

INTERVENER APPLICATION FORM

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| Application re Hearing: | | |
| 2024 MPI General Rate Application | | |
| Name of Prospective Intervener (Organization Name or Individual): | | |
| Coalition of Manitoba Motorcycle Groups (CMMG) | | |
| Prospective Intervener Contact Information | | |
| Organization or Individual Address: | | |
| 1345 Niakwa Road East (Unit A 109), Winnipeg, Manitoba, R2J 3T5 | | |
| Organization Contact Person(s) (if applicable): | | |
| Doug Houghton | | |
| Contact Information: | Business: | Other Phone: |
| | | |
| | Fax Number: | Email: |
| | | houghtnd@mymts.net |
| Representative Contact Information: | | |
| Counsel or Representative Name(s): | | |
| Charlotte Meek | | |
| Organization (if different from above) : | | |
| DFS Kaneski UnRuh LLP | | |
| Address (if different from above): | | |
| 903-386 Broadway, Winnipeg, Manitoba, R3C 3R6 | | |
| Contact Information (if different from above): | Business: | Other Phone: |
| | 204-949-1710 | |
| | Fax Number: | Email: |
| | | |

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|------------------------------------|--------------|-----------------|----------|
| | 204-956-4457 | cmeek@dfsku.com | |
| Counsel Seniority: | | | |
| Years of Experience | 4 Years | Tariff Rate | \$115.00 |
| Also representing (if applicable): | | | |
| N/A | | | |

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| 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 |
| <p>The CMMG is a non-profit organization promoting the safety of Manitoba's motorcyclists by encouraging education, promoting legislative reform, and disseminating information to aid in a continued safe enjoyment of two wheeled motorized transportation. The objectives of the CMMG are to involve all organized motorcycle groups and individual motorcyclists in Manitoba in a coalition to:</p> <ol style="list-style-type: none">1. Promote the safety of motorcyclists by encouraging education and liaison with organized safety counsels.2. Promote legislative reform and organize events with government officials and representatives.3. Disseminate information to aid in the continued safe enjoyment of two wheeled motorized transportation.4. To participate in the PUB hearings into insurance rate applications to ensure just and reasonable rates for motorcyclists in the province. <p>CMMG advocates not only for the interests of its members but also represents the interests of all motorcyclists throughout the province of Manitoba through intervention in the GRA.</p> |
| Please state your reasons for intervening in this proceeding: |
| <p>The CMMG has been granted intervener status in the MPI GRA since 1993. The CMMG's focus on their intervention is to advocate for just and reasonable rates for motorcyclists in the province. CMMG further seeks to review MPI's filings to test the reliability of MPI's forecasts, review the overall business health of the corporation, including investment strategies and use of public funds, to test whether the proposed rates are equally distributed amongst rate payers, and any proposed rebates are fairly assigned and distributed.</p> |

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

CMMG represents the interests of over 17,000 motorcyclists in the province of Manitoba who will be directly impacted by the provision of rebates to rate payers, rate changes, changes to discounts and rebates. CMMG also advocates on behalf of the public in general outside of purely motorcyclists.

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:

While the interests of motorcyclists are at times covered by other interveners in these applications, the motorcycle class has rates that are calculated and determined by specific parameters that do not relate to the general private passenger class or other MPI consumers. As a result, CMMG provides a focus for the motorcycle class to assist the Board in coming to a determination of just and reasonable rates while also providing commentary on the fairness of MPI's assumptions on a broader scope.

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:

Since 1993 CMMG has been actively involved in the PUB hearings examining MPI's application and the reasonableness of rates of insurance in Manitoba. CMMG is also actively involved in other legislative changes that impact driver safety and more specifically motorcycle safety within the province. CMMG's members are active participants in the motorcycle community in the province and can provide insight from consumers and their experiences with insurance premiums provided by MPI. CMMG has often collaborated with MPI on issues such as driver safety initiatives.

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

Based on the preliminary issues list from Order 64/23 the CMMG will focus on the following issues predominantly throughout this year's GRA:

#1. Projected claims, expenses, and vehicle counts, based on accepted actuarial practice in Canada;

- The 2024 GRA application will be somewhat unusual given the Ministerial directive issued to MPI on April 3, 2023. CMMG intends to examine the evidence presented by MPI to determine whether the applied for overall rate change of 0% is just and reasonable.

#2. Large Loss Loading.

- CMMG will review the direction provided by the Board that MPI incorporate an alternate methodology for serious loss loading, and provide a position regarding the reasonableness of the methodology used by MPI.

#4. Compliance with Orders 4/23 and 35/23 and any outstanding directives from past orders:

- CMMG intends to assess compliance by MPI with respect to directives arising from the 2022/23 GRA and will provide an opinion to the Board regarding any arrears of partial or non compliance.

#5. Financial forecast

#8. Capital management plan.

- The Corporation was directed by the board to reevaluate the Capital Management Plan and process. CMMG intends to review the new proposal from MPI to ensure that future rebate methodologies are efficient and fairly return excess capital to ratepayers.

#9. Performance of the investment portfolio.

- The Investment portfolio is critical to MPI's financial security and also has major implications for the calculation of premiums.

#11. Claims forecasting.

- The new methodology arising from Board Order 64/23 will be reviewed with a specific focus on any impacts for the motorcycle class.

#13. Driver safety rating (DSR).

- CMMG will continue to advocate for a shift in the DSR model being used. MPI continues to delay this transition despite a clear direction from the Board to a change to implemented. CMMG will examine the progress being made by the Corporation to adjust towards actuarially sound DSR levels.

#14. Operational benchmarking.

- CMMG will review how the Corporation compares with similar insurance providers nationwide.

#20. Current IT Strategic Plans and IT Expenses including Project NOVA

#22. Asset Liability Management study

- CMMG intends to review the decisions made by the Corporation in relation to the chosen asset mixes for the various investment portfolios and progress towards implementation.

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.

CMMG plans to be fully involved in the GRA this year with attendance at the oral hearings, including cross-examination of MPI witnesses. As in previous years CMMG has already collaborated with other interveners, including the Taxi Coalition (TC) and Consumers Association of Canada (Manitoba) (CAC). Through this effort, CMMG will share resources in an effort to reduce cost. CMMG will again use the expertise of Valter Viola who is also being retained by CAC and will consult with Jeff Crozier and Jason Wong, who are also being retained by TC. CMMG has not yet determined whether it will be necessary to submit evidence in this hearing or call an expert witness.

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

CMMG intends to seek an award of costs for its participation in this year's GRA. The Intervener Costs Policy indicates that the Board may award costs to an intervener who has demonstrated the following:

1. 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.

- CMMG intends to, as it has in past years, make a significant contribution to this year's GRA by reviewing the MPI application in detail, assisting the Board in examining the information presented by MPI through the information request process.
- CMMG intends to cross-examine MPI witnesses to better understand and clarify methodologies used by MPI in determining the requested rate indication.

2. 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 duplication of intervention.

- CMMG will participate in the hearings in a reasonable manner by coming to the hearings prepared with focused issues for review and examination. CMMG has already participated with other interveners in discussions regarding collaboration and common objectives in order to avoid duplication of efforts and in order to reduce costs of the application in general.

3. Represented interests beyond their sole business interest.

- While CMMG intends to focus much of its examination on the interests of motorcyclists within the province of Manitoba, a significant portion of CMMG's examination will also benefit rate payers more generally in insuring that the rates MPI is seeking are just unreasonable and subsidies or discounts are applied in a fair and equitable manner.

4. A substantial interest in the outcome of the proceeding and represents the interests of a substantial number of rate payers.

- As CMMG represents over 17,000 motorcyclists in the province of Manitoba, the interests of this subgroup present a substantial portion of insureds in the province who have a vested interest in the outcome of the proceedings.

| 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: | | |
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| Expert Consultant #1: | | |
| Name: | Experience | Evidence to be provided on issues in scope: |
| Jason Wong | 17 Years | N/A |
| Telephone #: | Tariff Rate: | |
| 1-647-795-8130 | \$224 (Tariff) \$280 (rate being sought) | |
| Address and Email: | Firm or Organization: | Brief explanation of experience relevant to evidence to be provided: |
| <p>York Street Suite 801 Toronto, Ontario M5J 1R7</p> <p>jasonw@dionstrategic.com</p> <p>CV Attached</p> | <p>Dion Strategic Consulting Group</p> | <p>Jason Wong holds a Bachelor of Mathematics, Honours Actuarial Science from the University of Waterloo. As a Senior Actuarial Consultant, Jason leads the Property and Casualty (P&C) Actuarial Practice at Dion Strategic Consulting Group. With over 15 years of experience in the P&C industry, Jason has expertise in Actuarial Pricing, Modeling, Rate Filing, and Reserving.</p> <p>Dion Strategic Consulting Group is a strategic and actuarial consulting firm. Founded by Sylvain Dion who has over 40 years of experience as a Consulting Actuary, Dion Strategic provides consulting services for all spectrums of insurance products from Property and Casualty (Personal and Commercial Lines), Life Insurance, and Pensions.”</p> <p>In the 2021/22 GRA Mr. Wong was qualified as an expert witness and provided evidence to the Board. In the 2022/23 GRA Mr. Wong provided consulting services to CMMG and the Taxi Coalition throughout the discovery and hearing process.</p> |

| Expert Consultant #2: | | |
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| Name: | Experience: | Evidence to be provided on issues in scope: |
| Jeff Crozier | 15 Years | N/A |
| Telephone #: | Tariff Rate: | |
| 1-204-880-1151 | \$235 | |
| Address and Email: | Firm or Organization: | Brief explanation of experience relevant to evidence to be provided: |
| 300-259 Portage Avenue Winnipeg, Manitoba R3B 2A9 jcrozier@intergroup.ca CV Attached | InterGroup Consultants Ltd. | <p>Mr. Crozier is a consultant with InterGroup Consultants who specializes in utility rates and regulation. He has prepared evidence in proceedings before the Alberta Utilities Commission, and in the 2021 MPI GRA before the Manitoba Public Utilities Board. Prior to his role with InterGroup, he 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 motorcycle customers.</p> <p>*Please note consulting from Mr. Crozier with CMMG has not been confirmed.</p> |

| Expert Consultant #3: | | |
|---|------------------------------|--|
| Name: | Experience | Evidence to be provided on issues in scope: |
| Valter Viola | 20 yrs plus | N/A |
| Telephone #: | Tariff Rate: | |
| 416-967-0252 (Ex222) | \$280.00 | |
| Address and Email: | Firm or Organization: | Brief explanation of experience relevant to evidence to be provided: |
| 50 De Vere Gardens Toronto, ON M5M 3E7 vviola@cortexconsulting.com CV Attached | Cortex Applied Research Inc. | <p>Mr. Viola has decades of experience in institutional portfolio management, investments research and risk management. He holds a Bachelors of Commerce from University of Toronto and a Masters of Business Administration Ivey School of Business. Mr. Viola has practiced as a Chartered Accountant and is a CFA charterholder.</p> <p>Mr. Viola extensive professional experience has involved executive and senior management roles focusing on portfolio management, risk management and investment research. He held positions providing advice to two of Canada's largest institutional investors (CPP Investments Board and Ontario Teacher's Pension Plan). More recently Mr. Viola has been an advisor to several boards, investments committees and management teams providing recommendations to some of North America's largest investors.</p> <p>Mr. Viola has been involved with interveners in the General Rate Application for several years, and has been qualified as an expert witness, providing testimony to the Board at past GRAs.</p> |

Do you intend to provide evidence from witnesses other than experts and/or consultants? If yes, please provide:

CMMG at this time does not anticipate calling any witnesses but would like to reserve the right to seek permission from the Board to call a witness later on in the proceedings if necessary. At the time of filing, CMMG does not anticipate pre-qualifying any witnesses at the Pre-hearing conference.

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.

Not at this time.