

INTERVENER APPLICATION FORM

Application re Hearing:			
Name of Prospective Intervener (Organization Name or Individual):			
Prospective Intervener Contact Information			
Organization or Individual Address:			
Organization Contact Person(s) (if applicable):			
Contact Information:	Business:		Other Phone:
	Fax Number:		Email:
Representative Contact Information:			
Counsel or Representative Name(s):			
Organization (if different from above) :			
Address (if different from above):			
Contact Information (if different from above):	Business:		Other Phone:
	Fax Number:		Email:
Counsel Seniority:			
Years of Experience	_____ Years	Tariff Rate	\$ _____
Also representing (if applicable):			

Additional Information

(For organizations only) Please describe the mandate of your organization and provide a description of the membership, including the number of members. Please also confirm whether the organization's intervention in this proceeding is supported by a resolution of the governing body, if any. Please enclose the resolution, if any, with your Application, along with supporting documentation of your mandate and membership

Please state your reasons for intervening in this proceeding:

Please state how you are directly affected by the Board's decision in this matter:

Please explain whether and how you represent a substantial number of ratepayers that are otherwise not represented on issues that are within the scope of this proceeding:

Please describe your experience, information, or expertise relevant to this matter that would contribute to the Board's decision making, including any other prior interventions in regulatory matters before this Board or other decision-makers:

Please list the key issues you intend to address in the proceeding. Please be specific.		
Do you intend to participate fully and actively, including attendance at hearings, submission of evidence, and testing of evidence and cross examination of witnesses? If yes, please describe your intended participation.		
Do you intend to request an award of costs for your participation? Please explain how you meet the criteria for an award of costs.		
Do you intend to retain experts or consultants? If yes, please attach copies of the <i>curriculum vitae</i> for any expert and/or consultant, as well as the following:		
Expert Consultant #1:		
Name:	Experience	Evidence to be provided on issues in scope:
	_____Years	
Telephone #:	Tariff Rate:	
	\$_____	
Address and Email:	Firm or Organization:	Brief explanation of experience relevant to evidence to be provided:

Expert Consultant #2:		
Name:	Experience:	Evidence to be provided on issues in scope:
	_____Years	
Telephone #:	Tariff Rate:	
	\$_____	
Address and Email:	Firm or organization:	Brief explanation of experience relevant to evidence to be provided:
Expert Consultant #3:		
Name:	Years of Experience:	Evidence to be provided on issues in scope:
	_____Years	
Telephone #:	Tariff Rate:	
	\$_____	
Address and Email:	Firm or organization:	Brief explanation of experience relevant to evidence to be provided:

Do you intend to provide evidence from witnesses other than experts and/or consultants? If yes, please provide:	
Witness #1:	
Name:	Evidence to be provided on issues in scope:
Email:	Brief explanation of relevant experience and/or knowledge to issues in scope:
Address and Phone number:	
Do you intent to seek approval for any other form of participation or provision of evidence, including for which you intend to seek an award of costs? If yes, please provide details and an explanation of the relation to issues in scope in the proceeding.	

Attachment A

CAC Manitoba Application to Intervene: MPI 2021/22 GRA

1) Overview

Manitoba is in a time of unprecedented change and uncertainty. Many Manitobans are unemployed; the economy is expected to materially contract in 2020; work patterns are in flux with an increasing number of individuals and businesses contemplating a significant change in where they work; Manitobans continue to drive less than pre-COVID-19.

In the context of significant economic dislocation, Manitoba motorists will no doubt welcome a significant average rate reduction in Manitoba Public Insurance (MPI) rates. But fundamental questions remain especially in light of the material change in circumstances currently underway in Manitoba and the many risks and uncertainties that all Manitoban residents and businesses, including MPI, face.

CAC Manitoba seeks to protect the interests of all MPI ratepayers with a particular focus on the private passenger class. It will test whether the proposed 10.5% overall rate decrease is just and reasonable in light of the current financial circumstances of MPI as well as its medium and longer term risks. Among the issues that CAC Manitoba will canvass in the current General Rate Application are:

- ⑩ The reliability of the claims incurred forecast in light both of COVID-19 effects, reduced average rates and claims by MPI that it is materially improving claims handling processes; Can MPI claims of increased efficiency be reconciled with the MPI claims incurred forecasts including collision severity?
- ⑩ Risks and opportunities for Manitoba ratepayers with regard to Project NOVA; is it credible that the project's budget has not been revised even though much of the budget appears committed to only part of the project? Is the business case viable even though major benefit streams such as FTEs and Commission savings may be in doubt?
- ⑩ Are there grounds for concern with the trends in basic expenditures over the next three years? How credible is the analysis underlying the developments in the claims expense forecast?
- ⑩ What are the implications for the rollout of new coverage flowing from the Compulsory and Extension Review Project (CERP). Recognizing the reduction in basic insurance coverage flowing from the increase in deductibles, are the expectations of the impacts of these changes on the basic program financial results credible? Recognizing the transfer of risk to extension flowing from the increase in basic insurance deductibles, what are the implications for extension revenues and income and potential transfers to basic through the Capital Management Plan (CMP)? What are the implications for broker commissions of the reduction in basic coverage?

⑩ The implications of COVID-19 on the short term and longer term circumstances of MPI including the implications on rates, claims incurred and the Capital Management Plan.

CAC Manitoba has had discussions with the representatives of the taxi industry in terms of ways to minimize duplication between their interventions. It also has exchanged correspondence with the Coalition of Manitoba Motorcycle Groups (CMMG) regarding the hearing and will continue to work cooperatively with them on ways to maximize hearing effectiveness and efficiency.

2) Introduction

This document provides background to the proposed intervention of the Manitoba Branch of the Consumers' Association of Canada (CAC Manitoba) by outlining:

- ⑩ who is CAC Manitoba?
- ⑩ reasons for the Proposed Intervention, including how CAC Manitoba represents consumers who will be directly affected by the Board's decision in this matter and how CAC Manitoba represents a substantial number of ratepayers;
- ⑩ CAC Manitoba's experience, information and expertise relevant to this matter;
- ⑩ the nature of the Proposed Intervention, including the key issues that CAC Manitoba intends to address in this proceeding; and
- ⑩ a brief overview of how CAC Manitoba intends to participate in this proceeding, including the legal advisors and consulting experts. The proposed estimate of costs will be consistent with or lower than similar bills in the past for hearings of similar length and complexity.

3) Who is the Manitoba Branch of the Consumers' Association of Canada?

Please describe the mandate of your organization and provide a description of the membership, including the number of members. Please also confirm whether the organization's intervention in this proceeding is supported by a resolution of the governing body, if any. Please enclose the resolution, if any, with your Application, along with supporting documentation of your mandate and membership:

CAC Manitoba is a volunteer, non-profit, independent organization working to inform and empower consumers and to represent the consumer interest in Manitoba. Formed in 1947, the organization is governed by a volunteer Board of Directors elected annually

at a general meeting of its membership. It is a branch of the national Consumers' Association of Canada but is financially separate and separately incorporated.

CAC Manitoba represents the interests of consumers across Manitoba in a number of areas including financial services, food safety and security, patient rights, environmental sustainability and the regulatory review of utilities and Crown's delivering services and products to consumers.

The organization seeks input on its policy positions from consumers through engagement, which includes the innovative use of focus groups-style sessions, workshops, surveys, and through its ongoing services to the public. For example, in 2016-2017, it had contact with approximately 13,000 consumers through its consumer education/information programs, services and consumer research. In addition, the organization seeks other perspectives on relevant issues through the use of policy community advisory committees and interviews

CAC Manitoba aims to protect and reconcile the interests of all Manitoba Public Insurance consumers with a particular emphasis on members of the private passenger class. It seeks to present an evidence-based intervention guided by a principled consideration of the consumer interest. It is represented by the Public Interest Law Centre.¹

The organization's policy is guided by its understanding of generally accepted consumer rights including:

- **The right to satisfaction of basic needs** - To have access to basic, essential goods and services: adequate food, clothing, shelter, health care, education, public utilities, water and sanitation.
- **The right to safety** – to be protected against products, production processes and services that are hazardous to health or life.
- **The right to be informed** – To be given the facts needed to make an informed choice, and to be protected against dishonest or misleading advertising or labelling.
- **The right to choose** – To be able to select from a range of products and services, offered at competitive prices with an assurance of satisfactory quality.
- **The right to be heard** - To have consumer interests represented in the making and execution of government policy, and in the development of products and services.
- **The right to redress** – To receive a fair settlement of just claims, including compensation for misrepresentation, shoddy goods or unsatisfactory services.
- **The right to consumer education** – To acquire knowledge and skills needed to make informed, confident choices about goods and services, while being aware of basic

¹An independent office of Legal Aid Manitoba.

consumer rights and responsibilities and how to act on them.

- **The right to a healthy environment** -To live and work in an environment that is non-threatening to the well-being of present and future generations.

CAC Manitoba is also guided by the following consumer responsibilities:

- **Critical awareness** - consumers must be awakened to be more questioning about the provision of the quality of goods and services.
- **Involvement or action** - consumers must assert themselves and act to ensure that they get a fair deal.
- **Social responsibility** - consumers must act with social responsibility, with concern and sensitivity to the impact of their actions on other citizens, in particular, in relation to disadvantaged groups in the community and in relation to the economic and social realities prevailing.
- **Ecological responsibility** - there must be a heightened sensitivity to the impact of consumer decisions on the physical environment, which must be developed to a harmonious way, promoting conservation as the most critical factor in improving the real quality of life for the present and the future.
- **Solidarity** - the best and most effective action is through cooperative efforts through the formation of consumer/citizen groups who together can have the strength and influence to ensure that adequate attention is given to the consumer interest.

4) Reasons for the proposed intervention

Please state your reasons for intervening in this proceeding:

CAC Manitoba seeks to represent the interests of all MPI consumers with a particular focus on the private passenger class. It intends to test whether the proposed average rate reduction is just and reasonable in light of the financial circumstances of MPI including its current and future risks and opportunities. Consistent with the statutory test and focusing on the issues list directed by the PUB for the purposes of this hearing, it will consider:

- ⑩ the reliability of MPI forecasts;
- ⑩ the prudence and reasonableness of MPI expenditures and operations;
- ⑩ the overall health of the corporation including material risks and opportunities;
- ⑩ whether expected costs are reasonably allocated among different classes of ratepayers;

- ⑩ whether the proposed rates are just and reasonable.

Please state how you are directly affected by the Board's decision in this matter:

MPI ratepayers are directly affected by the Board's decision in this matter, both relating to the overall rate for 2020/21 and other issues which will have long-term impacts on automobile insurance rates in Manitoba.

Please explain whether and how you represent a substantial number of ratepayers that are otherwise not represented on issues that are within the scope of this proceeding:

CAC Manitoba seeks to protect the interests of Manitoba Public Insurance ratepayers with a particular focus on the private passenger class. It will assert their right to just, reasonable and sustainable rates that are determined in a publicly accessible and transparent process.

No other intervener or group actively participating in this proceeding represents the private passenger class. CAC Manitoba intends to actively collaborate with other intervenors on areas of common interest.

For CAC Manitoba, bringing the voice of consumers directly to the Public Utilities Board is of primary importance in the independent rate-setting process. The organization places a priority on direct consumer input through focus groups, engagement sessions and stakeholder panels.

In preparation for the upcoming MPI General Rate Application, CAC Manitoba expects to meet with a number of potential stakeholders representing various Manitoba perspectives. It will conduct at least two focus groups with Manitoba consumers on issues relevant to public auto insurance. In addition, the organization will seek to better educate consumers about the rate application through the use of a variety of public engagement tools including social media.

Please describe your experience, information, or expertise relevant to this matter that would contribute to the Board's decision making, including any other prior interventions in regulatory matters before this Board or other decision-makers:

Over the past 30 years, CAC Manitoba has been active in rate regulation matters relating to Manitoba Public Insurance, Manitoba Hydro, Centra Gas, government cheque cashing and payday lending rates. In addition, the organization has extensive and intersecting regulatory experience at the Canadian Radio-television and Telecommunications Commission and the Manitoba Clean Environment Commission. It takes pride in its long-standing record of quality, evidence-based advocacy.

Over the past thirty years, CAC Manitoba has been particularly engaged in regulatory matters relating to Manitoba Public Insurance including every General Rate Application and technical conference as well as the Driver Safety Rating proceeding.

CAC Manitoba has a mandate to provide Manitoba consumers with unbiased information. Through interventions at rate hearings, the organization represents the consumer interest on prices and quality of service (“rates for service”).

In recent regulatory proceedings before the Public Utilities Board on Manitoba Public Insurance matters, CAC Manitoba has played an active role in issues such as:

- ratemaking in accordance with accepted actuarial practice;²
- an evidence based approach to interest rate forecasting;³
- the need for increased rigour in information technology expenditures and demonstrable benefits for ratepayers including a post project review of expenditures related to the personal injury protection plan technology management system;⁴
- risks and opportunities for Manitoba ratepayers relating to Project Nova and the Physical Damage Re-engineering project;⁵
- efficiency in expenditures on staffing;⁶
- a modern approach to road safety investments that provides good value to ratepayers and enhances protection for all Manitobans;⁷
- the necessity for a modernized approach to the Corporation's investment portfolio that better balances risk and reward;⁸
- an evidence based approach to setting reasonable reserves;⁹
- the importance of a fair and effective Driver Rating System.¹⁰

5) Proposed areas of analysis, evidence and expert witnesses

Please list the key issues you intend to address in the proceeding. Please be specific.

Do you intend to participate fully and actively, including attendance at hearings,

²Public Utilities Board Order 162-16, p. 5, 16, 18-19, 31-32, 35, 65-67; Public Utilities Board Order 130-17, p 25-26.

³162-16, p. 6, 16, 18, 46, 50, 54-56; 130-17, p 65-66, 69; Public Utilities Board Order 159/18, p 30-31.

⁴162-16, p. 6, 31-32, 33-34, 36; 130-17, p 51-53; 159/18, p 69-70.

⁵162-16, p. 22, 28 -29, 32, 34, 36; 130-17, p 56.

⁶162-16, p. 26.

⁷162-16, p. 7, 70, 80 -82; 130-17, p 87.

⁸162-16, p. 6, 15-16, 44-45, 50; 130-17, p 66; 159/18, p 84-88.

⁹162-16 p. 7, 59, 61 – 63; 130-17, p 75-77, 79; 159/18, p 31-33.

¹⁰162-16, p. 14; 130-17, p 33.

submission of evidence, and testing of evidence and cross examination of witnesses? If yes, please describe your intended participation.

The intervention of CAC Manitoba in this proceeding will be guided by the Public Utilities Board criteria for the consideration of just and reasonable rates. Pursuant to its jurisdiction and the statutory framework in which it operates, the Public Utilities Board has characterized the key elements of its independent review function and rate-setting role as follows:

- Ensuring that forecasts are reasonably reliable;
- Ensuring that actual and projected costs incurred are necessary and reasonable;
- Assessing the reasonable revenue needs of an applicant in the context of its overall general health (including reserves);
- Determining an appropriate allocation of costs between and within classes; and
- Setting just and reasonable rates in accordance with statutory objectives.¹¹

Through its information requests, cross examination and oral submissions, the proposed intervention of CAC Manitoba will consider all issues identified in the final PUB issues list. As elaborated in the overview to this document, currently, CAC Manitoba intends to focus on the following key issues:

- ⑩ the implications of COVID-19 on the short term and longer term circumstances of MPI including the implications on rates, claims incurred and the Capital Management Plan;
- ⑩ implications of the rollout of new coverage flowing from the Compulsory and Extension Review Project (CERP);
- ⑩ the reliability of the claims incurred forecast;
- ⑩ risks and opportunities for Manitoba ratepayers with regard to Project NOVA; and,
- ⑩ trends in basic expenditures over the next three years.

Given the short time frame between the filing of the application and the pre-hearing conference, this overview of issues is necessarily preliminary.

At the current time, CAC Manitoba does not anticipate calling a witness but reserves the right to seek permission to provide expert evidence after its review of the first round information requests especially with regard to the five issue outline above.

¹¹ *Public Utilities Board Order 98/14* at p 28, 37; *PUB Order 5/12* at p 27. See also the *Crown Corporations Public Review and Accountability Act*, C.C.S.M. c. C336, the *Public Utilities Board Act*, C.C.S.M. c. P280 and the *Manitoba Public Insurance Corporation Act*, C.C.S.M. c. P215

CAC Manitoba's team of experts currently includes Ms. Andrea Sherry, property and casualty insurer actuary, Mr. Peter Dyck, former MPI controller and regulatory accountant, and Mr. Jeff Crozier, former MPI head of regulatory affairs and regulatory economist. Ms. Sherry and Mr. Dyck will be made available to provide technical advice to one other intervenor. Mr. Crozier also may be assisting representatives of another intervenor.

To ensure efficiency and minimize duplication, the experts of CAC Manitoba will be assigned lead responsibility for different aspects of the application with the PILC legal team. The curriculum vitae of Ms. Sherry, Mr. Dyck and Mr. Crozier are attached.

6) Costs

Do you intend to request an award of costs for your participation? Please explain how you meet the criteria for an award of costs.

CAC Manitoba intends to request an award of costs for its participation in the 2021/22 MPI GRA.

As stated in the Intervener Costs Policy, in any proceeding, the Board may award costs to be paid to any Intervener who has:

- (a) made a significant contribution that is relevant to the proceeding and contributed to a better understanding, by all parties, of the issues before the Board;
- (b) participated in the hearing in a responsible manner and cooperated with other Interveners who have common objectives in the outcome of the proceedings in order to avoid a duplication of intervention;
- (c) represented interests beyond their sole business interest; and
- (d) a substantial interest in the outcome of the proceeding and represents the interests of a substantial number of ratepayers.

CAC Manitoba intends to make a significant contribution to this proceeding through its information requests, its cross-examination of MPI's witnesses and its final submissions. Its intervention will be guided by the PUB's criteria for the consideration of just and reasonable rates. CAC Manitoba also expects its intervention to be guided by engagement with Manitoba ratepayers.

CAC Manitoba will participate in this hearing in a reasonable manner and will cooperate with other interveners who have common objectives. CAC Manitoba will make reasonable efforts to ensure that its participation is not unduly repetitive of other interveners. CAC Manitoba's intervention will be limited to those issues that are raised in this application and approved in the PUB's procedural order following the Pre-Hearing Conference.

As has been described above, CAC Manitoba represents the interests of all Manitoba ratepayers, and in particular the private passenger class. As a result, it has a substantial interest in the outcome of the proceeding and represents the interests of a substantial

number of ratepayers.

Do you intend to seek approval for any other form of participation or provision of evidence, including for which you intend to seek an award of costs? If yes, please provide details and an explanation of the relation to issues in scope in the proceeding.

At the current time, CAC Manitoba does not anticipate calling a witness but reserves the right to seek permission to provide expert evidence after its review of the first round information requests especially with regard to the five issues outlined below:

- ⑩ the implications of COVID-19 on the short term and longer term circumstances of MPI including the implications on rates, claims incurred and the Capital Management Plan;
- ⑩ implications of the rollout of new coverage flowing from the Compulsory and Extension Review Project (CERP);
- ⑩ the reliability of the claims incurred forecast;
- ⑩ risks and opportunities for Manitoba ratepayers with regard to Project NOVA; and,
- ⑩ trends in basic expenditures over the next three years.

Given the short time frame between the filing of the application and the pre-hearing conference, this overview of issues is necessarily preliminary.

Attachment B

Do you intend to retain experts or consultants?

CAC Manitoba intends to retain experts and consultants and present a budget consistent with past budgets found to be appropriate by the PUB. It has not finalized arrangements with experts and the attached list contains some names who will not be retained for the hearing.

If yes, please attach copies of the curriculum vitae for any expert and/or consultant, as well as the following:

All curriculum vitae are attached.

Expert Consultant #1

Name:	Peter Dyck
Experience:	Over 20 years
Telephone #:	204-668-5694
Tariff Rate:	\$240.00
Address and Email:	35 Radium Cove Winnipeg, MB R2G 3K1 peter@peterdyck.ca
Firm or Organization	Oakwood Strategy Group Inc.
Evidence to be provided on issues in scope:	NA
Brief explanation of experience relevant to evidence to be provided:	<p>Peter Dyck received his Diploma of Technology in Financial Management Technology (Accounting Option) in June 1973 from the British Columbia Institute of Technology. In 1976 he received his Certified General Accountants Association of Canada designation (CGA). In 2005 the Certified General Accountants Association of Canada honoured him with the fellowship designation (FCGA) for outstanding contribution to the Association, accounting profession and community. With the amalgamation of the accounting associations he now holds the FCPA, FCGA designations. In 2006, Mr. Dyck was certified as a professional Corporate Director (ICD.D) by the Institute of Corporate Directors.</p> <p>Peter has worked in the property and casualty insurance industry since 1973 in various positions and capacities. The most</p>

	<p>recent position was as Director of Finance and Corporate Controller at the Manitoba Public Insurance Corporation where he was responsible for financial and risk management, strategic planning, forecasting, regulatory activities, budgeting, accounting, reinsurance accounting, financial controls and reporting. Currently he is President of Oakwood Strategy Group Inc. providing consulting services in regulatory support, estate planning and management and financial planning advice.</p> <p>Since 2016 he serves on the Board of Directors of the Workers Compensation Board of Manitoba as Director and he also serves on the Audit Committee as Chair and is a member of the Prevention Committee. Since 2008 he serves on the Board of Directors of the Concordia Hospital Foundation Inc. as Director and he also serves as Treasurer. He also served on the Bethania Group Board of Directors as Director for nine years.</p> <p>Peter has worked in the Property & Casualty insurance industry for over 34 years and will rely on all of the expertise he has gained, with particular emphasis on forecasting, financial reporting, financial sustainability and risk mitigation.</p>
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Expert Consultant #2

Name:	Jeff Crozier
Experience:	13 years
Telephone #:	(204) 942-0654 (ext 218)
Tariff Rate:	\$195.00
Address and Email:	300-259 Portage Avenue Winnipeg, MB R3B 2A9 jcrozier@intergroup.ca
Firm or Organization:	Inter Group Consultants
Evidence to be provided on issues in scope:	NA
Brief explanation of experience relevant to evidence to be provided:	Jeff holds a Masters in Economics from McGill and a Bachelor of Commerce (Hons)

	<p>from the University of Manitoba.</p> <p>Jeff has held progressively senior roles in a diverse range of firms over his 15 year career. Prior to joining InterGroup Consultants in 2020, Mr. Crozier served as the Director of Regulatory Affairs at Manitoba Public Insurance where he was accountable for the delivery and performance of the annual General Rate Application proceeding before the Manitoba Public Utilities Board.</p> <p>Before his time in the auto insurance field, Mr. Crozier's career focused on electricity rate regulation, and competitive wholesale and retail electricity markets. He has served as a consumer advocate in Alberta representing the interests of small consumers before the Alberta Utilities Commission, and conducted market surveillance and analysis of the wholesale and retail electricity markets in Alberta and the Western Interconnection.</p>
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Expert Consultant #3

Name:	Andrea Sherry
Experience:	28 years
Telephone #:	204-223-3847
Tariff Rate:	\$255.00
Address and Email:	628 Fairmont Road Winnipeg, MB R3R 1B1 andreawsherry@gmail.com
Firm or Organization	Independent Consultant
Evidence to be provided on issues in scope:	NA
Brief explanation of experience relevant to evidence to be provided:	Andrea Sherry received her Bachelor of Commerce (Honors) in December 1990 from the University of Manitoba with a major in Actuarial mathematics. She became a Fellow of the Casualty Actuarial Society and Fellow of the Canadian Institute of Actuaries in 2000.

	<p>Andrea became a Fellow Chartered Insurance Professional and received her Canadian Risk Management designation in 2005. She became a Certified Management Accountant in 2008 and is now a Chartered Professional Accountant, Certified Management Accountant.</p> <p>Andrea is currently Vice President, Insurance Solutions at The Wawanesa Mutual Insurance Company in Winnipeg. Her current role is responsible for the company's actuarial pricing, product development and maintenance, as well as head office personal lines underwriting. Prior roles include work in solvency and capital, enterprise risk management and investments. Andrea has had appointed actuary and valuation actuary roles prior to joining Wawanesa. She has worked on Dynamic Capital Adequacy Testing and internal models to satisfy the regulatory requirements in the United Kingdom (where internal models to determine capital adequacy are used by larger companies). She has also been involved in the preparation of an Own Risk Solvency Assessment.</p> <p>Andrea has worked in the Property & Casualty insurance industry for over 25 years and will rely on all of the expertise she has gained, with particular emphasis on her expertise in actuarial work and investments. She has provided expert evidence to the Manitoba Public Utilities Board on issues related to risk and ratemaking.</p>
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Notes:

At this time, CAC Manitoba does not intend to file evidence from Mr. Dyck, Mr. Crozier or Ms. Sherry. In the event that this changes as the record of the proceeding develops, CAC Manitoba will advise the Board and MPI and will seek direction on how to proceed in order to qualify the witnesses.