



August 13, 2019

**Hand Delivered**

The Public Utilities Board  
400 – 330 Portage Avenue  
Winnipeg, MB R3C 0C4

**Attention: Mr. Darren Christle, Board Secretary and Executive Director**

Dear Mr. Christle:

**RE: Manitoba Public Insurance (MPI) 2020 General Rate Application (GRA)  
Round One Confidential Information Request (IR) Filing**

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Please find accompanying this letter, MPI's responses to first round Confidential Information Requests. The responses have been loaded onto flash drives, and are password protected to open. The password will be sent by separate email. All parties who have signed the MPI confidentiality agreement will receive these IR responses.

As summarized in the August 12, 2019 letter filing the first round IR responses, this confidential filing contains the following:

- a) CAC (MPI) 1-1 Attachments A & B, and Appendices 18 – 21 filed in the CSI module only.

Note that Appendix 19 and 20 contain redactions. The particular information redacted relates to the competitive dynamics of a very small market, and this information, if accidentally disclosed, could be exploited and result in serious competitive harm to market incumbents.

- b) CAC (MPI) 1-4 b) filed in the CSI module, with redacted versions on the public record
- c) CAC (MPI) 1-31 Appendix 1 – 11 filed in the CSI module, with redacted versions on the public record
- d) PUB (MPI) 1-84 Appendix 1 filed in the CSI module only
- e) PUB (MPI) 1-85 b) Attachment A, filed in the CSI module only
- f) PUB (MPI) 1-86 a) & b) Appendix 1 & 2, filed in the CSI module only.

Note that responses to PUB (MPI) 1-85 b), and PUB (MPI) 1-86 a) & b) contain over 500 pages of project close out reports (447 pages), change requests (87 pages), and other information.

At the time of filing, MPI has been unable to confirm if confidential or commercially sensitive information is contained within the reports. Therefore MPI is filing the material confidentially, pending a final determination of the sensitivity of the contents.

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In discussions with Board Counsel it was agreed that for the purposes of the close out reports it would be sufficient to publicly file redacted versions of 2 larger and 1 smaller reports.

Finally, PUB (MPI) 1-49 Attachment A and PUB (MPI) 1- 40 request production of reports prepared by third parties. MPI is in the process of obtaining consent to file confidentially, from the study authors and participants. MPI will circulate confidentiality agreements for signatures once all parties have agreed to proceed.

Sincerely,



Michael Triggs  
General Counsel and Corporate Secretary

MT/st

Encl.

cc: K. McCandless and PUB Advisors  
2019 GRA Registered Interveners