

June 25, 2025

VIA EMAIL

Interveners of Past Record  
(2025 General Rate Application)

**Re: Manitoba Public Insurance 2026/27 General Rate Application**

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**Background**

The 2026/27 GRA of MPI was filed on Wednesday, June 25, 2025. Electronic copies are to be posted to the MPI website and MPI is to maintain and regularly update this website with a fully searchable version of the GRA.

**Intervener Responsibilities**

The Board requests that past Interveners immediately collaborate and review the GRA when filed, so as to determine which of the issues set out in the Preliminary Issues List in Board Order 89/25 will be reviewed and tested by Interveners should they be granted status at the Pre-Hearing Conference. Interveners should be prepared to discuss these issues at the Pre-Hearing Conference. Following the Pre-Hearing Conference, the Board will approve the Final Issues List for the GRA in its Procedural Order.

Where more than one Intervener identifies the same issue to be addressed and tested in the GRA, the Board expects Interveners to work collaboratively, with one Intervener being identified as primarily responsible for that issue in terms of Information Requests, expert evidence, cross examination and closing submissions.

All Intervener Applications should therefore include the specific issues to be addressed by Interveners, and their proposed budgets.

**Application Overview Workshop – Friday, June 27, 2025 at 9:00 a.m.**

The Board is anticipating that an Application Overview Workshop will take place on June 27, 2025, at 9:00 a.m. The Board expects that past and prospective Interveners will attend, having familiarized themselves and their consultants with the content of the GRA materials.

Please contact the Board to advise if you will be attending the Workshop. Those who are unable to attend in person may request attendance via Teams from the Board.

The Workshop will be used to discuss the Preliminary Issues List, identifying which issues are acknowledged by the parties to be included within the scope of the Final Issues List for the GRA, identify which issues are acknowledged by the Parties to be out of scope, and identify any new issues for proposed inclusion in the Final Issues List. Disagreements as to scope should be noted and explained in the Applications for Intervener Status that are to be filed with the Board and MPI prior to the Pre-Hearing Conference. The Board intends to hear from the parties at the Pre-Hearing Conference and make a determination as to any variations from the Preliminary Issues List to the Final Issues List, to be approved in the Board's Procedural Order.

### **Minimum Filing Requirements**

The Board has prepared a list of Minimum Filing Requirements (MFRs) for MPI, a copy of which is attached, and which was previously circulated on June 16, 2025. The MFRs identify information that should be included in MPI's GRA filing, with a corresponding benefit of reducing Information Requests of MPI.

### **Pre-Hearing Conference – Thursday, July 3, 2025 at 9:00 a.m.**

The traditional purposes of the Pre-Hearing Conference (PHC) include identifying Interveners, seeking collaborative efforts by Interveners on common issues, finalizing a Timetable and scheduling an oral public hearing. The PHC for the 2026 GRA will also include a pre-qualification process for any expert witnesses the Parties intend to call at the public hearings.

Those who are unable to attend in person may request attendance via Teams and may make those arrangements by contacting the Board.

Prior to attending the PHC for this GRA, the Board expects (and will seek confirmation from Interveners) that they have reviewed Order 89/25 and the Preliminary Issues List. The Board also expects that prospective Interveners will meet prior to the PHC for the purpose of identifying issues of common and divergent interest, and for preparing proposals to be advanced at the PHC for efficiently presenting evidence and cross examinations.

Prior to the PHC, the parties will have had an opportunity to discuss the issues for this GRA in the Application Overview Workshop. Through this process, MPI is to determine which of those issues set out in the Preliminary Issues List should by consensus remain in, be removed from, or be added to the Final Issues List. MPI should also provide information as to any disagreements about whether or not certain issues should remain in scope. MPI is to circulate this information to all Parties as soon as possible following the conclusion of the Workshop. Parties may speak to any disputed issues at the PHC and expect adjudication by the Board in its Procedural Order.

Attached hereto is the Timetable proposed by MPI. Any party proposing an alternative Timetable to the one attached should provide copies to all parties prior to the PHC, and address the matter at the PHC.

For purposes of planning the oral public hearing, all parties at the PHC will be asked to estimate their hearing time required for direct evidence, cross examinations and closing submissions.

### **Information Request (IR) Format**

In an effort to make all IRs electronically searchable and to provide rationale for the question (or the refusal to fully answer the question - as the case may be), the Board has adopted a standardized format for IRs. This format has been used successfully since the 2016 GRA.

If MPI determines that it will not be fully answering an IR, it should immediately notify the party making the request and attempt to resolve any dispute on an informal basis. If the dispute cannot be resolved informally, the Board will adjudicate the dispute. Please note that per the attached Timetable, Parties wishing to file any motions arising out of disputes related to First Round IRs must do so by August 11, 2025.

### **Other Matters**

Should any party have additional matters to be addressed at this time, please contact the Board. Thank you for your anticipated cooperation in continuing to implement improvements in the regulatory process.

Yours truly,



Darren Christle, PhD, CCLP, P.Log., MCIT  
Secretary/ Executive Director

DC/kls

Attachments:

1. Timetable
2. PUB Minimum Filing Requirements
3. Blank Information Request Format

cc. Anthony Guerra, Steve Scarfone and Eric Wishnowski MPI  
Todd Andres, Kara Moore and Trevor Yakimchuk, Board Counsel  
Roger Cathcart, Jason Hails, Michael Gandhi, Blair Manktelow, Marc Caron  
and Sunil Bridgelall, Board Advisors

**Legend**

	MPI Filing Date
	MPI Receiving a Filing

ITEM		June 27th FILING DATE	
		Date	Day of the Week
1	Request PUB to issue a Procedural direction (PUB Rules section 4(2))	June 04, 2025	Wednesday
2	PUB Preliminary Procedural Order Issued	June 17, 2025	Tuesday
3	Application Filed	<b>June 25, 2025</b>	Wednesday
3.1	PUB Issues Workshop	June 27, 2025	Friday
4	Notice of Public hearing Published	June 28, 2025	Saturday
5	Intervener Registration Deadline	July 02, 2025	Wednesday
6	Pre-hearing Conference	July 03, 2025	Wednesday
7	PUB Procedural Order Issued	July 07, 2025	Monday
8	Round One Information Requests Filed	July 14, 2025	Monday
8.1	Round One Confidential Information Requests Filed	July 17, 2025	Thursday
9	Round One Information Responses Filed	<b>August 07, 2025</b>	Thursday
10	Parties to file motions on Round 1 IRs	August 11, 2025	Monday
11	Board to hear Motions	August 14, 2025	Thursday
12	Round Two Information Requests Filed	August 20, 2025	Wednesday
13	Reminder Notice of Public Hearing Published	August 23, 2025	Saturday
14	Round Two Information Responses	<b>September 09, 2025</b>	Tuesday
15	Parties to file any motions	September 12, 2025	Friday
16	Board to hear Motions	September 16, 2025	Tuesday
17	Hearing Issues Meeting of Counsel	September 17, 2025	Wednesday
18	Intervener Evidence Filed	<b>September 18, 2025</b>	Thursday
19	Information Requests on Intervener Evidence	<b>September 24, 2025</b>	Wednesday
21	Rate Update Filed	<b>September 25, 2025</b>	Thursday
20	Interveners Information Responses	<b>September 29, 2025</b>	Monday
22	MPI Rebuttal Evidence	<b>October 03, 2025</b>	Friday
23	Pre-Asks Filed	<b>October 03, 2025</b>	Friday
24	Pre-Asks Responses	<b>October 08, 2025</b>	Wednesday
25	Oral Hearing commences	October 14, 2025	Tuesday
26	Oral Hearing finishes	October 31, 2025	Friday
27	PUB Order Released for rates only	December 08, 2025	Monday
28	PUB Order Released for other directives	January 07, 2025	Wednesday

### **PUB/MPI Minimum Filing Requirements ("MFRs") - 2026 GRA**

These MFRs build upon the MFRs issued in respect of the 2025 GRA, with the expectation that information should be provided in a similar format, if the MFR is otherwise unchanged. MFR items shown in gray font are **not** required for this GRA, but are preserved in the document to allow for possible changing areas of PUB focus in future GRAs.

Where older historical information is not directly comparable to more recent historical information due to changes in corporate organizational structure, accounting changes or other reasons, the information should still be provided but be annotated with any required explanations.

All of the information filed pursuant to these MFRs should be cross-referenced within a distinct section of the GRA.

No.	Topic	Preliminary Issues List	Information Request	Rationale
<i>General</i>				
A.1	Accessibility		Please include a master table of contents at the beginning of the application.	To improve accessibility of the application to the general public.
A.2	Value Proposition	5	Please advise of any enhanced value or benefits flowing to Manitobans from MPI aligned with the Corporate Strategic Plan (this information can be contained with the Costs Containment section of the GRA).	To assess the value received by Manitobans in exchange for payment of rates.
A.3	Budgeting Process	5	Please identify and explain any Key Performance Indicators (KPIs), Objectives and Key Results (OKRs) or other performance metrics and benchmarks in use by the corporation, including: a) How they are tracked, reported on and used in decision-making, b) How they do or do not support the corporation's strategic plan, c) Targets and actual performance for each metric with accompanying commentary, and	To understand MPI's approach to monitoring performance for use in decision-making and planning.

			d) Explanation of any corrective action taken by MPI in response to below-target performance.	
A.4	Cross Canada Average Premium Growth Rate Comparison	13	Please provide a schedule reflecting the percentage change in passenger vehicle average premiums since 2003 for different regions in Canada, including Manitoba, Saskatchewan, British Columbia, Ontario, Alberta, and the overall average for Canada.	<p>To provide context for the Corporation's rates compared with other jurisdictions.</p> <p>This analysis provides a representation of how passenger vehicle premiums have changed over time in different regions of Canada. This makes it easier to understand trends and compare data across regions. It helps identify long-term trends in premium growth.</p>
A.5	Rate Comparison of Canadian Public Auto Insurers	13	Please provide a schedule that compares the insurance premiums of selected rating profiles with ICBC and SGI.	<p>These profiles encompass the most common driver and vehicle scenarios, ensuring a representative and reliable comparison. Given that SGI and ICBC provide compulsory auto insurance similar to MPI, this approach facilitates an evaluation of relative affordability within the public insurance sector.</p>

No.	Topic	Preliminary Issues List	Information Request	Rationale
<i>General (continued)</i>				
A.6	Pro-Formas	4	Please provide all Pro-Forma statements separating the vehicle premiums from any Capital Build or Release Provision (separately), and separating out amounts relating to any loss components. Where necessary, expand the pro-forma statements to show the requested itemizations, showing \$0 as needed.	To clearly document the financial impact of RSR Rebuilding Fees and changes in rate level adequacy.
A.7	Pro-Formas	4	Please file the financial statements (forecasts) for 2025/26 comparing the forecasted financial statements, filed with the 2025 GRA, to the "Final" forecasted financial statements incorporating the directives of Board.	To ensure consistency with the compliance filing.
A.8	Pro-Forma Comparisons	4	The Pro-Forma comparisons are to be based on the Final forecast financial statements from prior fiscal year's GRA compliance filing.	To allow for a starting point against which future forecasted financial statements could be compared (e.g. 2025 GRA forecasted financial statements compared to 2026 GRA forecasted financial statements, with explanations of the differences).
A.9	Financial Statement	4	Please file a link to the most recently Audited Corporate and Basic Financial Statements as available.  Please file the following notes to the Basic	To understand the full financial disclosure related to MPI's last fiscal year financial results.

			<p>financial statement:</p> <ul style="list-style-type: none"> <li>a) Cash, Cash Equivalents and Investments</li> <li>b) Investment Property – Non-Financial Instruments</li> <li>c) Property and Equipment</li> <li>d) Deferred Development Costs</li> <li>e) Unearned Premiums and Fees</li> <li>f) Provision for Employee Future Benefits</li> <li>g) Insurance Contracts</li> <li>h) Claims Liabilities</li> <li>i) Capital Management</li> <li>j) Accumulated Other Comprehensive Loss</li> <li>k) Insurance and Financial Risk Management</li> <li>l) Subsequent Events</li> </ul>	
A.10	Financial Forecast	4	Please provide details on RSR Basic program amounts, in a format similar to Part X RSR Appendix 2 including a column for the MCT for each fiscal year.	To understand the changes in capital adequacy of Basic.
A.11	Financial Forecast	4	Please provide detailed calculations of the MCT components for each fiscal year of the forecast.	To assess the reasonableness of the MCT projection.
A.12	Risk Assessment and Management	17	Provide a Risk Assessment table of the likelihood and severity of each risk MPI faces.	To understand the nature and significance of any changes in risk (E.g. Inherent risk assessments/ratings, risk management processes, responsibilities, and residual risks)

No.	Topic	Preliminary Issues List	Information Request	Rationale
<b>Net Income</b>				
B.1	Quarterly Reports	4	Please file the Corporation's quarterly reports as available.	To assess the financial strength of MPI.
B.2	Financial Overview	4	<p>Please file,</p> <p>a) updated financial forecast comparisons for the most recently completed fiscal year and the current fiscal year with the compliance forecast of the last GRA, including detailed explanations of variances; and</p> <p>b) a comparison of actual versus forecast monthly claims incurred on an accounting and actuarial basis.</p>	To assess budgeted v. actual financial information and updated budgets.
B.3	Pro-Formas	4	<p>Please provide a complete set of restated Pro-Forma statements reflecting each of the following:</p> <p>a) At current rate level.</p> <p>b) IFRS 17 basis including detailed schedules, as part of the forecast for each of the fiscal years, the components that make up each IFRS 17 account, in similar level of detail as provided under IFRS 4.</p>	To clearly document the financial impact of the current rate level. IFRS 17 basis does not provide sufficient detail on revenue and expenses, which drives the requirement for IFRS 4 basis to continue to also be provided. To clearly document the financial impact of the current rate level.
B.4	Pro-Formas	4	Please provide claims incurred detailed changes, split between current and prior fiscal year including changes in frequency, and severity of claims by coverage reconciled to the changes in financial forecast. The impact related to changes in discount rate should be separately disclosed.	To understand changes in the financial forecast for claims incurred.

B.5	Service Fees & Other Revenue	1	Please provide support for any proposed changes or for proposing no change.	To provide context for any decision to change or any decision to preserve the status quo.

No.	Topic	Preliminary Issues List	Information Request	Rationale
<b><i>Investments</i></b>				
C.1	Investment Management	8	Please provide a description of substantive changes to the Corporation's investment portfolios or process.	To gain an understanding of the decision-making process and to assess MPI's investment income.
C.2	Equity Holdings & Impaired Investments	8	Please provide a schedule of the Corporation's equity investment holdings and impaired investments, both written off and currently held and including original book value, revised book value and current book value.	To understand the performance of MPI's investment portfolio and to assess MPI's investment income.
C.3	Investment Income Allocation	8	Update the table of investment income allocation weightings for Employee Future Benefits (Pension).	To understand the basis of allocation of MPI investment income between Basic and other lines.
C.4	Actual v. Benchmark Returns	8	Please provide a comparison by asset class of actual returns with the annual expected return benchmarks set out in the Investment Policy Statement for the last five fiscal years and provide detailed narrative commentary on the relative performance to benchmarks and the prior fiscal year and descriptions of any peer groups along with analysis reporting prepared by the corporation or a third party.	To assess the Corporation's investment returns against its benchmarks.

C.5	Investment Returns	8	Please provide a 5-fiscal year comparison of the Corporation's total annual investment return rates with the corresponding annual return rates of comparable peers and please provide commentary on any significant differences and descriptions of peer groups.	To assess the Corporation's investment returns against its peers.
C.6	Investment Returns	8	Please provide results indicating the performance of MPI's investment managers on MPI's reporting dashboard.	To assess the performance of the MPI's investments.
C.7	Investments	8	Please provide an explanation of the nature and adequacy of inflation protection in MPI's investment portfolio.	To assess the corporation's portfolio management.

No.	Topic	Preliminary Issues List	Information Request	Rationale
<b><i>Basic Expenses</i></b>				
D.1	Benchmarking	17	Please file a complete trend analysis for Basic & the Corporation as a whole for the last five fiscal years through the outlook period, including all expenditures, showing compound annual growth rates separately for the historical period and for the outlook period.	To test and assess the reasonableness of Basic Expenses for rate setting purposes.
D.2	Benchmarking	17	Provide a trend analysis for the last five fiscal years through the outlook period, including growth in Claims Expenses, Operating Expenses, Claims Expenses per Claim and Operating Expenses per Policy relative to CPI.	To assess the growth of claims and operating expenses relative to inflation.
D.3	Benchmarking	17	Please provide an update of the performance indicators for the last five fiscal years through the outlook period. Please indicate all BI3 Benchmarks and any other new indicators developed and/or monitored by the Corporation including a narrative description of each measure and commentary on the performance.	To assess changes in trends related to performance indicators and efficiency of operations for rate setting purposes.
D.4	Cost Allocation Methodology	17	Please advise of any changes in allocators, groupings of accounting units or purification adjustments used within MPI's Cost Allocation Methodology including any changes in the basis of allocation among the lines of business, RSR and Pension and changes made to comply with IFRS changes.	To understand any changes in the allocation of costs among the Corporation's lines of business.

D.5	IT Benchmarking	14	Please file full IT Benchmarking results inclusive of benchmarking methodology/process, sources, definitions of each observed benchmark, MPI and/or external review commentary about IT Benchmarking results.	To review and assess IT Benchmarking practices and calibration to IT expenses.
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No.	Topic	Preliminary Issues List	Information Request	Rationale
<b>Claims Costs</b>				
E.1	Claims Incurred	2	Please provide a breakdown of the number of individual claims and their severity by Major Class over dollar thresholds of \$100,000, \$250,000, \$500,000, \$1,000,000 and \$2,000,000 for each of the last ten fiscal years.	To understand the distribution of claims costs by severity.
E.2	PIPP Costs	10	Please provide a breakdown of PIPP costs by component coverage of the last ten fiscal years, in both dollars and percentages.	To understand the distribution and change patterns of PIPP costs by component.
E.3	PIPP Costs	10	Please provide a table indicating the number of claims opened, resolved and outstanding by accident year and by coverage.	To understand the distribution and change patterns of PIPP costs by coverage.
E.4	PIPP Claims	10	Please provide a table of frequencies and severities by type of claim, of the last ten fiscal years to the forecast for the current fiscal year.	To understand the nature of PIPP claims incurred.
E.5	Claims Forecasting	10	Please file a table for the last four GRAs showing projected frequencies/ severities/ claims incurred, by accident year broken down by coverage and for all coverages combined.	To provide context for discussion of claims forecasting accuracy and any evidence of systemic bias in such forecasts

E.6	Claims Expense Forecasting	10	Please provide a detailed reconciliation between the claims expense ratio used in the determination of the rate indication with the claims expense forecast in the financial statement.	To ensure consistency between the rate indication and the financial forecast.
E.7	Claims Expenses	10	Please provide the number of collision losses for the previous three fiscal years broken down into registered owner and non-registered owner including the DSR level of the driver and registered owner.	To understand the relationship between DSR level of drivers vs registered owners as it relates to collision losses.

No.	Topic	Preliminary Issues List	Information Request	Rationale
<b><i>Operating &amp; Administrative Expenses</i></b>				
F.1	Operating Expenses	9	Please include the detail of the MPI operating expenses by category for the last five fiscal years through the outlook period, showing compound annual growth rates separately for the historical period and for the outlook period.	To test and assess the reasonableness of Operating Expenses.
F.2	Operating Expenses	9	Please provide schedule(s) by expense category for the last five fiscal years through the outlook period for Basic total operations, and Basic normal operations, showing compound annual growth rates for the historical period and for the outlook period.	To assess the historical trend and the reasonableness of Operating Expenses.
F.3	Operating Expenses	9	Please provide a summary of Basic expenses by category for the last two fiscal years and through the outlook period, broken down between Claims Expenses, Operating Expenses, Road Safety Expenses, Regulatory/Appeal Expenses and in total, and shown separately for Normal Operations, Improvement Initiatives and in total.	To review the trends and changes in Operating Expense categories to identify changes in cost allocation to Basic.
F.4	Expense Details	9	Relative to the prior GRA, please provide a summary, with supporting rationale, for any significant changes to the integrated cost allocation methodology or any changes to accounting policies and management estimates that have a material impact financial reporting for Basic and Extension. Please summarize the allocation of any proposed or actual IT write-offs by line of business.	To clearly document any sources of change in the presentation of expenses.

F.5	Expense Details	9	<p>Please provide a detailed comparison of Total Corporate Staffing actual for the past fiscal year with the actual staff for the preceding fiscal year and explain the changes (similar to Appendix 21 from the 2025/26 GRA).</p> <p>Please provide a detailed comparison of Total Corporate Staffing forecast for the current fiscal year with the past actual fiscal year and explain the changes (similar to Appendix 21 from the 2025/26 GRA).</p>	To understand the changes in staffing level and the impact on operating expenses.
F.6	Expense Details	9	Please provide a detailed breakdown by cost category of actual Basic Claims, Operating and Road Safety expenses for the last five fiscal years.	To review the trends and changes in cost categories.
F.7	Expense Details	9	Please provide a detailed breakdown of broker commissions paid by category (Basic, Extension, etc.), for the last five fiscal years and forecast through the outlook period.	To review the trends and changes in commissions.
F.8	Expense Details	9	Provide a comparison of broker commissions written by fiscal year with that forecast last fiscal year and indicate the total change for the six fiscal years by product/transaction (EXP Appendix 22 2025/26 GRA).	To review the trends and changes in commissions.
F.9	Capital Expenditures	9	Please provide a comparison between actual capital expenditures in the last fiscal year and that forecast at the last GRA and explain all material differences, including a breakdown of deferred development costs by project.	To assess budgeted v. actual financial information and updated budgets.

No.	Topic	Preliminary Issues List	Information Request	Rationale
<b><i>Operating &amp; Administrative Expenses (continued)</i></b>				
F.10	Deferred Development Costs	9	Please provide a continuity schedule of deferred development costs and amortization costs by project for the last ten fiscal years through the outlook period.	To assess the impact of deferred development costs and amortization costs.
F.11	Deferred Development Costs	9	Provide a schedule that reconciles the financial forecast included in the application with a financial forecast reflecting the deferral of Project Nova integration costs as directed by the Board in Order 4/23 for rate setting purposes.	To understand the financial position of MPI for rate setting purposes.
F.12	IT Expenses	22	Please provide a schedule detailing IT costs by major capital project for the last seven fiscal years through the outlook period, and identify internal v. external costs for the historical period and for the outlook period.	To assess the amount spent on information technology and the reasonableness of costs forecast.
F.13	IT Expenses	22	Please provide Information Technology Costs broken down between Normal Operations, Initiative Implementation and Initiative Ongoing expenses, for the last five fiscal years and through the outlook period.	To assess the amount spent on information technology and the reasonableness of costs forecast.
F.14	IT Expenses	22	Please provide number of consultants supporting operating activities, general operating activities, compared to the number of consultants that are supporting improvement initiatives and their related annual costs for the last five fiscal years and forecast through each fiscal year in the outlook period.	To assess the extent MPI's reliance on external consultants impact operations.

F.15	IT Expenses	22	Please provide IT expenses for the last seven fiscal years and through the outlook period, and include two columns providing the compound annual growth rate separately for the historical period and for the outlook period.	To assess the amount spent on information technology and the reasonableness of costs forecast.
F.16	Project Costs	22	Please provide a budget comparison of capital master projects in excess of \$500 thousand by major component this fiscal year with the budget provided in the last application.	To provide context for amounts spent on IT projects and the relationship to revenue requirement.
F.17	Project Costs	22	Please provide listing, amount, categorization, and description of all requested funding envelopes reviewed by Board inclusive of resulting Board approval status.	To assess the amount spent on information technology, alignment to IT objectives and the reasonableness of requested costs.
F.18	Value Management	14	Please provide Value Management methodology inclusive of governance, monitoring process.	To review the methodology to review, approve, monitor IT and capital management projects.
F.19	Value Management	14	Please provide list, descriptions, assessment/reviews, financial cost/benefit metrics and respective business cases, funding envelopes for all IT initiatives.	To review the methodology to review, approve, monitor IT and capital management projects.
F.20	IT Expenses	22	Please provide IT expenses for each of the IT projects (non-Nova) for the current GRA, as well as three prior fiscal years where applicable. Please indicate if the project is a result of the Nova initiative.	To assess the amount spent on information technology projects (non-Nova) and the reasonableness of costs.

No.	Topic	Preliminary Issues List	Information Request	Rationale
<b><i>Operating &amp; Administrative Expenses (continued)</i></b>				
F.21	Consultant Recommendations	22	Please provide an update detailing the status of all recommendations made by the Gartner Group or any subsequent consultant, including any new recommendations, and highlight any changes in the recommendations or MPI's actions flowing from the recommendations from that provided last year.	To assess whether IT spending is just and reasonable.
F.22	Project Nova	21	Please provide details regarding the cancellation of Project Nova including, but not limited to: a) Results of Release 3 Discovery and decision-making process leading to Project Nova cancellation; b) Project closeout including final accounting; c) Treatment of capital expenditures, including reusability of previously developed assets, impairments, write-offs and costs deferred for regulatory purposes; d) MPI transition, strategy and proposed process to addressing legacy system risk and modernization; e) Learnings from Project Nova including but not limited to governance, vendor management, business capabilities; f) Steps and costs relating to Release 1 remediation; and g) Steps and costs relating to Release 2 remediation.	To understand the details regarding the cancellation of Project Nova.
F.23	Staffing Levels	9	Please file a corporate staffing analysis for Normal Operations.	To understand actual and forecast changes in staffing levels.

F.24	Staffing Levels	9	Provide a comparison of the prior GRAs staffing (Basic and Corporate) budget to actual staffing for the last full fiscal year of actuals.	To understand actual and forecast changes in staffing levels.
F.25	Staffing Levels	9	Please provide a schedule of Basic and Corporate Staffing Levels for the budget year.	To understand actual and forecast changes in staffing levels.
F.26	Staffing	9	Please provide a comparative organizational chart, indicating the number of staff in each department by level with that represented at the prior fiscal year's GRA. With a narrative description of changes.	To understand organizational changes from the prior fiscal year to assess organizational staffing.
F.27	Staffing Levels - IT	22	Please provide a comparison of staffing levels and comparison over the three prior GRAs, and future staffing levels (forecasted) by employee, and consultant/contractor. Please outline the general area of focus for these staff/consultants.	To understand the level of staffing (employee and consultants/contractors) for IT, and related trends.
F.28	Compensation	9	Please file an updated schedule of Basic compensation increases by category for the last five fiscal years through the outlook period.	To assess whether any increases in compensation costs are just and reasonable.
F.29	Compensation	9	Please file an updated schedule of average salary levels by classification for the last five fiscal years through the outlook period, showing compound annual growth rates separately for the historical period and the outlook period.	To assess whether any increases in salary levels are just and reasonable.

No.	Topic	Preliminary Issues List	Information Request	Rationale
<b><i>Operating &amp; Administrative Expenses (continued)</i></b>				
F.30	Salary Expenses	9	<p>Please file a table reflecting each of:</p> <ul style="list-style-type: none"> <li>a) Corporate Compensation Analysis - Normal Operations;</li> <li>b) Corporate Compensation/Payroll Costs - Normal Operations;</li> <li>c) Corporate Annual Compensation Changes - Normal Operations;</li> <li>d) Corporate Compensation Analysis - Corporate Total;</li> <li>e) Corporate Compensation/Payroll Costs - Corporate Total; and</li> <li>f) Corporate Annual Compensation Changes - Corporate Total.</li> </ul> <p>Please also file a similar analysis for Basic.</p>	To understand the changes in total compensation for the Corporation and its impact on Basic.
F.31	Operating Expenses	9	Please file a copy of the latest public compensation report prepared in accordance with the Public Sector Compensation Disclosure Act, together with the Auditor's report.	To understand changes in staffing expense.

F.32	Financial Forecast	4	Please file a copy of the most recent actuarial valuation reports pertaining to the pension and other benefit plans prepared by the external benefit consultant.	To understand financial impact on Basic insurance.
F.33	Budgeting Process	4	Please provide a detailed explanation of the corporation's budgeting processes. This should include: a) Identification of changes to budgeting processes from prior budgeting cycles, and b) Explanation of the effect of any budget alignment or adjustment conducted by corporate leadership following each division's bottom-up budgeting exercise.	To assess the prudence of budgeting processes and efficacy of cost containment efforts.

No.	Topic	Preliminary Issues List	Information Request	Rationale
<i>Road Safety &amp; Loss Prevention</i>				
G.1	Actual v. Budgeted Expenditures		Please provide a five year comparative history of actual v. budgeted expenditures by Road Safety and Loss Prevention program category.	To assess budgeted v. actual financial information.
G.2	Expense Forecast		Please provide a detailed forecast of Road Safety and Loss Prevention expenses by program through the outlook period.	To assess the amount spent on Road Safety.
G.3	Loss Prevention		Please provide a detailed Road Safety and Loss Prevention budget for the current year by specific program and compare that to actual spending for the last fiscal year.	To assess the amount spent and previously forecast to be spent on Road Safety.
G.4	Hot Maps		Please file updated Accident Maps.	To assess the Road Safety budget and expenditures in the context of collision frequency at specific locations.

No.	Topic	Preliminary Issues List	Information Request	Rationale
<b><i>Ratemaking</i></b>				
H.1	Indicated and Proposed Rate Level Changes	1	<p>Please provide a table reflecting the indicated rate change by Major Class together with the applied for rate changes.</p> <p>Please prepare an exhibit, with accompanying explanatory narrative, illustrating the transition from rate requirement indicators to requested revenue adjustments by Major Class.</p>	To provide context for any differences between indicated and proposed rate level changes by Major Class.
H.2	Claims Forecasting	10	For all selected regressions included in the ratemaking analysis, please provide a <u>graphical</u> representation, including display of actual data and fitted and selected trend lines, accompanied by the customary regression diagnostics.	To provide context for visually and statistically assessing the strength of the selected regressions.
H.3	Significant Changes to Methodology or Basis of Selection of Assumptions	2	Relative to the prior GRA, please provide a summary, with supporting rationale, for any significant changes to methodology or significant changes to the basis of selection of assumptions used in the derivation of the indicated changes in rate level in accordance with accepted actuarial practice in Canada, both overall and at the classification level.	To clearly document any sources of change in the derivation of rate indications.
H.4	Composition of Overall Required Rate	2	Please provide a comparative table for the current GRA and most recent prior GRA of the estimated dollar composition of the Income Sources and Expenditures, with accompanying narrative on any significant deviations.	To assess the stability of the rate setting forecasts.

H.5	Interest Rate Impact on Financial Forecast	4	Please provide details of the assumed Government of Canada bond yield, with the duration equal to the expected claims duration as well as yields/spreads for all asset classes supporting the claims portfolio. Please include detailed calculations, including assumed weightings.	To provide context for the financial forecast.
H.6	Interest Rate Impact on Financial Forecast	4	<p>Please provide a narrative explanation of the net impact of changes in interest rates impact to net income.</p> <p>Please provide the yield curve and implied average discount rate used for the calculation of the interest rate impact on claims incurred, and include the calculations used in the determination of the utilized yield curve.</p>	To provide context for the financial forecast.

No.	Topic	Preliminary Issues List	Information Request	Rationale
<b><i>Driver Safety Rating</i></b>				
I.1	Prospective Modeling Assumptions	12	<p>Please provide documentation of the DSR prospective modeling assumptions for each of the forecast years.</p> <p>Please display the forecasted number of Earned Drivers by DSR level for each of the forecast years.</p>	To provide context for assessing the revenue sensitivity of any changes to the DSR schedule.
I.2	Significant Changes to Methodology or Basis of Selection of Assumptions	12	Relative to the prior GRA, please provide a summary, with supporting rationale, for any significant changes to methodology or significant changes to the basis of selection of assumptions used in the derivation of the DSR indications.	To clearly document any sources of change in the derivation of indications.
I.3	Driver Safety Rating	12	For each of the last five (5) policy years, 2020 to 2024, please provide a chart comparing the DSR level with the actuarial discounts in each policy year, as well as the dollar difference and the number of clients within each separate DSR level.	To understand the disparity between DSR level discounts and actuarial discounts.

No.	Topic	Preliminary Issues List	Information Request	Rationale
<b>Valuation of Policy Liabilities</b>				
J.1	Runoff	15	In a single table, please provide the breakdown by insurance year and valuation line of business of the latest complete fiscal year Basic – Total (Net) – PIPP (undiscounted) runoff.	To document the financial impact of prior fiscal year claims activity on current fiscal year incurred claims.
J.2	Sources of Runoff	15	With respect to the latest complete fiscal year Basic – Total (Net) – PIPP (undiscounted) runoff, please provide a separation of the total amount of runoff into the portion attributable to changes in experience vs. the portion attributable to changes in valuation methodology vs. the portion attributable to changes in valuation assumptions, including commentary on the basis for this separation and the nature of and rationale for the changes.	To provide context for discussion of changes in valuation methodology or basis of selection of assumptions.
J.3	Regressions	2	For all selected regressions included in the valuation, please provide a <u>graphical</u> representation, including display of actual data and fitted and selected trend lines, accompanied by the customary regression diagnostics.	To provide context for visually and statistically assessing the strength of the selected regressions.

No.	Topic	Preliminary Issues List	Information Request	Rationale
<b><i>Financial Condition Test (FCT)</i></b>				
K.1	GRA Forecast vs. Financial Condition Test (FCT) Base Scenario	7	Please identify and justify all significant differences in modeling assumptions between the GRA Basic forecast and the FCT Base Scenario, and indicate which forecast represents the Corporation's best estimate projection of Basic operations.	To augment the GRA Basic forecast with any significant improvements to that forecast arising from the FCT process.
K.2	Basic Financial Condition Testing (FCT) Report	7	Please provide the most recent Basic FCT report. The FCT report should include a description of the development of the Base scenario, adverse scenarios, a description of the corrective management actions to mitigate risks and also include a signed opinion on the financial condition by the external Appointed Actuary.	The Basic FCT report examines various stress-testing processes to raise awareness of the significant risks faced by MPI. The primary goals of the FCT are to identify potential threats to the financial condition of the Basic line of business and consider appropriate risk management or corrective management actions to address those threats.
K.3	Basic FCT External Peer Review		Please provide the FCT External Peer Review report for Basic in the year in which it is completed as part of the triennial peer review cycle.	The objective of the peer review is to assist the PUB with the safety and soundness of MPI's Basic line of business and strengthen/maintain confidence in the work of the Appointed Actuary by the public and the PUB. The next report is expected October 2027.

K.4	Changes to OSFI MCT Guideline		Given the change in the OSFI MCT Guideline being used relative to the prior GRA, please include supporting details for the impact of the resulting change in the MCT ratio calculation for capital target determination.	To provide context for consideration of the MCT ratio as a basis for assessing changes in MPI Basic's financial strength, given the Board's earlier expressed understanding of "the merits of the MCT for providing a relatively simple, convenient and objective metric of Basic's relative financial strength".
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No.	Topic	Preliminary Issues List	Information Request	Rationale
<b><i>Extension</i></b>				
L.1	Extension - Actual vs. Budgeted Statement of Operations	4	Please provide a Pro Forma Statement of Operations for the Extension line of business including a comparative five fiscal year budget vs. actual history and including a five fiscal year forecast.	To demonstrate the accuracy of capital transfer forecast, at the line of business level.
L.2	Extension – Statement of Changes in Equity	7	Please provide a Pro Forma Statement of Changes in Equity including a five fiscal year history and five fiscal year forecast for the Extension line of business.	To demonstrate the accuracy of capital transfer forecast, at the line of business level.
L.3	Financial Forecast	4	With respect to the key assumption areas underlying the Extension Revenue Forecasts (e.g. volume, upgrade factors, product shifts, rate level change), please provide a ten fiscal year history of actual values shown beside the assumed values underlying the Extension forecast in EPF-1.	To assess reasonableness of Extension forecasts.
L.4	Financial Forecast	4	With respect to the key assumption areas underlying the Extension Claims Incurred Forecasts (e.g. by line annual rate of change for exposures, frequencies and severities), please provide a ten fiscal year history of actual values shown beside the assumed values underlying the Extension forecast in EPF-1.	To assess reasonableness of Extension forecasts.
L.5	Cost Allocation Methodology	4	Please provide a schedule that details line by line items shown in EPF-1 that are directly assigned versus those subject to allocation for each of the last five fiscal years and for each fiscal year of the forecast period.	To assess the reasonableness of the expenses allocated to Extension.

No.	Topic	Preliminary Issues List	Information Request	Rationale
<i>Extension (continued)</i>				
L.6	Cost Allocation Methodology	4	Please provide a comparative schedule of Basic v. Extension expenses, including the relative % of expenses allocated or forecast to be allocated to Extension for each of the last five fiscal years and for each fiscal year of the reporting period.	To assess the reasonableness of the expenses allocated to Extension.
L.7	Financial Forecast	4	Please provide a ten fiscal year history of Extension overall average rate level change indication, and the actual implemented overall rate level change as well as actual and anticipated profit margins over the rating period.	To assess the foundation for the Extension financial forecasts and the resulting expected transfers of excess capital from Extension to Basic.
L.8	Financial Forecast	4	Please provide the detail of Extension Normal Operating expenses for each of the last five fiscal years and each fiscal year of the forecast period, including the compound annual growth rates for each of the historical period and the forecast period.	To assess the reasonableness of the Extension forecast.
L.9	Transfers from Extension	7	Please provide a schedule with details of transfers from Extension to other lines of business in excess retained earnings from 2004 to present.	To understand the availability of funds for Basic from Extension. (2022 GRA MPI Exhibit #81)

**Party Asking]/[Party Responding] [Round]-[Question No.]**

<b>Part and Chapter:</b>		<b>Page #:</b>	
<b>Topic:</b>			
<b>Subtopic:</b>			

**Preamble (if any):**

**Question:**

**Rationale for Question:**

**Response:**