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July 5, 2018

Manitoba Public Utilities Board  
Darren Christle  
Secretary and Executive Director  
400-330 Portage Avenue  
Winnipeg, MB R3C 0C4

Dear Mr Christle:

**Re: Manitoba Public Insurance General Rate Application 2019/20 – CAC  
Manitoba Response to MPI Rule 13 Motion**

The Manitoba Branch of the Consumers' Association of Canada (CAC Manitoba) has reviewed the motion filed by Manitoba Public Insurance (MPI) under Rule 13 of the Public Utilities Board (PUB) Rules of Practice and Procedure.

Pursuant to Rule 22(4) of the PUB Rules of Practice and Procedure,<sup>1</sup> the purpose of this letter is to provide CAC Manitoba's response to MPI's motion.

Overall, CAC Manitoba's does not object to MPI's request that the PUB receive in confidence the following three documents:

1. the business case for the Five Year Strategic Space Plan (the "Space Plan Business Case");
2. the document identified as "attachment C" to Appendix 17 of the Investment Chapter under Part IV of the 2019 GRA (the "Mercer Methodology"); and
3. Mercer (Canada) Limited's ("Mercer") response to MPI's request for proposals ("RFP"), which details the Mercer Methodology (the "Response to RFP").<sup>2</sup>

CAC Manitoba acknowledges that treating these documents as confidential will impair the public interest in the disclosure of the information as they will not be disclosed on the public record. Based upon its review of MPI's materials, however, CAC Manitoba believes that MPI's proposed conditions on access constitute minimal impairment to the public interest in the disclosure of the information.

In order to clarify the process for the treatment of confidential information where an intervener files evidence, CAC Manitoba recommends one

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<sup>1</sup> 22(4): Any party who wishes to respond to a motion shall file and serve on all parties a written answer no later than 2:00 p.m. two days before the day the motion is heard.  
<sup>2</sup> See MPI Motion Brief at page 5.

amendment to the approach contemplated by MPI, as follows:

- If CAC Manitoba (or another intervener) files a report as evidence in this proceeding that is based on, refers to or contains confidential information, the evidence should be filed in confidence with the PUB and MPI on the filing deadline (i.e. Monday September 24, 2018 as per PUB Order 82/18). In consultation with MPI, CAC Manitoba (or any other intervener) would subsequently determine the need for and prepare a redacted version for public disclosure, if applicable, to be filed within two business days (by Wednesday September 26, 2018).

CAC Manitoba recognizes the efforts made by MPI to ensure that the Corporation's Rule 13 motion is limited in scope and that the proposed conditions on access contemplate disclosure to the appropriate interveners to ensure minimal impairment to the public interest in the disclosure of the information.

CAC Manitoba appreciates the opportunity to make these comments regarding MPI's motion pursuant to Rule 13 of the PUB Rules of Practice and Procedure.

Yours truly,



Katrine Dilay  
Attorney  
KD/