 material and the Board should be dealing with the --  
20 the most relevant and recent information.

21                   I'm going to stay on investment for a  
22 few more minutes and turn our client's attention to -  
23 - at page 19, to the discussion of -- just one (1)  
24 second. Turn our attention to certainly the  
25 discussion the Public Utilities Board and MPI had

1 with Mr. Gibson. I believe it was on -- oh, October  
2 the 9th. And I don't want to give too much credit to  
3 Board member Neville, but I thought she succinctly  
4 phrased the -- the key question when it comes to  
5 investment income and the management of the  
6 investment portfolio, which is: Who drives the bus  
7 on investment decisions?

8                   And by way of overview, and I'll --  
9 I'll walk through our client's reasoning on this,  
10 certainly our client acknowledges that there is no  
11 doubt that the Minister has certain legal authority  
12 with regard to decisions relating to the investments  
13 of the Corporation.

14                   But from our client's perspective, the  
15 evidence from October the 9th made it quite clear  
16 that the primary decision-making body is the  
17 Investment Committee Working Group, where the  
18 Corporation plays a key role.

19                   And from our client's perspective, the  
20 evidence of October 9th also made it clear that in  
21 certain -- do I have the wrong date, Ms. Grammond?  
22 In -- in certain regards, in key areas, such as  
23 portfolio rebalancing, it appears that the  
24 Corporation plays the primary role.

25                   On what do we base these conclusions?

1 Right near the start of his direct evidence Mr.  
2 Gibson, who our client certainly regarded as a candid  
3 witness, had a -- a very insightful statement. And I  
4 put this at the top of page 20 of the -- of the CAC  
5 outline and closing submissions. And I've used my  
6 own emphasis to highlight the -- the key phrase.

7 At pag -- transcript page 1,272, Mr.  
8 Gibson said:

9 "My experience in insurance would  
10 be limited. That's not what I do  
11 for a living. And I rely on the  
12 Corporation, through the Investment  
13 Committee Working Group, to give us  
14 the information we need to help  
15 them out."

16 And certainly right from the start he  
17 was candid in assessing the central role that the  
18 Investment Committee Working Group plays in assisting  
19 in the man -- management and indeed driving the  
20 management of the investment portfolio.

21 Now, Mr. Gibson was clear, at least in  
22 our client's view, that when it came to bonds, that  
23 was primarily his bailiwick, with the working group  
24 discussing broader strategies relating to bonds and  
25 to ensuring duration is kept within the band.

1                   When one got into the operation of  
2 equities, Mr. Gibson highlighted a much more intimate  
3 relationship, certainly, you know, again in our  
4 client's perspective, with the Investment Working  
5 Group driving by consensus the key decisions. The  
6 Working Group discusses the hiring and termination of  
7 external managers. It reviews the monitoring, which  
8 is done either by MPI itself or by an external  
9 consultant hired by MPI.

10                   And he was unable to recall a  
11 situation where there was no consensus relative to  
12 equity managers. Decisions from this Working Group,  
13 using his definition of the word 'consensus', being  
14 driven by consensus.

15                   In terms of real estate investments,  
16 he talked about them being discussed by the Working  
17 Group, achieving consensus upon them, and making a  
18 joint decision on who to hire, and that's quite  
19 startling, which -- which is flagged at page --  
20 transcript page 1,308.

21                   And in terms of the investment policy  
22 statement, all changes to the investment policy  
23 statement with -- within the Working Group were to be  
24 -- in his experience have been done by consensus.

25                   At page 21, we saw some interesting

1 language used by Mr. Gibson in terms of portfolio  
2 review. First of all, in terms of the previous  
3 portfolio review conducted by Aon, A-O-N, I -- he --  
4 he noted that the Corporation had tendered for Aon.  
5 And in our interpretation of transcript page 1,313,  
6 it would be with -- he took the position that it  
7 would be within the Corporation's purview to decide  
8 when another Aon report should be obtained. And  
9 certainly we urge the Board to go back to that  
10 language, but certainly our interpretation on behalf  
11 of our client is that language is quite clear. And  
12 he was unable to recall a situation in which the  
13 portfolio rebalancing issue was not achieved through  
14 consensus.

15                   Interestingly, given his role in  
16 managing bonds, Mr. Gibson indicated that he has no  
17 view on the Corporation being duration matched at 80  
18 percent compared to 100 percent. And his comment  
19 upon this piece of inquiry was, I don't view it as my  
20 job to run the Corporation.

21                   Now, another interesting item our  
22 client garnered from the Gibson discussion was from  
23 the Investment Committee terms of reference. And in  
24 terms of assessing the effectiveness of investment  
25 policy, it's our client's interpretation that it is

1 the Investment Committee which is driving the bus.

2 And certainly our client invites this  
3 Board to turn to -- at your leisure, not today; I --  
4 I wouldn't burden you with it today -- but turn to  
5 Exhibit 47, which is the Investment Committee terms  
6 of re -- reference, and clause 11. And I believe  
7 this is an accurate representation of the second  
8 sentence in clause 11:

9 "The Investment Committee will  
10 establish the actual criteria and  
11 mechanisms for assessing the  
12 effectiveness of investment policy,  
13 including investment strategies and  
14 parameters, in consultation with  
15 the Board."

16 Turning to page 23 of the outline, in  
17 terms of the investment policy review recommended  
18 findings -- not that there would be any question the  
19 PUB would not, but certainly it's -- it would be  
20 appropriate for all of us to realize that the -- the  
21 ambit of the Minister's lawful authority under the  
22 Act. But from our client's perspective, recognizing  
23 the Minister's lawful authority, it is open to the  
24 Public Utilities Board to find that the key decision-  
25 maker in terms of many aspects of the Corporation's

1 investment portfolio is the working group, in which  
2 MPI plays a central role.

3                   And it is open to the PUB to find that  
4 the primary responsibility for initiating portfolio  
5 reb -- review and/or re-balancing discussions, rests  
6 with the Corporation. And certainly, based upon our  
7 review of the evidence on behalf of our client, it is  
8 open for the PUB to -- to find that the Investment  
9 Committee is responsible for establishing the actual  
10 criteria and mechanisms for assessing the  
11 effectiveness of investment policy.

12                   Our client, in terms of investment  
13 policy review, has two (2) recommendations. And our  
14 client, first of all, does want to acknowledge that  
15 it recognizes the likely benefit to the Corporation  
16 of the duration mismatch in a time of rising interest  
17 rates and -- and, frankly, has some sympathy for the  
18 Corporation's interest in -- in taking some advantage  
19 of it.

20                   But certainly for future proceedings  
21 our client believes that it would be timely for the  
22 Corporation to bring forward a discussion paper on  
23 the merits and risks associated with a more closely  
24 matched portfolio. Our client takes no position on  
25 the ultimate outcome of -- of that deliberation, but



1 it certainly thinks that such a discussion would be  
2 timely.

3 And also our client, given the passage  
4 of time since Aon -- A-O-N -- suggests that it  
5 certainly would be prudent in the near future for the  
6 Corporation to initiate the process of a portfolio  
7 review for the consideration of the PUB.

8 Now, as is the wont of most  
9 Intervenors in these proceedings, our clients have  
10 made a -- a number of recommendations, which you'll  
11 see relating to research they would like the  
12 Corporation to undertake. And they certainly are  
13 mindful that there's only so many things you can put  
14 on a corporation's regulatory plate in a particular  
15 proceeding. So they have suggested that  
16 consideration be given to initiating the process of a  
17 portfolio review either for the 2015/'16 year, or  
18 perhaps for the 2016/'17 year.

19 Madam Chair and members of the panel,  
20 turning to page 24 of our client's outline, we did  
21 outline a primary concern with the reliability of the  
22 Corporation's forecast in terms of interest rates.  
23 Our client has a -- another important concern in  
24 terms of forecasting, and that relates to the IBNR  
25 for accident benefit weekly indemnity and accident

1 benefit other.

2                   And it's a bit of a complicated issue,  
3 so if the Panel will bear with me I just want to  
4 refresh your memory in terms of our client's  
5 understanding of this issue.

6                   First of all, the Corporation was  
7 experiencing challenges, in terms of its case  
8 reserves in bodily injury. And this occurred  
9 contemporaneous with the -- to our client's  
10 understanding, with the move to the BIII, as it's  
11 called, the Bodily Injury Improvement Initiative,  
12 when there was considerable st -- stress within the  
13 labour force of the claims department.

14                   And as MPI candidly put forward in its  
15 response to CAC Pre-ask 4(e), the problem with a  
16 failure to comply with policy, precipitated by an  
17 increase in workload and decrease in productivity in  
18 the first eighteen (18) months of the new system,  
19 I've put in brackets, "BIII implementation." And as  
20 -- as my client understands the issue, it was in some  
21 cases the failure to res -- apply the reserving  
22 guidelines that -- that were to be implemented.

23                   So how did the Corporation respond to  
24 this? On Oct -- in October of 2012, an actuarial  
25 adjustment was made, a \$30 million dollar increase to

1 the IBNR, because of concerns with the case reserving  
2 process. And traditionally the methodology for  
3 accident benefits weekly indemnity and accident  
4 benefits other is for the -- the most recent three  
5 (3) years, you take the higher of.

6           But given -- given what it was  
7 observing within the claims reserving process, the  
8 Corporation amended this by taking the higher of the  
9 past, the most recent five (5) years, defacto raising  
10 the IBNR by about \$30 million dollars. And our  
11 client takes no objection to this particular  
12 activity. It was prudent and certainly conducted in  
13 anticipation of an adjustment to the reserves, which  
14 might allow for that -- that increase to the IBNR to  
15 be -- to be retracted.

16           So that adjustment in the IBNR, as our  
17 client understands it, was made in contemplation of a  
18 future review of the reserves planned for the spring  
19 of 2013. And in March of 2013, the reserves were  
20 strengthened to accor -- with the res -- with the  
21 reserving guidelines. And in addition, the  
22 Corporation responded to unexpected del --  
23 development on certain claims such as the reversal of  
24 prior decisions relating to entitlements. And Mr.  
25 Johnson spoke of this. There were some adjustments

1 back in 1999 which appeared to have nothing to do  
2 with improper reserving.

3 In total, there were adjustments of  
4 close to 20 million, in terms of the reserves for  
5 accident benefit weekly indemnity, and of between 7  
6 and 8 million in ter -- in terms of accident benefit  
7 other.

8 Just to flip to page 25. The  
9 Corporation, in the fall of 2012, adjusted the IBNR  
10 to account for weaknesses in reserving practices. It  
11 then adjusted the reserves. But the \$30 million  
12 dollar adjustment in the IBNR remained. And Mr.  
13 Johnson was quite helpful in terms of this. His  
14 response at transcript page 1,139 was:

15 "And so in that sense, the IBNR was  
16 put in, and to a large extent is  
17 soon to be taken out when the  
18 review was completed."

19 My ineloqu -- inelegant question to  
20 him was: "But it's still in the forecast?"

21 To which he responded:

22 "The forecasted ultimates include  
23 the effects of that adjustment, if  
24 that's the question, correct."

25 So our client recommends that the PUB

1 find that there's potential for excess IBNR related  
2 to accident benefit WI and accident other. And this  
3 factor was important in our client's deliberations on  
4 whether to recommend a 1 percent rate increase or  
5 zero.

6 And certainly in determining whether  
7 the rate increase should be 1 percent or zero, our  
8 client would recommend to the Board that it take into  
9 account the finding that there is potential for  
10 excess IBNR.

11

12 (BRIEF PAUSE)

13

14 MR. BYRON WILLIAMS: Turning to the -  
15 - pages 26 through 28 of the outline, our client  
16 certainly wants to applaud the Corporation in terms  
17 of a couple of issues related to its claims incurred  
18 forecast and its rate-making methodology.

19 Certainly during the course of this  
20 proceeding, from our client's perspective, themes  
21 emerge relating to the transparency of certain  
22 elements of the application and cha -- as well as to  
23 challenges from the actual -- actuarial perspective  
24 relating to the determination of a rate based upon a  
25 fiscal year accounting basis.

1                   So I want to turn first to the  
2 question of transparency. And we don't mean  
3 transparency or lack thereof in a pejorative way,  
4 just that there were certain elements of this  
5 application that were unclear, where it was  
6 challenging to reconcile figures from one (1) part of  
7 the claims incurred forecast with another. And the  
8 Corporation, to its credit, was quite -- quite frank  
9 in acknowledging these. And certainly I just want to  
10 -- to flag these.

11                   And you can certainly see a discussion  
12 of this with Mr. Johnston at pages 1,013 of the  
13 transcript. And he acknowledged more details on that  
14 particular number would have been helpful in  
15 interpreting the full range of development of this  
16 particular coverage. In my discussion with Mr.  
17 Johnston we then went on to discuss challenges in  
18 understanding differences in the Corporation's  
19 calculation of incurred based upon accident year  
20 versus incurred based upon a fiscal year basis.

21                   And I apologize that it's boring, but  
22 it's -- it's a pretty important part of the  
23 application. And -- and in that discussion Mr.  
24 Johnston certainly expressed an openness to  
25 considering ways to improve the transparency of the -

1 - of the rate application.

2                   So that is appreciated by our client  
3 and it's also important because as we move forward  
4 with this rate-making process certainly one should be  
5 able to track the Corporation's calculations through  
6 the claims incurred forecast through the rate-making  
7 methodology, and there are some -- some modest  
8 changes in communication that would assist in doing  
9 that.

10                   There was also perhaps a more central  
11 discussion relating -- turning to page 27 of the  
12 outline, to the challenges posed by determining the  
13 rate based upon a fiscal accounting year. And I --  
14 I'm not sure that I'm capable of doing credit to the  
15 discussion on this particular issue, not in the time  
16 that we have today.

17                   But I would note that Ms. Grammond had  
18 a good discussion with Mr. Johnston on this on what I  
19 believe was the morning of October the -- the 1st,  
20 and that there's also additional discussion between  
21 myself and Mr. Johnston at pages 1,016 and 1,038 of  
22 the transcript.

23                   Mr. Johnston succinctly summar --  
24 summarized part of this issue in that we -- he -- at  
25 pa -- transcript page 1,029 when he noted that we do

1 project forward on an accident basis, but to be put  
2 into accounting-fiscal year accounting basis, all  
3 those numbers have to be converted in terms of what  
4 has been reported in each fiscal year and the  
5 expected change in a provision in those years.

6           And the discussion in -- by Ms.  
7 Grammond with the able assistance of Mr. Fell --  
8 Pelly focussed on the important issue related to the  
9 treatment of investment income. The concerns of CAC  
10 (Manitoba) related both to the loss of transparency  
11 related to that calculation, the undue complexity, as  
12 well as perhaps what might be considered challenges  
13 in projecting forward.

14           And our client notes that in our  
15 discussion with Mr. Johnston the -- the data in terms  
16 of accident years presented fairly stable  
17 development, whereas one could see that the fiscal  
18 year res -- results were quite volatile, much more  
19 volatile than the accident year losses.

20           And as we understand Mr. Johnston's  
21 discussion, first of all, with Mi -- with Ms.  
22 Grammond and later in terms of his discussion with  
23 CAC (Manitoba) at page -- transcript pages 1,035  
24 through 1,038. Our client is supportive of the  
25 openness of MPI to examine on a -- a basis different



1 than fiscal year, and to produce an output based upon  
2 that.

3                   Just to summarize our concerns in --  
4 in this proceeding -- and these don't go to the  
5 proposed rate but to the -- to the longer term  
6 transparency and best practice of the rate-making  
7 procedures. From our client's perspective, the rate  
8 application is challenging to follow, even for  
9 actuaries, and does not always include information  
10 necessary to duplicate results. And that employing  
11 the fiscal year basis for determining ultimate claims  
12 incurred and developing the proposed rates, from our  
13 client's perspective based upon the evidence to date,  
14 would not appear to be consistent with actuarial best  
15 practice.

16                   So certainly from our client's  
17 perspective, they would recommend that MPI be  
18 directed to report back on ways in which it has made  
19 its claims incurred and rate making methodology more  
20 transparent, and that it be directed to report back  
21 on options for developing its rate-making and claims  
22 and fore -- claims incurred forecasts on a different  
23 basis than the fiscal year basis, with an  
24 accompanying analysis of pros and cons.

25                   And Mr. Johnston was very careful on

1 this point. He was committed to do the analysis. He  
2 certainly wasn't recommending this approach or  
3 changing the approach, nor does my client, but we  
4 think it would be timely to explore whether there are  
5 better ways to -- to develop the ultimate incurred  
6 and the -- and the rate-making forecast.

7

8

(BRIEF PAUSE)

9

10 MR. BYRON WILLIAMS: Turning to page  
11 29 of the -- of the outline, I have now left  
12 forecasting and am directing our client's attention  
13 to prudent and necessary expenditures. And our  
14 client takes the position that MPI has not  
15 established that its management of operating and  
16 claims costs is reasonable and prudent. And by way  
17 of overview they flag four (4) pieces of evidence  
18 which they rely upon to make this conclusion.

19

The first is the evaluation from the  
20 Gartner Group suggesting that MPI continues to trail  
21 both the industry and team players in terms of cost  
22 containment and business process management. The  
23 second is the experience of the Corporation in terms  
24 of the HRMS, which came in 60 percent, or  
25 approximately \$6 million, over budget.

1                   The third concern of my client is the  
2 dramatic growth -- growth in the overall IT budget,  
3 which as we look forward, appears to have extremely  
4 modest impacts on staffing levels. And, ultimately,  
5 and the Board will be familiar with this concern from  
6 Hydro proceedings, our client is concerned that the  
7 growth of operating and claims costs far out --  
8 outstrips inflation. And as a going-forward  
9 approach, our client believes it's very important  
10 that we bring some inflation guidance back into our  
11 analysis of operating costs.

12                   If you returned -- if you turn to the  
13 supporting material at page 6, you will see an  
14 excerpt from one (1) of the best pieces of  
15 information our client receives in this proceeding,  
16 which is the Gartner CIO scorecard. And on the  
17 right-hand side of that -- that page, you will see an  
18 evaluation component where MPI in 2013 is compared to  
19 team players, to the insurance industry, and to its -  
20 - its outcome in 2012. And certainly when the Board  
21 takes an overall look at this -- at this document, it  
22 will see some flattering information from Manitoba  
23 Public Insurance.

24                   But if one goes down the evaluation  
25 component to business process management, you can see

1 that in 2013 the MPI team, at one point four (1.4),  
2 is not ranked as well or scored as well by Gartner as  
3 compared to the team player or as compared to the  
4 insurance industry. And if you move up to cost  
5 containment, you can see again the MPI score of two  
6 point three-eight (2.38) as compared to the team  
7 player at two point four-nine (2.49) and insurance at  
8 two point five-one (2.51). Again, some opportunities  
9 for improvement, some need for improvement of MPI in  
10 terms of these two (2) important evaluation  
11 components.

12 And if you move to the left-hand side,  
13 and it is circled, hopefully on your copy as well,  
14 you can see an implicat -- the implication analysis  
15 of the Gartner Group, making the point that MPI can  
16 still improve in areas such as cost containment and  
17 business process management.

18 Making the point that increasing  
19 maturity in these areas will improve the efficiency  
20 and effectiveness of both IT and MPI overall. And  
21 certainly that is the thrust of our client's argument  
22 at page 30 of the outline. They will acknowledge  
23 that MPI has been very aggressive in its information  
24 technology expenditures. Gartner Group ranks it high  
25 for innovation.

1                   But from our client's perspective,  
2 that aggressiveness has come at a cost. And that  
3 aggressiveness has come at a cost in terms of lacking  
4 the cost containing measures that we would have  
5 ideally like to have seen, lacking the business  
6 process management that we would id -- ideally like  
7 to have seen. And we have some objective information  
8 from the Gartner Group supporting that conclusion.

9                   If we turn to page 31 of our client's  
10 outline, we also have the experience from the HRMS  
11 Project, which reinforces to our client the point  
12 made by the Gartner Group. Our client describes the  
13 -- their learnings from the HRMS experience as being  
14 excessive costs for HRMS with modest financial  
15 benefits for ratepayer.

16                   And throughout this proceeding and  
17 throughout past proceedings, MPI has talked about  
18 needing to fix the roof in terms of IT investments.  
19 But the Gartner group -- and it's quite clear at page  
20 4 of its documentation in the CIO scorecard --  
21 describes HRMS not as fixing the roof, but as adding  
22 to the base. And that project came in 60 percent, or  
23 \$6 billion, over budget.

24                   And our client asked MPI to perform  
25 the calculations. And certainly in our client's

1 perspective, this is an exorbitant cost per employee  
2 for a human resource management system. The  
3 calculation at pages 980 and 981 of the transcript  
4 was of over eight thousand dollars (\$8,000) per  
5 company employee, eight thousand two hundred and  
6 sixty-one (8,261), in terms of the transcript  
7 reference.

8                   And certainly My Learned Friend Ms.  
9 Grammond explored in -- what was some of the payback  
10 to ratepayers. And MPI, at transcript page 468,  
11 originally argued that the new payroll system was  
12 saving about one hundred thousand dollars (\$100,000)  
13 a month by having the cash in house instead of  
14 providing it to the payroll company to meet payroll.

15                   If you'll turn to page 32, you will  
16 recall that our client asked MPI to substantiate that  
17 -- that assertion. And as we understand the  
18 Corporation's response to MPI exhibit 59, Undertaking  
19 34, even if one accepts the Corporation's  
20 calculations, the savings only amount to about  
21 thirteen thousand dollars (\$13,000) a month, as we  
22 understand it, one hundred and forty thousand  
23 (140,000) in annual third-party processing fees, plus  
24 seventeen thousand (17,000) in additional annual  
25 interest per month, in our client's prospective

1 calculation, roughly thirteen thousand dollars  
2 (\$13,000) a month. A material cry from one hundred  
3 thousand dollars (\$100,000) a month.

4                   And so, again, HRMS to our client is -  
5 - is a project that -- that went awry. It's a  
6 project that certainly will offer some benefits, but  
7 from our client's perspective, not enough benefits  
8 for its costs and certainly not enough benefits when  
9 you're looking at an expansion of its base, not  
10 something critical for replacing the roof.

11                   At page -- if the Board would turn to  
12 the -- excuse me -- supporting material, page 7 in  
13 the top right-hand corner. What you'll see here --  
14 so the -- it should have -- be labelled, "PUB/MPI-2-  
15 33 Attachment." And what you have here is a  
16 informative Information Request by the Public  
17 Utilities Board tracking the growth of informa --  
18 information technology costs, not on a Basic basis,  
19 but on a corporate basis. But it's quite stark and  
20 quite telling.

21                   If one starts at '05/'06, you see IT  
22 costs for that particular fiscal year at about \$24.8  
23 million. If one fo -- forwards to the actuals for  
24 the 2012/'13 year, towards the middle of the bottom  
25 of that attachment, you see that it has grown over

1 that period to \$50 million in the seven (7) years  
2 between '05/'06 and 2012/'13, a compound annual  
3 growth rate which is calculated on the right-hand  
4 side as 10.8 percent.

5                   And not withstanding that astonishing  
6 growth, in part to fix a roof, in part to expand the  
7 base, IT is projected to blossom on a corporate basis  
8 out to '27/'18 (sic) to a total of \$74.8 million.  
9 Again, from 2012/'13 to '27/'18 (sic), a compound  
10 annual projected increase calculated at 8.3 percent.  
11 Compound annual growth rate, excuse me.

12                   For our clients, the natural question  
13 that follows is: Where is the benefit to ratepayers?  
14 One expects there will be enhanced service. One  
15 expects, with those massive IT expenditures, there  
16 would also be productivity savings, perhaps requiring  
17 less staff on a going-forward basis.

18                   Now, at page 34 of the CAC outline, we  
19 simply track the corporate full-time equivalents  
20 associated with normal operations. And that's from  
21 '09/'10 through 2012/'13. And you'll see a -- a  
22 growth of about one hundred and forty (140) full-time  
23 equivalents in that time period. And that certainly  
24 is a -- a concerning development for our client.

25                   But perhaps more concerning is on page



1 35. Because let's assume that the roof is fixed now,  
2 and that the Corporation is -- is about expanding its  
3 base. What are the benefits flowing to Manitoba  
4 Public Insurance ratepayers from the expansion of --  
5 in the base from 2012/'13 through to '27/'18 (sic)?.

6 We note that for 2014/'15 the proposed  
7 IT operating budget is 60.6 mil. And we note as well  
8 that the Corporation's evidence appears to be -- that  
9 the cor -- that the staffing complement will be at a  
10 steady state of around nineteen hundred and fifty  
11 (1,950) FTEs, as per budget for 2013/'14, going  
12 forward.

13 And our client has to ask, perhaps  
14 rhetorically, with IT expenses rising significantly,  
15 how is it that there will be no FTE savings -- FTE  
16 savings? On a going-forward basis, are there no  
17 meaningful labour efficiency gains by implementing IT  
18 business solutions?

19 And that, for our client, is an  
20 important consideration and a cause for concern as --  
21 as they watch the striking growth of information  
22 technology up to 2012/'13 and then moving forward.  
23 And again you have that question, recognizing there  
24 was some need to fix the roof, how much of this  
25 expansion of the base is required, and how much is it

1 delivering to ratepayers?

2                   Going back to the supporting  
3 materials, page 8. This is a -- a table. It should  
4 be marked as a response to CAC/MPI-1-21A. And that's  
5 -- so it should be marked as page 8 in the top  
6 corner. What it simply does, is it looks at what  
7 Basic operating expenses were in 2007/'08 and then,  
8 in the fifth (5th) and sixth (6th) columns, compares  
9 their growth if they would've grown at the rate of  
10 the consumer price index, its growth, as compared to  
11 the actual growth in the Corporation.

12                   And if you draw your attention to the  
13 circled numbers on the 2012/'13, year, the last year  
14 for which we have actual results, you'll see that the  
15 Corporation's operating expenses, if they would have  
16 grown at the rate of inflation, which is generally  
17 what we often ask of monopolies in terms of their  
18 controllable expenses, their operating expenses, you  
19 see a \$52.3 million dollar expense. Then you compare  
20 that to the actuals for 2012/'13, 65.4 million, or a  
21 \$13 million dollar difference.

22                   Looking at it another way, just  
23 focussing again on the -- if we go out to the  
24 2013/'14, year, you can see that the Corporation in  
25 terms of its actual operating expenses, is projecting

1 expenses of \$67.8 million dollars. As compared to  
2 the 2007/'08 base of 41.6 million. As MPI confirmed  
3 during cross-examination, a 60 percent increase over  
4 that six (6) year period.

5 I'm going to put away the supporting  
6 materials for some moments so I don't hopefully  
7 confuse anyone more than I am confused. And I cou --  
8 Madam Chair, it's certainly fine for a break right  
9 about now. I think things will move a little faster  
10 in the next half.

11 THE CHAIRPERSON: Yes, I think this  
12 would appropriate time to take a break. We'll take  
13 fifteen (15) minutes and we'll return at five (5)  
14 after 2:00. Thank you.

15

16 --- Upon recessing at 1:52 p.m.

17 --- Upon resuming at 2:06 p.m.

18

19 THE CHAIRPERSON: Okay. Welcome  
20 back. And we'll invite Mr. Williams to continue with  
21 his closing submission.

22 MR. BYRON WILLIAMS: Thank you. I  
23 believe when we left this rivetting story we were on  
24 page 37 of our client's outline.

25

1 (BRIEF PAUSE)

2

3 MR. BYRON WILLIAMS: On this page, we  
4 asked the question: If inflation indexed operating  
5 cost growth is appropriate for Hydro, why not MPI?  
6 And certainly I had an extensive discussion with Ms.  
7 Reichert and Ms. McLaren in terms of their view, that  
8 inflation was not an appropriate indicator for  
9 operating costs, but MPI, to -- in my understanding  
10 of the conversation, was unable to come up with an  
11 alternative.

12 And our client begs to differ.  
13 Traditionally in regulated utilities, operating  
14 costs, in particular, had been considered most  
15 amenable to corporate control, corporate decisions.  
16 And our client remains of the view that -- that this  
17 is the area of it -- its expenditures which remains  
18 most within the control of the Corporation.

19 The PUB will be well aware of its  
20 advice to Manitoba Public -- or Manitoba Hydro in its  
21 most recent GRA order that in terms of Hydro's  
22 desires for -- to -- to enrich its -- I don't mean  
23 that in a pejorative sense, to enrich its bottom line  
24 it should look to keeping its operating expenses at  
25 the pace of inflation if it wishes to -- if it wished

1 to achieve its net income objectives. And certainly  
2 our clients would recommend similar advice to  
3 Manitoba Public Insurance.

4 In terms of the overall  
5 recommendation, in terms of operating and claims  
6 costs, our client believes there would be benefit to  
7 Manitoba Public Insurance in developing an IT five  
8 (5) year strategic plan, including cost-benefit  
9 analysis, just -- justifying the -- the -- its  
10 current and future expenses.

11 We certainly would recommend to the  
12 Public Utilities Board that it, like the Gartner  
13 Group, find there is room for improvement for MPI in  
14 terms of cost containment and business process  
15 management, that the Corporat -- we recommend that  
16 the PUB find that the Corporation has yet to  
17 demonstrate appropriate financial payback to  
18 ratepayers from its projected IT expenditures.

19 And we certainly recommend that the  
20 PUB express concern with the ongoing growth in  
21 operating and claims costs well in excess of  
22 inflation. Our client would recommend that the PUB  
23 express the expectation that operating costs will  
24 track inflation.

25 But to torture -- we already tortured

1 the bus analogy. Perhaps we'll torture another  
2 analogy. A regulator can -- can express lots of  
3 concerns about ex -- expenditure control, but where  
4 the rubber hits the road is in terms of driving that  
5 message home.

6                   And our client, as I said, had some  
7 modest deliberations in terms of whether a 1 percent  
8 rate increase or zero would be more appropriate. In  
9 some, when our client looked at the overall potential  
10 for excess reserves in the IBNR, when our client  
11 looked at what it considers to be dramatic growth in  
12 IT expenditures without commensurate benefit to  
13 ratepayers, it thought that the better signal would  
14 be a zero percent rate increase.

15                   On a totally different topic, I should  
16 just note that I have been busy mispronouncing Mr.  
17 Johntson's name. I have -- Mr. Johnston, I've  
18 forgotten the 'T'. And I certainly apologize. The  
19 court reporter has been correcting the record, but I  
20 certainly meant no ri -- disrespect to Mr. Johnson --  
21 Johnston. Let's just assume I'm going to keep  
22 screwing up today, only on this small point though.

23                   At page 439, we ask about the Ward  
24 Group and the comparison between the Ward Group and  
25 MPI. And certainly, from our client's perspective,

1 in la -- and as the PUB found in last year's GRA, one  
2 would expect a Corporation operating in a no-fault  
3 environment with a monopoly in Basic and a near-  
4 monopoly in extension to generally enjoy lower  
5 operating costs certainly economies of scale.

6                   The critical question is whether MPI  
7 is fulfilling its onus of demonstrating that it's  
8 managing its operations to maximize the value that  
9 should be flowing to ratepayers. And in our client's  
10 submission, it has not.

11                   In the next three (3) pages, under the  
12 heading of "Matters to Monitor," our client has  
13 flagged some issues that they will be tracking in  
14 future proceedings, and frankly weren't quite sure  
15 what to do with in this proceeding. One (1) is --  
16 there is, at page 40, there are a lot of MPI staff  
17 involved in IT. Currently between 18 and 20 percent  
18 of the staff, as we understand the record. And at  
19 the same time, the Corporation in 2012/'13, according  
20 to the Gartner Group, was above the industry average  
21 in terms of outside contractors.

22                   And the consulting fee for outside  
23 contractors was in the range of 18 million for  
24 2012/'13. And it is projected to grow to 28 million  
25 for the current year, a more than 50 percent

1 increase. Put another way, almost a \$10 million  
2 increase between those years. So that's something  
3 that our client will be looking at in future  
4 proceedings and certainly is a matter of some  
5 concern.

6                   At page 41, our client adverts -- A-D-  
7 V-E-R-T-S -- to some productivity issues related to  
8 the bodily injury improvement initiative, or BIII,  
9 that have been flagged by the Corporation in this  
10 proceeding. In -- in -- around page 989 of the  
11 transcript, certainly I was having to -- some  
12 discussions with Ms. McLaren in terms of the -- the  
13 developing benchmarks for claims duration.

14                   And one (1) of the points she point --  
15 made to me was that there have been some growing  
16 pains associated with the move to BIII. And she  
17 noted:

18                   "We are trying to get to a position  
19 after we clear up issues like the  
20 transition and the severe loss of  
21 productivity that staff faced as  
22 they were learning a new system and  
23 putting in place rehab plans for  
24 all claimants and things like  
25 that."



1                   And certainly she spoke to the  
2 productivity challenges in roughly the first eighteen  
3 (18) months of the BIII. And that echoed a comment  
4 that had been made in terms of the IBNR and the  
5 challenges in the reserving process. And I've read  
6 this quote to you before, speaking from CAC Pre-ask  
7 4(e), talking about the challenges in terms of  
8 productivity in terms of the new system, BIII  
9 implementation. And certainly our clients will be  
10 kick -- kicking some tires in the next year's  
11 proceeding, just to assure itself that those  
12 productivity issues have been resolved.

13                   At page 42, in terms of matters to  
14 monitor, our client flags the issue of risk  
15 management. And I -- I won't go through the entire  
16 discussion except for one (1) of the concerns for our  
17 client under "Comment," is whether once the IT  
18 systems are implemented and the consultants have  
19 left, can MPI's management maintain the new system.

20                   And certainly our client, over the  
21 coming years, relating to Basic insurance, would look  
22 and would be making a recommendation to the Board for  
23 MPI to file an update and a framework -- a detailed  
24 framework in terms of identifying, quantifying, and  
25 mitigating and monitoring risk. Certainly that would

1 be something that our client would look forward to in  
2 coming years and would -- and expect it would provide  
3 good insight in terms of how the Corporation manages  
4 the challenging transition as, presumably, the  
5 external consultants diminish in supply.

6 At page 43, our client turns to the  
7 ongoing and important discussion regarding  
8 benchmarks. And by way of overview, it notes that:

9 "The framework is not yet in place  
10 to enable the assessment of cost  
11 containment measures. Important  
12 indicators relating to the bodily  
13 injury improvement initiative are  
14 still outstanding."

15 And from our client's perspective, the  
16 jury, or at least the CAC (Manitoba) jury, is still  
17 out on the value of the Ward Group indicators and,  
18 perhaps more importantly, to what use they will be  
19 put.

20 At page 44, our Board -- our Board --  
21 our client reminds the Board of its own words in  
22 Board Order 157/'12 when it indicated with respect to  
23 operating and claims expenses, the Board orders that  
24 the Corporation develop productivity factors to  
25 enable the assessment of the cost containment

1 measures.

2                   And this is our client's understanding  
3 of the record. Certainly the Corporation has put  
4 additional information on the record, but the key  
5 performance indicator framework has not been  
6 finalized. And in our client's understanding, key  
7 performance indicators are still outstanding for  
8 injury claims management and for physical damage.

9                   And at the bottom of this page we --  
10 we point to some language chosen by Ms. McLaren at  
11 transcript page 996 when we asked what we might  
12 expect for next year's proceeding. And as befits  
13 someone who will be leaving us in the -- the next  
14 year, Ms. -- Ms. McLaren was very careful. She said,  
15 first of all:

16                   "I'm hopeful that we will actually  
17 come up with the framework, some of  
18 it populated, some of it not."

19                   And then within the same paragraph she  
20 went on to say:

21                   "We may not come  
22 missed a word] up with the  
23 framework. We may come with more  
24 indicators."

25                   Actually:

1                    "We may not come  
2                    'up'] with the framework. We may  
3                    come with more indicators."

4                    And so, from our client's perspective,  
5 there's not a great deal of certainty in terms of  
6 when what we understand to be the intent of Board  
7 Order 157/'12 at page 4 will be complied with.

8                    When we turn to page 45, we go back to  
9 some important language of the Board from last year's  
10 decision. In terms of the BIII, or bodily injury  
11 improvement initiative, the PUB talked about its  
12 expectation that it would -- that information from it  
13 would be used to accurately benchmark the outcomes of  
14 MPI with other similar organizations. The PUB  
15 highlighted its expectation of the -- that the  
16 Corporation would be able to ultimately reduce  
17 disability durations to optimize claimant's recovery  
18 time.

19                    What we learned in this hearing is  
20 that that ultimate objective, there is still much to  
21 be done. We know that the new system went live in  
22 September of 2010. We also know that the application  
23 does not contain an analysis of disability durations  
24 as compared to benchmarks.

25                    And as Ms. McLaren pointed out to me,

1 and that's at transcript page 989, part of the issue  
2 relates to being unable to tell you what the typical  
3 claim duration was pre-2010. We're not in a position  
4 to implement a new system and ex -- expect to see  
5 reductions from that because he had no real strong  
6 ability to understand what we were dealing with  
7 through the old system.

8 In the course of that discussion I  
9 went on to ask Ms. McLaren:

10 "So what are you doing in ter --  
11 terms of current durations?"

12 And -- and she was frank in -- in the  
13 analysis, in her answer:

14 "So I'm not monitoring  
15 durations..."

16 Excuse me.

17 "I'm not monitoring durations.  
18 This is something that is the point  
19 -- this is not --  
20 missing a word]. This is not  
21 something that is at the point of  
22 being reported to the executive of  
23 the Company as a performance  
24 indicator."

25 And in terms of where the Corporation

1 would be in terms of this important indicator, she  
2 indicated that the Corporation will be in a position  
3 to know where we stand within the next two (2) years.

4           So again, from our client's  
5 perspective, our clients certainly understand the  
6 pre-2010 -- 2010 experience. Our clients are aware  
7 that the Corporation's knowledge of -- of this  
8 important issue is evolving. But from our client's  
9 perspective, there is certainly some disappointment  
10 in terms of the pace of the development of this  
11 important indicator.

12           Perhaps our expectations were  
13 unrealistic, but this is a key indicator that  
14 certainly the Board has expressed an interest in and  
15 our client certainly hopes for increased progress in  
16 -- in the near future.

17           Turning to page 46. Our client notes  
18 in terms of the Ward Group that it's a very different  
19 exercise from what we're getting with Gartner. And  
20 we also note the Corporation's response to our  
21 inquiry, CAC-2-21, that the goal of the benchmarking  
22 exercise is not to establish benchmark targets for  
23 the Corporation.

24           And certainly for our client, this  
25 raised the question about how, if at all, this

1 information should fit within the benchmarking  
2 process. Our client's perspective on benchmarking,  
3 it's an issue that our client, along with the Board,  
4 has been raising for a number of years. We can't say  
5 on behalf of the client that the client is thrilled  
6 with the Corporation's progress. They realize that  
7 it's a challenging exercise.

8                   But our cer -- our -- our client  
9 certainly would -- would be looking for direction  
10 from this Board -- from this Board to encourage MPI  
11 to respond to the benchmarking initiative with  
12 considerable enthusiasm. And we certainly would be  
13 recommending that MPI be directed to file at the next  
14 GRA a benchmarking framework, along with at least  
15 some benchmarking indicators to which to Corporation  
16 intends to be held accountable.

17

18                   (BRIEF PAUSE)

19

20                   MR. BYRON WILLIAMS: Madam Chair, I -  
21 - and members of the panel, I'm going to be turning  
22 to road safety at page 47 of the outline. And I have  
23 to say that given the wealth of information on the  
24 record in terms of road safety, it was a bit of a  
25 struggle to figure out exactly what order in which to

1 present this information.

2                   Just by way of outline, I'm going to  
3 start with just a couple of key definitions that --  
4 that really capture points of dispute between Ms.  
5 Johnson and Manitoba Public Insurance. And then I do  
6 want to flag some of the key issues that our client  
7 sees in terms of -- of road safety, and then turn to  
8 Ms. Johnson's analysis and -- and excerpts from the  
9 record that support her analysis. And finally, go to  
10 our client's recommendations based upon their  
11 observations of the record.

12                   A key definition in this proceeding,  
13 two (2) key definitions, are the dif -- difference  
14 between outcome and outputs. And perhaps the best  
15 example of this difference that's on the record is if  
16 you look to that wildlife report that we canvassed at  
17 some detail with Manitoba Public Insurance.

18                   An output might be described in -- in  
19 the context of that program is tickets, warnings,  
20 program recall by local residents. An outcome  
21 measure might do -- be described as the impact on  
22 collisions, the impact on ratepayers. And Ms.  
23 McLaren was quite frank in her discussion with me  
24 pointing out the fact that Manitoba Public Insurance  
25 often measures outputs. It rarely measures outcomes.



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Our client focussed on that wildlife report because it's one (1) of the rare examples of an outcome analysis by the Corporation. And you can see this discussion at pages 629 and 630 of the transcript, when I suggest to Ms. McLaren that this would be the wildlife report would be a relatively rare report, in that it measures both outputs and outcomes. And she agreed.

And in the next question she outlined a really important point. Because you can have all the success in the world in terms of outputs, but not be making a measurable or meaningful difference in terms of outcomes. And Ms. McLaren made this point, and really that's at the heart of the Corporation's wildlife report. It looks like a well-managed report. It looks like they did a lot of innovative things in it. They had some good output measures, but when it comes down to making a difference in claims, that outcome just wasn't there.

That doesn't mean that one turns away from a pilot project like that, but it does capture a clear demarcation point between the analysis of Ms. Johnson and, we would suggest, international best practice, and the approach of Ms. -- Manitoba Public

1 Insurance. Because Manitoba Public Insurance  
2 enthusiastically reports outputs.

3 Ms. Johnson says when you're looking  
4 at an individual program, when you're looking at a  
5 portfolio, you have to look at outputs, but you have  
6 to go farther. When you're making decisions about  
7 how to spend scarce resources, you have to consider,  
8 What am I achieving. And that is a critical  
9 definition which marks a clear difference in the  
10 perspective of Ms. Johnson versus the Corporation.

11 Another definition that is important  
12 is between formative evaluations and summative  
13 evaluations. And, in particular, final summative  
14 evaluations. And we may -- we highlight this  
15 discussion at page 48 of our outline. Formative are  
16 helping make a program into a more effective  
17 operation. We saw, in the Northport assessment of  
18 the current MPI drivers' education program, that's a  
19 formative evaluation.

20 Summative gets to that outcome  
21 analysis. Program outcomes and impacts. I hesitate  
22 to add confusion, but I shall. The word 'summative  
23 evaluation' has been tossed around this hearing in --  
24 in an imprecise fashion. Final summative evaluations  
25 are outcome analyses.

1                   Within the literature you'll also see  
2 other words, such as 'intermediate summative  
3 evaluations'. And those are not outcome evaluations.  
4 Those look more at outputs, did I make a -- not  
5 whether I prevented collisions, but did I impact  
6 skills, knowledge, attitudes, or behaviours.

7                   And you'll recall a -- a discussion  
8 that Mr. Triggs, My Fri -- Learned Friend Mr. Triggs  
9 had with Ms. Johnson. And you might have thought I  
10 was rude for interrupting his cross-examination and,  
11 if so, I apologize.

12                   But -- but he -- he put to Ms. Johnson  
13 the -- the premise that MPI was con -- conducting a  
14 summative evaluation in 2013, or it was having Lonerio  
15 and Associates conduct such an evaluation. And I  
16 interrupted and took issue with that because  
17 certainly, based upon Information Requests on the  
18 record, and certainly my discussion with Ms. McLaren,  
19 the -- the 2013 report, as we understand it, is not a  
20 final summative evaluation.

21                   And you can see me putting this  
22 premise to Ms. McLaren at transcript page 608 when I  
23 cast it as an intermediate summative evaluation. And  
24 I go on in the next quote to note that we're not  
25 talking about a summative cost-benefit analysis

1 evaluation of driver education. Instead what we're  
2 expecting would be a product evaluation, impacts on  
3 skills, knowledge, attitudes, or behaviour. And Ms.  
4 McLaren's response was, "I believe so."

5                   And so, again, that's an important  
6 distinction because when you look at what Ms. Johnson  
7 is saying. She's saying that now that we have the  
8 benefit of the GDL experience, and we have this rare  
9 opportunity in Manitoba because -- because of the  
10 dominant position in the marketplace for drivers'  
11 education that MPI has, let's do a summative  
12 evaluation, an outcome evaluation of the drivers'  
13 education in the GDL period.

14                   And she's saying something to similar  
15 effect which is what the Robinsons, as I -- our  
16 client understands their evidence, were saying as  
17 well. Let's look at whether drivers' education is  
18 making a difference in terms of outcomes in this  
19 jurisdiction.

20                   What one does with it is a different  
21 question. But it's an important analysis to see --  
22 to give insight into the direction of drivers'  
23 education.

24                   Turning to outline page 49, I do want  
25 to flag just quickly for the Board my client's take

1 on the key issues in this hearing. And I flagged it  
2 because MPI -- in terms of road safety, MPI has its  
3 analysis of the evidence. Ms. Johnson has hers. Our  
4 client will flag what they consider to be the -- the  
5 key road safety issues, very similar to those of Ms.  
6 Johnson. But they certainly will add at least one  
7 (1).

8 In terms of road safety the big three  
9 (3) issues, the historically important issues, no  
10 doubt, are impaired driving, unsafe speed, and the  
11 failure to use appropriate safety equipment. At page  
12 50, our client flags the issue of speed:

13 "We note that unsafe speed is  
14 concentrated in fatalities and --  
15 its consequences are concentrated  
16 in fatalities and serious injuries.  
17 Speed was involved in 34 percent of  
18 the fatal collisions in the most  
19 recent year for which we have  
20 evidence. And in serious injuries,  
21 17 percent of the time."

22 Over the last, the preceding four (4)  
23 or five (5) years it was involved in fatal collisions  
24 25 percent of the time.

25 And MPI in -- in its internal analysis

1 has flagged really the preeminent status of speed as  
2 the driver of claims costs within the Corporation.  
3 Direct costs associated with unsafe speed being  
4 estimated to be between twenty-four (24) and the  
5 upper bound of \$40 million.

6                   Our client was aware of much of this  
7 information but the insight that Ms. Johnson provided  
8 last Friday, and which really underscores the value  
9 of the Safe System Approach, was she highlighted the  
10 critical roles that lower speed can mean in reducing  
11 the tragic costs of motor vehicle accidents. And she  
12 made the point it's not just about following speed  
13 limits.

14                   She flagged the need to reduce speed  
15 as one approaches dangerous intersections, and the  
16 use of a creative array of tools to provide more  
17 protection to motorists and to vulnerable road users,  
18 either by slowing down speeds or for providing -- or  
19 by providing a safe refuge from unsafe activities.

20                   And really that was something that was  
21 striking to my client, was the variety of tools  
22 articulated by Ms. Johnson. My client had thought of  
23 them primarily as speed limits and speed enforcement.

24

25                   But Ms. Johnson flagged a much more

1 versatile set of tools. Certainly lower travel  
2 speeds and enforcement measures, but speed limits  
3 targeted for high-risk location, or using innovative  
4 sign warnings, electronic sign warnings, tools such  
5 as speed humps, rumble strips, pedestrian refuge  
6 islands, pedestrian crossing areas, mini roundabouts.  
7 A much more sophisticated and nuanced understanding  
8 of the impacts of speed and the tools to combat it,  
9 excess speed, than our client had recognized.

10 Another key issue obviously, at  
11 transcript page 51, is the impact of impaired  
12 driving. Cost-wise, the Corporation estimates  
13 between 16 million and 33 million annually. Tragic  
14 social costs in terms of 25 percent of fatal  
15 collisions in 2011, and ever -- even higher  
16 historically.

17 And certainly, as Ms. Johnson  
18 highlighted -- and turning to page 52, occupant  
19 restraint, sadly notwithstanding se -- seatbelt usage  
20 in excess of 90 percent, contributing to 39 percent  
21 of people killed in the 2011 year. Costs of around  
22 31 million annually is estimated by MPI, and between  
23 tre -- tre -- 2006 and 2010, roughly 46 percent of  
24 fatally injured collision victims. And again, the  
25 failure to use occupant restraint certainly has been

1 highlighted in the evidence as disproportionately a  
2 rural issue.

3                   Turning to page 53. And I -- I fear  
4 Ms. -- Ms. Peters will be angry at me for not writing  
5 more about distracted driving. Clearly something  
6 both CAC and CAA (Manitoba) have been flagging as an  
7 emerging new issue is dis -- distracted driving, and  
8 I've put some information to that effect.

9                   At page 54 our client flags what is  
10 perhaps less prominent, at least in the -- some of  
11 MPI's statements, but a key issue to our client and -  
12 - and, our client is sure, implicitly to MPI is the  
13 rural issue, and the fact that the fatality issue it  
14 disproportionately a rural issue.

15                   Of the one hundred and ten (110)  
16 persons killed in motor vehicle collisions in 2011,  
17 roughly 67 percent of fatal collisions took place in  
18 rural Manitoba. And from 2006 through to 2010, close  
19 to 70 percent of fatal collisions were in rural areas  
20 between -- in that time period. Just one (1) second.

21

22                   (BRIEF PAUSE)

23

24                   MR. BYRON WILLIAMS: And one (1) of  
25 the important insights flagged by Ms. Johnston in



1 terms of her evidence last Friday, she says that the  
2 issue of rural ro -- roads is a major issue. But  
3 then she went on -- and I -- I apologize for not  
4 having the reference from the transcript, but she  
5 went on to discuss the potential causes of it. Some  
6 of them may be unsafe roads. Some of them may be the  
7 lack of emergency facilities and hospitals. That was  
8 the BC experience. Some of it may be the failure to  
9 use seatbelt -- seatbelts.

10                   The point though she raised that,  
11 while this is a critical issue, to drill deep, to  
12 understand how Manitoba as a whole in creating a safe  
13 system, or Manitoba Public Insurance as the ultimate  
14 payer of claims costs, should be responding to this  
15 issue requires a lot more evidence, a lot more  
16 analysis, than what is set out in the traffic  
17 collision report.

18                   So Ms. Johnson has flagged this as a  
19 critical issue for further analysis. So our client,  
20 in terms of the recommendations regarding rural  
21 roads, our client identifies this as a clear  
22 priority. And they certainly suggest that MPI should  
23 be requested to pro -- to analyze the key factors  
24 contributing to fatalities on rural roads and, as my  
25 client says here, which may be targeted for future

1 road safety investments.

2                   Those investments may come from  
3 Manitoba Public Insurance. They may come from  
4 elsewhere. But our client sees a key role for this  
5 Corporation with its pre-eminent control of key data  
6 in terms of understanding what is driving this rural  
7 fatality issue and flagging areas where we might  
8 respond to it.

9                   If the decision is made that this is  
10 something the Corporation can respond to, Ms. Johnson  
11 recommends a corridor strategy, which I won't detail  
12 in -- in my discussions except for to note that it's  
13 in the written evidence of Ms. Johnson, CAC-3. But I  
14 put the wrong page number here. It is at page 52, as  
15 opposed to page 50. And there's a good discussion of  
16 the corridor approach in that -- in that discussion.

17                   It's -- our client, as we turn to --  
18 to page 55, does concur with Manitoba Public  
19 Insurance that vulnerable road users are of -- are a  
20 particular concern. And they note that in urban  
21 environments pedestrian and cyclist fatalities  
22 comprise a disproportionate share of fatalities. And  
23 they note that in 2011, 10 percent of fatal  
24 collisions involve vo -- motor vehicles and  
25 pedestrians. But within urban areas, 25 percent of

1 fatal collisions involve motor vehicles and  
2 pedestrians.

3                   To our client's surprise, there were  
4 nineteen (19) pedestrian deaths identified by the  
5 Corporation in the 2012 year. Seven (7) cyclist  
6 deaths -- cyclist deaths identified by the  
7 Corporation in the 2012 calendar year. And when you  
8 look at the information in terms of vulnerable road  
9 users as a whole, in 2012 they accounted for roughly  
10 25 to 26 percent of the fatalities related to motor  
11 vehicle collisions.

12                   Following up on some inquiries by  
13 Board member Neville, our client got insight into the  
14 disproportionate role, in terms of pedestrian  
15 fatalities, associated with seniors. Over half of  
16 the eighteen (18) fatalities in 2010 involved persons  
17 over the age of sixty-five (65). The Corporation  
18 provided some additional information, and I think the  
19 record suggests that -- I don't have the citation, it  
20 was an undertaking, that over the past number of  
21 years roughly 25 percent of pedestrian fatalities  
22 have involved persons over the age of sixty-five  
23 (65). And if you throw in those over the age of  
24 fifty-five (55), around -- over 30 percent of  
25 pedestrian fatalities.

1                   Our client also notes with interest --  
2 and this was brought up -- brought up by Bikes  
3 Winnipeg both last year and in its presentation this  
4 year, the 1-metre rule, and that the Ontario coroner  
5 -- coroner has recommended the 1 metre rule for  
6 passing cyclists. And we -- our client certainly  
7 appreciated the comment from MPI, at transcript  
8 record 1,212, that MPI does not dispute that safe  
9 passing distance should be at least 1 metre. And we  
10 understand that -- that 1 metre information is  
11 already on the Corporation's website.

12                   Where it has not been to date is in  
13 some of the more public billboards and advertising  
14 campaigns. But our client accepts and -- and  
15 applauds the Corporation for suggesting that new  
16 messages, such as Share the Road, would prominently  
17 feature that 1 metre messaging. That's what they  
18 understand to be the Corporation's information from  
19 transcript reference page 1,214.

20                   And certainly it's -- it's really not  
21 well described on the record, but in terms of the  
22 Corporation's retention of the ADTSEA group -- A --  
23 A-D-T-S-E-A, in their qualifications they did speak  
24 to work they had done in -- with regard to cyclists  
25 and vulnerable road users. And certainly our client

1 recommends to MPI some of the truly outstanding  
2 material that ADTSEA has prepared in terms of  
3 vulnerable road users.

4                   In terms of the recommendations for  
5 vulnerable road users, our client certainly  
6 recommends that MPI produce, for the next general  
7 rate application, updated maps of collisions and  
8 fatalities related to pedestrian and motor vehicle  
9 accidents in Winnipeg and other urban environments,  
10 and report on any patterns. And certainly our client  
11 wishes to make the point it's not just about doing  
12 the map. It's about understanding the map, doing the  
13 analysis of the data, and considering whether there's  
14 additional measures that might be undertaken.

15                   They certainly endorse as well the  
16 recommendation that MPI produce for the next GRA  
17 updated maps of collisions and fatalities related to  
18 cyclists and motor vehicle accidents in Winnipeg and  
19 more -- and just as importantly, or more importantly,  
20 undertake the analysis of what's driving those  
21 deaths.

22                   We can certainly see from the map in  
23 this year's proceeding the overwhelming concentration  
24 of collisions in downtown Winnipeg. And certainly  
25 that may invite a policy response by MPI or by

1 others. And certainly that consistent with good  
2 practice, our client would recommend that MPI  
3 reinforce the message of 1 metre safe passing  
4 distance between motor vehicles and cyclists.

5                   Members of the panel and Madam Chair,  
6 at page 56 of the outline, you can see I'm turning to  
7 the outline of Ms. Johnson. I'm not going to go  
8 through her qualifications. Simply I wish to remind  
9 you of the expertise for which she was qualified for.  
10 And also, there's an extensive discussion of her  
11 qualifications between pages 1,655 and 1,665 of the  
12 transcript.

13                   I think what we can observe from her  
14 discussions is she is vastly experienced both within  
15 the auto insurance mo -- ru -- world and beyond. She  
16 is prac -- practical. She is evidence-based and she  
17 is innovative. And our client certainly would  
18 recommend that the Board give heavy weight to her  
19 advice.

20                   And one (1) of the revelations to my  
21 client from Ms. Johnson's evidence on Friday was a  
22 lot of insight into the variety of tools that a  
23 public auto insurer might have in their toolbox. And  
24 certainly perhaps because of the poor advice provided  
25 by her lawyer, my -- I'm not -- I -- I can't say with

1 confidence that our client has been well informed on  
2 the variety of tools.

3                   We focussed on advertising,  
4 enforcement, driver's education. But really, one (1)  
5 of the key lessons for our client from Ms. Johnson  
6 was there is such a vital poss -- potential role for  
7 the Corporation in terms of data analysis. There are  
8 many innovative approaches to unsafe speed that my  
9 client could only have imagined prior to Ms.  
10 Johnson's recommendation.

11                   So if we turn to page 57 of the  
12 outline, we see the key messages of Ms. Johnson.  
13 Using an integrated safe system approach. There is a  
14 realistic potential over time to reduce claims costs.  
15 Not just pie in the sky, but a real, practical  
16 difference and opportunity to reduce claims costs  
17 while achieving a valuable social role.

18                   Ms. Johnson also observes that the  
19 ability of MPI to optimize its road safety  
20 expenditure appears to be impeded by the absence of a  
21 road safety strategy. And we certainly cannot blame  
22 Manitoba Public Insurance for the absence of the  
23 strategy, but that is an observation that -- that its  
24 ability to maximize its expenditures is impeded by  
25 that absence.

1 Ms. Johnson tells us that within the  
2 context of an auto insurer, it is important to  
3 critically evaluate the cost and return on investment  
4 of individual programs. And she sends the message  
5 and draws the conclusion that there is little  
6 information to demonstrate that individual programs,  
7 or the portfolio as a whole are optimally designed.

8 Madam Chair, I -- I wonder if I could  
9 beg the Board's indulgence for -- to stand down for  
10 about four (4) minutes?

11 THE CHAIRPERSON: Yes, we're fine  
12 with that.

13

14 --- Upon recessing at 2:52 p.m.

15 --- Upon resuming at 2:54 p.m.

16

17 THE CHAIRPERSON: Okay, thank you  
18 very much. We're ready to begin again. Mr.  
19 Williams...?

20 MR. BYRON WILLIAMS: Thank you. As  
21 we understand Ms. Johnson's evidence, we've set out  
22 her key findings at page 58 of our outline, our  
23 client's outline. She expressed a con -- well, first  
24 of all, she did observe that auto crime was clearly a  
25 tremendous success for the Corporation. But she



1 detected -- or held that there was a lack of evidence  
2 that other programming was making a difference, in  
3 terms of reducing collisions and the tragic social  
4 and economic costs of accidents.

5           She expressed a concern, in reviewing  
6 the portfolio, that the programs were not, taken  
7 together, strategic and appeared to be lacking  
8 coordination. She identified level -- little  
9 evidence of any ongoing and monitoring and  
10 evaluation. And, again, that would be with regard to  
11 summative -- final summative or outcome evaluation.

12           She suggested that the focussed  
13 enforcement tactics seem to fall short of good  
14 practice based upon her work in ICBC and her  
15 observations, at least in Quebec and Australia, and  
16 that there seemed to be a lack of regular review of  
17 the investment portfolio in road safety.

18           And she noted that even though MPI  
19 produces a huge amount of useful information through  
20 its website and quality brochures and guidelines, it  
21 is probably not enough to create sustained  
22 behavioural change.

23           Somewhat arbitrarily perhaps, at page  
24 59 our client has provided its take on the Ms.  
25 Johnson's key recommendations. And many of these are

1 set out at pages -- transcript pages 1,757 and -- and  
2 7 -- through 1,760, but not all.

3 In terms of evaluation, she  
4 recommended reviewing the programs in the current  
5 portfolio and say that that really has to be the  
6 starting point. And a key issue which she flagged at  
7 transcript page 1,671 was the emphasis given to  
8 advertising versus enforcement. She spoke of the  
9 need to measure outcomes, not just outputs.

10 And that was at transcript page 1,758.  
11 In terms of drivers' education, she pointed to the  
12 tremendous opportunity in the Manito -- Manitoban  
13 environment to do a summative evaluation now that we  
14 have the graduated driver's licence experience.

15 There has been considerable talk in  
16 this hearing of a second stage of driver education,  
17 and she had some advice of caution. If the  
18 Corporation anticipates walking down that path, she  
19 certainly recommended piloting it, piloting that  
20 approach.

21 Ms. Johnson provided some important  
22 advice regarding infrastructure and perhaps some  
23 clarification when she said it's really not about  
24 building bridges and things like that. She argued  
25 powerfully that there was still a role for the

1 Corporation in terms of black spot analysis, road  
2 safe -- and road safety audits, and perhaps other  
3 low-cost investments with potentially significant  
4 returns.

5                   And important advice to all that the  
6 road safety investments of Manitoba Public Insurance,  
7 to maximize their utility, have to be situated within  
8 a larger strategy, a Safe System Approach that's  
9 break down -- breaks down silos and set clear targets  
10 and evaluates performance compared to those targets.

11                   In the me -- next few pages, Ma --  
12 Madam Chair and members of the panel, I just want to  
13 flag information from the record from other sources  
14 that, in our client's respectful submission, supports  
15 the evidence of Ms. Johnson. And if you could turn  
16 to your supporting materials for a moment to page  
17 20(a) in the top right-hand corner. Page 20(a). And  
18 you can see that Mr. Williams omitted a page when he  
19 first put together this -- this document. And this  
20 is an excerpt from CAC-6, Teen Driver Safety, an  
21 outstanding report by Lonero -- L-O-N-E-R-O -- and  
22 Mayhew -- M-A-Y-H-E-W -- that MPI actually assisted  
23 in funding.

24                   And -- and for members of the panel,  
25 we put this report before you as an exhibit. It was

1 referenced on the record, because certainly if  
2 there's one (1) report that you read on driver  
3 education, we -- we highly recommend, on behalf of  
4 our client, that this is the report that you read.  
5 It is an outstanding objective analysis of the record  
6 relating to driver's education by some one Mr. Lonerio  
7 and some one Mr. Mayhew, who certainly see the  
8 potential in driver's education, but also the  
9 limitations in the experience to date.

10                   Now, what I want to flag for you on  
11 page 15 -- or at 20(a), excuse me. That's the page -  
12 - it's -- it's actually page 15 from the report. And  
13 I've circled it, or -- or rectangled it, towards the  
14 top of page 20(a). Here you see Lonerio and Ma --  
15 Mayhew commenting on another preeminent analyst of  
16 driver road safe -- of -- of road safety programming,  
17 Christie.

18                   And you see them noting that Christie  
19 also addressed public information and advertising  
20 programs for road safety. And they concluded that  
21 they, too, are ineffective except as "adjuncts to  
22 legislative and enforcement programs." And Christie  
23 went on to suggest that:

24                                 "Other kinds of programs, including  
25                                 graduated licensing, enforcement,

1 crash-worthy vehicles, and black  
2 spot roadway hazard correction  
3 should be given priority."

4 And the authors of this report note  
5 that:

6 "This broader view of road safety  
7 management, as a context for driver  
8 educations in all forms, is well  
9 considered and consistent with  
10 earlier recommendations."

11 And certainly our clients see this  
12 paragraph as being very supportive of the thesis of  
13 Ms. Johnson, both by Mr. Christie and also by Lonerio  
14 and Mayhew. These are leading researchers and  
15 thinkers in the area of driver safety. And -- and  
16 they're certainly in this paragraph, at least in  
17 part, raising concerns about the cost-effectiveness  
18 of a disproportionment -- disproportionate investment  
19 in advertising. And so that is certainly some  
20 support for -- from other learned authors -- or,  
21 excuse me, from learned authors in terms of Ms. --  
22 Ms. Johnson's perspective.

23 At page 61, our client notes an  
24 important point of agreement between Mr. and Dr.  
25 Robinson and Ms. Johnson, because Ms. Johnson is very

1 clear about the importance of setting goals, and  
2 about the potential for summative evaluation of  
3 driver education. And that -- those views are echoed  
4 -- or actually made quite clear by the Robinsons.

5 We put here excerpts from our  
6 conversations with the Robinsons at transcripts page  
7 1,518 and 1,519. They note:

8 "It is important to set goals to  
9 give you a roadmap to where you  
10 plan to head with a program, and  
11 then being able to measure against  
12 those goals as well."

13 And they also observed, actually after  
14 a lot better examination by Board member Gosselin  
15 than by myself, the potential to do summative  
16 evaluation for drivers' education in terms of the  
17 impacts of collision for those taking the program and  
18 those not taking the program.

19 At page 62 our client flags important  
20 support for Ms. Johnson in the MPI consultation  
21 document prepared in 2012.

22 And at the top of page 62 of our  
23 client's outline, we flagged the insight from the  
24 consultation document that we discussed in cross-  
25 examination.

1 "Export organization -- expert  
2 organizations such as TIRF and  
3 Northport were observing generally,  
4 based upon their vast experience,  
5 that when it comes to road safety  
6 there was a substantial body of  
7 knowledge that is not being used  
8 effectively."

9 They flag the dearth of multi-  
10 disciplinary consultation and collaboration and noted  
11 that in their experience best practices are rarely  
12 followed.

13 And this concern about silos, the lack  
14 of collaboration, was echoed by many of the Manitoba  
15 consulted in MPI's road safety consultation document.  
16 They made the point that -- that the outcome of the  
17 Manitoba, or the effort in Manitoba would be much  
18 more effective if we were working in a coordinated  
19 way, rather than in silos.

20 Ms. McLaren wouldn't quite go that far  
21 with me in my discussion with her. But at the bottom  
22 of page 62, you'll see a bit of our discussion. She  
23 agreed with me that there was no overarching report  
24 considering the effectiveness in which MPI and other  
25 players currently operate and integrate road safety

1 programs. And my client would observe that that's  
2 probably an issue.

3 I asked Ms. McLaren to agree with me  
4 that it is possible that dollars could be spent more  
5 effectively in an environment where there was  
6 coordination and strategic support. She wasn't  
7 prepared to go all the way with me in terms of  
8 analytically, but conceptually, sure. She was  
9 prepared to agree that far.

10 And similarly, to the suggestion that  
11 one might get more bang for our road safety dollars  
12 if we were coordinating things better, she had agreed  
13 that there was some potential.

14 So our client in this proceeding, when  
15 our client brings in an esteemed expert like Ms.  
16 Johnson, we bring her to present her independent  
17 view. Our client brings her to provoke discussion,  
18 knowing that while generally they're in agreement  
19 with what she says, they may not always be.

20 So from pages 63 to 60 -- well, for a  
21 number of pages, I highlight my client's observations  
22 of the record based in part on Ms. Johnson's  
23 evidence, based in part on cross-examination, and  
24 based on a thorough examination of the record.

25 One of our client's key observations



1 is that Ms. Johnson's concerns about the need for  
2 portfolio review are only reinforced by their review  
3 of the record.

4                   And our client, as we note on page 63,  
5 had challenges in understanding how the Corporation  
6 judges if its investment in road safety has been  
7 effective. And as you'll see in this discussion on  
8 page 63, I was asking the Corporation, how do you  
9 make that -- when you're making that choice to go  
10 from a three hundred and fifty thousand dollar  
11 (\$350,000) investment in Road Watch to a six hundred  
12 thousand dollar (\$600,000) investment, how do you  
13 evaluate the business case? How do you know in  
14 hindsight whether it was a good investment?

15                   And the record says -- suggests, first  
16 of all it's not clear that a business case was  
17 prepared. But I asked Ms. McLaren:

18                   "Well, will you have some  
19                   expectations in terms of internal  
20                   performance indicators? You know,  
21                   in terms of the -- in terms of the  
22                   risk of being apprehended?"

23                   And her response, and it was candid,  
24 was:

25                   "I'm not sure. Ideally it should

1 be. I'm not sure it is that  
2 specific and direct, but certainly,  
3 ideally it should be."

4 Our client asked as well, how does a  
5 corporation weigh its investment in one (1) road  
6 safety program versus other road safety programs?  
7 Why is it that the impaired budget driving is -- dri  
8 -- impaired budget -- impaired driving road safety  
9 budget looks to be almost twice as much as the speed  
10 budget? And the answer that we got was -- was not  
11 very clear. What was clear was that for quite some  
12 time the Corporation has not conducted an overall  
13 evaluation of its road safety portfolio to measure  
14 cost effectiveness.

15 Ms. Johnson, as we cite at page 64 of  
16 our outline, has perhaps the most salient and pointed  
17 advice to the Board in this proceeding. She was  
18 asked about expenditures. And she was -- she made  
19 the point that if the budget was a hundred and the  
20 wor -- the number 24 should be struck out, million  
21 dollars, and it was being wasted, it would be of no  
22 value, but \$5 million in the right direction can go a  
23 lo -- a long way.

24 And so our client's recommended  
25 findings to the Board is to find that the MPI has not

1 established that the current level of road safety  
2 expenditures is prudent and necessary. And,  
3 secondly, that MPI has not established that the  
4 current portfolio of expenditures is prudently and  
5 reasonably optimized to maximize value to ratepayers  
6 or to minimize the tragic economic and social costs  
7 of motor vehicle collisions.

8           What we are recommending on behalf of  
9 our client, that the PUB order, are two (2) separate  
10 things. One (1) is that MPI report back for the next  
11 general rate application with a review of the current  
12 portfolio with regard to optimizing it. In other  
13 words, assuming you had this budget, what would be  
14 the best way to maximize your expenditure.

15           The second question, and it goes more  
16 to a question Board member Gosselin was asking, which  
17 is: What do good practice monopoly public insurers  
18 spend as an investment in road safety programming?

19           And we are recommending that the Board  
20 seek the advice of MPI and, ideally, independent  
21 advice retained by MPI to examine the optimal size of  
22 a road safety bu -- budget. Maybe it's 1 percent,  
23 maybe it's 2. Maybe it's something different. So  
24 those are key recommendations from our client.

25           At page 65, I won't go through the --

1 the commentary at the top which really reiterates  
2 some of my discussion previously. We make the point,  
3 though, in terms of any portfolio review, that it  
4 should be reflective of the innovative approach that  
5 Ms. Johnson brought to the hearing on Friday.

6 Any portfolio review, in our client's  
7 submission, should look at options for optimal design  
8 which include different levels for enforcement,  
9 different levels for research, including hot spots  
10 and black spots, different levels for drivers'  
11 education and ad -- and advertising.

12 And to a certain degree, my client  
13 fears that, in the course of our historic debate over  
14 road safety, we've kind of been hampered by our  
15 artificial delimi -- delineation between what is a  
16 government role and what is an MPI role. And our  
17 client wants to be quite clear. When it comes to  
18 infrastructure, they see that as primarily a  
19 taxpayer's investment.

20 But the insight that our client gained  
21 from Ms. Johnson on Friday, and certainly previous  
22 discussions, was there are innovative ways that a  
23 monopoly public auto insurer can contribute to an  
24 infrastructure dialogue without necessarily investing  
25 in infrastructure. There are innovative ways that it

1 can contribute to enforcement, flagging the -- the  
2 proper time of day for which enforcement should be  
3 done that are not necessarily -- have been part of  
4 our dialogue previously.

5 At page 66 of our outline, our client  
6 notes that both Ms. Johnson and CAC -- excuse me, Ms.  
7 Johnson and MPI talk about evidence-based road safety  
8 programming but, in our client's view, they appear to  
9 have very different conceptions of what that is.

10 Ms. Johnson certainly sees using  
11 evidence to target those factors that are critical to  
12 serious injuries and fatalities, but the insight from  
13 Ms. Johnson's evidence is that there is a need to dig  
14 deeper. What is driving, for example, rural road  
15 fatalities? Are there hot spots which are  
16 contributing disproportionately to collisions,  
17 fatalities, or serious injuries in urban and rural se  
18 -- settings? Use that evidence to develop priorities  
19 and develop programs, and then evaluate whether they  
20 are working or not based on outcomes. And at the  
21 bottom of that page, I highlight some of the  
22 questions that Ms. Johnson would ask.

23 If we turn to page 67, our client  
24 would suggest that there appears to be a different  
25 focus in terms of evid -- evidence based research

1 from MPI. There is no doubt that MPI targets its  
2 programs based on collision data, focussing on  
3 serious injuries and fatalities. So there, there is  
4 some common ground between MPI. But as MPI has  
5 indicated, they have very few outcome measures.

6                   And just to highlight the difference  
7 between Ms. Johnson's perspective and the MPI  
8 perspective, our client has shared some -- some  
9 records from the transcript with regard to -- with  
10 regard to infrastructure hot spots. And remembering  
11 the evidence of Ms. Johnson on this point, then we're  
12 asking at page -- transcript page 596, what type of  
13 ev -- evidence analysis, if any, MPI undertakes in  
14 terms of infrastructure hot spots.

15                   This is only part of the answer, but  
16 MPI's response was:

17                   "We likely wouldn't be doing much  
18                   in that regard."

19                   We went on to ask:

20                   "Well, would you take the  
21                   information you have and meet with  
22                   the province or the city to advise  
23                   them of the significant amount of  
24                   collisions that are taking place in  
25                   these location?"

1                   And MPI again, frankly, admits that  
2 historically not -- there's not a lot of that,  
3 although it does say:

4                   "Well, we're developing better  
5 relationships. But that's not  
6 something that's happened  
7 historically."

8                   And our cl -- we went on to ask MPI:

9                   "Are you aware of what ICBC and US  
10 insurance companies are -- are  
11 doing in terms of retaining their  
12 own infrastructure engineers to --  
13 to provide advice on hot spots?"

14                   And, again, MPI su -- suggests that:

15                   "That's not something that would be  
16 appropriate, given that we would be  
17 not directly looking for an  
18 investment."

19                   And so we -- we make the point that  
20 there is a different approach. Our client is clearly  
21 of the view that the -- Ms. Johnson's approach in  
22 terms of evidence-based is superior. And certainly  
23 we reiterate the point that any portfolio review  
24 should consider the potential for material value  
25 added by undertaking further analysis into hot spots

1 for rural and urban collisions, including serious and  
2 fatal accidents.

3           At pages 69 and 70 at the -- of the  
4 outline, our client makes the observation that there  
5 are greater opportunities for integration between  
6 enforcement and advertising. And it has been  
7 reiterated again and again in this proceeding that  
8 advertising in a vacuum is not effective. It's most  
9 effective when accompanied by meaningful enforcement.

10           Yet when one goes through the  
11 integrated calendar of MPI, and certainly as it was -  
12 - and issued in 2011, it's a vast improvement. But  
13 we note that in terms of occupant restraint for the  
14 month of March, for example, activity is targeted yet  
15 there does not appear to be any dedicated enforcement  
16 in that month.

17           We note that this summer, as flagged  
18 by Information Requests by CAC and CAA, there was  
19 some advertising about distracted driving and  
20 demerits, but not accompanied by dedicated  
21 enforcement. We note that there -- in November 2013,  
22 in the integrated road safety calendar, there is a  
23 distracted driving campaign but it is not clear  
24 whether there -- it is accompanied by a dedicated  
25 enforcement campaign. And you can see the



1 Corporation's response when we sought to flesh out  
2 that information.

3           At page 70 and 71 of our client's  
4 outline, our client makes the point that while MPI  
5 has a modest enforcement program via Road Watch,  
6 there are significant opportunities to learn from the  
7 practices employed in other jurisdictions, ICBC and  
8 the SAAQ in Quebec is two (2) examples.

9           And towards the middle of the page we  
10 make the point -- we -- we pose the question: Who  
11 selects the optimal time for enforcement -- dedicated  
12 enforcement campaigns? And MPI reiterates that  
13 that's the police call. And as you go along that  
14 page we note some challenges with the wildlife  
15 program in terms of having police availability for  
16 the hours as committed, those important evening  
17 shifts.

18           And certainly if one were to review  
19 Ms. Johnson's evidence in its totality, she suggests  
20 certainly a -- a greater intensity of effort in terms  
21 of traffic enforcement activities and a greater  
22 directive role for the monopoly insurance provider  
23 which is funding these overtime activities.

24           And certainly our client, at page 71,  
25 is recommending that MPI examine and report back on

1 how other public insurers manage their enforcement  
2 tec -- support techniques in terms of total budget,  
3 por -- portfolio program, integration with  
4 advertising, relative proportion going to advertising  
5 versus enforcement, and the role in determining prot  
6 -- program direction.

7                   From our client's perspective, there's  
8 a lot to learn. Pages 72 through 75, our client  
9 discusses briefly the drivers' education program.  
10 There can be no denying that the drivers' education  
11 program is very popular, certainly with parents. And  
12 speaking as a parent, I certainly was supportive of  
13 it.

14                   And there certainly are some positive  
15 output measures in terms in terms of -- in terms of  
16 issues such as driving skills. But when the panel  
17 reads the Teen Driver Safety Document marked as CAC  
18 Exhibit 6, it'll find a very nuance discov --  
19 discussion of drivers' education. And -- and really,  
20 that discussion will point out that to date there is  
21 little evidence to support a positive impact in terms  
22 of reducing collisions and injuries.

23                   And certainly we've -- we're well  
24 aware of the ongoing challenges that Manitoba Public  
25 Insurance has with its -- with its current drivers'

1 education program. And just for a moment, if I could  
2 turn the Board's attention to the supporting  
3 material, top right-hand corner starting at page 14.  
4 I just flagged this for the Board's attention. This  
5 is an excerpt from the Northport report and it's  
6 certain -- the formative evaluation. And it's  
7 certainly a helpful analysis on page 14 in terms of  
8 the strengths of the drivers' education. But then as  
9 you go towards the bottom of page 14 and on to page  
10 15, flagging the weaknesses of the drivers' education  
11 program as it currently stands.

12                   At the bottom of page 14 we see  
13 concerns raised in terms of staffing level, R & D,  
14 and program development capability. If we turn to  
15 page 15 we can see a concern going down to the fifth  
16 bullet in terms of the widely variable instructor  
17 capabilities with -- in the bullet immediately  
18 following that, instructors having too much  
19 flexibility in terms of content and delivery. And  
20 certainly a series of other material concerns with  
21 the program.

22                   So there is plenty of -- of grist for  
23 the mill in terms of improving the existing drivers'  
24 education program in Manitoba.

25                   Staying still on page 72, our clients

1 certainly found both Dr. Robinson and Mr. Robinson to  
2 be helpful witnesses who clearly have done a lot of  
3 work in terms of this hearing.

4                   But they would caution that the  
5 conclusion from the A -- ADTSEA must be taken with a  
6 bit of caution, first of all, recognizing the  
7 traditional advocacy role of the organization;  
8 recognizing, as well, limits in terms of their  
9 expertise in the development and assessment of  
10 summative evaluations, and recognizing, as well, the  
11 more tempered views of more experience and qualified  
12 researchers into outcomes.

13                   If you turn to page 73 -- and again,  
14 this is not to diminish what -- what they have done  
15 but only to regard their oral evidence with some  
16 care. At the top of page 73, we flag their  
17 organization's traditional advocacy role. But  
18 perhaps more -- sorry, Board member Gosselin, I'm --  
19 I'm at por -- page 73 of the outline. And probably  
20 I'm moving too -- either too fast or too slow, I'm  
21 not sure which.

22                   But also when you reexamine their oral  
23 -- oral evidence it's important to use some care in  
24 looking through their evidence because they came out  
25 as advocating for stage 2 training as best practice,

1 but they did use stage 2 training in two (2) quite  
2 different ways.

3                   In part of their description, and --  
4 and they conceded this in our discussion in the  
5 transcript at page 1,531, they talked about the  
6 experience from Michigan. And Michigan is stage 2  
7 training only to the extent that they defer some of  
8 the in-classroom time.

9                   So it's the same package as the  
10 traditional ADTSEA product, forty-five (45) hours in  
11 class, ten (10) hours on the road and ten (10) hours  
12 of observation. But they were, when -- when pressed,  
13 careful to point out that what they've done is move  
14 some of the in-classroom time to a later stage.

15                   That's very different from the stage 2  
16 approach that they refer to from Denmark. And that  
17 initiative and that experiment in Denmark is a really  
18 important and intriguing initiative, but it should be  
19 distinguished. It certainly wasn't just about  
20 additional classroom time. It was about different  
21 amounts of training on the road, different amounts of  
22 training at night. It was a much more extensive  
23 program than the Michigan program of which the  
24 Robinsons spoke.

25                   Just if the Board can turn to page 74

1 of the written outline and also pull up page 25 of  
2 the oral -- or the supporting materials. So that's  
3 page 74 of the written outline and page 25 of the  
4 supporting materials.

5                   The point we make at page 74 of the  
6 written outline is that care must be used in the  
7 AADTSEA description of second stage dri -- stage 2 as  
8 accepted or best practice. Now, in my discussion  
9 with both the Robinsons they were frank in  
10 acknowledging the risk in any analysis of confounding  
11 factors and selection bias. And they were also --  
12 MPI was frank in not seeking to qualify them as  
13 experts in the design and analysis of road safety  
14 summative or outcome reviews.

15                   But certainly the -- the Robinsons  
16 seemed to be describing the sec -- the stage 2  
17 approach employed in Denmark as accepted best  
18 practice. And our client does not want to diminish  
19 that point. But they do want to put a nuance on it.

20                   It's not in our supporting materials,  
21 but if the Board looks to CAC Exhibit 10, page 7,  
22 that's the Jensen study. And that's from the ADTSEA  
23 chronicle. It describes that study, the Danish  
24 study, as completed under less than ideal conditions.

25                   And if you turn, as you have,

1 hopefully at page 25 of the supporting materials,  
2 you'll see what, in part, Lonerio and Mayhew say about  
3 the Danish material. And they outline an important  
4 limitation: no control of confounding variables.  
5 They didn't control for driver age, months of driving  
6 experience -- excuse me, they did control for driver  
7 age. They didn't control for a number of confounding  
8 variables.

9                   And so the simple point our client  
10 makes here is that there's something very intriguing  
11 that went on in Denmark. It's worthy of further  
12 research. But it would go to far, in our client's  
13 view, to consider it or describe it as best practice.

14  
15                   And if you flip back just a couple  
16 pages in the supporting materials, to page 23, in the  
17 -- in the top right-hand corner, page 23. Circled  
18 there you'll see how Lonerio, page 23 in the top-right  
19 corner -- you'll see there how Lonerio and Mayhew  
20 describe the Danish experience.

21                   "The Danish experience and the  
22                   later introduction of second stage  
23                   training requirement elsewhere in  
24                   Scandinavia point to one (1)  
25                   potentially fruitful direction for

1 further investigation: multi-stage  
2 instruction."

3 So our clients don't wish to diminish  
4 the potential for multi-stage instruction. But they  
5 do not wish -- and do not accept its characterization  
6 as best practice. Careful, summative researchers  
7 have described it as completed -- the studies as  
8 completed under less than ideal conclusions. And  
9 careful researchers like -- such -- such as Lonerio,  
10 have been more cautious, saying it's one (1)  
11 potentially fruitful area for further discussion.

12 And certainly our clients, turning to  
13 page 75, they agree that when we look at drivers'  
14 education we should be looking to consideration of a  
15 summative review. And if -- certainly if MPI is  
16 interested in walking down the path of the second-  
17 stage or multi-stage instruction, our client  
18 recommend a cautious, incremental approach involving  
19 pilots. And that would be on all fours with, as we  
20 understand it, the recommendation of the Robinsons  
21 and Ms. Johnson.

22 Going beyond perhaps the rate-setting  
23 function of the Board, recognizing that the Board can  
24 provide advice to the province, our client certainly  
25 recommends that the province, in conjunction with MPI



1 and other stakeholders, consider development of a  
2 Safe System road safety strategy. And that there be  
3 consideration to convening a stakeholders' meeting to  
4 discuss a road safety strategic plan and better  
5 coordination.

6                   And our client noted with some regret,  
7 they thought the Board's recommendation last year of  
8 a technical conference broader than this proceeding  
9 was an inspired one. Whether that was in the Board's  
10 jurisdiction might be a -- a matter of -- of debate,  
11 but that type of approach is something that our  
12 client feels is -- is an important need.

13                   And it certainly, based upon our  
14 client's ana -- analysis of Alberta, our  
15 international best practice, there certainly is an  
16 opportunity to do more in road safety. And our  
17 client, as I said, thought that -- that technical  
18 conference was inspired. And it was with some regret  
19 that our client noted that it -- it did not take  
20 place. MPI has a distinct and important perspective,  
21 so do CAA, CAC, and Bikes Winnipeg, but there are  
22 many other players, many other stakeholders, whose  
23 voices our clients would look forward to hearing.

24                   In terms of road safety, in terms of  
25 its con -- the conclusions of our clients at page 76,

1 they believe that there was unrealized pro --  
2 potential within this province and within Manitoba  
3 Public Insurance. Our client is not satisfied with  
4 what appears to be a near status quo in terms of  
5 fatalities over the past de -- decade,  
6 notwithstanding material changes in vehicle designs  
7 and the dampening effect on road travel of the  
8 recession.

9                   And certainly, based upon Ms.  
10 Johnson's response to MPI/CAC-7, our client believes  
11 that there's been less progress in Manitoba over the  
12 past five (5) years, less relative improvement as  
13 compared to jurisdictions with strategic plans such  
14 as Alberta. At the heart of Ms. Johnson's evidence  
15 is a message about the need to be more innovative and  
16 more businesslike in the management of the road  
17 safety portfolio. And our client believes that her  
18 key contribution has been to bring forward an  
19 innovative series of tools that MPI and the province  
20 can put in the road safety tool box.

21                   Now, the starting point at CAC  
22 (Manitoba) is always to look at is -- what is an  
23 appropriate role for the ratepayer as opposed to the  
24 taxpayer. But certainly my client is -- our client  
25 is -- believes the issue of road safety is of such

1 importance that all options must be considered,  
2 including innovative ways to rethink the role of the  
3 auto insurer. Our client is not saying they endorse  
4 -- they will endorse changes, but we -- they think  
5 clearly Ms. Johnson points to a -- a need to broaden  
6 our horizon.

7                   Madam Chair and members of the Panel,  
8 I thank you for your patience. At page 77, we  
9 discuss what is -- issues relating to the rate  
10 stabilization reserve and the DCAT. And it certainly  
11 seems that we've been discussing the -- these issues  
12 since 1999. Ms. -- Ms. McLaren might think we've  
13 been discussing them slightly further. It goes back  
14 a while.

15                   And our client was appreciative of the  
16 cross-examination of Board counsel in terms of the  
17 understanding parties had in leaving the technical  
18 conference. Because our client certainly left the  
19 technical conference a) appreciative for the Board  
20 for recommending it, or -- or directing it, b)  
21 appreciative of the openness from Mr. Johnston and --  
22 and MPI in terms of ideas, but also with a strong  
23 sense that we were adjourning the technical  
24 conference in mid-stride, that there were important  
25 issues yet to be determined which we understood were

1 to be adjourned to a later date after the current  
2 GRA.

3 Just a few of those issues. The  
4 impact of the financial model in terms of interest  
5 rates and also balance sheet issues. Validation of  
6 the financial model. And, perhaps most important to  
7 our client, if not the actuary, appropriate -- an  
8 appropriate framework for risk tolerance.

9 CAC (Manitoba) has spent a lot of its  
10 effort on rate stabilization reserve issues in  
11 previous proceedings. One (1) of the reasons they  
12 chose not to call evidence in this proceeding was the  
13 expectation that we would be resuming the dialogue  
14 within the technical conference. And certainly  
15 you'll note that while I may be long-winded, I have  
16 been less long-winded on -- on DCAT and RSR issues in  
17 this proceeding. And again, that's part of our  
18 client's understanding of where we left the  
19 discussion off.

20 So certainly from our client's  
21 perspective, there are still some steps to make in  
22 terms of refining the DCAT product. We've flagged  
23 some of them, risk tolerance. Balance sheet forecast  
24 still to come. This is page 78 of the outline. No  
25 formal validation attesting of the financial model

1 can be provided at this time.

2                   And we note that in the event that our  
3 client is unable or unsuccessful in obtaining the  
4 Corporation's internal models, they may explore  
5 developing their own models to test the assumptions.

6                   From our client's perspective, turning  
7 to page 79, they recommend that the DCAT technical  
8 conference be resumed after this hearing to finish  
9 the agenda. They recommend that a status quo RSR  
10 target, i.e., the incumbent board mechanism repla --  
11 remain in place until a final determination and  
12 finalization with regard to the DCAT and associated  
13 issues is -- is confirmed.

14                   Just at page 80 of our outline, Madam  
15 Chair and members of the panel, I noted this  
16 previously, but apart from the specific rate  
17 recommendations of our client there have been an -- a  
18 series of other recommendations. And our client  
19 would not be surprised if that Manitoba Public  
20 Insurance said even if the Board were or -- to order  
21 these follow-up recommendations it is not feasible to  
22 achieve them all for the next general rate  
23 application.

24                   So certainly while our client has  
25 worded these recommendations in terms of bringing it

1 back forward generally for the next general rate  
2 application, they welcome the advice of Manitoba  
3 Public insurance and the direction of the Board in  
4 terms of perhaps, if the Board in its wisdom accepts  
5 these recommendations, staggering some of them  
6 between the next GRA and the GRA afterwards.

7                   The very last page of the outline I do  
8 have some thank-yous. I've already expressed some to  
9 CAC, I hope, to CAA and to Bikes Winnipeg. Our  
10 client did not, and I did not, represent Bikes  
11 Winnipeg in this hearing. We have to say we found  
12 them to be very inspired and collegial colleagues,  
13 but there were limitations in our ability to assist  
14 Bikes Winnipeg.

15                   The recommendations that you heard  
16 today on vulnerable road users were those of CAC  
17 (Manitoba), not Bikes Winnipeg. and our client has  
18 no doubt that the Bikes Winnipeg re --  
19 recommendations might be si -- significantly broader.  
20 So it was a tremendous honour. We thought some of  
21 the IRs posed by Bikes Winnipeg were outstanding, but  
22 there are limits to the role that CAC could play.  
23 They were honoured to have the opportunity. They  
24 learned a great deal, but there were limits.

25                   And, Ms. McLaren, we do have a special

1 thank-you on behalf of our client. And you'll  
2 forgive me if I get weepy, Ms. McLaren. I'll try not  
3 to though.

4 MS. MARILYN MCLAREN: I won't.

5 MR. BYRON WILLIAMS: I -- I want to  
6 say that there's some really unique things about Ms.  
7 McLaren's story. And the starting point, it's a  
8 tremendous testament to the wisdom of Manitoba Public  
9 Insurance because her career path, in our client's  
10 respectful view, is a unique but very rich one.

11 I don't recall seeing a lot of MBAs or  
12 those degrees attached to Ms. McLaren. I could be  
13 wrong. Maybe she's gained them subsequently. And  
14 our client does not care. She had a unique path  
15 through this Corporation, one presumes, doing almost  
16 every job within the Corporation. And it has given  
17 her a unique insight into the Corporation that our  
18 client has not seen repeated in any other witness who  
19 has appeared before it from the Corporation. And  
20 they thank her for that.

21 In addition, she's a little quieter  
22 this hearing than usual, but Ms. McLaren has been an  
23 outstanding and passionate advocate for the value of  
24 public automobile insurance. And our client has  
25 heard that message year after year in a really

1 persuasive fashion, and -- and they commend that in  
2 Ms. McLaren and -- and they hope she will continue in  
3 some form with that voice in -- in future venues.

4 Ms. McLaren, our client wishes to note  
5 a couple of her specific achievements. We will not  
6 do justice to them, especially given how much time  
7 I've taken already this afternoon.

8 But it can be said of Ms. McLaren that  
9 when she approached an issue and when she seized upon  
10 it, you could be dar -- guaranteed that would --  
11 there would be a material transformation. One (1) of  
12 those is the Immobilizer Program of which much has  
13 been said in media coverage. And it is commonly  
14 cited in terms of, you know, one (1) of her great  
15 achievements. And -- and certainly the Corporation  
16 was an innovator and a leader in that and it deserves  
17 much credit, as does she.

18 One (1) of my personal favourites was  
19 the Driver Safety Rating Program because if -- if one  
20 (1) is as old as I and has sat through these hearings  
21 since the mid 1970s -- 1990s, excuse me, Driver  
22 Safety, Bonus-Malus as it was called then, was one  
23 (1) of these moribund issues that everyone thought  
24 something should be done about, but was just never  
25 achieved.



1                   And MPI's approach under Ms. McLaren's  
2 leadership was -- was truly innovative. It took the  
3 issue out to the public. It did really  
4 groundbreaking work in terms of consultation in a --  
5 in my client's view, and got a lot of buy in, and got  
6 a product that is materially improved from what we  
7 had before. And so our client wishes to applaud Mr.  
8 McLaren's contribution in these -- in these factors  
9 and -- and of course many more.

10                   Finally, on a personal note, it is an  
11 adversarial process, but Ms. McLaren has really  
12 accepted the regulatory process as a -- an engaged  
13 dialogue. And our client has certainly observed,  
14 just as our client learns from this process, an  
15 openness on the part of MPI to do so.

16                   So they wish her well on her future  
17 endeavours. They congratulate her on a astonishing  
18 and entirely laudable career and thank her for her  
19 contribution. Subject to any questions, which I hope  
20 there aren't any, I'm done.

21

22                   (BRIEF PAUSE)

23

24                   THE CHAIRPERSON:    You're not off the  
25 hook yet; we're just checking.

1 (BRIEF PAUSE)

2

3 MR. REGIS GOSSELIN: Mr. Williams,  
4 I'm looking at page 16. And I'm specifically looking  
5 at the -- at the last paragraph of that page. And it  
6 talks about the double-counting and the investment  
7 income report.

8 Could you elaborate on that?

9 MR. BYRON WILLIAMS: Yeah, and I -- I  
10 perhaps was a little hyper -- hyperbolic in that  
11 statement, Mr. -- Mr. Chair (sic). But -- oops,  
12 excuse me. Just -- our analysis of the investment  
13 for the interest rate forecast of the Corporation,  
14 our client does not consider it a best estimate. It  
15 considers -- it considers it an estimate with a  
16 downward or conservative slant.

17 From our client's perspective,  
18 forecasting should be focussed on best estimates.  
19 And to the extent that there were material unforeseen  
20 or extremely unlikely events such as a enduring low-  
21 interest rate scenario, those should be provided for  
22 in the rate stabilization reserve. And what our  
23 client -- and as ag -- again, I -- I perhaps might  
24 have used the language differently, but what our  
25 client would consider to be best practice, and

1 appropriate practice is best estimate forecasting  
2 that allow for extremely unlikely events within the  
3 RSR.

4                   What they contend has happened in this  
5 proceeding is that the investment income forecast has  
6 been skewed downwards rather than a best estimate,  
7 which, in essence, amounts to double-protecting  
8 against an adverse event. That's the -- the -- what  
9 I intended to say and did not say well.

10                   MR. REGIS GOSSELIN: As part of my  
11 notes in this area, I noted that you -- you indicated  
12 your client would have been prepared to meet with  
13 MPIC to discuss the interest rate forecast.

14                   Did I -- did I understand you  
15 correctly?

16                   MR. BYRON WILLIAMS: If I said that I  
17 mis -- misspoke. What I -- what I intended to say is  
18 this, Mr. Chair, is that our client has been raising  
19 these issues of low interest rate forecasts both in  
20 Centra and Hydro. We're sympathetic to the concerns  
21 with over-optimistic forecasts. And if MPI would  
22 have come in and, for example, with a proposal  
23 similar to the Centra -- the -- the outcome flowing  
24 from the Centra rate order, our client would have  
25 been very sympathetic to that, and indeed has

1 endorsed that type of approach here. And if I was  
2 imprecise, I'm kind of tired. Oh dear, not Board  
3 member Neville.

4 MS. ANITA NEVILLE: That's not very  
5 nice. I'm sort of reluctant to ask you, given you  
6 just said you're tired. But you used the term  
7 frequently, and particularly at the beginning of your  
8 presentation, 'with a commensurate benefit to  
9 ratepayers'.

10 And I wonder if you could just expand  
11 on that a bit?

12 MR. BYRON WILLIAMS: I'm presuming  
13 you're re -- and it's always a great pleasure to talk  
14 with you. And I -- I shouldn't be frivolous.

15 MS. ANITA NEVILLE: That's okay.

16 MR. BYRON WILLIAMS: I'm presuming  
17 you're referring to some of our discussion in terms  
18 of information technology expenditures. And  
19 certainly our client recognizes the need to be as  
20 modern as any other Crown monopoly auto insurer. But  
21 what it's pointing to is what seems to be an over-  
22 investment in information technology as compared to  
23 the tangible benefits to ratepayers.

24 Now, certainly there are -- it is  
25 arguable that there are -- that through information

1 technology there will be some better services. But  
2 one would also expect a express payback to ratepayers  
3 in terms of savings on other sides of the business.  
4 And what our client was referring to is, let's just  
5 for a moment accept that up until 2011/'12, MPI was  
6 busy fixing the roof.

7                   There's a whole series of expenditures  
8 flowing out to 2017/2018, described by the Gartner  
9 Group as "extending the base." And when it's going  
10 beyond kind of upkeep and maintenance, and keeping  
11 the system modern, and really towards a -- a  
12 portfolio that is expanding the infrastruc -- the  
13 information technology reach of the Corporation, my  
14 client would have expected a tangible pay -- payback  
15 to ratepayers.

16                   And the most eloquent expression of  
17 our client's concerns is the human resource  
18 management system, where really you're spending, in  
19 essence, simplified, eight thousand dollars (\$8,000)  
20 per employee for a very modest payback, at least on  
21 the record of this hearing, in terms of savings. And  
22 that's what my client would have expected. Some sort  
23 of more defined and more material payback, whether  
24 through interest savings, whether through a reduction  
25 in EFTs, something like that. That's what I was

1 referring to.

2 MS. ANITA NEVILLE: Thank you.

3 THE CHAIRPERSON: Thank you very much

4 for your very thorough closing submissions, Mr.

5 Williams. The Board continues to appreciate the work

6 you do on behalf of CAC and will take all the

7 evidence you've provided during these hearings into

8 consideration as we make our deliberations. So that

9 will conclude our proceedings for today. And we'll

10 reconvene on Thursday, October 17th, at 9:30 a.m. at

11 which time MPI will be making its closing remarks.

12 So thank you. Have a good evening.

13

14 --- Upon adjourning at 3:55 p.m.

15

16

17 Certified correct,

18

19

20 \_\_\_\_\_

21 Cheryl Lavigne, Ms.

22

23

24

25

\$	1991:12	1914:2,3	<b>1,278</b> 1868:7	1911:13
<b>\$10</b> 1958:1	<b>\$67.8</b> 1953:1	1919:12	<b>1,308</b>	<b>1/2</b> 1921:24
<b>\$100</b> 1883:10	<b>\$7.5</b> 1862:6	1920:22	1931:20	<b>1:52</b> 1953:16
1888:25	<b>\$74.8</b> 1950:8	1925:14	<b>1,313</b> 1932:5	<b>10</b> 1846:9
<b>\$100,000</b>	<b>\$8</b> 1852:20	1926:6	<b>1,518</b> 1988:7	1851:17,21
1948:12	<b>\$8,000</b>	1928:1,23	<b>1,519</b> 1988:7	1852:2
1949:3	1948:4	1939:4,7	<b>1,531</b> 2003:5	1863:16
<b>\$13</b>	2019:19	1940:6	<b>1,598</b>	1868:23
1880:18,24	<b>\$92</b> 1872:15	1945:14	1865:23	1871:18
1952:21		1956:7	<b>1,655</b>	1872:9
<b>\$13,000</b>		1957:15	1980:11	1883:8
1948:21		1958:14	<b>1,665</b>	1889:15
1949:2		1959:16	1980:11	1897:6
<b>\$14</b> 1911:10		1967:3	<b>1,671</b> 1984:7	1976:23
<b>\$172</b> 1879:22		1971:7	1980:11	2003:11
1889:16		1974:20,24		2004:21
<b>\$173</b> 1881:6		1978:5,9,1		
<b>\$19</b> 1860:1		0,17		
<b>\$24.8</b>		1980:3,20		<b>10.6</b> 1873:4
1949:22		1981:4		<b>10.8</b> 1950:4
<b>\$250</b> 1879:20		1986:2		<b>10:05</b>
<b>\$3</b> 1878:13		1992:5		1856:14
<b>\$30</b> 1885:13		1993:10,22		<b>10:13</b>
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1937:10		2006:10		<b>100</b> 1851:10
1938:11		2010:11		1858:4
<b>\$350,000</b>		2014:11,14		1879:25
1991:11		,18,20,23		1881:7
<b>\$4.2</b> 1880:17		<b>1,013</b>		1889:13
<b>\$40</b> 1972:5		1940:12		1897:12
<b>\$5</b> 1992:22		<b>1,016</b>		1898:18
<b>\$50</b> 1926:8		1941:21		1932:18
1950:1		<b>1,029</b>		<b>105</b> 1867:4
<b>\$50,000</b>		1941:25		<b>11</b> 1921:3
1893:5		<b>1,035</b>		1933:6,8
<b>\$52.3</b>		1942:23		<b>11.6</b> 1876:12
1952:19		<b>1,038</b>		<b>11:07</b>
<b>\$550</b> 1897:25		1941:21		1896:23
<b>\$6</b> 1944:25		1942:24		<b>11:12</b>
1947:23		<b>1,049,409</b>		1896:24
<b>\$6,185,910</b>		1859:19		<b>11:24</b>
1880:21		<b>1,059</b>		1904:13
<b>\$600,000</b>		1880:10		<b>110</b> 1974:15
		<b>1,139</b>		<b>110.6</b>
		1938:14		1861:21
		<b>1,212</b> 1978:8		<b>113/8</b> 1874:8
		<b>1,214</b>		<b>114.5</b>
		1978:19		
		<b>1,272</b> 1930:7		

1861:23	1960:22	<b>1904</b> 1833:17	1908:17	1938:4
<b>12</b> 1840:5	1962:7	<b>192</b> 1844:17	1914:6	1957:17
1921:12	<b>16</b> 1924:19	<b>193.1</b>	1918:4,5	<b>20 (a)</b> 1985:17
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