

MANITOBA PUBLIC INSURANCE
2024 GENERAL RATE APPLICATION
Round 1 Information Requests
August 2, 2023

Coalition of Manitoba Motorcycles Groups (CMMG)



**MANITOBA
PUBLIC INSURANCE**

RESPONSE:

The required average premium, column [a], was pulling the required rate in error. The rate change should be calculated based on the adjusted required rate. On June 27, 2023, MPI filed a blackline and cleaned version of this figure as MPI Exhibit #2 after noticing this error. Please see the revised Figure RMO-1 below:

Figure RMO- 1 Projected 2024/25 Average Premium

Line No.	Major Class	Required Average Premium	Projected Average Premium w/ no Rate Change	Required Rate Change	Selected Rate Change	Selected Average Premium	Impact From DSR Changes	Offset to Vehicle Premium for DSR Impact	Average Premium after DSR Offset but before Application of DSR	Average Premium after DSR Offset and after Application of DSR
		[a]	[b]	[c]	[d]	[e]	[f]	[g]	[h]	[i]
2	Private Passenger	\$1,236 \$1,210	\$1,219	1.4% -0.7%	-0.4%	\$1,214	-5.4%	5.2%	\$1,283	\$1,214
3	Commercial	\$1,092 \$1,070	\$950	15.0% 12.6%	11.6%	\$1,059	-0.2%	11.8%	\$1,062	\$1,059
4	Public	\$2,671 \$2,616	\$2,280	17.2% 14.7%	10.4%	\$2,517	-0.9%	11.4%	\$2,540	\$2,517
5	Motorcycles	\$846 \$828	\$882	4.1% -6.1%	-4.4%	\$843	-7.1%	2.9%	\$908	\$843
6	Trailers	\$75 \$74	\$67	12.8% 10.5%	10.5%	\$74	0.0%	10.5%	\$74	\$74
7	Off Road Vehicles	\$6 \$6	\$6	0.0% -2.0%	-1.6%	\$6	0.0%	-1.6%	\$6	\$6
8	Overall	\$911 \$911	\$912	0.1% -0.1%	0.0%	\$912	-5.0%	5.2%	\$960	\$912
9	Notes:									
10	[c] = [a]/[b] - 1									
11	[e] = [b] * (1 + [d])									
12	[g] = (1 + [f]) / (1 + [h]) - 1									
13	[h] = [b] * (1 + [g])									
14	[i] = [h] * (1 + [f])									

The difference between the required rate and adjusted required rate is due to time value of money. Please refer to Part VII Rate Indication Chapter RI.2.4 for a more detailed discussion.

The overall required rate remains to be a decrease of 0.1%. Three of the six major classes (Commercial, Public, Trailers) require rate increases. Private Passengers constitute the biggest proportion of the overall vehicles and has the largest influence on the overall rate indication.

CMMG (MPI) 1-2

Part and Chapter:	Part VI Claims Forecasting	Page No.:	Pg 22-23 of 135
PUB Approved Issue No:	11. Claims forecasting, including but not limited to PIPP and changes or enhancements to claims forecasting design		
Topic:			
Sub Topic:			

Preamble to IR:

At Part VI Claims Forecasting Pg 22 – 23 MPI states as follows:

“MPI has introduced enhancements to loss trending procedure to adhere more to actuarial standards of practice and industry best practices.’

MPI then summarizes key enhancements that have been implemented which include:

- Improved technical rigor
- Improved disclosure and documentation of trend regression analysis
- Application of accident year weighting
- Projecting not just from the last data points

At Part VII RI Appendix 3 Table 6 the selections continue to be based on “all years” and “most recent 10”.

Question:

- a) Please explain why there are 2 methods for selecting trends.
- b) Please explain why the enhancements are not applied to the Pure Premium trend selection in Part VII – Rate Indication methodology.

Rationale for Question:

To understand why the improvements in the Claims Forecasting section were not used in the Rate Indication section.

RESPONSE:

- a) MPI applies a top-down approach to the claims projection for rate indication. The process encompasses two distinct steps, first, the aggregate level claims are projected for the overall rate indication. Next, the overall claim projection is allocated down to the major classes to determine rate indication for each Major Class. This approach is consistent with previous GRA submissions.

- b) The enhancements were applied to the Pure Premium trend selection in Part VII Rate Indication Chapter RI.1 – Overview of the Methodology. For example, in determining the projected loss cost by Major Class, MPI used accident year weighting, not just from the last data point. Please refer to Part VII Rate Indication RI Appendix 3 Table 7 – Major Classes Pure Premiums for the accident year weights.

CMMG (MPI) 1-3

Part and Chapter:		Page No.:	
PUB Approved Issue No:	13. Driver Safety Rating (DSR), including but not limited to MPI’s progress towards a plan for changes to the DSR model, moving vehicle discounts, and driver premiums by one-fourth of the way the actuarially indicated percentage, and implementation of Order 4.23, Directives 15 and 16		
Topic:	DSR Distribution		
Sub Topic:			

Preamble to IR:

Question:

Please provide the distribution of units by each DSR level for each major class.

Rationale for Question:

To examine the DSR rating distribution of each major class.

RESPONSE:

Figure 1 Vehicle Units by Major Class

Line No.	Vehicle Units				
	DSR Level	Private Passenger	Commercial	Public	Motorcycle
1	16	196,243	246	116	4,934
2	15	162,201	230	96	4,106
3	14	28,836	61	33	773
4	13	36,720	65	34	1,026
5	12	29,302	67	51	754
6	11	27,991	67	23	696
7	10	32,871	74	33	853
8	9	23,193	58	33	640
9	8	21,696	58	27	530
10	7	23,234	63	20	615
11	6	21,420	65	20	483
12	5	21,259	70	33	516
13	4	22,452	68	37	531
14	3	22,697	74	30	545
15	2	23,071	131	28	567
16	1	22,647	105	29	535
17	0	89,383	2,524	185	770
18	-1	7,689	43	14	214
19	-2	5,918	34	5	143
20	-3	4,189	24	6	137
21	-4	5,356	45	7	171
23	-5	3,324	30	8	85
24	-6	2,476	7	3	70
25	-7	2,316	14	2	74
26	-8	1,724	17	5	56
27	-9	1,261	7	3	35
28	-10	1,374	10	5	43
29	-11	711	3	-	17
30	-12	751	2	1	22
31	-13	1,024	7	1	40
32	-14	356	2	1	11
33	-15	387	-	1	18
34	-16	349	2	2	11
35	-17	227	1	-	8
36	-18	225	-	-	6
37	-19	131	2	-	5
38	-20	1,062	6	1	40
39	Notes:				
40	Units are as at November 1, 2022				

CMMG (MPI) 1-4

Part and Chapter:	Part IV Benchmarking	Page No.:	Pg 9 of 29
PUB Approved Issue No:	14. Operational Benchmarking		
Topic:	Motorcycle Insurance Rate Comparison		
Sub Topic:			

Preamble to IR:

MPI states:

"A comparison of motorcycle rates within Canada shows that MPI continues to excel in providing what are among the lowest motorcycle insurance rates in the country."

Figure BMK – 2 Motorcycle Rate Comparison shows benchmarking for the 3 motorcycle profiles used.

The rates shown in Winnipeg are the highest in 2 of the 3 profiles used, with the 3rd profile being the second highest premium.

Question:

- a) Does the Corporation accept that the highest proportion of motorcycle riders in Manitoba reside in Winnipeg?
 - i. If no, please provide an explanation and basis outlining distribution of registered motorcycle rides throughout the Province.

- b) When looking at rates in Winnipeg when compared to other jurisdictions, does the Corporation agree that Winnipeg has some of the highest rates in the Country?

Rationale for Question:

To understand MPI's assertion that Manitoba has some of the lowest motorcycle rates in the country.

RESPONSE:

- a) In terms of motorcycle registrations, Winnipeg (i.e., territory 1) has just under half while Southern Manitoba (excluding Winnipeg) has just over half.

Part VII Risk Classification RC Appendix 3 – Incurred Claims and Earned Units

Table 1 to 13 shows counts of registered motorcycles, mopeds, and motor-scooters:

- Territory 1 (Winnipeg) at a count of 39,813 represents 44% of all registrations;
 - Territory 2 (Southern Manitoba excluding Winnipeg) at a count of 47,004 represents 52% of registrations;
 - Territories 3, 4, and 5 combined (the rest of Manitoba) at a count of 3,743 represent the remaining 4% of registrations;
- b) MPI confirms that the rates comparison for profiles in Winnipeg have some of the highest rates shown in Part IV Benchmarking BMK Appendix 2 – Vehicle Rates Comparison. However, MPI cannot agree that Winnipeg has some of the highest rates in the country as missing from the analysis is information from private insurance jurisdictions, which would be required to reasonably reach that conclusion. Of note, as per Part IV Benchmarking Chapter Figure BMK-1, passenger vehicle rates in private jurisdictions tend to be considerably higher than in public insurance jurisdictions.

CMMG (MPI) 1-5

Part and Chapter:	Part IV Benchmarking	Page No.:	Pg 9 of 29
PUB Approved Issue No:	14. Operational Benchmarking		
Topic:	Motorcycle Insurance Rate Comparison		
Sub Topic:			

Preamble to IR:

In the 2023 GRA IR responses, CMMG (MPI) 1-27 MPI provided the following comments in response to a question about the significant difference in rates for the same motorcycle in Manitoba and Saskatchewan:

"For motorcycles, the majority of rates MPI charges cover the cost of PIPP claims (e.g., accident benefits and income replacement). In comparison, the scale of PIPP benefits in Saskatchewan is lower. There may be other differences in the scope of benefits, however, it may not be possible to comment on their approach to pricing."

"MPI understands that pricing methodology and pricing approach may vary substantially between jurisdictions. While MPI cannot confirm the precise difference in rates among providers, many factors may cause rate disparity, including:

- Better underlying experience
- Lower benefit scale
- Difference in approach to cross-subsidization across different makes/models
- Fewer or higher number of such vehicles
- Differences in demographics
- Road/weather conditions
- costs of parts due to different suppliers
- differences in wages/labor costs
- provincial inflation etc."

Question:

- a) Given the number of factors identified by MPI above which may cause rate disparity between jurisdictions, please comment on the following:
- i. What value does the benchmarking exercise for motorcycles provide given the disparities between jurisdictions?
 - ii. The accuracy of MPI's assertion that Manitoba has the some of the lowest motorcycle rates in the country.

Rationale for Question:

To understand the value of the motorcycle benchmarking exercise and the reliability of same.

RESPONSE:

Upon further reflection, MPI is of the view that the following statement is more appropriate:

The Injury Coverage offered by SGI and MPI are very similar so long as the SGI ratepayer selects the No Fault Coverage, which is the default coverage in Saskatchewan. The comparison of the Injury Coverages can be found in GRA Part III. However, motorcyclists in Saskatchewan have the option of selecting a Reduced No-Fault Injury Coverage, which reduces their total premium by 20-30% on average. The reduction is closer to 5% with small engine size (information taken from the SGI public website).

MPI Basic Policies for motorcycles do not include Comprehensive coverage, whereas SGI Policies do include the coverage. Physical damage coverage is a relatively small premium compared to the Injury Benefit premium for both provinces.

As with all auto insurers in Canada, pricing is completed in accordance with Accepted Actuarial Practices, resulting in the use of consistent methodologies.

MPI uses the following rating factors for motorcycles: rating territory, insurance use, driver record, make and model of the motorcycle and engine size. SGI does not vary rates by territory or insurance use for motorcycles.

a)

- i. The rates comparison study is provided in the General Rate Application as part of the minimum filing requirements. Over time, comparisons provided have expanded with requests for additions of more and varied driver profiles and vehicles. This evolution and expansion included motorcycles comparisons.

The value of this report is the benchmarking of rates in Manitoba relative to rates for a comparable product across jurisdictions. The profiles and the rates provided make every effort to understand and account for jurisdictional differences.

- ii. The rates shown in *Part IV Benchmarking BMK Appendix 2 – Vehicle Rates Comparison* for Manitoba are among the lowest rates available to the authors of the Rates Comparison report. MPI recognizes that it should not interpret this to represent the lowest or highest rates in the country as there is a lack of comparisons from private insurance jurisdictions with which to make that conclusion. MPI says more accurately that its motorcycle rates are, among those available for comparison, among the lowest in the country.

CMMG (MPI) 1-6

Part and Chapter:	Part XI Investments	Page No.:	Pg 25-26 of 85
PUB Approved Issue No:	22. Asset Liability Management Study (in accordance with Directives 11.19 and 11.20 of Order 134/21), including implementation		
Topic:	Basic Portfolio		
Sub Topic:	Basic Short and Basic Long		

PREAMBLE TO IR:

The Corporation has indicated that a decision was made not to implement a strategy where the Basic investment portfolio would be split into two parts, Basic short and Basic long.

Question:

- a) If MPI had decided to segment the Basic Portfolio into two parts (i.e., Long and Short), would there be any material difference between i) the Basic Portfolio and ii) the Basic Long and Basic Short segments when aggregated together? If so, please explain any differences and why they would arise. Your response should address, at a minimum, any differences related to the following items:
- i. asset mix;
 - ii. surplus volatility;
 - iii. expected return;
 - iv. minimum capital required;
 - v. the overall rate indication; and
 - vi. the rate indication by major class.

Rationale for Question:

To understand the basis for the decision by MPI not to proceed with a split of the Basic portfolio.

RESPONSE:

If MPI had decided to segment the Basic Portfolio into two parts (i.e., Long and Short), there would be no material difference between i) the Basic Portfolio and ii) the Basic Long and Basic Short segments when aggregated together.

CMMG (MPI) 1-7

Part and Chapter:	Part VII Risk Classification	Page No.:	Pg 42-43 of 44
PUB Approved Issue No:	13. Driver Safety Rating (DSR)		
Topic:			
Sub Topic:			

Preamble to IR:

MPI has provided a discussion of the various DSR models and how those models may interact when Generalized Linear Modelling is implemented.

Question:

- a) At what point in the GLM implementation plan can changes to the DSR model be facilitated?
 - i. Is the answer to the above question affected by the DSR model selected?
- b) Does the Corporation agree that transitioning from the Registered Owner model to the Primary Driver model using GLM would be less complicated than a transition to the Listed Driver, Combined Driver or NLD Surcharge Models?
- c) Upon completion of the GLM implementation plan, please comment on whether a change in the DSR model is feasible and any relevant cost considerations.

Rationale for Question:

To understand the implication of GLM on potential DSR models being reviewed.

RESPONSE:

- a) Changes to the Driver Safety Rating (DSR) model can be facilitated after the base Generalized Linear Models (GLM) structure is in place and validated.

A base GLM model allows for a foundational understanding of risk and the corresponding premiums. Altering the DSR model after GLM implementation allows MPI to incorporate changes accurately into a pre-established framework.

- i. The choice of the DSR model is not expected to affect the point at which the DSR model is facilitated into the GLM implementation.
- b) Transitioning to the Primary Driver model from the Registered Owner model is likely less complex than transitioning to the Listed Driver or Combined Driver models. The model chosen has minor impacts to GLM given the flexibility of GLM as a ratemaking model.

The non-listed driver (NLD) Surcharge is a separate concept that could be combined with a DSR model to encourage customers to accurately report driver information.

The Primary Driver model requires information on who primarily drives the vehicle, which can be simpler to integrate into the GLM structure compared to models requiring additional driver details or rule sets (as with the Listed or Combined models). Even though the Listed or Combined models may require additional driver information, this information is used to potentially provide better predictive analysis and more actuarially sound rates.

- c) Yes, a change in the DSR model is feasible upon completion of the GLM implementation plan, but costs will depend on the specific DSR model chosen.

CMMG (MPI) 1-8

Part and Chapter:	Part VII RC Appendix 6	Page No.:	Pg 8 of 9
PUB Approved Issue No:	13. Driver Safety Rating (DSR)		
Topic:			
Sub Topic:			

Preamble to IR:

Figure RC- 5 Vehicle Premium Discount Figure

Line No.	DSR Level	Vehicle Premium Discount		
		Current 2023/24	Proposed 2024/25	Proposed less Current
1	18	n/a	48%	n/a
2	17	40%	45%	5%
3	16	40%	44%	4%
4	15	40%	43%	3%
5	14	34%	38%	4%
6	13	33%	36%	3%
7	12	32%	35%	3%
8	11	31%	33%	2%
9	10	29%	31%	2%
10	9	27%	28%	1%
11	8	26%	26%	0%
12	7	26%	26%	0%
13	6	21%	21%	0%
14	5	16%	16%	0%
15	4	16%	16%	0%
16	3	11%	11%	0%
17	2	10%	10%	0%
18	1	5%	5%	0%
19	0	0%	0%	0%
20	-1 to -20	0%	0%	0%

Question:

- a) Please replicate this Figure but adding a column which provides the indicated discount; and
- b) Please include average dollar values for each column and DSR level and a column for variance between proposed and current as a dollar figure.

Rationale for Question:

To better understand the implications of the rate indication, and the real dollar impact for rate payers at each DSR level.

RESPONSE:

- a) and b)

Please see the figure below for the change in premium between the current vs. proposed discounts based on merit eligible vehicles at a point in time. Indicated discounts are also included in the the figure below.

Figure 1 Vehicle Premium by DSR

Line No.	DSR Level	Current 2023/24	Indicated 2024/25	Proposed 2024/25	Current 2023/24	Proposed 2024/25	Current Versus Proposed (\$)	Current Versus Proposed (%)
1	18	-	66%	48%	\$0.00	\$0.00	\$0.00	\$0.00
2	17	40%	62%	45%	\$0.00	\$0.00	\$0.00	0%
3	16	40%	58%	44%	\$889	\$830	-\$59	-7%
4	15	40%	55%	43%	\$898	\$853	-\$45	-5%
5	14	34%	51%	38%	\$1,035	\$972	-\$63	-6%
6	13	33%	48%	36%	\$1,049	\$1,002	-\$47	-4%
7	12	32%	44%	35%	\$1,081	\$1,033	-\$48	-4%
8	11	31%	40%	33%	\$1,101	\$1,069	-\$32	-3%
9	10	29%	37%	31%	\$1,137	\$1,105	-\$32	-3%
10	9	27%	33%	28%	\$1,191	\$1,174	-\$16	-1%
11	8	26%	29%	26%	\$1,215	\$1,215	\$0	0%
12	7	26%	26%	26%	\$1,216	\$1,216	\$0	0%
13	6	21%	22%	21%	\$1,300	\$1,300	\$0	0%
14	5	16%	18%	16%	\$1,387	\$1,387	\$0	0%
15	4	16%	15%	16%	\$1,393	\$1,393	\$0	0%
16	3	11%	11%	11%	\$1,483	\$1,483	\$0	0%
17	2	10%	7%	10%	\$1,503	\$1,503	\$0	0%
18	1	5%	4%	5%	\$1,594	\$1,594	\$0	0%
19	0	0%	0%	0%	\$1,632	\$1,632	\$0	0%
20	-1 to -20	0%	0%	0%	\$1,644	\$1,644	\$0	0%

CMMG (MPI) 1-9

Part and Chapter:	Part VII Rate Indication	Page No.:	Pg 27 of 28
PUB Approved Issue No:	1. Projected claims, expenses, and vehicle counts, based on accepted actuarial practice in Canada.		
Topic:	Required Rate Changes		
Sub Topic:			

Preamble to IR:

Figure RI- 10 Rating Year 2024/25 Major Classification Required Rate Changes – Breakeven Rates

Line No.	Coverage	Overall	Private Pass	Comm	Public	Motor-Cycle	Trailer	ORV
1	24/25 Units	1,280,333	863,331	49,070	13,089	19,322	244,888	90,633
2	Claims	710.18	953.28	738.91	1,888.37	665.64	49.09	4.51
3	Claims Expense	122.19	164.01	127.13	324.90	114.52	8.45	0.78
4	Road Safety	9.47	12.83	12.83	12.83	12.83	0.00	0.00
5	Operating Expense	53.65	72.70	72.70	72.70	72.70	0.00	0.00
6	Regulatory/Appeal	3.35	4.53	4.53	4.53	4.53	0.00	0.00
7	Commission: Vehicle	38.50	51.15	45.21	110.58	35.02	3.12	0.24
8	Prem Tax: Vehicle	27.90	37.07	32.76	80.13	25.37	2.26	0.17
9	Comm & Prem Tax: Driver	2.84	3.85	3.85	3.85	3.85	0.00	0.00
10	Commission Flat Fee	5.68	7.70	7.70	7.70	7.70	0.00	0.00
11	Reins: Casualty	2.01	2.72	2.72	2.72	2.72	0.00	0.00
12	Reins: Catastrophe	11.38	12.45	12.45	12.45	0.00	12.45	0.00
13	Fleet Rebates	15.31	11.52	130.25	249.26	0.00	0.00	0.00
14	Anti-Theft Discount	0.56	0.83	0.00	0.00	0.00	0.00	0.00
15	Driver Prem	51.89	70.05	70.05	70.05	70.05	0.00	0.00
16	Service Fees	21.41	29.02	29.02	29.02	29.02	0.00	0.00
17	Req Rate	929.90	1,235.59	1,091.97	2,670.94	845.83	75.36	5.69
18	Adj. Req Rate	910.61	1,210.23	1,069.56	2,616.12	828.47	73.61	5.58
19	23/24 Average Rate	870.37	1,150.24	908.29	2,252.53	882.92	62.24	5.69
20	Major Class Drift	4.8%	6.0%	4.6%	1.2%	-0.1%	7.3%	0.0%
21	24/25 Average Rate	912.02	1,218.86	949.64	2,279.87	882.12	66.61	5.69
22	Without Rate Change							
23	Full Cred Req Change	-0.1%	-0.7%	12.6%	14.7%	-6.1%	10.5%	-2.0%
24	Applied for Change	0.0%	-0.6%	12.8%	14.9%	-6.0%	10.6%	-1.9%
25	Credibility		99.3%	89.1%	68.6%	76.3%	97.6%	93.8%
26	Cred Wtd Change		-0.6%	11.4%	10.2%	-4.5%	10.4%	-1.8%
27	Cred Wtd Req Rate	910.61	1,211.89	1,057.76	2,512.82	842.02	73.74	5.59
28	Cred Wtd Req Rate (Bal)	912.02	1,213.76	1,059.40	2,516.71	843.32	73.85	5.60
29	Cred Wtd Change (Bal)	0.0%	-0.4%	11.6%	10.4%	-4.4%	10.5%	-1.6%

MPI provides the following comment

"The adjusted required rate changes then reflect the average changes to the 2024-25 rates for the respective major classes.

Question:

Please explain in greater detail what changes are included in the adjustment from Row 17 'Require Rate' to Row 18 'Adjusted Required Rate'.

Rationale for Question:

For clarification of the information provided.

RESPONSE:

The adjustment to the required rate is to recognize the time value of money. This discounting for time value of money captures the effect of investment income on the premiums collected. Please refer to *Part VII Rate Indication Chapter RI.2.4* for more details.

CMMG (MPI) 1-10

Part and Chapter:		Page No.:	
PUB Approved Issue No:	11. Claims forecasting		
Topic:	Motorcycle Claims frequencies		
Sub Topic:			

Preamble to IR:

Question:

Please updated CMMG (MPI) 1-24 form the 2023 GRA.

Rationale for Question:

To review motorcycle claims frequencies and trends.

RESPONSE:

Please see *Appendix 1 – Unique Asset Mix for Motorcycles.*

Ran on July 18, 2023

**Motorcycle Claims Loss Data
By Insurance Year
All Physical Damage and Injuries, All Heads of Coverage**

Collision - Incurred

Ranges	2022		2021		2020		2019		2018	
	Claim Count	Incurred Amount	Claim Count	Incurred Amount	Claim Count	Incurred Amount	Claim Count	Incurred Amount	Claim Count	Incurred Amount
< 0	1	-95	1	-877.34	3	-1044.76	1	-602.17	1	-15.08
0	50	0	22	0	18	0	25	0	25	0
0.01 to 25000	206	1086398.3	277	1578994.61	247	1338857.68	254	1338229.75	268	1345505.97
25001 to 50000	3	112222.94	2	69958.67	3	84077.54	3	107538.74	4	128207.1
50001 to 75000										
Grand Total	260	1,198,526	302	1,648,076	271	1,421,890	283	1,445,166	298	1,473,698

Collision - Paid

Ranges	2022		2021		2020		2019		2018	
	Claim Count	Paid Amount	Claim Count	Paid Amount	Claim Count	Paid Amount	Claim Count	Paid Amount	Claim Count	Paid Amount
< 0	1	-193.21	1	-877.34	3	-1044.76	1	-602.17	1	-15.08
0	73	0	22	0	19	0	26	0	25	0
0.01 to 25000	184	932197.47	277	1576940.33	246	1338756.43	253	1334330.45	268	1345505.97
25001 to 50000	2	72102.94	2	69958.67	3	84077.54	3	107538.74	4	128207.1
50001 to 75000										
Grand Total	260	1,004,107	302	1,646,022	271	1,421,789	283	1,441,267	298	1,473,698

Ran on July 18, 2023

**Motorcycle Claims Loss Data
By Insurance Year
All Physical Damage and Injuries, All Heads of Coverage**

Public Liability - Incurred

Ranges	2022		2021		2020		2019		2018	
	Claim Count	Incurred Amount	Claim Count	Incurred Amount	Claim Count	Incurred Amount	Claim Count	Incurred Amount	Claim Count	Incurred Amount
0					1	0				
0.01 to 25000							1	714.27		
25001 to 50000										
Grand Total	-	-	-	-	1	-	1	714	-	-

Public Liability - Paid

Ranges	2022		2021		2020		2019		2018	
	Claim Count	Paid Amount	Claim Count	Paid Amount	Claim Count	Paid Amount	Claim Count	Paid Amount	Claim Count	Paid Amount
0					1	0				
0.01 to 25000							1	714.27		
Grand Total	-	-	-	-	1	-	1	714		

Ran on July 18, 2023

**Motorcycle Claims Loss Data
By Insurance Year
All Physical Damage and Injuries, All Heads of Coverage**

Property Damage - Incurred

Ranges	2022		2021		2020		2019		2018	
	Claim Count	Incurred Amount	Claim Count	Incurred Amount	Claim Count	Incurred Amount	Claim Count	Incurred Amount	Claim Count	Incurred Amount
< 0									1	(181)
0	21	-	20	-	15	-	13	-	16	-
0.01 to 25000	27	30,713	39	49,705	35	41,906	48	71,801	36	42,688
Grand Total	48	30,713	59	49,705	50	41,906	61	71,801	53	42,507

Property Damage - Paid

Ranges	2022		2021		2020		2019		2018	
	Claim Count	Paid Amount	Claim Count	Paid Amount	Claim Count	Paid Amount	Claim Count	Paid Amount	Claim Count	Paid Amount
< 0									1	(181)
0	28	-	20	-	15	-	13	-	16	-
0.01 to 25000	20	25,013	39	49,705	35	41,906	48	71,801	36	42,688
Grand Total	48	25,013	59	49,705	50	41,906	61	71,801	53	42,507

Ran on July 18, 2023

**Motorcycle Claims Loss Data
By Insurance Year
All Physical Damage and Injuries, All Heads of Coverage**

Accident Benefits - Incurred

Ranges	2022		2021		2020		2019		2018	
	Claim Count	Incurred Amount	Claim Count	Amount	Claim Count	Incurred Amount	Claim Count	Incurred Amount	Claim Count	Incurred Amount
< 0					1	2,012.68			1	940.76
0	23	-	26	-	25	-	29	-	24	-
0.01 to 25000	76	777,579.30	92	867,753.99	89	676,309.74	83	698,617.28	91	642,826.20
25001 to 50000	33	1,145,190.53	37	1,357,802.15	32	1,095,539.44	19	733,894.96	18	637,416.39
50001 to 75000	17	1,001,472.45	16	989,153.00	13	813,185.48	17	1,097,700.37	15	924,591.50
75001 to 100000	5	424,208.13	11	985,374.93	4	331,819.13	3	257,252.66	4	344,565.80
100001 to 125000	6	683,052.71	3	324,335.15	2	219,920.49	3	336,983.82	2	207,307.55
125001 to 150000			4	552,808.93	1	139,542.34	2	266,290.36		
150001 to 175000			5	821,118.46	2	312,244.56	1	166,576.48		
175001 to 200000			1	196,140.90	2	365,335.62	1	186,480.72	3	555,126.09
200001 to 225000	1	213,929.52	1	224,013.17			1	213,548.88	1	208,089.00
225001 to 250000							1	229,574.20	1	228,682.72
250001 to 275000					1	269,818.69				
275001 to 300000					1	280,945.60			1	298,909.99
300001 to 325000					2	622,691.94	1	323,304.22		
325001 to 350000									2	659,467.42
350001 to 375000									2	737,663.96
400001 to 425000			1	402,296.00	1	402,951.00	1	423,554.14	1	419,881.71
425001 to 450000									1	429,539.45
475001 to 500000					2	967,109.73				
525001 to 550000	2	1,079,506.00					1	548,522.35		
575001 to 600000			1	591,064.68						
625001 to 650000							1	647,544.52	1	637,247.68
650001 to 675000									1	650,556.91
725001 to 750000							1	725,992.50		
750001 to 775000							1	757,286.00	1	769,434.80
800001 to 825000							1	802,831.83		
900001 to 925000							1	913,752.00		
1000001 to 1025000					1	1,011,456.94			1	1,017,093.29
1025001 to 1050000							1	1,039,454.52		
1100001 to 1125000							1	1,109,835.14	1	1,109,275.92
1275001 to 1300000									1	1,294,865.11
3125001 to 3150000					1	3,132,405.46				
Grand Total	163	5,324,939	198	7,311,861	180	10,639,263	170	11,478,997	173	11,771,601

Ran on July 18, 2023

**Motorcycle Claims Loss Data
By Insurance Year
All Physical Damage and Injuries, All Heads of Coverage**

Accident Benefits - Paid

Ranges	2022		2021		2020		2019		2018	
	Claim Count	Paid Amount	Claim Count	Paid Amount	Claim Count	Paid Amount	Claim Count	Paid Amount	Claim Count	Paid Amount
< 0									1	(941)
0	33	-	36	0	28	-	31	-	24	-
0.01 to 25000	108	626,912	111	540714.02	112	641,996	82	616,417	93	663,741
25001 to 50000	15	506,306	24	882836.89	15	556,129	20	754,444	17	609,474
50001 to 75000	4	216,896	11	673757.6	7	466,118	15	954,043	15	922,983
75001 to 100000			6	525052.75	7	626,296	4	340,887	4	344,566
100001 to 125000	1	117,524	2	216479.3	3	348,792	2	227,124	2	207,308
125001 to 150000			3	402148.94	3	403,157	3	394,135	1	133,468
150001 to 175000			3	476043.15	1	156,338	1	166,576	1	160,880
175001 to 200000					1	177,065	1	186,481	3	556,689
200001 to 225000							5	1,042,793	2	427,874
225001 to 250000					1	247,740	1	247,601	1	230,108
250001 to 275000							1	261,054	1	266,981
275001 to 300000			1	278234.82	1	280,946				
300001 to 325000							1	304,189	2	632,038
325001 to 350000							2	677,668		
350001 to 375000									2	716,440
400001 to 425000			1	402296					2	826,586
425001 to 450000									2	872,865
525001 to 550000	2	1,079,506								
675001 to 700000					1	676,855				
775001 to 800000							1	782,696		
Grand Total	163	2,547,143	198	4,397,563	180	4,581,432	170	6,956,109	173	7,571,059

CMMG (MPI) 1-11

Part and Chapter:	Part X Rate Stabilization Reserve	Page No.:	Pg 9 of 15
PUB Approved Issue No:	8. Capital Management Plan a) Transfers of Extension excess capital		
Topic:			
Sub Topic:			

Preamble to IR:

MPI has indicated that the Board of Directors may transfer excess funds from Extension Reserve to its other lines of business to cover any subsequent or existing shortfalls.

Question:

- a) Do the Board of Directors of MPI have a defined set of parameters which determine the timing and/or amount of transfers from Extension that can occur prior to fiscal year end?
- b) If yes to (a) above please provide confirmation of the parameters which would initiate such a decision.
- c) Will the transfers made by the Board of Directors only occur where the capital in Extension Reserve is in excess of 200% MCT?
- d) If yes to (c) above please identify where this where this limitation of the Board’s discretion is defined.

Rationale for Question:

To understand MPI’s position with regard to the discretion of the Board of Directors and transfers from Extension.

RESPONSE:

a) No. The Board of Directors of MPI do not have a defined set of parameters which determine the timing and/or amount of transfers from Extension that can occur prior to fiscal year end.

b) n/a

c) and d)

While MPI cannot guarantee how its Board would vote, the MPIC Act requires that Extension Reserve be maintained at 200% MCT.

CMMG (MPI) 1-12

Part and Chapter:	Part X Rate Stabilization Reserve	Page No.:	Pg 10 of 15
PUB Approved Issue No:	8. Capital Management Plan a) Transfers of Extension excess capital		
Topic:			
Sub Topic:			

Preamble to IR:

When discussing the Capital Build Provisions, MPI States the following:

"If the MCT is below 100% at the beginning of the current fiscal year, MPI will require a capital build and will apply for one with its GRA, unless assumed capital transfers from Extension can build capital to the 100% MCT target in less than five years."

Question:

- a) Where MPI provides calculations that assume capital transfers from Extension to build capital to the 100% MCT target within a 5 year period, will the Board of Directors then be prohibited from authorizing transfers from Extension to other lines of business within that same period?
- b) If yes to (a) above please identify where this where this limitation of the Board's discretion is defined.

Rationale for Question:

To understand MPI's position with regard to the discretion of the Board of Directors and transfers from Extension

RESPONSE:

- a) No, the Board of Directors is not prohibited from authorizing transfers from Extension to other lines of business within the same 5-year forecast period. The calculations provide a 5-year forecast that guides a particular course of action in year 1, and MPI must be able to make decisions on an annual basis that are in its best interest (e.g., ensuring its compliance with the MPIC Act).

- b) n/a