

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.	

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.

Duffy's Taxi (1996) Ltd. ("**Duffy's**") and Unicity Taxi Ltd. ("**Unicity**") (collectively, the "**Taxi Coalition**") are independently operated dispatch companies providing service in the city of Winnipeg and surrounding areas, which together represent approximately 80% of the 621 Taxicab Vehicles-for-Hire (Taxi VFH)¹, and 22% of the Accessible Vehicle Vehicles-for-Hire in Manitoba. Duffy's and Unicity are collaborating for the purpose of this intervention on issues of common concern related to the premiums and characteristics of VFH insurance. The Taxi Coalition will continue consulting with smaller taxi dispatch companies throughout Manitoba to ensure broad representation of Taxi VFH interests in the City of Winnipeg and other municipalities such as Brandon and Thompson (all of these including Accessible VFH are referred to collectively as "**Manitoba Taxis**").

Please state your reasons for intervening in this proceeding:

The Taxi Coalition seeks to intervene in this proceeding in order to:

- 1) Test the reasonableness of the requested increase in insurance premiums for Manitoba Taxis, and the increase in Public Major Class rates generally. The Taxi Coalition will also assess taxi rate increases against those proposed for the Passenger VFH insurance use, which offer substantially similar services in the personal transportation services market.
- 2) Review and assess MPI's compliance with Board directives stemming from PUB Order 134/21, including preliminary proposals for a revised VFH Framework.
- 3) Examine ratemaking approaches for VFH including:
 - a. Appropriateness of forecasting serious losses in Passenger VFH experience;
 - b. Implications for Taxi VFH and VFH generally, of the Alternative rate indication (per directive 11.3 of Order 134/21), and potential for credibility weighting changes; and
 - c. Implications of combining VFH into a single major class.
- 4) Examine the implications of proposed changes to the Driver Safety Rating (DSR) system on Manitoba Taxis, and for comparison, to any future revisions to the VFH Framework.

¹ Per RM Appendix 4 of 2023 GRA

- 5) Examine the implications for Manitoba Taxis of changes to the Capital Management Plan, specifically the elimination of the capital release provision and its impact on Manitoba Taxis rates at renewal, and the potential for future capital rebates.

The Taxi Coalition has been involved in consultations with MPI since the conclusion of the 2021 GRA in an effort to progress towards an improved VFH Framework. The Taxi Coalition appreciates the dialogue that has occurred thus far, and is mindful of progress towards the shared goal of an improved VFH as it plans its intervention.

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

This proceeding will determine rates charged for VFH insurance uses for the 2023/24 insurance year. MPI proposes rate increases to the Public Major Class (as well as Commercial and Motorcycle), but rate decreases to the Private Passenger major class. MPI’s filing in this respect is reproduced below:

Figure RM- 1 Indicated Rate Change

Line No.	Major Class	Before DSR Change			After DSR Change	
		Current Average Rate	Proposed Average Rate	Proposed Rate Change	Proposed Average Rate	Proposed Rate Change
1	Private Passenger	\$1,170	\$1,169	-0.1%	\$1,165	-0.4%
2	Commercial	\$890	\$923	3.7%	\$923	3.7%
3	Public	\$2,236	\$2,277	1.8%	\$2,275	1.7%
4	Motorcycles	\$908	\$927	2.0%	\$923	1.6%
5	Trailers	\$69	\$63	-8.6%	\$63	-8.6%
6	Off-Road Vehicles	\$6	\$6	0.0%	\$6	0.0%
7	Overall	\$888	\$888	0.0%	\$885	-0.3%
8	DSR Scale Movement and Expansion			-0.9%		-0.6%
9	Overall including DSR Scale Movement			-0.9%		-0.9%

The Manitoba Taxis are also impacted indirectly by insurance rates for Passenger VFH in an increasingly competitive vehicle for hire industry. Ensuring that premiums are fair, accurate, and cost based will promote a level playing field in the industry, and serve the interests of all Manitobans through fair and efficient competition within the industry.

Finally, the Taxi Coalition will be impacted by the proposed changes to the Capital Management Plan. As such, the Taxi Coalition intends to understand and test the application for returning excess premiums.

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:

The Taxi Coalition directly represents approximately 80% of the Taxi VFH vehicles, and 22% of the Accessible VFH vehicles insured in Manitoba. It intends to continue its consultation with smaller dispatch operators to ensure that the issues examined in this proceeding reflect the range of issues concerning Taxi, Accessible, and Passenger VFH premiums.

Additionally, all ratepayers benefit from the thorough examination of DSR system, including approaches to capture principal driver risk, improved ratemaking approaches and an appropriate Capital Management Plan. The Taxi Coalition intends to assist the PUB in its determination of just and reasonable rates and related matters.

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:

The Taxi Coalition made non-evidentiary submissions in the 2020 General Rate Application, and the 2018 Interim Vehicles for Hire Application.

In the 2021 GRA, the Taxi Coalition hired counsel and expert consultants with experience before the PUB and in the field of regulated auto insurance. The experts prepared evidence and delivered testimony on behalf of the Taxi Coalition, which contributed to 13 separate directives in PUB Order 1-21.

In the 2022 GRA, the Taxi Coalition provided actuarial evidence on several issues including generalized linear models, MPI's current credibility weighting procedure, and an approach to serious losses.

The Taxi Coalition has retained new counsel and the same actuarial experts this year to provide advice and insight on ratemaking issues detailed in this Application.

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

At this time, the Taxi Coalition expects to examine the following issues, as itemized in the PUB's Interim Procedural Order 60/22:

2a) Rate indication based on AAP in Canada

MPI proposes to increase Taxi VFH rates by \$122 on average, and by \$165 for Territory 1, undiscounted. The Public Major Class has the second highest increase among major classes. This must be reconciled with the headline 0.9% rate decrease, and tested in the context of changes to the Capital Management Plan.

2b) Ratemaking methodology

Within the ratemaking methodology, the Taxi Coalition expects to review and assess the alternative rate indication and any implications for adoption of GLMs, particularly in relation to Order 134/21 Directive 11.3.

The Taxi Coalition may rely upon an actuarial expert to test the ratemaking methodology.

3) Compliance with Board Orders

The Taxi Coalition intends to review and assess compliance with VFH related directives, and in particular, those that were re-issued under Order 134/21.

10) Vehicles for Hire (VFH)

The Taxi Coalition intends to test the preliminary information provided on the revised VFH Framework, recognizing, however, that application for a new framework has been delayed to the 2024 GRA to allow for completion of a pricing examination for the proposed blanket policy.

11) Driver Safety Rating (DSR)

The Taxi Coalition intends to review and test the implications of the proposed changes to the DSR system on Manitoba Taxis with a specific focus on its implications to future revisions to the VFH Framework.

16) Impact of COVID-19 on MPI financial results for the 2023/24 and 2024/25 rating years and beyond

Related to claims forecasting and accumulation of surplus, the Taxi Coalition intends to examine the ongoing impact of COVID-19 on the cost of insurance.

18) Capital Management Plan

The Taxi Coalition intends to review and test the proposed changes to the Capital Management Plan, including the proposed range of 100% to 120% minimum capital target (MCT), and potential impacts on capital releases to Taxi VFH, who pay the highest premiums of any insurance use.

In addition to the key issues outlined above, the Taxi Coalition may also examine matters on the PUB's approved issues list should those matters prove relevant to the Taxi Coalition's interests, and not be sufficiently addressed by the efforts of other interveners.

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.

Yes. To date the Taxi Coalition has participated in a meeting of counsel for potential interveners and is preparing to have individual discussions with counsel for other interveners of record.

The Taxi Coalition expects to participate in discovery through first and second round information requests, including on materials yet to be filed. It will review CSI information for matters relevant to the Taxi Coalition.

The Taxi Coalition has not yet determined if evidence will be required and does not anticipate making that determination until after the responses to second round IRs have been received.

The Taxi Coalition expects to fully participate in the oral hearing, including the cross examination of MPI witnesses and the provision of opening and closing submissions.

The Taxi Coalition intends to collaborate with the Consumers' Association of Canada (Manitoba) Inc. (CAC) and the Coalition of Manitoba Motorcycle Groups (CMMG) with respect to any overlapping issues in their respective interventions.

The Taxi Coalition hopes that any issues identified for oral hearing will be organized so it can limit its attendance to days on which issues relevant to the Taxi Coalition are addressed.

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

Yes, the Taxi Coalition intends to seek an award of costs.

The Intervener Cost Policy at Section 3.0 outlines the eligibility requirements for cost awards. These include:

3.1 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.

The Taxi Coalition will satisfy part (a) by working with qualified and established legal counsel and expert consultants who have significant regulatory experience, both before this Board, and in the field of regulated auto insurance. The Taxi Coalition intends to build upon its contributions in the 2021 and 2022 GRA's, and assist the PUB in determining just and reasonable rates, and the building of an evidentiary basis to support the testing of a revised VFH Framework in a future application.

For part (b), the Taxi Coalition will coordinate with other Interveners on matters of common interest to avoid duplication and promote efficient proceedings, including in particular the CAC and CMMG. The Taxi Coalition is retaining the same firm to provide expert consultant services. In this regard, the Taxi Coalition expects to reduce costs through certain jointly shared activities, such as reviewing the application and information requests (IR) responses.

For part (c), the Taxi Coalition intends to again consult with other dispatch companies in Manitoba to ensure the intervention represents the broadest cross section of Taxi VFH interests. Certain issues the Taxi Coalition intends to examine will contribute to a level playing

field in the personal transportation services industry, which is to the benefit of all customers of that industry.

For part (d), the Taxi Coalition intends to represent interests of a significant majority of Taxi VFH insureds, as well as the general interests of customers of the personal transportation services industry.

Do you intend to retain experts or consultants? If yes, please attach copies of the curriculum vitae for any expert and/or consultant, as well as the following:

Expert Consultant # 1:

Jeff Crozier
InterGroup Consultants Ltd.
Suite 300, 259 Portage Ave, Winnipeg, MB R3B 2A9
jcrozier@intergroup.ca
cell: 204-880-1151

Tariff Rate: \$195/hr

Experience: 14+ years professional experience in the areas of Utility Rate Regulation, Auto-insurance Rate Regulation, and Competitive Wholesale and Retail Electricity Markets.

Evidence to be provided on issues in scope: The extent of the evidence, if any, to be adduced on behalf of the Taxi Coalition will be determined upon completion of discovery. It is expected to address the issues identified by the Taxi Coalition in this Application.

Brief explanation of experience relevant to evidence to be provided: Mr. Crozier is a consultant with InterGroup Consultants who specialize in utility rates and regulation. He has prepared evidence in proceedings before the Alberta Utilities Commission and in the 2021 and 2022 MPI GRA's before the Manitoba Public Utilities Board. Prior to this, Mr. Crozier was the Director of Regulatory Affairs at MPI from 2016 to 2020. In this capacity, he was accountable for and oversaw the development of MPI's annual General Rate Application and the regulatory process. Mr. Crozier has a working knowledge of regulated auto insurance in Manitoba and the issues facing Taxi VFH customers.

Mr. Crozier's CV is attached.

Expert Consultant # 2:

Sylvain Dion and Jason Wong
Dion Strategic Consultants and Actuaries
55 York Street, Suite 801
Toronto, ON M5J 1R7
416-222-4405

Tariff Rates: To be provided with budget submission.

Experience:

Mr. Dion: +40 years as strategic advisor and consulting actuary.

Mr. Wong: +15 years with expertise in pricing, valuation and loss modelling.

Evidence to be provided on issues in scope: The extent of the evidence to be adduced on behalf of the Taxi Coalition will be determined upon completion of discovery. Any evidence adduced is expected to address the ratemaking issues identified by the Taxi Coalition in this Application.

Brief explanation of experience relevant to evidence to be provided:

Mr. Dion is the founder of the Dion Strategic Consulting Group Inc. and a principal consultant to a number of major clients for the firm. Mr. Dion provides strategic advice in addition to consulting and actuarial services relating to optimal risk financing strategies and the evaluation of outstanding and future liabilities with respect to self-insurance and insurance programs.

Mr. Dion has over 40 years of experience as a strategic advisor and consulting actuary to his clients. He has been instrumental in the development of computerized risk models to assist organizations in the evaluation and selection of risk retention strategies for their various insurance programs and exposures to risk.

Mr. Wong is a Senior Actuarial Consultant and leads the Property & Casualty (P&C) Actuarial Practice at Dion Strategic Consulting Group. With over 15 years of experience in the P&C industry, Mr. Wong has developed expertise in a number of traditional actuarial areas including Pricing, Reserving (Valuation), and Loss Modelling.

Prior to joining the Dion Strategic Team, Mr. Dion held progressively senior roles at various insurance companies including Desjardins General Insurance Group. Mr. Dion also has extensive experience with rate filings for the Ontario, Alberta and Atlantic Canada markets.