# Manitoba Public Insurance (MPI)

# 2027 GRA Intervener Evidence

# MPI Information Requests to Consumers' Coalition (CC)

# September 24, 2026

**MPI (CC) 1**

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|---|---|---|---|
| **Part and Chapter:** | **Section 4; Figures 3–45; Tables 4 and 42; Section 7 and Figure 50** | **Page No.:** | |
| **PUB Approved Issue No:** | | | |
| **Topic:** | **Reproducible calculations and source data** | | |
| **Sub Topic:** | | | |

**Question:**

a. Provide the native workbooks, scripts and input files used to produce RCS's claims models, base loss costs, trend adjustments and projected claims. Include the claim-development and benefit-assumption calculations relied upon for forecasting.
b. Identify differences between the data supplied by MPI and the data used by RCS, including exclusions, reclassifications, adjustments, corrected observations and changed claim-development assumptions.
c. For the historical comparisons requested in IRs 9 and 12, provide the retained files identified in the 2026 GRA as MPI CC 1-5c.xlsx and PUB (CC) 1-5b.xlsx, or a precise accessible filing reference. Identify any limitations in obtaining or reproducing those earlier analyses.

**Rationale for Question:**

Enable independent reproduction of the calculations actually relied upon.

**RESPONSE:**

CC to insert response here.

**RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:**

CC to insert rationale for refusal here.

**MPI (CC) 2**

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|---|---|---|---|
| **Part and Chapter:** | **loss cost summary Tables 7–39; Figure 50; Section 4.21 and Table 40** | **Page No.:** | **Pages 6–7 and 80–81** |
| **PUB Approved Issue No:** | | | |
| **Topic:** | **Data vintages and projection periods** | | |
| **Sub Topic:** | | | |

**Preamble to IR (If Any):**

Page 80 describes the 2027 GRA trend data as valued at December 31, 2023, although the trend figures include later accident years. The summary tables describe HTA units as a weighted average of 2026/27 and 2027/28, while the trend-factor descriptions refer to 2027 and 2028.

**Question:**

a. Identify the actual valuation date of every data series used in Figure 50 and in the trend models. Confirm or correct the December 31, 2023 reference.
b. Identify the accident years and weights underlying the 1,025,314 HTA units, the projected losses and the future trend factor in each loss cost summary. Explain how these relate to the 2027/28 rating year and to the 1,385,741 total units. Confirm which HTA and total-unit forecasts RCS accepts, identify any adjustments, and explain how the exposure basis is used consistently in base loss costs, frequency and projected claim counts.
c. Confirm the year represented by the $38.86 and $29.24 base loss costs in Tables 27 and 33. Provide corrected labels and calculations if either table uses a different base year from the other coverage tables.

**Rationale for Question:**

Establish consistent valuation dates, units and accident-year-to-rating-year calculations.

**RESPONSE:**

CC to insert response here.

**RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:**

CC to insert rationale for refusal here.

**MPI (CC) 3**

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| **Part and Chapter:** | **Section 4.2 and RCS alternative models in Figures 5, 12, 15, 20, 23, 26, 35, 38 and 45; 2026 MPI(CC)5, pp.23–25; 2025 OW report, pp.30–34** | **Page No.:** | |
| **PUB Approved Issue No:** | | | |
| **Topic:** | **Model selection** | | |
| **Sub Topic:** | | | |

**Preamble to IR (If Any):**

RCS states that statistical significance is not the sole determinant of a good model.

**Question:**

a. Describe the criteria used to select experience periods, exclusions, break dates, explanatory variables and the final model for each alternative in Table 42. Identify which choices were specified before reviewing model results. Identify any change from the framework explained in MPI(CC)5 in the 2026 GRA, and demonstrate its application to the present models; the prior general explanation need not be repeated.
b. Provide the material alternative specifications actually tested, with their selected trends, fit statistics and resulting forecast claims and loss cost impacts where calculated. Explain the principal reasons for rejecting them.

**Rationale for Question:**

Establish the reasons for the selected models and the alternatives rejected.

**RESPONSE:**

CC to insert response here.

**RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:**

CC to insert rationale for refusal here.

**MPI (CC) 4**

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|---|---|---|---|
| **Part and Chapter:** | **Section 4.2, pages 8–10; Figures 5, 12, 18, 20 and 45; CC/MPI I-56, response pages 1–3; MPI CF.2.2 and CF.5.3.** | **Page No.:** | |
| **PUB Approved Issue No:** | | | |
| **Topic:** | **Mobility and new-normal parameter tests** | | |
| **Sub Topic:** | | | |

**Preamble to IR (If Any):**

CC/MPI I-56 explains MPI's use of a joint F-test for the mobility and new-normal terms as one modelling construct. The Google mobility series ends in October 2022; MPI's model uses a separate new-normal term for the subsequent accident years.

**Question:**

a. Identify the precise test RCS understands MPI to use for mobility and new-normal parameters, including the null hypothesis, test statistic and decision rule. Reconcile the description that both parameters must be significant with the discussion of their combined significance.
b. For each alternative frequency model, provide the coefficients, standard errors, p-values and parameter correlations with both mobility and new-normal terms included, and after each disputed term is removed. For Collision, reconcile the individual significance results shown for MPI's selected frequency model in Figure 18 with the conclusion about new normal in RCS's alternative model; distinguish effects of the experience period, the underlying trend and the testing rule.

c. Does RCS contend that the joint F-test itself is statistically invalid in this application, or that a significant joint result is insufficient by itself to justify retaining both terms? Explain the basis for the position taken, when individual tests should govern retention, and how subject-matter evidence and limited statistical power affect that decision.
d. Identify the criteria permitting retention of an individually insignificant term, including the Weekly Indemnity terms, and explain how those criteria were applied consistently across coverages.
e. Address MPI's explanation in CC/MPI I-56 that the terms represent related aspects or successive phases of pandemic-related changes in driving behaviour. Explain why different time periods or causal descriptions make joint assessment inappropriate, if that remains RCS's position. Identify how RCS represents the period after the Google series ends, and explain the restriction imposed by omitting new normal on post-pandemic frequency, conditional on the selected underlying trend. Distinguish unavailable mobility observations from evidence of a return to pre-pandemic behaviour.
f. Has RCS tested whether its proposed individual-testing approach forecasts claims more accurately than MPI's approach? If so, provide the results using the same data and forecast period, and state whether later or withheld observations were used. If not, confirm this and explain the basis for preferring its approach.

**Rationale for Question:**

Clarify the disputed statistical decision rule and its consistent application.

**RESPONSE:**

CC to insert response here.

**RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:**

CC to insert rationale for refusal here.

**MPI (CC) 5**

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|---|---|---|---|
| **Part and Chapter:** | **Page 35; Figure 20; 2026 PUB(CC)1; 2026 MPI(CC)3, pp.14–15; October 27, 2025 transcript, pp.1732:7–22, 1734:3–25, 1843:14–1844:5, 1854:1–18 and 1868:3–25; Order 156/25, pp.60–61.** | **Page No.:** | |
| **PUB Approved Issue No:** | | | |
| **Topic:** | **Collision development and the latest observation** | | |
| **Sub Topic:** | | | |

**Preamble to IR (If Any):**

RCS states that the 2025 frequency observation may decrease at future evaluations.

**Question:**

a. Define the claim count used in this frequency measure: for example, reported claims, claims with payment, closed claims or estimated ultimate claims. Identify the exposure denominator and valuation date.
b. Identify the data, development history and assumptions supporting the possibility of a reduction in the 2025 estimate. Provide the relevant triangles or successive valuations relied upon, where available to RCS, and distinguish revisions to estimated ultimate counts from changes in reported counts.
c. Confirm whether RCS made a numerical adjustment to the 2025 observation or retained MPI's estimate unchanged. If an adjustment was made, provide its amount and the projected claim-cost impact.

d. Provide the change in RCS's selected trend and projected claim costs and coverage loss costs per insured unit when 2025 is included as supplied and when it is omitted. Explain how the higher 2025 observation affects RCS's confidence in its forecast.
e. Identify the mobility and new-normal assumptions the witnesses ultimately supported at the close of their 2026 GRA oral evidence. Reconcile those assumptions with the present selection, distinguishing new experience, greater maturity, changed specification and changed judgment. Compare the proportion of the accident year observed and subsequent development at the two valuation dates; explain whether the prior uncertainty argument applies with the same force now.

**Rationale for Question:**

Establish the factual basis and numerical effect of the latest-year maturity argument.

**RESPONSE:**

CC to insert response here.

**RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:**

CC to insert rationale for refusal here.

**MPI (CC) 6**

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|---|---|---|---|
| **Part and Chapter:** | **Sections 4.10 and 4.21; Table 40; MPI Claims Forecasting Attachment A.** | **Page No.:** | |
| **PUB Approved Issue No:** | | | |
| **Topic:** | **Collision exposure and independent evidence** | | |
| **Sub Topic:** | | | |

**Question:**

a. Identify Manitoba-specific mobility, commuting patterns, return-to-office arrangements, travel behaviour, road usage, distance travelled, traffic, weather, vehicle safety or other evidence relied upon to support the projected Collision frequency trend. State how that evidence was used quantitatively or qualitatively.
b. Explain the relevance and limitations of the pre-pandemic trend for the forecast period, including changes in vehicle mix, deductibles, reporting behaviour and claim definitions. Explain why the post-pandemic commuting, return-to-office, travel and road-use evidence does or does not justify greater reliance on recent accident years. Identify any explicit recency weights used; distinguish those weights from the influence of older years through a longer fitting period.
c. Show how the selected frequency trend combines with MPI's accepted HTA growth forecast to produce projected ultimate Collision counts. Distinguish claims per exposure from total claims.
d. Identify any independent evidence reviewed that supports a persistent post-pandemic level change, and explain why it did not result in retaining a new-normal parameter in RCS's selected Collision model.

**Rationale for Question:**

Test the Collision extrapolation against independent evidence and consistent exposure definitions.

**RESPONSE:**

CC to insert response here.

**RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:**

CC to insert rationale for refusal here.

**MPI (CC) 7**

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| **Part and Chapter:** | **Sections 4.2, 4.10 and Appendix A; Oliver Wyman Alberta Annual Review, September 15, 2025, printed pages 59–60; Alberta preliminary Semi-Annual Review, January 15, 2026, printed pages 26, 44–45 and 48; Ontario Annual Review, October 14, 2025, printed pages 71–72; and Ontario Mid-Year Review, February 23, 2026, printed pages 21, 53 and 55–56.** | **Page No.:** | |
| **PUB Approved Issue No:** | | | |
| **Topic:** | **Comparison with the authors' prior regulatory work** | | |
| **Sub Topic:** | | | |

**Preamble to IR (If Any):**

The cited Alberta Collision models include both a new-normal adjustment and a declining frequency trend; the Ontario models include new normal and a positive frequency trend. In all four selected Collision frequency models, mobility and new normal are individually significant, with each p-value reported as 0.000 (rounded). Their inclusion alone does not establish inconsistent testing. Separately, the January 2026 Alberta review's selected Accident Benefits frequency model retains new normal at p = 0.060, and the February 2026 Ontario review's selected Accident Benefits Total direct loss-cost model retains new normal at p = 0.091. Mobility is reported at p = 0.000 (rounded) in both. Each report describes p-values below 5% as statistically significant.

**Question:**

a. Confirm each witness's responsibility for preparing, reviewing or approving the cited analyses, and identify any correction to the document references or attribution.
b. Describe the model-selection principles used in those reviews to decide whether to include a post-pandemic level adjustment, an ongoing frequency trend, or both. Identify material differences from the principles used in this evidence.
c. Explain the data, coverage, exposure, deductible, valuation-date and jurisdictional differences that support the different Manitoba specification. Include relevant product reforms and movement of claims between Collision and DCPD. Provide existing comparable model results supporting the explanation.
d. For the three most recent prior MPI GRAs in which either witness supplied actuarial rate evidence, identify that witness's material Collision forecasts and provide any existing comparison with subsequently emerging experience. Specifically address the 2025 and 2026 GRAs, including the prospective estimates filed in 2025 PUB(CAC)1-2 and its attachment. Retain the assumptions as they stood at each forecast date; distinguish those results from models refitted using later information. State the adjustments needed for comparable coverage, exposure, claim-development and claim-cost bases. If no retrospective comparison was performed, please confirm.
e. Reconcile retaining new normal in the two selected Accident Benefits models, despite its individual p-value exceeding the reports' stated 5% significance benchmark, with the approach recommended for MPI. Explain the basis for retention in each case, including any alternative significance threshold or considerations beyond individual significance. State whether the same criteria would permit retention in MPI's models and, if not, identify the material differences supporting that conclusion. Distinguish the choice of statistical test from the decision to retain a term after reviewing its result.

**Rationale for Question:**

Assess consistency of the witnesses' methods and parameter-retention decisions while recognizing material jurisdictional differences.

**RESPONSE:**

CC to insert response here.

**RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:**

CC to insert rationale for refusal here.

**MPI (CC) 8**

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| **Part and Chapter:** | **Sections 4.1, 4.3 and 4.11; Figures 21–23; Table 21; CC/MPI I-54 and PUB/MPI II-33(d); 2025 OW report, pp.24–25; November 4, 2024 transcript, pp.2153–2155.** | **Page No.:** | |
| **PUB Approved Issue No:** | | | |
| **Topic:** | **Attempted and Partial Theft** | | |
| **Sub Topic:** | | | |

**Question:**

a. Identify the information in MPI's theft analysis and IR responses considered before concluding that the theft parameter is arbitrary. Explain the specific remaining deficiency in its derivation or validation. Distinguish that deficiency from the use of a scalar itself, having regard to OW's comprehensive scalar in the 2025 GRA. State the consistent evidentiary and calibration requirements for such adjustments and apply them to both cases.
b. Distinguish exclusion of 2021 and 2022 from the trend regression from their zero weight in the selected base-loss-cost average. Explain why 2019, 2020 and 2023 are retained in the regression, and why 2023–2025 are treated as representative years for the base average. Address the July 18, 2022 commencement of the Scrap Metal Act relative to accident years. Identify evidence, if any, of continuing implementation or behavioural adjustment during 2023/24, and explain how residual abnormal theft experience was treated; do not assume that the commencement date alone establishes when claim effects stabilized.
c. Provide the on-level costs and selected base cost under four cases: MPI's trend and five-year weights; RCS's trend and five-year weights; MPI's trend and three-year weights; and RCS's trend and three-year weights. Identify whether MPI's theft adjustment is retained, removed or replaced in each case.

d. Explain how each adjustment serves a distinct purpose and whether any residual theft effect is removed more than once. State precisely the proposed change to the base-loss-cost weighting approach and the circumstances in which five-year weights would resume.
e. Explain the actuarial basis for assigning each retained accident year 2023/24–2025/26 a one-third weight (33.3% when rounded). Identify alternative experience windows or weighting schemes actually considered, including any four-year equal weighting, 40%/30%/30% weighting, credibility weighting or exponential weighting. Specify the exact year-to-weight mapping and any credibility complement or decay assumption, and provide the resulting base loss costs and projected claim costs where calculated. If no alternatives were tested, please confirm. Explain how the selection balances representativeness of the expected theft environment against variability from using only three years in the base average, and provide any assessment of that variability. The five-year comparison in part (c) may be cross-referenced.

**Rationale for Question:**

Separate trend and baseline-weight effects and assess the treatment of abnormal theft experience.

**RESPONSE:**

CC to insert response here.

**RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:**

CC to insert rationale for refusal here.

**MPI (CC) 9**

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| **Part and Chapter:** | **Section 4.16, pages 53–56; Figure 35.** | **Page No.:** | |
| **PUB Approved Issue No:** | | | |
| **Topic:** | **Vandalism** | | |
| **Sub Topic:** | | | |

**Question:**

a. Identify the common experience period and unrounded frequency, severity and elevated-period coefficients supporting the selected trends.
b. Explain why the selected specification is preferable to MPI's and to the direct loss-cost model, including the basis for retaining the continuing severity term.
c. Provide the change in projected Vandalism claims and coverage loss cost from RCS's alternative, and confirm that the increase is included in its total projected claims. Reconcile the result to the underlying Vandalism calculations supporting Table 42.

**Rationale for Question:**

Verify the upward Vandalism claims adjustment and its inclusion in total projected claims.

**RESPONSE:**

CC to insert response here.

**RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:**

CC to insert rationale for refusal here.

**MPI (CC) 10**

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|---|---|---|---|
| **Part and Chapter:** | **Section 4.20, pages 66–69; Figure 45.** | **Page No.:** | |
| **PUB Approved Issue No:** | | | |
| **Topic:** | **Property Damage Other** | | |
| **Sub Topic:** | | | |

**Question:**

a. Provide the model containing both the frequency trend and new-normal terms, and explain the basis for omitting the new-normal term from the selected model.
b. Quantify the projected claim-cost impact separately from changes to historical on-level costs and the future frequency trend, retaining MPI's accepted severity assumptions.
c. Explain the treatment of 2025 maturity and provide the selected trend and projected claim costs with 2025 excluded. Identify whether RCS adjusted MPI's 2025 estimate numerically.

**Rationale for Question:**

Test the property-damage frequency specification and the treatment of recent experience.

**RESPONSE:**

CC to insert response here.

**RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:**

CC to insert rationale for refusal here.

**MPI (CC) 11**

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|---|---|---|---|
| **Part and Chapter:** | **Sections 4.5, 4.6, 4.9, 4.13–4.15, 4.18 and 4.19.** | **Page No.:** | |
| **PUB Approved Issue No:** | | | |
| **Topic:** | **Coverages with no proposed change** | | |
| **Sub Topic:** | | | |

**Question:**

a. Confirm whether RCS proposes any change to the claims forecasts for personal care assistance, travel, bodily injury, fire, glass, hail, third-party loss of use or third-party deductible transfer beyond the claims changes expressly identified in Table 42.
b. For travel, bodily injury and hail, provide the alternative trends actually tested, the resulting projected claim-cost impacts and the threshold used to conclude that the claims forecast was not sensitive.

**Rationale for Question:**

Define areas of agreement and quantify concerns described as immaterial.

**RESPONSE:**

CC to insert response here.

**RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:**

CC to insert rationale for refusal here.

**MPI (CC) 12**

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|---|---|---|---|
| **Part and Chapter:** | **Claims forecasting discussion and figures on pages 5, 28, 33, 38, 42–43, 49, 58, 64 and 80; Figure 1's claims-cost component; coverage loss cost summary Tables 7–39; Figure 50.** | **Page No.:** | |
| **PUB Approved Issue No:** | | | |
| **Topic:** | **Claims data and computational corrections** | | |
| **Sub Topic:** | | | |

**Question:**

a. Provide an errata schedule for coverage, year, valuation-date, coefficient and unit labels in the claims analysis. Address the 2026/27 rating-year reference on page 5, the coverage and year references on pages 33, 38 and 42, the 2026/27 reference on page 64, and the valuation-date description on page 80. Corrections already provided under other IRs may be cross-referenced.
b. Confirm whether Figure 1's claims-cost amount of 859.03 is dollars per insured unit rather than millions of dollars, and correct the scale if necessary. State the units and conversions required for rows G and J in the loss cost summary tables, including any thousands-to-dollars conversion. Explain how the displayed factor F for future rental days enters the actual calculation, whether it is omitted from a displayed formula, and whether its value of 1.000 in the displayed calculations makes any omission numerically immaterial. Demonstrate the full conversion from loss cost per insured unit to projected claim costs.
c. Explain the Oliver Wyman model legends in Figure 15 and identify the exact model and calculation files underlying that figure and confirm that they are the files used for RCS's current ABO Other Non-Indexed claims forecast. Explain any mismatch between the figure and the current model output.

d. For each correction, state whether it affects presentation only, an intermediate claims calculation, a selected coverage assumption or projected claims. Supply replacement pages and revised native files where a substantive calculation changes.

**Rationale for Question:**

Distinguish drafting errors from errors that change the claims forecast.

**RESPONSE:**

CC to insert response here.

**RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:**

CC to insert rationale for refusal here.

**MPI (CC) 13**

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|---|---|---|---|
| **Part and Chapter:** | **Section 5, pages 73–74 and 78–79; Figure 49; Table 43; footnote 11.** | **Page No.:** | |
| **PUB Approved Issue No:** | | | |
| **Topic:** | **Merit Rating (DSR): overfitting and smoothing** | | |
| **Sub Topic:** | | | |

**Question:**

a. How does RCS assess the risk of overfitting at DSR levels with limited exposure or low credibility when DSR is modelled (i) as a categorical variable or (ii) using log-LOESS? Provide any existing validation or stability results supporting its assessment.
b. Under a categorical approach, should each DSR level have a separately estimated relativity, or should credibility weighting, pooling or smoothing be applied? Explain how RCS would select that treatment. For log-LOESS, explain how the degree of smoothing and treatment of levels with limited exposure are determined.

**Rationale for Question:**

Establish how the proposed approaches balance fit with credibility and stability.

**RESPONSE:**

CC to insert response here.

**RATIONALE FOR REFUSAL TO FULLY ANSWER THE QUESTION:**

CC to insert rationale for refusal here.