CMMG (MPI) 1-1

Part and Chapter:	**Part II – Legal Application**	**Page No.:**	**5 of 8**
PUB Approved Issue No:	**2. Ratemaking**		
Topic:	**b. Ratemaking Methodology**		
Sub Topic:			

Preamble to IR (If Any):

LA.1.4 states "In its 2027 GRA, MPI is seeking to recover forecasted initiative expenses of approximately $10.1 million"

Question:

a. If these initiative expenses are not deemed to be recoverable, where does this expense fall/who pays for them?

b. What would the required rate change be if recovery of these initiative expenses were disallowed (broken down by major class)?

Rationale for Question:

To determine the impact and responsibility of initiative expenses.

RESPONSE:

a. The MPI ratemaking process is on a break-even basis based on forecasted claims and expenses. If initiative expenses are not included in the ratemaking process, the expenses will come from the RSR as the Basic line of business is underpriced. Over time, this results in capital deficiency and a capital build application.

b. Please refer to *PUB (MPI) 1-6 part (a)* for the required rate change by major classes if recovery of initiative expenses were disallowed.

CMMG (MPI) 1-2

Part and Chapter:	**Part VIII - Revenues**	**Page No.:**	**15 of 37**
PUB Approved Issue No:	**2. Ratemaking**		
Topic:	**b. Ratemaking Methodology**		
Sub Topic:			

Preamble to IR (If Any):

Figure REV-15 Upgrade Forecast Comparison

Line No.		Vehicle Upgrade			DSR Upgrade		
1	Year	This Year	Last Year	Difference	This Year	Last Year	Difference
2	2025/26(a)	4.12%	3.37%	0.75%	-0.80%	0.04%	-0.84%
3	2026/27	4.46%	5.71%	-1.25%	-0.10%	0.05%	-0.15%
4	2027/28	2.84%	2.54%	0.31%	-0.20%	0.15%	-0.35%
5	2028/29	2.84%	2.54%	0.31%	0.14%	0.11%	0.04%
6	2029/30	2.84%	2.54%	0.31%	0.06%	0.04%	0.03%
7	2030/31	2.84%	n/a	n/a	-0.05%	n/a	n/a

"MPI forecasts the DSR upgrade factor based on the DSR simulation model (described in section REV.2.2)."

In comparison, 2026 GRA Figure Rev -10

June 25, 2025 2026 General Rate Application
Part X - Revenues

Figure REV- 10 Upgrade Forecast Comparison

Line No.		Vehicle Upgrade			DSR Upgrade		
1	Year	This Year	Last Year	Difference	This Year	Last Year	Difference
2	2024/25(a)	3.04%	2.38%	0.66%	-0.49%	0.05%	-0.55%
3	2025/26	3.37%	3.03%	0.33%	0.04%	0.09%	-0.05%
4	2026/27	5.71%	2.38%	3.33%	0.05%	-0.01%	0.06%
5	2027/28	2.54%	2.38%	0.16%	0.15%	-0.10%	0.25%
6	2028/29	2.54%	2.38%	0.16%	0.11%	0.07%	0.04%
7	2029/30	2.54%	n/a	n/a	0.04%	n/a	n/a

Question:

a. What is causing the larger discrepancy in last year's projected DSR upgrade factor for 2025/26 (Figure REV-15)?

b. It appears that the most recent year has the largest difference in the DSR upgrade factor (2025/26(a) in this year's GRA and 2024/25(a) in the 2026 GRA). Does MPI have a plan to improve the estimate for the first projected year? If so, please provide details on possible estimate improvements

Rationale for Question:

To determine the appropriateness of the DSR upgrade factor estimates

RESPONSE:

a) Please note that the indicated 2025/26 DSR upgrade of -0.80% is not comparable to the 0.04% forecast presented in 2026 GRA. This is partly because the indicated result is calculated using the approved 2026/27 DSR discount structure, while the forecast in the 2026 GRA was based on the 2025/26 DSR discounts.

Specifically, MPI determines the 2025/26 DSR upgrade by re-rating the in-force portfolio at two points in time using the approved 2026/27 rate table and DSR discounts. As a result, the indicated -0.80% reflects the movement of drivers through the DSR scale under the updated discount structure. In contrast, the 0.04% forecast was developed using the prior DSR discounts and therefore reflects a different basis.

b) Similar reasoning was discussed in 2026 GRA for 2024/25 on page 13 of *Part X REV 2.2*. The intent of the DSR upgrade component is to capture the impact of natural movements of drivers through the DSR scale, independent of any changes to the DSR discount structure itself.

MPI does not view the difference between the forecasted and indicated DSR upgrades as evidence of a material forecasting deficiency. Rather, the comparison reflects differing underlying discount assumptions. The proposed changes to DSR discounts are typically finalized near the end of the GRA process and are captured as part of MPI's overall rate indication, therefore not fully reflected in the original DSR upgrade forecast. Accordingly, MPI does not currently propose any changes to the DSR upgrade methodology.

CMMG (MPI) 1-3

Part and Chapter:	**Part VII – Rate Indication**	**Page No.:**	**20 of 36**
PUB Approved Issue No:	**2. Ratemaking**		
Topic:	**b. Ratemaking Methodology**		
Sub Topic:			

Preamble to IR (If Any):

> "The rate model does not account for the addition of the new Driver Safety Rating (DSR) level that was introduced by MPI in the 2025 GRA (DSR level +20), given that the population of vehicles is based on the population at November 1, 2025. To account for this, MPI forecasted an additional decrease in revenue from the additional movements not captured in the rate model (e.g., policies moving from DSR +19 to DSR +20). The estimated additional impact is a decrease of 0.85% to the average vehicle premium."

Question:

How is the additional impact of a 0.85% decrease selected?

Rationale for Question:

To understand how the decrease in premium is estimated

RESPONSE:

The additional impact arising from changes in the DSR levels is estimated by first summarizing policy counts by the DSR levels based on the November 1, 2025 population. Policies are then segmented according to their estimated renewal status. Policies that have already renewed into the 2025 rating year require one additional renewal to be fully on-level to the 2026 DSR levels, while policies that have not yet renewed require two renewals.

MPI then applies a transition matrix based on historical year-over-year movements in DSR levels to estimate the expected future distribution of policies across DSR levels. For DSR levels 19 and 20, the transition experience of DSR level 18 was used, as insufficient historical experience exists for levels 19 and 20.

The overall impact from DSR movements is determined by comparing the weighted average DSR discount under the current and projected DSR level distributions. To isolate the impact of the DSR level changes, the effect of natural DSR drift — which is already reflected in the premium trend — is removed. The resulting amount (decrease of 0.85%) represents the selected additional impact attributable to the DSR level changes.

This analysis is performed at the major class level, with impacts calculated separately for each major class and then aggregated to determine the overall impact.

CMMG (MPI) 1-4

Part and Chapter:	**Part VII – Dislocation Reports**		**Page No.:**	**13 of 20**
PUB Approved Issue No:		**2. Ratemaking**		
Topic:		**b. Ratemaking Methodology**		
Sub Topic:				

Preamble to IR (If Any):

"The 3.1% reflects the impact on the rate model population of vehicles (i.e., the population as of November 1, 2025). As discussed in RI.3, the use of a static population will not capture the additional movements for policies moving from DSR +19 to DSR +20. As a result, MPI expects an additional decrease of **– 0.7%**1 in premium revenue by rating year 2027/28 because of changes to the distribution of vehicles by DSR level. The total impact of both the 3.1% and -0.7% is the applied for overall rate change of 2.38% for rating year 2027/28.

"1 Using the DSR simulation model discussed in Revenues REV 2.2 with changes to the vehicle discount yields an overall DSR upgrade factor of -4.6%. The -**1.3%** is the calculated additional impact from DSR simulation and the rate model due to forecasted movements that are not captured by the rate model."

From Part VII – Rate Indication *Page 20 of 36*

"To account for this, MPI forecasted an additional decrease in revenue from the additional movements not captured in the rate model (e.g., policies moving from DSR +19 to DSR +20). The estimated additional impact is a decrease of **0.85%** to the average vehicle premium."

Question:

How do these different impacts of DSR Upgrades reconcile with one another (Figure REV 15 vs -0.85% vs -0.7% vs -1.3%)?

Rationale for Question:

To understand the different figures used for the additional revenue required

RESPONSE:

MPI would like to correct Footnote 1 in the Part VII Dislocation Report chapter. The footnote should read:

> *"[1] Using the DSR simulation model described in Revenue Requirement REV 2.2, incorporating the vehicle discount changes, results in an overall DSR upgrade factor of -**3.01%**. The **-0.7%** represents the additional impact estimated through the DSR simulation model and rate model to account for forecasted movements not captured within the rate model."*

Please note that these percentages measure different impacts and are applied to different bases. Therefore, they are not directly comparable.

- *Figure REV-15* reflects the annual premium trend applied to actual written premiums and is used within the Financial Forecast Models.
- The -0.85% represents the estimated adjustment required to align MPI's rate model, based on the in-force population as at November 1, 2025, with the approved 2026 DSR levels and vehicle discounts.
- The additional -0.7% reflects the estimated adjustment required to align the rate model with the forecasted 2027 DSR levels and vehicle discounts.

These additional adjustments are necessary because the rate model is based on an in-force population that has not yet fully renewed into the approved 2026 DSR levels and vehicle discounts. As a result, MPI must estimate the impacts associated with future DSR level and discount changes that are not yet reflected in the rate model.

CMMG (MPI) 1-5

Part and Chapter:	**Part VI – Claims Forecasting - Redacted**	**Page No.:**	**40 of 95**
PUB Approved Issue No:	**2. Ratemaking**		
Topic:	**b. Ratemaking Methodology**		
Sub Topic:			

Preamble to IR (If Any):

"As the increase in the Basic deductible from $750 to $1,000 reduces each affected Basic forecasted claim by up to $250, MPI recognizes that the severity trend applicable to claims settled at a $1,000 deductible may differ from the severity trend calculated at the prior $750 deductible level. MPI uses the historical data in Figure CF-12 to trend the losses for 2021-2025 to future accident years. This data is used to project the adjustment factor for a $1,000 deductible applicable to each forecasted year, as shown in the table below.

Question:

a) Does the loss trend analysis take into consideration that the data analyzed does not account for the increase in deductible when selecting the trend factor to apply? If so, how?

b) Did MPI do an analysis to estimate the possible difference and impacts of adjusting the historical data before the trend is analyzed? If so, please provide

c) What is the typical impact on trend with an increase in deductible? Does it increase or decrease the trend? Please comment on frequency, severity and loss cost

Rationale for Question:

To evaluate the impact of adjusting the losses for the increase in deductible before the trend analysis.

RESPONSE:

a) Yes, the loss trend analysis adjusts historical losses to the current product level, which reflects the $750 deductible level, prior to selecting the trend factor. The selected trend factors are based on historical losses adjusted to the current product level ($750 deductible). The impact of the planned increase to a $1,000 deductible is not reflected in the trend selection and is instead incorporated through the deductible adjustment factor applied after trending.

b) No, MPI did not perform a separate analysis to estimate the impact of adjusting the historical data for the deductible change prior to conducting the trend analysis.

c) MPI did not perform an analysis of the impact of the deductible increase on the selected trend factors. In general, increases in deductibles are expected to reduce claim frequency and aggregate loss costs, as smaller claims may no longer exceed the deductible threshold. The impact on average claim severity can vary depending on the relative reduction in claim counts and incurred losses. While deductible changes can affect the observed loss distribution, the direction and magnitude of any impact on measured severity trends is case-specific and depends on the underlying claims experience. Accordingly, MPI did not assume that the proposed deductible increase would systematically increase or decrease the selected trend factors and instead reflected the deductible change through a separate deductible adjustment factor.

CMMG (MPI) 1-6

Part and Chapter:	**Part VI – Claims Forecasting - Redacted**	**Page No.:**	**46 of 95**
PUB Approved Issue No:	**2. Ratemaking**		
Topic:	**b. Ratemaking Methodology**		
Sub Topic:			

Preamble to IR (If Any):

CF.7 Accident Benefits – Personal Care Assistance to CF.9.1 Accident Benefits - Other (Indexed) provides the current selected trends. As these sub-coverages are separated in this year's GRA, no comparison to prior selections is provided

Question:

a) Please provide a combined weighted current selections for coverages that were separated in this GRA so a comparison to prior selections can be made

Rationale for Question:

To evaluate the impact of separating the sub-coverages and implied change in trend selections

RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:

MPI is unable to provide a directly comparable combined current trend selection for the coverages that were separated in the 2027 GRA.

The current trends were selected separately based on the historical frequency, severity and loss cost experience of each underlying coverage. A weighted average of the separately selected trends would depend on the weighting basis used and would not represent the trend that would result from regression analysis of the combined historical experience.

Similarly, calculating the year-over-year change in the aggregate projected loss cost would not isolate the selected future trend. The projected loss costs reflect the cumulative effect of the selected trend, the changing mix of the underlying coverages, and other applicable forecast adjustments. Comparing that change to the prior combined trend selection could therefore obscure the underlying reasons for differences between the current and prior forecasts.

A directly comparable current selection would require MPI to recombine the historical losses and claim counts and perform the trend analysis and model-selection process on the combined experience. MPI did not perform such an analysis because Personal Care Assistance, Travel and Other (Indexed), and Attempted & Partial Theft and Entire Theft, were separately analyzed and projected in the 2027 GRA to better reflect their distinct claims experience.

CMMG (MPI) 1-7

Part and Chapter:	**Part VIII – REV Appendix 2**	**Page No.:**	**2 of 4**
PUB Approved Issue No:	**2. Ratemaking**		
Topic:	**b. Ratemaking Methodology**		
Sub Topic:			

Preamble to IR (If Any):

"Rate change – Historical overall rate change for Extension is provided in Figure EXP App 2-1. In the 2026 GRA, MPI increased the Basic deductible from $750 to $1,000 and introduced a $750 deductible option under Extension. This change facilitates the transition of customers to the new $750 deductible while maintaining premium neutrality. However, maintaining premium neutrality requires a reduction in profitability in the short term. To gradually return to the previous profitability levels while preventing rate shock for customers, MPI continues to assume a 2% rate increase year on year in the subsequent years.

2026 GRA Part VIII – RI Appendix 3 page 2 of 2 states

Figure RI App 3-2 2026 Product Change Impact

	Projected Avg Premium	Basic $750		Basic $1,000	
Line of Business	Before Rate Change	Avg Premium	Rate Change	Avg Premium	Rate Change
Basic	1,012.88	1,063.59	5.01%	1,033.86	2.07%
Extension $750	0.00	0.00	NA	29.73	NA
Total	1,012.88	1,063.59	5.01%	1,063.59	5.01%

Question:

a. In last year's GRA increasing the Basic Deductible lowered the required premium by $29.73. How does the presented illustration compare with the actual average premium charged for Extension to move back to a $750 deductible for the 2025/26 year?

b. What would be the overall required premium in this year's GRA without the increased in deductible (eg by removing the adjustments made to historical data for the increase in deductible)?

i. What is the increase in total claims cost by major class?

ii. What is the increase in pure premium by major class?

iii. What is the rate change required by major class?

Rationale for Question:

To understand the customer impact of increasing the Basic Deductible to average premiums

RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:

a) MPI assumes that CMMG is referring to actual results for the 2026/27 rating year. MPI does not believe that providing actual results would be representative of the transfer to Extension and therefore respectfully declines to provide the requested analysis. At present, MPI has only four complete months of actual experience for the 2026/27 rating year, which is insufficient to produce a reliable or representative assessment. In addition, the $29.73 figure was an estimate determined prior to the issuance of the PUB Order and was not based on subsequent actual experience.

   Further and in any event, premiums for the Extension line of business are outside the scope of the PUB's regulatory authority.

b) MPI will not be providing an alternative required premium that excludes the adjustments made to historical data to reflect deductible increases. Completing such an analysis would require significant effort and extensive rework of its claims forecasting and major class allocations, to name a few. Given the complexity of this exercise and the resources required to perform it, MPI does not believe that undertaking this work is feasible or proportionate to the value of the information that would be produced, particularly given that detailed consideration of the Basic deductible increase was an issue in the 2026 GRA.

CMMG (MPI) 1-8

Part and Chapter:	**Part VII – Risk Classification**	**Page No.:**	**17 of 40**
PUB Approved Issue No:	**2. Ratemaking**		
Topic:	**b. Ratemaking Methodology**		
Sub Topic:			

Preamble to IR (If Any):

> "RC.6.3 Motorcycles and Mopeds MPI also assigns motorcycles and mopeds to rate groups based on owner declared values. In 2021/22, the maximum declared value increased from $50,000 to $70,000, prompting MPI to expand the rate group range by introducing rate groups 10 and 11 to supplement the existing range of 0 to 9."

CLEAR assigns rate groups based on loss costs. Loss cost is frequency times severity. Declared value represents the severity component.

Question:

For each year in the last 5 years, please provide:

a) Collision and comprehensive claim counts by declared value ranges/rate group, body style and engine displacement
b) Collision and comprehensive claim amount totals by declared value ranges/rate group, body style and engine displacement
c) Exposure counts by declared value ranges/rate group, body style and engine displacement

Rationale for Question:

To understand the appropriateness of using declared value alone to determine rate group and if frequency varies by declared value.

RESPONSE:

In response to parts (a), (b), and (c), *Appendix 1* provides five years of historical collision claim counts, collision incurred losses before and after adjustment for product change impacts, and earned units, which are used as the exposure measure, for major class 4. The data is summarized by rate group, body style and engine displacement with motorcycle declared value ranges associated with each rate group provided in Table 1-1 in *Appendix 1*.

Basic comprehensive coverage is not available for motorcycles and mopeds; therefore, comprehensive claim counts and incurred losses are not applicable and have not been provided.

1-1

Vehicle Rate Groups - Motorcycle / Mopeds

RATE GROUP	0*	1	2	3	4	5	6	7	8	9	10	11
						DECLARED VALUE						
FROM ($):		0	1501	2001	4001	8001	14001	20001	30001	40001	50001	60001
TO ($):		1500	2000	4000	8000	14000	20000	30000	40000	50000	60000	70000

*Note Antique Motorcycles are assigned RG 0 as they are not rated based on declared value.

1-2

MC4 Collision Claim Counts

Rate Group	2021	2022	2023	2024	2025
1 *	9	2	4	8	4
2	4	1	6	1	5
3	31	25	24	31	35
4	78	66	55	74	60
5	73	83	66	82	76
6	58	40	40	45	43
7	32	29	30	40	28
8	13	20	18	24	28
9	6	8	11	11	17
10	0	0	2	5	3
11	0	1	2	0	2
Total	304	275	258	321	301
Bodystyle					
Motorscooter **	16	14	10	17	5
Other	130	119	80	111	115
Sport	50	34	58	65	53
Sport-Touring	19	19	13	19	14
Touring	89	89	97	109	114
Total	304	275	258	321	301
Engine Displacement					
0 to 500 cc ***	44	31	35	45	35
501 to 1000 cc	84	61	70	98	83
> 1000 cc	176	183	153	178	183
Total	304	275	258	321	301

Notes:

* Includes historical experience for Rate Group 0 due to the $1000 Basic deductible

** Includes Moped/Mobility Vehicle

*** All Moped/Mobility Vehicle assumed less than or equal to 500 cc

1-3

MC4 Collision Incurred Amount

Rate Group	2021	2022	2023	2024	2025
1 *	4,301	1,071	1,428	9,205	4,827
2	2,901	211	9,662	154	7,426
3	71,848	56,365	65,346	70,696	85,495
4	302,909	241,754	204,621	298,363	248,104
5	415,451	447,360	466,969	509,711	444,505
6	374,006	274,334	359,167	325,961	356,784
7	294,318	208,688	368,765	361,300	299,368
8	112,557	155,044	149,813	205,783	280,567
9	96,088	38,590	140,333	99,459	207,295
10	0	0	10,104	56,775	46,385
11	0	19,057	32,938	0	58,365
Total	1,674,378	1,442,474	1,809,145	1,937,406	2,039,121
Bodystyle					
Motorscooter **	25,123	27,913	23,300	25,527	5,833
Other	609,660	584,445	387,195	651,049	558,393
Sport	242,044	153,051	351,751	270,060	319,404
Sport-Touring	101,303	66,598	96,569	136,129	58,823
Touring	696,247	610,468	950,330	854,642	1,096,668
Total	1,674,378	1,442,474	1,809,145	1,937,406	2,039,121
Engine Displacement					
0 to 500 cc ***	103,821	91,806	99,902	176,434	113,591
501 to 1000 cc	370,091	260,231	400,049	454,449	435,718
> 1000 cc	1,200,466	1,090,437	1,309,194	1,306,523	1,489,812
Total	1,674,378	1,442,474	1,809,145	1,937,406	2,039,121

Notes:

* Includes historical experience for Rate Group 0 due to the $1000 Basic deductible

** Includes Moped/Mobility Vehicle

*** All Moped/Mobility Vehicle assumed less than or equal to 500 cc

1-4

MC4 Collision Incurred Amount
(Adjusted for Product Change Impact)

Rate Group	2021	2022	2023	2024	2025
1 *	4,076	1,071	1,178	8,980	4,577
2	2,651	211	8,662	154	6,776
3	66,053	54,615	62,346	69,621	80,745
4	287,154	235,429	197,871	290,320	241,104
5	402,796	440,072	457,945	502,461	434,880
6	363,256	270,334	353,604	319,184	351,784
7	288,318	204,992	364,390	357,987	297,118
8	111,057	153,544	147,563	203,619	278,292
9	95,588	37,590	139,583	97,959	205,795
10	0	0	9,913	56,275	46,135
11	0	19,057	32,688	0	57,865
Total	1,620,949	1,416,916	1,775,743	1,906,559	2,005,071
Bodystyle					
Motorscooter **	23,353	26,838	22,800	24,134	5,683
Other	586,256	573,248	377,671	641,697	547,018
Sport	233,039	150,051	343,813	262,685	311,654
Sport-Touring	96,803	65,598	94,444	134,129	56,823
Touring	681,497	601,180	937,014	843,915	1,083,893
Total	1,620,949	1,416,916	1,775,743	1,906,559	2,005,071
Engine Displacement					
0 to 500 cc ***	96,551	89,731	96,402	174,529	109,441
501 to 1000 cc	356,836	254,481	390,337	443,761	425,218
> 1000 cc	1,167,562	1,072,704	1,289,004	1,288,270	1,470,412
Total	1,620,949	1,416,916	1,775,743	1,906,559	2,005,071

Notes:

* Includes historical experience for Rate Group 0 due to the $1000 Basic deductible

** Includes Moped/Mobility Vehicle

*** All Moped/Mobility Vehicle assumed less than or equal to 500 cc

1-5

MC4 Earned Units

Rate Group	2021	2022	2023	2024	2025
1 *	1,281	1,118	1,011	893	829
2	686	687	664	601	603
3	2,794	2,833	2,863	2,766	2,698
4	4,319	4,488	4,781	4,948	5,179
5	4,177	4,325	4,604	4,803	5,037
6	2,529	2,638	2,768	2,874	2,979
7	1,867	1,902	2,026	2,066	2,193
8	937	992	1,086	1,168	1,229
9	329	311	395	481	536
10	23	79	122	166	206
11	7	36	49	68	94
Total	18,949	19,410	20,367	20,835	21,582
Bodystyle					
Motorscooter **	2,062	2,059	2,037	1,849	1,751
Other	8,422	8,667	9,042	9,241	9,510
Sport	1,474	1,507	1,614	1,753	1,932
Sport-Touring	998	1,105	1,258	1,376	1,515
Touring	5,993	6,071	6,417	6,617	6,873
Total	18,949	19,410	20,367	20,835	21,582
Engine Displacement					
0 to 500 cc ***	4,049	4,276	4,502	4,527	4,663
501 to 1000 cc	4,380	4,494	4,810	5,030	5,227
> 1000 cc	10,519	10,639	11,055	11,278	11,691
Total	18,949	19,410	20,367	20,835	21,582

Notes:

* Includes historical experience for Rate Group 0 due to the $1000 Basic deductible

** Includes Moped/Mobility Vehicle

*** All Moped/Mobility Vehicle assumed less than or equal to 500 cc

1-1

Vehicle Rate Groups - Motorcycle / Mopeds

RATE GROUP	0*	1	2	3	4	5	6	7	8	9	10	11
						DECLARED VALUE						
FROM ($):		0	1501	2001	4001	8001	14001	20001	30001	40001	50001	60001
TO ($):		1500	2000	4000	8000	14000	20000	30000	40000	50000	60000	70000

*Note Antique Motorcycles are assigned RG 0 as they are not rated based on declared value.

1-2

MC4 Collision Claim Counts

Rate Group	2021	2022	2023	2024	2025
1 *	9	2	4	8	4
2	4	1	6	1	5
3	31	25	24	31	35
4	78	66	55	74	60
5	73	83	66	82	76
6	58	40	40	45	43
7	32	29	30	40	28
8	13	20	18	24	28
9	6	8	11	11	17
10	0	0	2	5	3
11	0	1	2	0	2
Total	304	275	258	321	301
Bodystyle					
Motorscooter **	16	14	10	17	5
Other	130	119	80	111	115
Sport	50	34	58	65	53
Sport-Touring	19	19	13	19	14
Touring	89	89	97	109	114
Total	304	275	258	321	301
Engine Displacement					
0 to 500 cc ***	44	31	35	45	35
501 to 1000 cc	84	61	70	98	83
> 1000 cc	176	183	153	178	183
Total	304	275	258	321	301

Notes:

* Includes historical experience for Rate Group 0 due to the $1000 Basic deductible

** Includes Moped/Mobility Vehicle

*** All Moped/Mobility Vehicle assumed less than or equal to 500 cc

1-3

MC4 Collision Incurred Amount

Rate Group	2021	2022	2023	2024	2025
1 *	4,301	1,071	1,428	9,205	4,827
2	2,901	211	9,662	154	7,426
3	71,848	56,365	65,346	70,696	85,495
4	302,909	241,754	204,621	298,363	248,104
5	415,451	447,360	466,969	509,711	444,505
6	374,006	274,334	359,167	325,961	356,784
7	294,318	208,688	368,765	361,300	299,368
8	112,557	155,044	149,813	205,783	280,567
9	96,088	38,590	140,333	99,459	207,295
10	0	0	10,104	56,775	46,385
11	0	19,057	32,938	0	58,365
Total	1,674,378	1,442,474	1,809,145	1,937,406	2,039,121
Bodystyle					
Motorscooter **	25,123	27,913	23,300	25,527	5,833
Other	609,660	584,445	387,195	651,049	558,393
Sport	242,044	153,051	351,751	270,060	319,404
Sport-Touring	101,303	66,598	96,569	136,129	58,823
Touring	696,247	610,468	950,330	854,642	1,096,668
Total	1,674,378	1,442,474	1,809,145	1,937,406	2,039,121
Engine Displacement					
0 to 500 cc ***	103,821	91,806	99,902	176,434	113,591
501 to 1000 cc	370,091	260,231	400,049	454,449	435,718
> 1000 cc	1,200,466	1,090,437	1,309,194	1,306,523	1,489,812
Total	1,674,378	1,442,474	1,809,145	1,937,406	2,039,121

Notes:

* Includes historical experience for Rate Group 0 due to the $1000 Basic deductible

** Includes Moped/Mobility Vehicle

*** All Moped/Mobility Vehicle assumed less than or equal to 500 cc

1-4

MC4 Collision Incurred Amount
(Adjusted for Product Change Impact)

Rate Group	2021	2022	2023	2024	2025
1 *	4,076	1,071	1,178	8,980	4,577
2	2,651	211	8,662	154	6,776
3	66,053	54,615	62,346	69,621	80,745
4	287,154	235,429	197,871	290,320	241,104
5	402,796	440,072	457,945	502,461	434,880
6	363,256	270,334	353,604	319,184	351,784
7	288,318	204,992	364,390	357,987	297,118
8	111,057	153,544	147,563	203,619	278,292
9	95,588	37,590	139,583	97,959	205,795
10	0	0	9,913	56,275	46,135
11	0	19,057	32,688	0	57,865
Total	1,620,949	1,416,916	1,775,743	1,906,559	2,005,071
Bodystyle					
Motorscooter **	23,353	26,838	22,800	24,134	5,683
Other	586,256	573,248	377,671	641,697	547,018
Sport	233,039	150,051	343,813	262,685	311,654
Sport-Touring	96,803	65,598	94,444	134,129	56,823
Touring	681,497	601,180	937,014	843,915	1,083,893
Total	1,620,949	1,416,916	1,775,743	1,906,559	2,005,071
Engine Displacement					
0 to 500 cc ***	96,551	89,731	96,402	174,529	109,441
501 to 1000 cc	356,836	254,481	390,337	443,761	425,218
> 1000 cc	1,167,562	1,072,704	1,289,004	1,288,270	1,470,412
Total	1,620,949	1,416,916	1,775,743	1,906,559	2,005,071

Notes:

* Includes historical experience for Rate Group 0 due to the $1000 Basic deductible

** Includes Moped/Mobility Vehicle

*** All Moped/Mobility Vehicle assumed less than or equal to 500 cc

1-5

MC4 Earned Units

Rate Group	2021	2022	2023	2024	2025
1 *	1,281	1,118	1,011	893	829
2	686	687	664	601	603
3	2,794	2,833	2,863	2,766	2,698
4	4,319	4,488	4,781	4,948	5,179
5	4,177	4,325	4,604	4,803	5,037
6	2,529	2,638	2,768	2,874	2,979
7	1,867	1,902	2,026	2,066	2,193
8	937	992	1,086	1,168	1,229
9	329	311	395	481	536
10	23	79	122	166	206
11	7	36	49	68	94
Total	18,949	19,410	20,367	20,835	21,582
Bodystyle					
Motorscooter **	2,062	2,059	2,037	1,849	1,751
Other	8,422	8,667	9,042	9,241	9,510
Sport	1,474	1,507	1,614	1,753	1,932
Sport-Touring	998	1,105	1,258	1,376	1,515
Touring	5,993	6,071	6,417	6,617	6,873
Total	18,949	19,410	20,367	20,835	21,582
Engine Displacement					
0 to 500 cc ***	4,049	4,276	4,502	4,527	4,663
501 to 1000 cc	4,380	4,494	4,810	5,030	5,227
> 1000 cc	10,519	10,639	11,055	11,278	11,691
Total	18,949	19,410	20,367	20,835	21,582

Notes:

* Includes historical experience for Rate Group 0 due to the $1000 Basic deductible

** Includes Moped/Mobility Vehicle

*** All Moped/Mobility Vehicle assumed less than or equal to 500 cc

CMMG (MPI) 1-9

Part and Chapter:	**Part VII – RC Appendix 6**	**Page No.:**	**3 of 15**
PUB Approved Issue No:	**11. Driver Safety Rating (DSR)**		
Topic:			
Sub Topic:			

Preamble to IR (If Any):

> "MPI did not use the data for merit-eligible motorcycles and merit-eligible motorhomes. These vehicle types are not considered 'typical' because they are insured by a small subset of Manitobans. Further, given their seasonal nature, these vehicle types do not reflect the same risk as vehicles that are used throughout the year. Finally, the riskiness of these vehicle types is different than the more general passenger vehicles and light trucks (e.g., there is a higher proportion of PIPP losses to total losses for motorcycles)1."

Noting that:

- The data uses claims experience for all months of the year and DSR discounts are annual percentages.
- Manitoba population can be broken into different subsets. Exposures in Territory 4 is small, for example.
- Short rate cancellation can account for seasonal use when calculating earned exposures
- DSR discount is applied to total premium, including PIPP

Question:

Please expand why motorcycle data should be excluded from the analysis to determine the DSR indication.

Rationale for Question:

To understand the appropriateness of excluding motorcycles experience when determining DSR discounts

RESPONSE:

As described in *Part VII RC Appendix 6 Section 2.2* in 2027 GRA, motorcycle vehicle types are not considered representative of the broader merit-eligible vehicle population due to their limited exposure, seasonal nature, and distinct risk characteristics.

In particular, motorcycle claim experience differs from that of passenger vehicles and light trucks, including a higher proportion of Personal Injury Protection Plan (PIPP) losses relative to total losses. Further, MPI currently uses one DSR scale for all merit eligible vehicles as prescribed by legislation. The DSR level represents the driving behaviour of an individual, including scenarios where the individual drives multiple classes of vehicles.

As a result, incorporating motorcycle experience into the DSR analysis could introduce vehicle-specific effects that are not representative of the broader merit-eligible population for which the DSR framework is intended.

CMMG (MPI) 1-10

Part and Chapter:	**Part VII – RC Appendix**	**Page No.:**	**5 of 9**
PUB Approved Issue No:	**2. Ratemaking**		
Topic:	**b. Ratemaking Methodology**		
Sub Topic:			

Preamble to IR (If Any):

Rate Line Relativities
Motorcycle Relativity
(Credibility-Weighted)

Rate Group	2027 GLM	2026 GLM	2026 MBP
1	0.9595	0.9611	0.9579
2	0.9626	0.9666	0.9625
3	0.9744	0.9749	0.9736
4	1.0000	1.0000	1.0000
5	1.0318	1.0318	1.0313
6	1.0710	1.0728	1.0702
7	1.1153	1.1191	1.1133
8	1.1693	1.1777	1.1692
9	1.2350	1.2551	1.2463
10	1.2786	1.3038	1.2995
11	1.3494	1.3778	1.3843

Question:

How does the 2026 GLM have values for Rate Groups 10 and 11 if they were only introduced in this year's GRA?

Rationale for Question:

To understand the results of the GLM model comparison

RESPONSE:

Rate Groups 10 and 11 were not introduced as part of the current 2027 GRA. Rather, they were introduced in 2021/22 when the maximum declared value threshold was increased from $50,000 to $70,000, as described in *Part VII RC 6.3*. Accordingly, Rate Groups 10 and 11 were already present in the data used to develop the 2026 GLM model.

CMMG (MPI) 1-11

Part and Chapter:	**Part VII – RC Appendix 2b**	**Page No.:**	**5 of 16**
PUB Approved Issue No:	**2. Ratemaking**		
Topic:	**b. Ratemaking Methodology**		
Sub Topic:			

Preamble to IR (If Any):

For the 2027 GRA, DSR is modeled directly as an explanatory variable, following the same approach taken in 2026 GRA. This approach reflects the timing reality that proposed DSR discounts are typically finalized after the rate line relativity analysis. All DSR levels, both positive and negative, are treated as distinct categories without curve fitting. This approach simplifies the modeling process while maintaining alignment with the current structure of MPI's risk classification framework.

Implementation of Order 4/23, Directive 16 moves vehicle discounts one half of the way to the actuarially indicated percentage.

Question:

For the questions below, please comment on the appropriateness of its use in the rate line relativity models, overfitting risk, impact on the signal/lift of other explanatory variables.

a. Please explain why using the entire DSR categories in the GLM are preferred compared to using the current DSR discounts offset?

b. Please explain why using entire DSR categories in the GLM are preferred compared to using an offset of halfway to the DSR indicated discount?

c. Please explain why using the entire DSR categories in the GLM are preferred compared to a curve?

Rationale for Question:

To understand the appropriateness of using DSR as a categorical variable on the GLM model

RESPONSE:

a) MPI did not use the current DSR discounts as offsets in the Rate Line Relativities GLM models. The purpose of including DSR in the GLM is to control for observed differences in driver risk, rather than to reproduce the current discount structure. Using the current discounts as fixed offsets could limit the model's ability to isolate the actual DSR-related risk differences present in the experience data. Any remaining DSR effect could then be attributed to other explanatory variables, potentially biasing the estimated rate group relativities.

   MPI does not believe this approach introduces a material overfitting risk or distorts the estimated effects of other explanatory variables. Rather, inclusion of DSR as an explanatory variable helps reduce potential confounding by ensuring differences in driver risk are appropriately recognized within the model, rather than being attributed to other rating variables.

   As MPI continues its transition toward a more comprehensive GLM-based ratemaking framework, alternative approaches to incorporating DSR, including offsets or other parameterizations, may be considered where appropriate. However, at this stage of implementation, MPI's focus was on producing stable and credible relativity results that remain aligned with the existing ratemaking framework.

b) Please refer to part a).

c) Similar to MPI's response in part a), MPI considered it appropriate to retain DSR as individual categories rather than applying a curve in the Rate Line Relativities

GLM models. Treating DSR levels as distinct categories allows the model to account directly for observed differences in driver risk without imposing a specific functional form on the relationship. While fitting a curve to smooth the DSR discounts may be appropriate for developing an intuitive discount scale, DSR serves as a control variable in the Rate Line Relativities in GLM. Accordingly, MPI considered it more appropriate to use the observed DSR categories directly to ensure DSR related effects are captured within the model rather than reflected in other rating variables.

CMMG (MPI) 1-12

Part and Chapter:	**Part VII – RC Appendix 2b**	**Page No.:**	**14 of 16**
PUB Approved Issue No:	**2. Ratemaking**		
Topic:	**b. Ratemaking Methodology**		
Sub Topic:			

Preamble to IR (If Any):

DSR (Parameters 17 through 56): The model indicates that the only statistically significant DSR levels are DSR level -20, -13, -12, -8, -4 to 1, 3, 4, 6 and 18. All other DSR level standard errors (%) are above 50%, indicating their coefficient estimates are statistically insignificant or may require the use of other statistical diagnostics to determine their value to the model.

Question:

a. The model indicates that only a subset of DSR levels are significant. Are insignificant DSR levels still included in the final model when determining the rate line relativities?

b. Are other insignificant variables (excluding Accident Year) included when determining the final rate line relativities?

c. If yes to 2 or 3, please comment on the appropriateness of not removing the insignificant variables/categories and keeping them impacts, fit on sample data, statistical tests, model coefficients, impact on the signal/lift of other explanatory variables.

Rationale for Question:

To understand the use of the GLM outputs in the rate line relativity analysis

RESPONSE:

a) and b) Yes.

c) DSR levels and other rating variables (for example Territory 3, 4 and 5) that are not individually statistically significant remain in the final Rate Line Relativities in MPI's Generalized Linear Models (GLM). Variables such as DSR and Territory are included

as control variables to account for differences in risk characteristics and reduce potential confounding effects in the estimation of rate group relativities. The fitted relativities for these variables are conditional on the model specification and are not used directly in ratemaking.

Consistent with the approach used in the 2026 GRA, all relativities, including those that are not individually statistically significant, were retained to align with the current risk classification framework and support comparability between the GLM and Minimum Bias Procedure (MBP) methodologies. In some cases, statistical insignificance may reflect limited volume within a particular category rather than a lack of underlying relationship.

MPI considers this approach appropriate for the 2027 GRA as it supports a smooth transition to GLM-based ratemaking while minimizing customer dislocation and maintaining comparability with the historical MBP approach used in developing rate group relativities. As MPI continues to mature its GLM-based ratemaking framework, it may evaluate opportunities for further refinement and enhancement where appropriate.

CMMG (MPI) 1-13

Part and Chapter:	**Part II – COM Appendix 7**	**Page No.:**	**74 of 153**
PUB Approved Issue No:	**20. Road Safety**		
Topic:	**Motorcycle Collisions**		
Sub Topic:			

Preamble to IR (If Any):

MPI completed a collision analysis of motorcycle collisions which identified certain key findings related to motorcycle collisions.

The purpose of the motorcycle collision analysis was to identify opportunities for collision prevention for motorcyclists through analysis of collisions involving motorcycles.

The motorcycle collision analysis was presented to CMMG in July 2025.

Question:

a. Please file a copy of the motorcycle collision analysis and findings.

b. Since the motorcycle collision analysis has been completed, what changes has MPI made to its road safety strategy for motorcyclists in consideration of the findings of the study?

    i. Where changes have not been made, please identify what plans MPI has to modify or update its road safety strategy for motorcyclists in consideration of the findings of the study?

c. Since the motorcycle collisions analysis has been completed, please identify how MPI has modified messaging to motorcyclists and/or motorists to specifically address the key issues identified in the analysis.

Rationale for Question:

To examine how MPI is adjusting its road safety strategy and messaging in light of findings from the motorcycle collision analysis.

RESPONSE:

a. Please see ***Appendix 1*** for a copy of the Motorcycle Collision Analysis.
Note: The purpose of the motorcycle collision analysis was to identify opportunities to prevent collisions involving motorcyclists through analysis of motorcycle-involved collisions. The analysis was not developed for ratemaking purposes or to assess motorcycle insurance premiums. Therefore, the findings should not be used to draw conclusions regarding ratemaking or motorcycle insurance rates.

b. As the Motorcycle Collision Analysis was completed before the development of MPI's Road Safety Strategy 2030 (RSS 2030), it served as one of many inputs used to inform the Strategy's approach to motorcycle safety.

MPI undertook an extensive engagement process with road safety stakeholders and Manitobans across the province to gather input and insights that helped inform RSS 2030. This work included stakeholder and public surveys, as well as one-on-one meetings with key stakeholders, including the CMMG.

Key insights from those engagements, which aligned with findings from the analysis, included the need to increase motorcycle awareness among all road users, expand access to modernized rider training, improve data sharing and insights, and strengthen collaboration among road safety partners. This feedback helped shape the Strategy's focus on coordinated road safety messaging, education and training, stakeholder engagement, and shared responsibility for improving motorcycle safety in Manitoba.

In response to findings that highlighted the importance of rider training and motorist awareness, as well as stakeholder engagement and discussion at the

2026 Technical Conference, MPI has committed to working with stakeholders to explore enhancements to motorcycle training and to review motorcycle-related content in the Driver's Handbook and other driver education materials.

Motorcycle safety is reflected in RSS 2030 as part of the broader commitment to reducing serious injuries and fatalities for all road users through education, awareness, collaboration, and evidence-based road safety initiatives. RSS 2030 recognizes motorcyclists as vulnerable road users and incorporates motorcycle safety within its shared-responsibility approach to road safety. More specifically:

- *Pillar 1: Building a Culture of Road Safety* - Motorcycle safety is reflected through efforts to increase awareness and understanding of vulnerable road users. This includes promoting safe interactions between motorists and motorcyclists, delivering public education campaigns, and fostering a culture in which all road users recognize their shared responsibility for road safety. RSS 2030 emphasizes education and awareness as key tools for reducing harm on Manitoba roads.

- *Pillar 2: Strengthening Partnerships Through Shared Responsibility* - Stakeholder feedback highlighted the need for stronger coordination, better data sharing, and more consistent road safety messaging. In RSS 2030, motorcycle safety is supported through collaboration with motorcycle interest groups such as the CMMG, rider training providers such as Safety Service Manitoba, law enforcement, municipalities, and other community partners – all of whom participate in the Community Partners in Road Safety Committee. Consistent with RSS 2030's emphasis on shared responsibility and stakeholder engagement, MPI will continue to engage and collaborate with these partners to identify emerging issues, share information, inform road safety initiatives, and support ongoing efforts to reduce motorcycle-related collisions, injuries, and fatalities in Manitoba.

- *Pillar 3: Shaping Safer Driving Behaviours* - This pillar has the most direct connection to motorcycle safety. For motorcyclists, this includes promoting safe riding behaviours, encouraging training and skill development, and expanding access to training opportunities. For drivers, this includes increasing driver awareness of motorcycles on the road through updates to driver education curriculum and training materials such as MPI's Driver's Handbook. This work will be supported by stakeholder collaboration and informed by data and analysis, including findings from MPI's Motorcycle Collision Analysis and analysis of customers' Knowledge Test results related to motorcycles (*see Day 1, Session 1: Review of 2024 Technical Conference Commitments of MPI's 2026 Technical Conference presentation*).

b(i). Not applicable.

c. Following the 2025 completion of the motorcycle collision analysis, MPI reviewed its motorcycle safety communications and adjusted messaging to better address a few collision factors identified through the analysis.

A key finding was that many of the contributing factors of motorcyclist and vehicle collisions shared a common theme: motorists failed to notice, detect, or properly identify motorcyclists in traffic. Based on these findings, and feedback received from CMMG, MPI has put messages like "Look Twice for Motorcyclists" and "See the Rider" into market over the past two years. This messaging encourages motorists to be more aware of motorcycles and to reinforce the presence of a person behind every motorcycle.

For its most recent spring/summer 2026 campaign, MPI worked with CMMG to develop a campaign that featured some of its members—real-life Manitoban riders—to further humanize motorcyclists. MPI values the relationship it has with CMMG and the perspectives shared in helping to develop creative concepts that resonate with both motorists and riders.

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Motorcycle Collision Analysis Findings

Overview

Purpose

As stated in the project charter, the purpose of the following analysis is to identify opportunities for collision prevention for motorcyclists through analysis of collisions involving motorcycles.

To achieve this purpose, this analysis assesses the characteristics of collisions involving motorcycles and performs a deep dive into the major contributing factors associated with motorcycle collisions.

Scope

The following points were deemed **in-scope** for this analysis.

- Gather data on relevant motorcycle collisions from 2019-2023 from MPI databases.
- Analyze the types and causes of motorcycle collision by injury status (Physical Damage Only, Injury, Fatality)
- Assess variables that significantly impact injury and fatality motorcycle collisions.
- Share findings with CMMG and integrate subject matter expertise into interpretation of data.
- Provide recommendations on areas to focus on to prevent motorcycle collisions in Manitoba.

The following was deemed **out-of-scope** for this analysis.

- Any analysis or use of the data related to ratemaking or motorcycle insurance premiums. While both MPI and CMMG understand the importance of these areas, we agree that this data and analysis is solely applicable to collision prevention and safety improvements.
- Any potential safety initiatives that arise from this project's findings. This project will be deemed complete once the set of recommendations has been developed.

Based on the above, the following are some high-level characteristics of the data pulled for the following analysis.

- The motorcycle collision data was queried on December 18, 2024, and covers the 2019 - 2023 calendar years. This includes all incidents involving a motorcycle, except incidents classified as "Glass Only" which are chips in glass usually due to small stones.
- The three injury levels used in this analysis are Physical Damage Only (PDO), Injury (Any level of injury except fatality), and Fatal. These injury levels indicate the highest level of injury sustained by a motorcyclist involved in a collision.
- The analysis does not make a distinction between at-fault or not-at-fault collisions. If a motorcyclist is riding too fast for the conditions, the relevance to our situation is not whether this factor would contribute to the motorcyclist being at-fault or not.

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Project process

This following is the process taken from initial conception to final analysis.

1. Discussed the upcoming analysis during the 2024 PUB Hearings.
2. MPI and CMMG held a kick-off meeting to discuss the purpose of the analysis, scope of the analysis, and how findings might be used.
3. MPI and CMMG agreed to a project charter.
4. MPI conducted a descriptive analysis to obtain a detailed understanding of the characteristics of collisions involving motorcycles with the intent to identify variables that are of greatest concern in the causes of motorcycle collisions.
5. MPI shared the descriptive analysis with CMMG for review, met to discuss findings, then identified areas for a more detailed analysis.
6. MPI conducted more detailed analysis of agreed-upon areas, developed recommendations, and shared final draft of analysis with CMMG for review.

Recommendations

These are the recommended areas to focus on based on the analysis.

1. Motorcyclists under 30 years of age get into twice as many collisions as motorcyclists between 30 and 59 years of age: 63 versus 32 collisions per 10,000 motorcyclists. Prioritizing the development of a safer riding culture among younger motorcyclists should be a key area of focus.

2. Careless driving is the primary factor in motorcycle collisions and is included in 28% of such incidents. These primarily involve reckless driving behaviours, such as motorcyclists following too closely, changing lanes unsafely, or losing control of the motorcycle. Enhancing education and/or training on increasing awareness of surroundings and handling may help reduce the occurrence of these collisions.

3. Of the collisions involving careless driving, 25% are related to navigating atypical road surface conditions, such as gravel roads, potholes or debris. This includes taking appropriate measures when navigating turns, exit ramps, or slippery surfaces such as dirt, gravel, or sand. However, a more holistic approach is likely required to reduce these instances further. The work of the MTI-CMMG Motorcycle Road Debris Working Group is expected to include recommendations in this area.

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Descriptive Characteristics of Motorcycle Collisions

Population Statistics

On average there are 86,393 motorcyclists with active licences in each calendar year from 2019 – 2023, and about 86% of them are male. Note that not all individuals with a valid licence actively own a motorcycle. This analysis focuses on the most frequent types and causes of collisions and is not designed to compare collision rates across groups of motorcyclists. This data and analysis is not appropriate for a rate-based analysis.

In an average year, the number of collisions involving motorcycles is 259, though in 2021 there was a spike in motorcycle collisions of 303.

In any given year, between about 50% to 60% of motorcycle collisions result in an injury.

Demographics

Males make up about 91% of all collisions (93% PDO, 89% Injury, 94% Fatal). Comparing collision rates of males to females indicate that males get into 56% more motorcycle collisions than females.

The youngest motorcyclists (15 – 29 years of age) have collision rates about twice as high as those between 30 – 59 years of age: 63 versus an average of 32 motorcycle collisions per 10,000 motorcyclists in the younger age group compared to those in the older age group, respectively.

Within each age group, more than 50% of collisions result in an injury.

Geographic Distribution of Collisions

Most collisions occur within the Winnipeg area and other highly populated areas surrounding Winnipeg. This pattern holds for both PDO and injury-related collisions. Fatal collisions are discussed in more depth later in this report, but they tend to occur in more rural areas.

Locations with more than ten collisions over the five-year study period include highly populated areas around Winnipeg, the city of Brandon, Thompson, and the Whiteshell.

Temporal Patterns of Collisions

The analysis showed that most collisions occur between June and August, as expected.

Most motorcycle collisions occur on weekends, particularly on Saturdays, and during the afternoon hours. This aligns with the recreational nature of motorcycle riding, as most people ride on weekends.

Weather and Lighting Conditions

Motorcycle collisions tend to occur during clear or cloudy weather, likely due to the recreational nature of riding and the preference for favourable weather conditions.

Nighttime riding is the second most common lighting situation for collisions while the first is daytime riding, but we lack the data required to compare the safety of nighttime to daytime riding. Both have unique hazards and risks. Riding during high traffic periods carries different risks

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compared to riding at night, when it may be more difficult for other vehicles to see motorcyclists on the road.

Major Contributing Factors

MPI records four types of major contributing factors: driver action, environmental condition, human condition, and vehicle condition.

- **Driver Action**: This indicates how the driver was acting at the time of the collision.

  Driver action is the most common reason for collisions. Careless driving, following too closely, and driving too fast for conditions are the top three most common driver actions reported for the motorcyclists involved in the collision.

  Careless driving behaviour is investigated further in the next section.

- **Environmental Condition**: Anything related to the driving environment.

  Common factors include collisions with wild animals (mainly deer) and issues with the driving surface (defects, obstructions, debris).

- **Human Condition**: If the driver's physical condition is inhibited in some way.

  Generally uncommon as a reason for collisions, but when it occurs it is usually distraction or inattention related. Motorcyclists may be more aware of their physical state due to the inherent risks of riding.

- **Vehicle Condition**: If there was something defective with the vehicle.

  This was rarely a significant issue in motorcycle collisions.

Multi-Vehicle Collisions Involving Non-Motorcycle Vehicles

In multi-vehicle collisions with a motorcycle and another type of vehicle, the main factors attributed to the non-motorcycle driver were typically related to driver action, particularly careless driving and lane changing behaviour.

Environmental, human, and vehicle-related contributing factors associated with the other vehicle are not major concerns in motorcycle collisions.

Correlation Between Conviction History and Subsequent Motorcycle Collisions

The correlation analysis explores the relationship between conviction history in one year and collision history in the following year.

For motorcyclists with zero convictions in a calendar year, about 24 motorcyclists out of 10,000 will get into one collision the following year. When considering motorcyclists with one conviction, about 52 out of 10,000 will get into one collision the following year.

There is an increasing trend in the number of collisions for motorcyclists with two or more convictions in the previous year. However, this should be interpreted cautiously due to the small number of collisions, as this leads to lower confidence in the estimates.

Investigating Causes of Motorcycle Collisions

Information from 1,306 motorcycle claims for incidents which occurred between 2019-2023 is analyzed further. Of all the claims considered, there are 707 single vehicle claims and 599 multi-vehicle claims. The summaries below are reported at the claim level, with each count or collision count representing a single filed claim.

Careless Driving

A number of different factors can contribute to the cause of a collision, one of which MPI refers to as careless driving. All 361 single and multi-vehicle collision claims recorded as careless driving are considered. The two most prevalent themes attributed to careless driving claims include driver action and road surface conditions.

The most prevalent categories within driver action are driver behaviour and losing control. Different driver behaviours account for collisions which involve factors within the motorcyclist's control, such as following a vehicle too closely or changing lanes unsafely. These are present in approximately 30% of careless driving claims. A motorcyclist losing control can be associated with about 18% of the careless driving claims studied. The 64 claims where a motorcyclist lost control of their motorcycle were investigated further. While there were a number of codes assigned to these claims, approximately 25% of claims where a motorcyclist lost control were related to behaviour taken while approaching a corner, turn, or exit ramp. Furthermore, 19% of instances where a motorcyclist lost control can be attributed to the motorcyclist losing their balance or there being some form of operator error, such as hitting the throttle instead of the brakes.

Across all careless driving claims, different road surface conditions accounted for approximately 25% of scenarios a motorcyclist encountered. These include instances where a motorcyclist comes across loose gravel/sand, which was the most common road surface condition and was a factor in 19% of careless driving claims.

Environmental and vehicular conditions are also considered; however, they are factors in less than 10% of these careless driving claims. Environmental conditions include circumstances such as slippery road surface, obstructions or debris in roadway, and the wind.

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Table 1: Summary of single and multi-vehicle collision claims attributed to careless driving.

	Number of Claims
Driver Action	**199**
Driver Behaviour	107
Lost Control	64
Taking Avoiding Action	17
Taking Avoiding Action (Wildlife)	10
Taking Avoiding Action (Domestic Animal)	1
Road Surface Condition	**92**
Loose Gravel/Sand	69
Bump	8
Rut/Crack	8
Pothole	4
Railroad Tracks	2
Mud	1
Not Enough Information	**34**
Unknown	28
Unclear	6
Environmental Conditions	**19**
Slippery Road Surface	10
Obstruction/Debris in Roadway	3
Collision with Wildlife	2
Wind	2
Animal Action – Wild	1
Glare/Reflection	1
Vehicular Conditions	**16**
Locked up	7
Defective Brakes/Steering	4
Defective Engine Controls/Drivetrain	3
Tire	2
NA	**1**
NA	1
Grand Total	**361**

Avoiding Action

There are several reasons why a motorcyclist might take action to avoid a collision. This could involve, but is not limited to, avoiding third-party vehicles, poor road surface conditions, wildlife, or domestic animals. A total of 24 collisions in the data utilized for this project were initially recorded in the traffic accident report as motorcyclists avoiding action, including 20 single vehicle and 4 multi-vehicle collisions. The accident detail text was reviewed for all 707 single vehicle claims to determine if more accidents may have involved the motorcyclist taking avoiding action, in addition to the 20 initially coded as such. It was determined that the motorcyclist was taking avoiding action in 56 additional single-vehicle claims. In total, 80 claims in the study involved a motorcyclist taking avoiding action – 76 single-vehicle and 4 multi-vehicle claims.

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Motorcyclists tried to avoid third party vehicles who cut them off in about 15% of these 80 claims. In fact, 50% of the 80 avoiding action claims were the result of motorcyclists avoiding a third-party vehicle. Approximately 33% of the avoidance claims were due to motorcyclists attempting to avoid wildlife, primarily deer.

Collision Configuration: 'Other'

Each claim is assigned a specific collision configuration to illustrate how the collision occurred. There are 16 different collision configurations recognized by MPI such as rear end, head on and side swipe. If a collision does not match any of the 16 pre-defined configurations, it is assigned a collision configuration of 'other': 664 collisions reported from 2019 – 2023 met these criteria.

A summary of the claim perils for these 664 collisions based on injury status can be found in Table 2. It is clear that the vast majority of claims were recorded as a collision, rather than a collision with a domestic animal or wildlife. Collisions with wildlife represent a much larger proportion of these claims than collisions with a domestic animal, accounting for about 18% of claims recorded with a collision configuration of 'other'.

Table 2: Summary of claim perils for collisions with a configuration of "other": physical damage only (PDO).

	Claim Peril			
Claim	**Collision**	**Collision With Domestic Animal**	**Collision With Wildlife**	**Total**
Fatal	13	0	1	14
Injury	276	4	62	342
PDO	247	3	58	308
Grand Total	**536**	**7**	**121**	**664**

Fatalities

Of all the claims reviewed, 17 involved a fatality, and the analysis identified two primary themes. First, a third-party (TP) vehicle was involved in 7 (41%) of these 17 claims. These incidents were largely attributed to a lack of awareness or poor judgment on the part of the TP vehicle driver, resulting in 5 out of the 7 fatal collisions involving TP vehicles. Most of these occurred at highway intersections.

The second theme, accounting for 35% of the fatalities, involved motorcyclists losing control of their vehicles. These single-vehicle collisions typically occurred on roadway curves, where motorcyclists lost control, veered into a ditch, and were ejected from their motorcycles.

While road surface and environmental conditions occasionally contributed to fatalities, the vast majority were linked to driver behaviour. Most fatalities resulted from poor judgement by the TP or the motorcyclist losing control – both linked to driver behaviour and decision-making. In fact, these were the most prevalent factors found within careless driving claims, which were discussed in detail earlier, and 7 fatalities were recorded with careless driving as a major contributing factor.

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Table 3: Summary of factors in incidents with fatalities[1]

Factor	Number of Claims
Collision with TP Vehicle (multi-vehicle collision)	**7**
FP hit TP vehicle	4
TP crossed intersection before safe to do so	2
TP failed to stop at stop sign	1
FP passed TP vehicle using oncoming lane, TP turned left in front of motorcycle	1
FP hit by TP vehicle	3
FP crossed intersection before safe to do so	1
Head on – TP changed lanes improperly while turning	1
Read end – TP failed to stop for traffic stalled for highway construction	1
FP Lost Control (single-vehicle collision)	**6**
Driving on a curve in roadway	4
Drove into ditch	2
Collided with cement culvert	1
Passing TP	1
BAC beyond limit (collided with median)	1
Drifted into ditch	1
Road Surface Conditions	**2**
Loose gravel	2
Environmental Conditions	**1**
Mud (FP was hit by TP after falling in oncoming traffic lane)	1
Wildlife	**1**
Deer	1
Grand Total	**17**

Recommendations

These are the recommended areas to focus on based on the analysis.

1. Motorcyclists under 30 years of age get into twice as many collisions as motorcyclists between 30 and 59 years of age: 63 versus 32 collisions per 10,000 motorcyclists. Prioritizing the development of a safer riding culture among younger motorcyclists should be a key area of focus.

2. Careless driving is the primary factor in motorcycle collisions and is included in 28% of such incidents. These primarily involve reckless driving behaviours, such as motorcyclists following too closely, changing lanes unsafely, or losing control of the motorcycle. Enhancing education and/or training on increasing awareness of surroundings and handling may help reduce the occurrence of these collisions.

[1] blood alcohol concentration (BAC); first-party (FP); third-party (TP). FP refers to the motorcyclist.

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3. Of the collisions involving careless driving, 25% are related to navigating atypical road surface conditions, such as gravel roads, potholes or debris. This includes taking appropriate measures when navigating turns, exit ramps, or slippery surfaces such as dirt, gravel, or sand. However, a more holistic approach is likely required to reduce these instances further. The work of the MTI-CMMG Motorcycle Road Debris Working Group is expected to include recommendations in this area.

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Part and Chapter:	**Part II – COM Appendix 7**	**Page No.:**	
PUB Approved Issue No:	**20. Road Safety**		
Topic:	**Motorcycle fatalities**		
Sub Topic:			

Preamble to IR (If Any):

Question:

a. Please provide a chart identifying motorcycle collision fatalities over the last 10 years.

b. Please identify how many motorcycle fatalities have occurred in 2026 to date.

c. Please provide a narrative discussion of motorcycle fatalities over the last 10 years and any underlying reasons for fluctuations that MPI is able to identify.

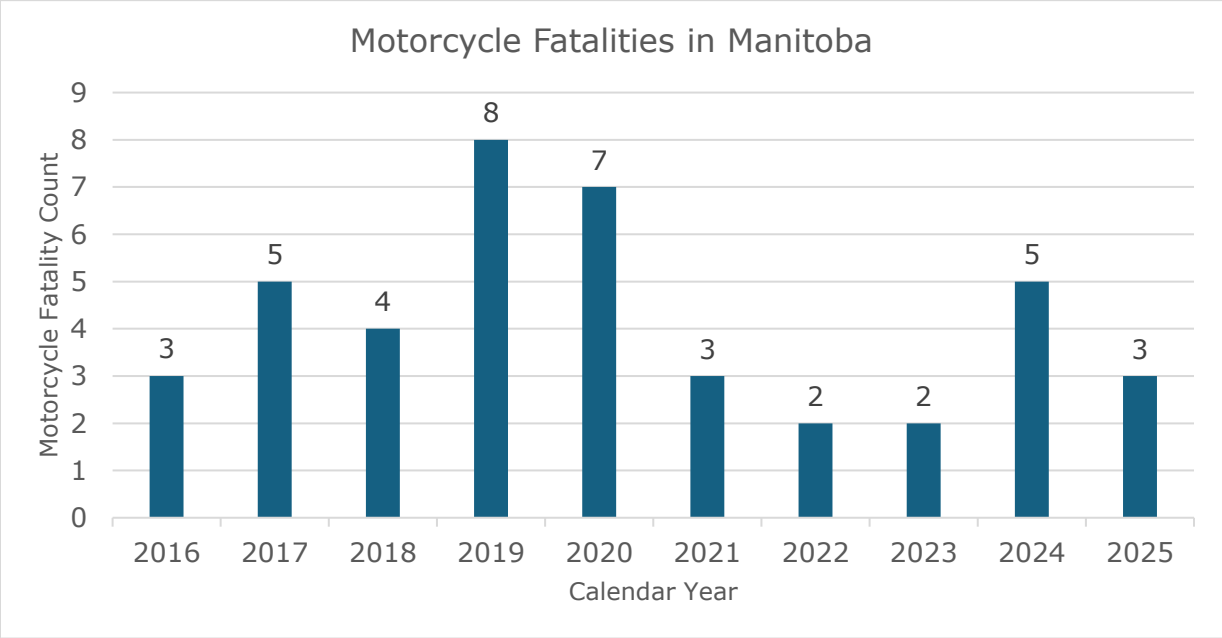
Rationale for Question:

To examine rates of motorcycle fatalities on Manitoba Roads.

RESPONSE:

a. The figure below shows the number of motorcycle collision fatalities in Manitoba for the 10-year period from 2016 to 2025. These counts may differ slightly from previously reported figures, due to ongoing collision investigations and subsequent data updates.

Figure 1 Motorcycle Fatalities in Manitoba



b. Between January 1 and July 15, 2026, a total of six motorcycle fatalities in Manitoba were reported to MPI.

c. Motorcycle fatalities continue to be a road safety concern due to the vulnerability of motorcyclists and the severity of outcomes when collisions occur. Between 2016 and 2025, 42 motorcycle collision fatalities were reported in Manitoba. Annual fatalities fluctuated from a high of eight fatalities in 2019 to two fatalities in both 2022 and 2023 (see ***Figure 1*** above).

MPI's analysis of fatal motorcycle collisions occurring between 2019 and 2023 identified human behaviour as a contributing factor in most fatal motorcycle collisions. Two common collision scenarios were observed:

1) Collisions involving another vehicle (41%), which frequently occurred at highway intersections.
2) Loss of control by the motorcyclist (35%), which often occurred on curves where the rider left the roadway and was ejected from the motorcycle.

Fatal motorcycle collisions were more likely to occur in rural areas and during the summer riding season, particularly in June and July. Of all 17 fatalities recorded during this period, careless driving (7), driver judgement errors (7), and loss of control (6) were identified as key contributing factors. Road surface conditions and wildlife-related events were identified less frequently but were contributing factors in some collisions.

Variations in riding exposure, traffic volumes, weather conditions, and the occurrence of severe collision events likely contribute to the fluctuations in annual motorcycle fatality counts.

While collision analysis can identify common characteristics and contributing factors associated with fatal motorcycle collisions, caution should be exercised when interpreting year-to-year changes due to the small sample size. With relatively few fatalities each year, even minor changes in the number of cases can result in noticeable fluctuations, making it difficult to attribute changes to any single factor.

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Part and Chapter:	**Part II – COM Appendix 7**	**Page No.:**	**Pg 67 of 153**
PUB Approved Issue No:	**20. Road Safety**		
Topic:	**Driver Training/Motorcycle Training**		
Sub Topic:			

Preamble to IR (If Any):

MPI has identified that a main focus of the Road Safety Strategy is creating a culture of road safety in Manitoba. One Pillar of the Road Safety Strategy is "Shaping Safer Driver Behaviours' where reference is made to modernizing the training curriculum including the Driver's Handbook.

Question:

a. Please confirm that MPI has plans to update driver curriculum and the driver training handbook (both for private passenger vehicles and motorcycles) in response to the findings from the motorcycle collision analysis.

b. Please provide an expected timeline for updates to the curriculum and handbook.

Rationale for Question:

To understand how MPI intends to implement the findings from the motorcycle collision analysis into driver training and curriculum development.

RESPONSE:

a) MPI has plans to update its Driver's Handbook, including content related to both private passenger vehicles and motorcycles. Work on the handbook review and update is expected to begin in the current fiscal year.

While the planned updates are not being undertaken solely in response to the motorcycle collision analysis, the findings from that analysis will help inform the

review process and the consideration of potential enhancements to driver education materials.

Stakeholder engagement will be an important part of the handbook review and update process to help ensure the materials reflect current safety priorities, user needs, and best practices.

b) Foundational work for the updates to the Driver's Handbook is expected to begin during the current fiscal year. The scope of the review will be determined as the project progresses. At this time, MPI has not finalized the specific form or extent of the changes that may result from the review, nor has it established a formal timeline for the completion of the work.

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Part and Chapter:	**Part VIII – EXP Appendix 14**	**Page No.:**	**1 - 4**
PUB Approved Issue No:	**20. Road Safety**		
Topic:	**Road Safety Budget**		
Sub Topic:			

Preamble to IR (If Any):

The historic Road Safety Programs costs demonstrate that MPI has underspent on Road Safety programs as compared to the budgeted amount in every year since the 2021 – 2022 year.

MPI has spent an average of 10.7M on road safety from 2022-2026. This is despite budgetary allowances of over 14 M in some years.

Question:

a. Has MPI reduced the forecast budget for road safety based on historical underspending?

b. Please provide a narrative discussion examining the Corporation's history of underspending on road safety issues as compared to the forecast amount.

c. Please identify what happens to road safety budget that is not spent (IE is it re-distributed to other basic expenses, or is it held for future road safety initiatives?)

Rationale for Question:

To examine MPI's Road Safety budget and historic spending.

RESPONSE:

a) MPI has not reduced the overall forecast budget for Road Safety based solely on historical underspending. MPI's forecast reflects the planned program delivery and expected level of expenditures required to deliver the Road Safety Strategy over the forecast period.

Historical underspending is considered in the forecasting process, but it is not applied mechanically as a reduction to the Road Safety forecast. MPI reviews prior actual spending, known program requirements, expected timing of initiatives, and planned strategy actions when developing the forecast. In some cases, forecast amounts are reallocated between program lines to better align spending with updated priorities or delivery plans.

b) MPI acknowledges a history of underspending on road safety issues as compared to the forecast amount. The recurring underspend is primarily attributable to the nature of Road Safety spending relating to direct program activity rather than fixed departmental costs. These direct program expenditures depend on the timing of program launches, partner delivery, procurement, program development, evaluation work, and the scope of initiatives able to be implemented in a given year. Where initiatives are delayed, revised, delivered through a different approach, or completed at a lower cost than forecast, actual spending has been lower than budget.

The current forecast reflects MPI's planned Road Safety activities and its new Road Safety Strategy. The 2026 Road Safety Technical Conference materials (filed) explain that MPI's Road Safety budget is aligned to support delivery of the Road Safety Strategy, with spending focused on the behaviours contributing most to serious collisions, including impairment, distraction and careless driving, speed, and occupant restraints, as well as communities and road users most exposed to harm, including new drivers, vulnerable road users, and First Nations communities. The forecast reflects planned program delivery, stakeholder-informed priorities, and the expected cost of delivering Road Safety initiatives over the forecast period. This is consistent with MPI's

prior evidence that Road Safety spending is dynamic and that future spending is adjusted as programs change.

c) Unspent amounts are reflected in actual results for the applicable fiscal year and are not carried forward. If a Road Safety initiative is delayed, deferred, or revised, the related future-year budget requirement is considered through the normal annual zero-based budget process.