

December 9, 2020

SENT VIA EMAIL: [Darren.Christle@gov.mb.ca](mailto:Darren.Christle@gov.mb.ca)

Manitoba Public Utilities Board  
400-330 Portage Avenue  
Winnipeg, Manitoba R3C 0C4

**Attention: Dr. Darren Christle**

Dear Dr. Christle:

**Re: MPI Special Rebate Application II  
Submissions on behalf of Coalition of Manitoba Motorcycle Groups (CMMG)**

Manitoba Public Insurance (MPI) has applied to the Public Utilities Board for approval on another Special Rebate as a result of the implications of the COVID-19 pandemic in Manitoba. CMMG respectfully submits that the eligibility criteria of the Special Rebate Application II (SRAII) and any future rebates, should adhere to the same eligibility criteria as approved by the Board in Board Order 67/20.

In April MPI filed a Special Rebate Application (SRA) seeking to reimburse funds to insureds for the period from March 15<sup>th</sup> to May 15<sup>th</sup> wherein collisions frequency declined dramatically resulting in an excess of capital held by MPI. The SRA sought to reimburse excess funds from both the Extension reserve as well as from Basic premiums. MPI sought to apply the rebate from Extension across all vehicles class but limited the rebate from Basic to those customers "with a policy in effect and earning premiums on March 15, 2020".<sup>1</sup>

During the hearing for the SRA, CMMG questioned MPI's proposed methodology for the rebate from Basic. Throughout that questioning, MPI confirmed that a rate reduction provided through a release from CMP would apply to all major classes.<sup>2</sup> MPI has further confirmed premiums can be paid by insureds outside of the period that a

<sup>1</sup> 2021 Special Rebate Application Pg 21 Line 22-23

<sup>2</sup> Transcript of Proceedings April 20, 2020 Pg 60 Line 23 and Pg 112 Line 2-14

premium is deemed 'earned' by MPI.<sup>3</sup> Finally MPI has agreed that coverage is still applicable to an in-force policy outside of the earning period of the premium.<sup>4</sup>

In MPI's Special Rebate Application II (SRA II) filed November 30, 2020, MPI has again applied for the rebate to apply to customers with policies in force and earning premiums between March 16, 2020 and November 21, 2020.<sup>5</sup> This is in spite of the Board's previous determination in Reasons For Decision in Order 67/20 that "the fact that MPI, for accounting purposes, does not consider that premium to be "earned" until the riding season was not persuasive to the Board."<sup>6</sup>

CMMG respectfully submits that the eligibility criteria for SRA II should align with the criteria as ordered by the Board in Board Order 67/20. Rebates which are being issued by MPI for the same conditions and for the same purpose should be applied consistently and according to set precedent. CMMG submits that the rebate should be issued to ratepayers at a uniform percentage of their annualized premiums based on policies in force between March 16, 2020 and November 21, 2020.

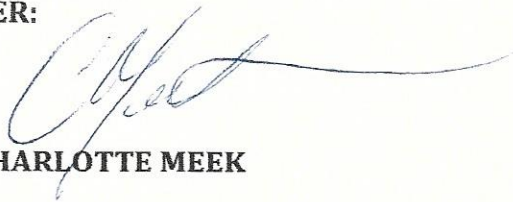
CMMG supports MPI's position that a material change in circumstances has occurred, justifying a variation of PUB Orders 159/19 and 176/19. CMMG agrees that the financial hardship being experienced by Manitobans at this time, coupled with MPI's improved financial position, demonstrates that a Special Rebate at this time is just and reasonable in the circumstances.

Thank you for the opportunity to provide comments in this Application on behalf of CMMG.

Sincerely,

**BD OAKES JARDINE KANESKI UNRUH LLP**

**PER:**



**CHARLOTTE MEEK**

Cc: Interveners

MPI

CMMG Board

<sup>3</sup> Transcript of Proceedings April 20, 2020 Pg75-76 Line 18-25 and 1-2

<sup>4</sup> 2021 Special Rebate Application Round I Information Requests CMMG (MPI) Pg 2

<sup>5</sup> 2021 Special Rebate Application Pg 22 Line 8-14

<sup>6</sup> Reasons for Decision in Order 67/20 May 20, 2020 Pg 26