



“When You Talk - We Listen!”



MANITOBA PUBLIC UTILITIES BOARD

Re:

MANITOBA PUBLIC INSURANCE CORPORATION (MPI)
2026/27 MPI GRA WORKSHOP

Before Board Panel:

Irene Hamilton, K.C.- Panel Chairperson
Patrick Ireland - Board Member
Kim Sharman - Board Member

HELD AT:

Public Utilities Board
400, 330 Portage Avenue
Winnipeg, Manitoba

July 3, 2025

Pages 1 to 99

Day 1 of 1

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APPEARANCES (cont'd)

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1	Table of Contents	
2		Page No.
3	List of Exhibits	5
4		
5	Discussion	6
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20	Certificate of Transcript	99
21		
22		
23		
24		
25		

LIST OF EXHIBITS		
Exhibit No.	Description	Page No.
1		
2		
3	PUB-1 Board Order 89/'25 - Manitoba Public	
4	Insurance Corporation (MPI or The	
5	Corporation): Interim Procedural Order	
6	respecting preliminary issues list and	
7	commercially sensitive information	
8	(CSI) process for 2026 General Rate	
9	Application for compulsory 2026/2027	
10	driver and vehicle insurance premiums	
11	and other matters - June 16, 2025	17
12	PUB-2 PUB letter re MPI 2026 GRA - timetable,	
13	MFRs and IR template - June 25, 2025	17
14	PUB-3 PUB letter re: MPI 2026 GRA - pre-	
15	qualifications - June 25, 2025	17
16	PUB-4 Notice of Public Hearing and pre-	
17	hearing conference - June 28, 20225	18
18	PUB-5 The Public Utilities Board's Rules of	
19	Practice and Procedure - effective July	
20	1, 2025	18
21	MPI-1 Manitoba Public Insurance (MPI) - 2026	
22	General Rate Application and cover	
23	letter files June 25, 2025.	13
24		
25		

1	LIST OF EXHIBITS		
2	Exhibit No.	Description	Page No.
3	TC-1	Taxi Coalition Intervener Application	
4		for the 2026/2027 MPI General Rate	
5		Application.	55
6	TC-2	Curriculum vitae of Sylvain Dion.	55
7	TC-3	Curriculum vitae of Jason Wong.	56
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

1 --- Upon commencing at 8:58 a.m.

2

3 PANEL CHAIRPERSON: Good morning,
4 everyone. And welcome to the pre-Hearing conference
5 for MPI's 2026/'27 General Rate Application that was
6 filed on June 25th, 2025.

7 I am Irene Hamilton, Chair of the Panel
8 -- this Panel of the Public Utilities Board. And
9 joining me today in the Hearing room are Board Members
10 Patrick Ireland and Kim Sharman.

11 The Board acknowledges that we are
12 gathered on the ancestral lands of the Anishinaabe
13 Cree, Anisininew, Dakota, and Dene peoples and the
14 homeland of the Red River Metis Nation.

15 The Panel is assisted in this General
16 Rate Application by Board Secretary Darren Christle,
17 Assistant Associate Secretary Jennifer Dubois,
18 Judicial Hearing assistants Kristen Schubert and
19 Christie Dweh. Todd Andres, Kara Moore, and Trevor
20 Yakimchuk will act as Board Counsel.

21 As in prior hearings, the Board is also
22 assisted by technical advisors from Cathcart Advisors,
23 Eckler Partners, and Paradigm Consulting.

24 The Public Utilities Board mandate is
25 to set just and reasonable rates that are in the

1 public interest. The public interest has been defined
2 by the Manitoba Court of Appeal as balancing the
3 impacts of rate increases on consumers with the fiscal
4 health of the utility.

5 In order to set just and reasonable
6 rates that are in the public interest, the Board will
7 need to hear and consider all of the evidence that is
8 adduced on the record of this proceeding and hear
9 submissions from Manitoba Public Insurance and all
10 approved Interveners.

11 Manitoba Public Insurance is applying
12 to the Board for approval of its premiums charged with
13 respect to compulsory driver and vehicle insurance.
14 This General Rate Application will be conducted in
15 accordance with the provisions of the Crown
16 Corporation's Governance and Accountability Act and
17 the Public Utilities Board Act.

18 We will employ throughout the process
19 the Board's rules of practice and procedure, which can
20 be viewed on the Board's website. Any questions in
21 terms of locating the rules can be posed to the Board
22 office.

23 In its Application, MPI proposes among
24 other things an overall 2.07 percent increase to
25 compulsory vehicle insurance premiums to take effect

1 on April 1st, 2026.

2 MPI proposes no changes to
3 miscellaneous permits and certificates, driver
4 premiums, Basic service and transaction fees, or fleet
5 rebates and surcharges.

6 MPI is applying for a change to the
7 driver's safety rating, DSR, system; that being, the
8 addition of DSR level plus 20 for the 2026/'27 policy
9 year. MPI is requesting that the DSR level plus 20
10 receive the same discount as DSR level plus 19.

11 MPI is not seeking a provisional rate
12 in the 2026 GRA, opting instead to make the rate in ==
13 in this Application its final request. It will
14 nevertheless update the overall rate indication using
15 the August 31st, 2025, interest rates in or about
16 October of 2025.

17 As always, MPI bears the onus in this
18 proceeding of satisfying the Board that its
19 application should be granted on the whole of the
20 evidence that it provides.

21 Our objectives for today's pre-hearing
22 conference are to identify prospective Interveners, to
23 learn of their reasons for intervention, to hear
24 submissions on the issues to be included in the scope
25 of the General Rate Application, more particularly,

1 any variations from the preliminary issues list which
2 was approved by the Board on June 16th, 2025, in its
3 interim procedural Order number 89/'25, to hear
4 requests from MPI or any proposed Interveners for
5 prequalification of expert witnesses they intend to
6 call at the public Hearing, to discuss the process for
7 commercially sensitive information and the rate update
8 to be filed by MPI in October, to discuss and arrive
9 at a timetable for the orderly exchange of evidence
10 and information throughout the GRA process.

11 The Board welcomes public
12 participation. Individuals or groups may submit
13 written comments to be made to the Board. Individuals
14 wishing to submit a brief or express comments at the
15 Hearing should contact the Board through its online
16 comment tool.

17 The Board will consider what weight, if
18 any, should be attached to information received from
19 members of the public, which is not sworn or subject
20 to cross-examination.

21 All parties and their representatives
22 and consultants should be aware that the Board intends
23 to livestream the public Hearing proceedings through a
24 link accessible on the Board's website. As such, the
25 use of acronyms is to be discouraged.

1 This would be not only for the benefit
2 of persons watching on the livestream, but also for
3 the benefit of Board members. It will assist the
4 Panels and the public's understanding of the issues
5 and evidence if acronyms are avoided.

6 The Board appreciates that some
7 potential Interveners who will be seeking cost awards
8 may not have provided detailed budgets at this time as
9 approval of Intervener status and approval of the
10 issues for each Intervener has not yet been given.

11 After the Board has issued its
12 procedural Order approving Intervener status and
13 issues, approved Interveners will be required to file
14 their detailed budgets within the time prescribed by
15 the Board.

16 Respective Interveners should
17 familiarize themselves with the Board's Intervener
18 cost policy, which is available on the Board's website
19 and which has previously been circulated to
20 Interveners of record.

21 The Manitoba Ombudsman has issued
22 privacy guidelines for administrative tribunals. The
23 PUB is mindful of its obligations under those
24 guidelines. Its decisions in respect of the
25 applications being considered will be sensitive to the

1 guidelines.

2 Personal information will not be
3 disclosed unless it is appropriate and necessary to do
4 so. However, the PUB advises participants that these
5 proceedings are public and that, as a result, personal
6 information protections are reduced.

7 I will now call upon Board counsel for
8 introductions, followed by MPI's Counsel, Mr. Guerra,
9 to introduce the representatives of MPI that are
10 present, after which I will call upon the prospective
11 Interveners who are present to introduce themselves.
12 Once we have heard all introductions, I will call on
13 Board Counsel to make opening comments.

14 Thank you, Mr. Andres...?

15 MR. TODD ANDRES: Thank you, Madam
16 Chair. We will start by introducing the -- myself,
17 first of all. I'm Todd Andres with Pitblato Law, co-
18 counsel to the Public Utilities Board. And to my
19 immediate right is my co-counsel, Kara Moore. And
20 then to her immediate right is co-counsel, Trevor
21 Yakimchuk -- Yakimchuk. Pardon me. And that is it
22 for counsel for the PUB.

23 MR. ANTHONY GUERRA: Thank you. Good
24 morning, Madam Chair. Anthony Guerra, vice-president,
25 chief legal and risk officer for MPI speaking. On my

1 left is Steve Scarfone, legal counsel. On my right is
2 Eric Wishnowski, legal counsel as well.

3 I'm also joined by our regular --
4 regulatory affairs support team this morning, which
5 includes Ted Meira, our manager of regulatory affairs,
6 Lily da Silva, our regulatory analyst, Chitranjan
7 Singh, our regulatory analyst, and Jeanie Dalman, who
8 sends her regrets but is also a regulatory analyst and
9 is -- is here in spirit with us this morning.

10 And just before we continue, I have one
11 (1) more housekeeping item, which is the entering of
12 MPI Exhibit number 1, which is the 2026 GRA filed on
13 June 25th, 2025, as well as the accompanying cover
14 letter.

15

16 --- EXHIBIT NO: MPI-1: Manitoba Public Insurance
17 (MPI) - 2026 General Rate
18 Application and cover letter
19 files June 25, 2025.

20

21 PANEL CHAIRPERSON: Thank you. Thank
22 you, Mr. Guerra. And if I could ask everyone to speak
23 loudly so that we can hear you over the jackhammers,
24 that would be appreciated. Ms. Dilay ...?

25 MS. KATRINE DILAY: Good morning,

1 Madam Chair and Board members. My name is Katrine
2 Dilay. I'm Counsel to the Consumers Coalition in this
3 matter, one of the prospective Interveners. And I'm
4 from the Public Interest Law Centre.

5 My co-counsel, Chris Klassen, and is
6 unable to join us today but will be joining us later
7 in the proceeding. And to my right is the Public
8 Interest Law Centre's current articling student, Ms.
9 Janessa Shechter (phonetic). Thank you.

10 PANEL CHAIRPERSON: Thank you. Ms.
11 Meek...?

12 MS. CHARLOTTE MEEK: Yes. Good
13 morning to the Board. My name is Charlotte Meek. I'm
14 representing the Coalition of Manitoba Motorcycle
15 Groups, or CMMG. Thank you.

16 PANEL CHAIRPERSON: Ms. Wittman...?

17 MS. KAREN WITTMAN: Good morning and
18 thank you, Madam Chair. And good morning to the Board
19 members. I'm Karen Wittman. And I'm here on behalf
20 of the Taxi Coalition. With me to my left is Alisen
21 Kotyk, who will be assisting this year. Thank you.

22 PANEL CHAIRPERSON: Thank you. And my
23 apologies. I'm not sure what your name is.

24 MS. JENNIFER SOKAL: My apologies.
25 Good morning. This is Jennifer Sokal. I'm on for the

1 Manitoba Motor Dealers Association should Intervention
2 status be granted. Michael Weinstein will also be co-
3 counsel.

4 PANEL CHAIRPERSON: Thank you.

5 DR. DARREN CHRISTLE: Madam Chair, if
6 I -- if I could. You did make a mention to speak
7 loudly, but even more importantly, folks, I do
8 apologize for all this noise. We couldn't have
9 anticipated the construction below our window. But if
10 you could make an overt effort to speak directly into
11 the mic, it's even more important than speaking loudly
12 because, of course, you know we're recording this, and
13 this is -- this could be problematic.

14 So, I do apologize for that. Sorry,
15 Madam Chair.

16 PANEL CHAIRPERSON: Thank you very
17 much. And I see on the screen we have Mr. Kreml.
18 Would you introduce yourself please?

19 MR. JORDAN KREML (by TEAMS): Yeah.
20 Good morning, Madam Chair and Board members. Jordan
21 Kreml speaking, last name, K-R-E-M-L. And I'm
22 appearing for Automotive Trades Association of
23 Manitoba, who is a proposed Intervener.

24 PANEL CHAIRPERSON: Thank you.

25 MR. JORDAN KREML (by TEAMS): Thank

1 you.

2 PANEL CHAIRPERSON: Mr. Andres...?

3 MR. TODD ANDRES: Thank you, Madam

4 Chair. And, yes, I appreciate that we are being

5 serenaded, so I'll do my utmost speak loud and

6 clearly.

7 So, first of all, the agenda is up on

8 the screens in front of everyone. And by way of

9 housekeeping matter, we do have some exhibits to enter

10 for the record. The first is PUB number 1, which is

11 Order -- Board Order 89/'25, dated June 16, 2025,

12 which sets out the preliminary issues list and

13 commercially sensitive information process for this

14 GRA, PUB 2, which is a letter from the Board

15 secretary/executive director, Dr. Darren Christle, to

16 MPI and all prospective Interveners, dated June 25,

17 2025, with attachments.

18 And that letter is addressed to such

19 issues -- pardon me. That letter addresses such

20 issues as Intervener responsibilities, minimum filing

21 requirements, or MFRs, the pre-hearing workshop,

22 today's pre-hearing conference, the format to be used

23 for information requests, et cetera.

24 PUB 3, letter from Dr. Darren Christle

25 to MPI and all prospective Interveners, dated June 25,

1 2025. And that letter related to the Prequalification
2 process for expert witnesses.

3 PUB-4, notice of public hearing and
4 pre-hearing conference dated June 28, 2025. PUB 5,
5 the Board's Rules of Practice and Procedure, which are
6 now effective, and they became effective July 1, 2025.
7 And those will be referred to throughout as the rules.

8

9 --- EXHIBIT NO. PUB-1: Board Order 89/'25 -
10 Manitoba Public Insurance Corporation
11 (MPI or The Corporation): Interim
12 Procedural Order respecting preliminary
13 issues list and commercially sensitive
14 information (CSI) process for 2026
15 General Rate Application for compulsory
16 2026/2027 driver and vehicle insurance
17 premiums and other matters - June 16,
18 2025

19

20 --- EXHIBIT NO. PUB-2: PUB letter re MPI 2026
21 GRA - timetable, MFRs and IR template -
22 June 25, 2025

23

24 --- EXHIBIT NO. PUB-3: PUB letter re: MPI 2026
25 GRA- pre-qualifications - June 25, 2025

1

2 --- EXHIBIT NO. PUB-4: Notice of Public Hearing
3 and pre-hearing conference - June 28,
4 20225

5

6 --- EXHIBIT NO. PUB-5: The Public Utilities
7 Board's Rules of Practice and Procedure
8 - effective July 1, 2025

9

10 MR. TODD ANDRES: Now, prior to
11 hearing from prospective Interveners, I can confirm
12 that each should provide the following information to
13 the Board in order that it can be deliberate on and
14 decide intervention.

15 An indication of their constituency and
16 their interests, an outline of the areas of MPI's
17 application that they intend to test, their reasons
18 for Intervener status, how their intervention will
19 assist the PUB in reaching its decision, their plans
20 to call evidence at the Hearing and whether they
21 intend to seek an award of costs, bearing in mind that
22 the proposed budget is to be provided to the Board in
23 accordance with the Board's Intervener cost policy.

24 As always, the Board will apply the
25 criteria set out in the Board's Intervener cost policy

1 with respect to the awarding of costs, such decisions
2 being at the sole discretion of the Board.

3 And then lastly, at the workshop on
4 Friday, June 25th, 2025, the preliminary issue list
5 was discussed. The Panel will be asked to issue as
6 part of the order following this pre-hearing
7 conference the final issues list for this GRA.

8 And I don't see anything else that
9 needs to be taken care of aside from that. And so
10 with that, Madam Chair, I'll turn it back to you.

11 PANEL CHAIRPERSON: Thank you, Mr.
12 Andres. Mr. Guerra...?

13 MR. ANTHONY GUERRA: Thank you, Madam
14 Chair. And just as a housekeeping issue, we have not
15 received the application for Intervener status from
16 the Automotive Trades Association. So, this was a new
17 indication for us.

18 So, if Counsel for the ATA could
19 provide us with a copy of that application, we'll
20 certainly take a look at it. We may ask for a short
21 adjournment just before we make some comments in
22 regards to that application, but we have -- we didn't
23 have any notice of that.

24 PANEL CHAIRPERSON: Yes. Certainly,
25 we'll do that. Thank you. And, Mr. Kreml, can you

1 get that in as quickly as possible?

2 MR. JORDAN KREML (by TEAMS):

3 Certainly. Now, it was emailed yesterday. I don't
4 know if there was a particular process to submit that
5 otherwise. You know, didn't -- we had tried to reach
6 out to the secretary a few times. And we understood
7 that the best way was just to email it.

8 So, I don't know if there's another
9 process to do that, but regardless, I can do that with
10 some direction.

11 PANEL CHAIRPERSON: Yes. I would
12 suggest that, if you could, please. If it's in the
13 Board office, that's fine. But for the sake of this
14 morning's pre-Hearing conference, if you could please
15 email that directly to Mr. Guerra, that would be
16 helpful.

17 MR. JORDAN KREML (TEAMS): I can do
18 that right now.

19 MR. ANTHONY GUERRA: Thank you. And
20 just in terms of some opening remarks, we understand
21 the purpose of today's pre-hearing conference. And
22 MPI will submit its position with respect to each of
23 the items that will be addressed today.

24 But before we get into some of those --
25 those -- topics, I'd like to just provide some

1 highlights in terms of the significant effort that it
2 was -- it was to prepare the 2026 General Rate
3 Application. And just for -- yes.

4 DR. DARREN CHRISTIE: Sorry, Mr.
5 Guerra, could you speak right into the microphone,
6 please?

7 MR. ANTHONY GUERRA: Right into the
8 microphone.

9 DR. DARREN CHRISTIE: Right into it.
10 Thank you.

11 MR. ANTHONY GUERRA: I will do my
12 best. I'll start by providing some numbers. Sixteen
13 (16), number of weeks that it took to prepare the
14 Application. Over one hundred (100), the number of
15 employees who helped prepare the Application.

16 Over five thousand (5,000), the number
17 of pages of the 2026 GRA. Over sixty-five hundred
18 (6,5000) hours, the number of hours it took to draft
19 the Application, and that doesn't include the time
20 that is -- is put in by our regulatory affairs team.

21 So, those are impressive numbers, and
22 they continuously increase every year. But it just
23 highlights the important work that our team does to
24 make sure that there is a comprehensive application
25 before this Board every year.

1 And so, I want to take this time just
2 to thank all of those individuals who assisted in
3 preparing the Application and who will continue to
4 support us throughout this process.

5 I also want to take some time to offer
6 my thanks to the prospective Interveners for their
7 interest in this rate Application. This regulatory
8 process is important and you, as prospective
9 Interveners, play a valuable role when you participate
10 in assessing the reasonableness of our rate
11 application, so thank you for that.

12 That said, MPI has made a number of
13 improvements to this year's rate Application. I'll
14 just highlight a few of those for your consideration.
15 Number 1, there were fewer redactions to documents
16 that were filed in this rate Application. There was
17 twenty (20) versus fifty-nine (59) in last year's
18 Application.

19 The appendices and chapters prepared
20 were in direct response to ninety-two (92) minimum
21 filing requirements that were -- that were drafted
22 with consultation with MPI looking to improve that
23 process to hopefully reduce the amount of information
24 requests received as the process continues.

25 We worked with Interveners to respond

1 earlier to Information Requests either by including
2 that information within the GRA, as I mentioned, or by
3 preparing material in advance to ensure that we can
4 respond to Information Requests in as timely a fashion
5 as possible.

6 And before we move into this Hearing, I
7 would like to also clarify a few matters. As Madam
8 Chair indicated, we are applying for a final rate this
9 year.

10 Since 2021, the overall rate that MPI's
11 applied for in the rate Application filing in June or
12 July of every year has been a provisional or
13 preliminary rate. There's been a few exceptions, and
14 I'll talk about that.

15 But this practice developed in response
16 to the Public Utilities Board routinely requesting
17 that MPI provide an updated rate based upon investment
18 -- interest rate data rather at the end of September
19 or August. And, as I mentioned, there was a couple of
20 exceptions to this.

21 So, last year, MPI applied for a 3
22 percent overall rate increase and specifically
23 indicated that this was the final rate request. And
24 in 2024, in the 2024 GRA, the government directed that
25 MPI request approval of the 0 percent overall rate

1 change.

2 So, the 2026 GRA also requests the
3 final rate, which is the 2.07 overall rate request.
4 This is neither preliminary nor provisional. And MPI
5 has identified a number of documents that will be
6 filed as part of its rate indication. We believe that
7 those would be similar to the documents that were
8 filed in the 2025 GRA.

9 So, I won't go into those in any more
10 detail, but subject to any clarifications that people
11 would like or additional documents that might be
12 beneficial, we would propose that we would use the
13 same documents, update the same documents that were
14 updated in last year's rate Application.

15 MPI doesn't plan on updating the claims
16 forecast as part of the rating update process as well,
17 so just to clarify that.

18 And despite seeking a provisional rate
19 again this year, MPI understands that the PUB rather
20 believes that this is a valuable practice of updating
21 the rate. And so, MPI will update its rates materials
22 by September 25th, 2025.

23 However, MPI will also file in addition
24 to those required materials evidence and argument in
25 support of its position that the annual practice

1 should be abandoned because providing the update is
2 incredibly resource intensive, and it requires the use
3 of resources at the same time as we are required to
4 prepare for the October hearing.

5 Also, we expect that the evidence will
6 show that between 2015 and 2023, the use of forecasts
7 based on March data was more accurate than the
8 forecasts based on August data, which demonstrates
9 that updating the new money yields using August data
10 does not improve the accuracy of the rate and -- and
11 can, in fact, actually do the opposite.

12 MPI anticipates that this could result
13 in pre-asks and therefore recommends -- and therefore
14 recommended rather when the timetable was being
15 constructed in April, that additional time be provided
16 for pre-asks.

17 So, the timetable that is before this
18 Board this morning reflects that those pre-asks be
19 filed by October 3rd and that responses be due by
20 October 8th. And it's important to note that there
21 was expressed deadlines for the pre-asks and the
22 responses. And this was done intentionally to avoid
23 responses provided during the Hearing, which creates a
24 trial by ambush of sorts atmosphere. And MPI is
25 trying to avoid or limit this as much as possible.

1 However, for this work to be -- to be
2 achieved, the pre-asks must be limited to evidence
3 that MPI -- evidence rather filed by MPI after the
4 information rounds -- Information Request rounds, such
5 as the financial condition test chapter or the rate
6 update material, issues that could not have been
7 reasonably addressed through the existing process but
8 are essential to resolve an issue in the GRA.

9 And although MPI seeks accommodation --
10 to accommodate rather the Interveners as much as it
11 can, it must take a stance on this issue, and that
12 means ensuring that the pre-asks are appropriate, in
13 order to advance the aims of fairness and efficiency
14 through the Hearing process.

15 I also want to speak briefly on the
16 financial condition test chapter. As stated in the
17 placeholder that's included in the 2026 GRA and the
18 overview section, that brings a list of supplemental
19 filings that we intend to file in late September or
20 early October, the financial condition test.

21 However, the document is primarily
22 prepared by EY. And Information Request rounds are
23 scheduled to be completed by August 20th. Therefore,
24 we have volunteered a dedicated spot on the timetable
25 for the Hearing for -- in the Hearing rather for

1 Interveners to ask questions, and the PUB to ask
2 questions, on that financial condition test so as to
3 try to reduce the number of undertakings captured
4 during the Hearing.

5 On the financial statements, the Board
6 of directors approved the 2024/'25 audited financial
7 statements in late June per the Crown Corporation's
8 Governance and Accountability Act.

9 The audited financial statements are
10 incorporated into the annual report, which must be
11 submitted to the responsible minister, in this case,
12 the Minister of Justice, within four (4) months of the
13 end of the fiscal year, which for MPI is July 31st.

14 The ability of MPI to make the content
15 of the annual report public is limited until it is
16 tabled by the responsible minister.

17 In the meantime, MPI has previously
18 filed the annual report confidentially until such time
19 as the report is tabled and expects to do so again
20 this year. MPI expects that the annual report will be
21 made -- will be provided to the responsible minister
22 on or about July 30th and commits to filing that
23 document confidentially with the PUB as soon as it is
24 provided to the responsible minister.

25 And again, as in keeping with

1 historical practice, once that document is public, the
2 claim of confidentiality would be -- would be
3 abandoned as well.

4 On the corporate strategy. MPI
5 includes in this year's GRA a chapter dedicated to the
6 corporate strategy. It went live on April 1st, 2025,
7 incorporating feedback received from a variety of
8 stakeholders, including some of those who are present
9 today, and receiving final support from the MPI Board
10 of Directors.

11 MPI includes a retail version of its
12 strategic plan as an appendix to its chapter. The
13 Board will recall that MPI claimed certain portions of
14 the situational analysis, strategic narrative, and
15 detailed Strategic Plan as containing confidential
16 information and should have been received in
17 accordance with the confidential process.

18 In confidential Order 135/'24, the PUB
19 directed certain information from those documents be
20 removed from the public record. And now despite the
21 fact that the corporate strategy is alive, MPI rather
22 believes that some or all of the confidential
23 information in those documents should remain
24 confidential.

25 Therefore, while MPI has not -- has not

1 filed any documents connected with the corporate
2 Strategic Plan confidentially in the event that other
3 documents, including the strategic analysis and other
4 documents I've referred to, are requested to be
5 entered into evidence again in this GRA, MPI may again
6 assert a claim of confidentiality over those portions
7 of the documents that the PUB has previously found to
8 be confidential.

9 And finally, on Information Requests
10 anticipated by potential Interveners along with the
11 minimum filing requirements, I can indicate that MPI
12 included a handful of requests beyond the -- beyond
13 the minimum filing requirements and the 2026 GRA but
14 is working to provide outstanding information as
15 quickly as it can. Thank you.

16 PANEL CHAIRPERSON: Thank you, Mr.
17 Guerra. Ms. Dilay...?

18 MS. KATRINE DILAY: Thank you, Madam
19 Chair. The 2026/2027 Manitoba Public Insurance
20 General Rate Application process represents an
21 important opportunity for the Public Utilities Board
22 and those involved in the regulatory process to assist
23 MPI while it is still in the midst of recovery after
24 years of turbulence.

25 As many in the room will know, the

1 Corporation faced numerous challenges in recent years,
2 including a government ordered organizational review,
3 many high-level leadership changes, a historic labour
4 interruption, and most recently, the cancellation of
5 what was supposed to be the largest technology project
6 of its history.

7 As always, Manitobans look to MPI, its
8 regulator, the PUB, as well as Interveners to use the
9 regulatory process to ensure transparency and
10 accountability for our Crown owned monopoly auto
11 insure, and to ensure that basic insurance rates are
12 just and reasonable and in the public interest.

13 This year, we are presenting an
14 Intervener Application on behalf of the Consumers
15 Coalition.

16 We will go into more detail in a couple
17 of minutes in terms of who is the Consumers Coalition.
18 But briefly, our clients are a coalition of two (2)
19 Manitoba organizations which are deeply invested in
20 the effective regulation of MPI for the benefit of
21 Manitoba consumers.

22 The Consumers Coalition applies to
23 intervene in the 2026 MPI GRA to represent the
24 interests of the private passenger vehicle customer
25 class and ensure that customers' voices are heard.

1 The Consumers Coalition views its
2 primary role as Intervener to be that of assisting the
3 Public Utilities Board in setting just and reasonable
4 rates. The Consumers Coalition looks forward to
5 making valuable contributions in the GRA process.

6 Our clients filed their Application to
7 intervene yesterday, on July 2nd. I will not review
8 all the materials in detail, but what I propose to do
9 is to first outline who is the Consumers Coalition,
10 then highlight the reasons for the proposed
11 intervention, followed by our client's proposed area
12 of analysis -- areas of analysis. Pardon me.

13 Then I will provide some comments on
14 the Consumers Coalition preliminary budget estimate
15 which was filed along with its Application to
16 intervene. And throughout these comments, I
17 anticipate to respond to the topics highlighted by Mr.
18 Andres.

19 So, I'll first start with an overview
20 of who is the Consumers Coalition. In this year's MPI
21 rate application process, the Manitoba branch of the
22 Consumers' Association of Canada was a regular
23 Intervener in MPI hearings will be joined by the
24 Manitoba Seniors Equity Action Coalition in its
25 intervention. Together we propose to refer to these

1 two (2) organizations as the Consumers Coalition.

2 Further information relating to these
3 two (2) organizations is provided at pages 3 to 6 of
4 Attachment A to the Application to intervene.

5 By way of brief background, CAC
6 (Manitoba) is a volunteer nonprofit independent
7 organization working to inform and empower consumers
8 and to represent the consumer interest in Manitoba.

9 Formed in 1947, the organization is
10 governed by a volunteer Board of Directors who are
11 elected annually at a general meeting of its
12 membership. There is no written resolution of the
13 Board of Directors of CAC (Manitoba) supporting the
14 intervention in this proceeding. However, the
15 decision to participate and to seek intervention
16 status was made by consensus among members of the
17 board of directors, which then applied to the Public
18 Interest Law Centre for representation in this
19 process.

20 Following approval of CAC (Manitoba)'s
21 application by Legal Aid Manitoba, the board of
22 directors instructed legal counsel to proceed with
23 this application and to participate in the proceeding
24 in a manner consistent with the organization's past
25 practice.

1 The Manitoba Seniors Equity Action
2 Coalition is a relatively new entity which is
3 dedicated to promoting the quality of life and equity
4 among older adults in Manitoba through community
5 education, research, and advocacy.

6 The Manitoba Seniors Equity Action
7 Coalition traces its roots to an intensive engagement
8 process in 2022 and 2023 funded by the Manitoba Law
9 Foundation. That process invited interaction with
10 seniors from across Manitoba, including southern,
11 northern, rural, and urban residents from diverse
12 cultural and socioeconomic backgrounds.

13 The Manitoba Seniors Equity Action
14 Coalition is governed by an eighteen (18) member board
15 of directors designed to reflect the diversity in the
16 population that it serves. It is an incorporated,
17 not-for-profit organization and is currently in the
18 process of applying for charitable status.

19 The board of directors of the Manitoba
20 Seniors Equity Action Coalition passed a motion at its
21 April 15th, 2025, board meeting to join the clients
22 currently represented by the Public Interest Law
23 Centre in both the Manitoba Hydro General Rate
24 Application as well as the Manitoba Public Insurance
25 General Rate Application.

1 I'll now -- now move on to discuss the
2 reasons for the proposed intervention, which is for
3 reference included at page -- starting at page 7 of
4 Attachment 8 to the Application to Intervene.

5 The Consumers Coalition aims to protect
6 and reconcile the interests of all Manitoba Public
7 Insurance customers with a particular emphasis on
8 members of the private passenger class. It seeks to
9 present an evidence-based intervention guided by a
10 principled consideration of the consumer interest. It
11 is represented in this matter by the Public Interest
12 Law Centre.

13 MPI ratepayers will be directly
14 affected by the Public Utilities Board's decision in
15 this matter, both as a result of the overall rate
16 change being requested starting in 2026, as well as
17 changes to the Basic deductible proposed for 2026 and
18 2027, as well as other issues which will have longer-
19 term -- term impacts on automobile insurance rates in
20 Manitoba.

21 Some of these longer-term issues
22 include the status of implementation of
23 recommendations from the organizational review, the
24 management of MPI's investment portfolio, the
25 cancellation of Project NOVA and the treatment of

1 costs relating to the project, the longer-term
2 information technology strategy, as well as the
3 evolution of the driver safety rating system.

4 Advocating for the interests of
5 Manitoba consumers and more specifically members of
6 the private passenger customer class is central to the
7 mandate of the Consumers Coalition.

8 In addition to the direct impacts on
9 its members and the groups it works for, the Consumers
10 Coalition brings significant expertise and experience
11 to this process that we expect will be helpful for the
12 Public Utilities Board.

13 For more than thirty (30) years, CAC
14 (Manitoba) has been active in PUB rate regulation
15 matters relating to Manitoba Public Insurance,
16 Manitoba Hydro, Centra Gas, government check cashing,
17 and payday lending rates.

18 CAC (Manitoba) also has extensive and
19 intersecting regulatory experience before the Canadian
20 Radio, Television, and Telecommunications Commission
21 at the federal level, as well as the Manitoba Clean
22 Environment Commission. CAC (Manitoba) takes pride in
23 its longstanding record of quality evidence-based
24 advocacy.

25 CAC (Manitoba) has been engaged in

1 regulatory matters relating to Manitoba Public
2 Insurance by intervening in every General Rate
3 Application and Special Rebate Application, and by
4 attending each technical conference held by the PUB.

5 In recent regulatory proceedings before
6 the Public Utilities Board on MPI matters, CAC
7 (Manitoba) has played an active role on all issues
8 listed in the preliminary issues list. And these
9 issues for reference are listed on page 8 of
10 Attachment 'A' to the Consumers Coalition Application
11 to Intervene.

12 While the Manitoba Seniors Equity
13 Action Coalition is a newer entity, the experience and
14 information it has gathered through its engagement
15 with seniors are expected to facilitate the Board's
16 review of the issues in this hearing.

17 Specifically, the Manitoba Seniors
18 Equity Action Coalition conducted extensive engagement
19 in 2022 and 2023 which led to the identification of
20 policy priorities.

21 As part of its work on behalf of
22 seniors from across Manitoba, the Manitoba Seniors
23 Equity Action Coalition joins the Consumers Coalition
24 to ensure utility rates are affordable, accessible,
25 and accountable.

1 I will now move on to providing some
2 comments regarding the proposed areas of analysis by
3 the Consumers Coalition.

4 As in past hearings, the intervention
5 of the Consumers Coalition will be guided by the
6 Public Utilities Board criteria for the consideration
7 of just and reasonable rates. The Public Utilities
8 Board has previously characterized the key elements of
9 its independent review function and rate-setting rule
10 in orders both relating to Hydro and to MPI. For
11 reference, we have listed those at page 10 of
12 Attachment A.

13 These criteria include ensuring that
14 forecasts are reasonably reliable, ensuring that
15 actual and projected costs incurred are necessary and
16 reasonable, assessing the reasonable revenue needs of
17 an applicant -- in this case MPI -- in the context of
18 its overall general health, determining an appropriate
19 allocation of costs between and within customer
20 classes, and finally setting just and reasonable rates
21 in accordance with statutory objectives.

22 Through its Information Requests,
23 participation at the oral hearing, cross-examination
24 of witnesses, and oral submissions, the proposed
25 intervention of the Consumers Coalition will consider

1 all issues identified in the preliminary issues list.

2 The specific issues that the Consumers
3 Coalition intends to canvass in this proceeding are
4 listed at page 11 of Attachment 'A' to the Application
5 to Intervene. This list is still preliminary,
6 recognizing that we are still at the beginning stages
7 of the process, but some of the key issues include the
8 proposed rate indication, including the accuracy of
9 MPI's claims and expense forecasts; the reliability of
10 the underlying methodologies; and whether the rates
11 proposed are just and reasonable.

12 Our clients will examine the proposed
13 increase in the Basic deductible from seven hundred
14 and fifty dollars (\$750) to a thousand dollars
15 (\$1,000) and its impacts, including the effects on
16 consumers -- sorry, on customer rates and
17 affordability and whether the change is in the public
18 interest.

19 Our clients will examine the
20 organizational review undertaking by EY, and in
21 particular an update relating to MPI's responses to
22 findings and implementation of recommendations from
23 the review.

24 Our clients intend to examine MPI's
25 corporate strategy, including the status of the plan's

1 implementation and costs relating to the plan. They
2 intend to explore MPI's budgeting process framework
3 and what measurements are being used to assess
4 performance as well as whether key performance
5 indicators and objectives and key results are being
6 used.

7 As in previous years, our clients will
8 examine the Corporation's financial forecasts and
9 projected operating expenses, including the
10 reasonableness of budgeted full-time equivalence and
11 the effectiveness of measures to contain operating and
12 claims costs.

13 We expect to explore the treatment of
14 Project NOVA costs and MPI's proposed process for the
15 project's cancellation, as well as MPI's information
16 technology strategy, client expenditures, and the
17 necessity and justifications of information technology
18 projects

19 with the assistance of Mr. Valter
20 Viola, Our clients will look at the management and
21 performance of MPI's investment portfolio, including
22 management decision-making updates to the asset
23 liability management and inflation hedging strategies
24 and efforts to improve performance.

25 Our clients will ask questions

1 regarding the upcoming and proposed changes to MPI's
2 rating model and processes. And finally, they will
3 also look at the proposed amendments to and the future
4 plans for improving the Driver Safety Rating Model to
5 correct the actuarial soundness of discounts and
6 surcharges.

7 At the current time, the Consumers
8 Coalition does not anticipate calling witnesses or
9 filing independent expert evidence. This recognizes
10 the early stage of the process and that our clients
11 typically review responses to Information Requests
12 before making a decision whether or not independent
13 expert evidence will be required.

14 So, our clients would respectfully
15 reserve the right to seek permission to provide
16 independent expert evidence after it has reviewed
17 responses to Information Requests. It would then seek
18 direction from the board in terms of the qualification
19 of those independent expert witnesses.

20 To support its intervention, the
21 Consumers Coalition does intend to retain a team of
22 expert analysts. This team and many of these names
23 will be familiar to the Board.

24 The team includes Mr. Peter Dick,
25 former MPI Controller and regulatory accountant; Mr.

1 Valter Viola, investment consultant and managing
2 director and principal at Cortex Consulting; Mr. Scott
3 Greenlay, an experienced IT project management
4 consultant whose experience includes eight (8) years
5 at -- as MNP LLP's National Director of Technology
6 Consulting.

7 This year, our clients also intend to
8 retain Mr. Michael Aldor who has over twenty (20)
9 years experience at an information technology
10 professional and who will support the efficient
11 participation of Mr. Scott Greenlay.

12 Our clients will also retain Mr. Rajesh
13 Sahasrabuddhe and Mr. Felix Chan, actuarial
14 consultants with the firm Oliver Wyman, and who will
15 be supported by two (2) senior analysts from their
16 firm.

17 And finally, our team will also retain
18 Darren Rainkie, a consultant with thirty-two (32)
19 years of hands-on and multifaceted experience in
20 public utility leadership, rate regulation, and
21 financial management.

22 As in previous years, the expert team
23 supporting the Consumers Coalition is engaged in
24 active discussions on how to efficiently coordinate
25 their respective roles while minimizing costs and

1 duplication.

2 This will be done in a few different
3 ways, including through an arrangement with the --
4 with CMMG by which the services of Mr. Valter Viola
5 will be shared and which has in the past significantly
6 reduced duplication in -- in the time that two (2)
7 consultants would otherwise take to familiarize
8 themselves with the same issue.

9 Efficiencies will also be achieved by
10 Mr. Peter Dick acting as both a generalist who can
11 efficiently assist in flagging key issues for the
12 specialists on the team and who also takes the lead on
13 specific issues. In particular, Mr. Dick and Mr.
14 Rainkie's efforts will be complimentary and not
15 duplicative.

16 By assembling an interdisciplinary team
17 and assigning its members distinct responsibilities,
18 the Consumers Coalition can efficiently prepare more
19 meaningful contributions to this proceeding than would
20 be possible with fewer consultants providing more
21 general expertise.

22 By assigning each team member a narrow
23 scope of focus that draws on their specific areas of
24 expertise, the Consumers Coalition ensures that its
25 participation benefits from in-depth, evidence-based

1 analysis while maintaining efficiency. We have filed
2 the resumes of the consultants for the proposed
3 Intervener as attachments to the Application to
4 Intervene.

5 Before closing, I'll just provide some
6 brief comments on the preliminary budget estimate that
7 was filed along with our client's Application to
8 Intervene.

9 The Consumers Coalition does intend to
10 request an award of costs for its participation in the
11 2026/2027 MPI GRA. As stated in the PUB's Rules of
12 Practice and Procedure -- and we've reproduced these
13 criteria on page 13 of the Attachment 8 -- the Board
14 may award costs to be paid to any Intervener who has
15 made a significant contribution relevant to the
16 hearing that led to a better understanding of the
17 issues before the Board, participated in the hearing
18 in a responsible manner and cooperated with other
19 Interveners who have common objectives in the outcome
20 of the hearing, who has demonstrated a substantial
21 interest in the outcome of the hearing, and who has
22 represented the interests of rate-payers or the public
23 interest and not merely its own business interests.

24 In this hearing, the Consumers
25 Coalition intends to make a significant contribution

1 to the proceeding through -- in two (2) rounds of
2 Information Requests, participation at the oral
3 hearing, cross-examination of witnesses, opening and
4 closing submissions, and, if necessary, independent
5 evidence and expert testimony.

6 The Consumers Coalition's intervention
7 will be guided by the PUB'S criteria for the
8 consideration of just and reasonable rates, by the
9 interests of Manitoba consumers, and by the Public
10 Utilities Board's Rules of Practice and Procedures.

11 The Consumers Coalition will
12 participate in this hearing in a responsible manner,
13 including by collaborating with other Interveners
14 where possible.

15 The Consumers Coalition remains in
16 close contact with the representatives of other
17 prospective Interveners, including the Coalition of
18 Manitoba Motorcycle Groups and the Taxi Coalition. We
19 intend to work cooperatively with the Board, MPI, and
20 all Interveners to maximize hearing efficiency and
21 effectiveness.

22 As in the last hearing, the Consumers
23 Coalition will be supported by the Consumers Advisory
24 Panel. This is a group that has provided valuable
25 input to CAC (Manitoba) in prior interventions in MPI

1 GRAs, as well as most recent proceedings relating to
2 Manitoba Hydro.

3 The Consumers Coalition represents the
4 interests of all Manitoba ratepayers, and in
5 particular the private passenger class. And as a
6 result, it has a substantial interest in the outcome
7 of the proceeding and represents the interests of a
8 substantial number of ratepayers.

9 We've provided a few additional
10 comments with respect to the detailed budget estimate
11 starting on page 14 of Attachment 'A' to our
12 Application to Intervene. But I don't propose to go
13 through those this morning unless the Board has any
14 question --questions regarding those comments.

15 Madam Chair, those would be our opening
16 comments and our comments relating to our Application
17 for Intervene (sic). I'm happy to address numbers 3
18 to 7 on the agenda or to leave those for a later
19 discussion.

20 PANEL CHAIRPERSON: Thank you, Ms.
21 Dilay. No, I think that we can deal with 3 to 7
22 following the opening comments of all Interveners.

23 MS. KATRINE DILAY: Thank you, Madam
24 Chair.

25 PANEL CHAIRPERSON: Ms. Meek...?

1 MS. CHARLOTTE MEEK: Thank you, Madam
2 Chair. Good morning again to the Board, MPI, fellow
3 Interveners, and members of the public. Again, my
4 name is Charlotte Meek, of DFS Kaneski UnRuh LLP, and
5 I'm representing the Coalition of Manitoba Motorcycle
6 Groups, or CMMG.

7 I'll start off by providing a brief
8 background about my clients, the Coalition of Manitoba
9 Motorcycle Groups, and then I will summarize the
10 reasons for our intended intervention and areas of
11 interest for my client.

12 CMMG is a volunteer-run non-profit
13 organization which advocates for motorcycle safety and
14 promotes motorcycle ridership. CMMG has approximately
15 three hundred (300) members and is governed by a board
16 of directors.

17 CMMG has four (4) main stated
18 objectives: 1) to promote the safety of motorcyclists
19 in Manitoba;

20 2) to promote legislative reform and
21 consult with government officials and representatives;

22 3) to disseminate information to aid in
23 the continued safe enjoyment of motorcycle
24 transportation; and

25 4) to participate in the PUB hearings

1 to ensure just and reasonable rates for motorcyclists
2 in the province.

3 CMMG has advocated for motorcycle
4 interests in this hearing for over thirty (30) years.
5 Throughout this hearing, CMMG intends to represent the
6 interests of not only its members, but all motorcycle
7 riders in the province of Manitoba.

8 CMMG is also an active participant in
9 various stakeholder activities with MPI

10 In my client's view, the rate-setting
11 methodology has a distinct impact on the motorcycle
12 class which requires a specific focus. The needs and
13 interests of motorcyclists often differ from other
14 rate groups, and CMMG is able to provide firsthand
15 knowledge regarding the motorcycle experience.

16 CMMG intends to provide commentary on
17 the impact on motorcyclists and to advocate for fair
18 and reasonable rates. CMMG intends to fully
19 participate in the application process, including
20 throughout the discovery process and during the
21 hearing.

22 As in previous years, CMMG will be
23 cognizant of cost savings and will only attend during
24 hearing days that are relevant to the interests of our
25 client.

1 As has been done in the past, CMMG has
2 already connected with other Interveners work to a --
3 areas of common interest and promote efficiencies
4 where possible.

5 For this Application, CMMG has retained
6 the assistant of -- assistance of two (2) consultants
7 being Jason Wong of Dion Strategic Consulting and
8 Valter Viola at Cortex Consulting.

9 Mr. Wong will provide actuarial advice
10 and is also retained by the Taxi Coalition, and Mr.
11 Viola will provide advice regarding investments and is
12 also being retained by the Consumers Coalition. MG
13 anticipates that the sharing of experts' consultants
14 will provide efficiencies through the hearing process
15 and ultimately lead to cost savings.

16 The issues expected to be canvassed by
17 CMMG in this year's Application are outlined in more
18 detail in our written submissions, but the most
19 important issues are as follows: the rate-making
20 process and the rate indication, including the overall
21 rate increase of 2.07 being sought by MPI, and the
22 rate sought for motorcyclists being an increase of
23 6.82 percent; the proposed deductible increase to a
24 thousand dollars (\$1,000) and its impact on the
25 motorcycle class specifically; the Capital Management

1 Plan; MPI's investment portfolio and asset liability
2 management study; claims forecasting; the Driver
3 Safety Rating system, including the rating scale and
4 rating model; operational bank marking; changes to
5 integrated cost allocation methodology since the 2025
6 GRA; and the interest rate forecast.

7 CMMG notes that a full review of the
8 GRA has not yet being completed, and it's possible
9 that other areas of interest may arise that CMMG would
10 anticipate examining on.

11 At this time, CMMG does not intend to
12 call any evidence at this stage of the hearing.

13 CMMG does intend to seek an award of
14 costs, and we have provided a cost budget, which is
15 attached to our application which has been filed.

16 Subject to any questions, those are our
17 initial submissions regarding CMMG's Application for
18 Intervener Status.

19 PANEL CHAIRPERSON: Thank you, Ms.
20 Meek.

21 Ms. Wittman...?

22 MS. KAREN WITTMAN: Thank you, Madam
23 Chair. Karen Wittman, of Myers LLP, for the record.
24 Also attending with me is Alisen Kotyk, and together
25 we are representing the Taxi Coalition.

1 In my remarks this morning, I intend to
2 touch on three (3) topics. First, I will provide
3 brief background information with respect to the Taxi
4 Coalition. I then propose to review our intended
5 intervention, including the areas on which the Taxi
6 Coalition intends to focus its intervention. And then
7 finally, I will provide some information regarding our
8 proposed experts.

9 By way of background, the Taxi
10 Coalition is a coalition of two (2) independently
11 operated taxi companies, Duffy's Taxi and Unicity
12 Taxi. Together, they represent 80 percent of the taxi
13 cab Vehicles For Hire in the province and 22 percent
14 of the accessible Vehicles For Hire.

15 They are collaborating for the purpose
16 of intervention in these proceedings on issues of
17 common concern to the taxis and Vehicle For Hire
18 industry generally.

19 To ensure that there is a broad
20 representation of taxi Vehicle For Hire interest in
21 these proceedings, the Taxi Coalition remains in
22 contact and consults with smaller taxi dispatch
23 companies throughout the province.

24 As far as the reasons for the proposed
25 intervention are concerned, taxis pay among the

1 highest premiums of any insurance use and represent
2 some of the most acute risk. As a result, the Taxi
3 Coalition has a significant interest in insurance
4 rates.

5 As the Board is aware, MPI has not put
6 forward a Vehicle For Hire framework for approval in
7 this year's General Rate Application. As we
8 understand it, Vehicle For Hire blanket policies are
9 once again being held in abeyance for the application
10 this year, and the time bands that have been used in
11 the past will continue to remain in use.

12 Given that no Vehicle For Hire
13 framework or model has been put forward, the Taxi
14 Coalition intends to take a more focussed or limited
15 approach to its intervention this year compared to its
16 interventions in previous years.

17 But although our intervention may be
18 more focussed, we are nevertheless of the view that
19 the intervention is still necessary. The fact that a
20 revised Vehicle For Hire framework or model has not
21 been put forward again this year raises a number of
22 questions for the Taxi Coalition about MPI's future
23 plans.

24 Since the initial introduction of
25 transportation network companies, there has been a

1 steady increase in passenger Vehicle For Hire insured
2 vehicles year after year with their numbers having
3 almost doubled since their initial introduction. The
4 number of taxi Vehicle For Hire insured vehicles on
5 the other hand has not increased and instead has
6 remained relatively consistent.

7 The Taxi Coalition remains particularly
8 concerned with ensuring that premiums charged are
9 fair, accurate, and cost-based so as to promote a
10 level playing field in the industry.

11 The Taxi Coalition therefore intends to
12 ask questions at a high level testing this
13 transparency and fairness, particularly with respect
14 to MPI's treatment of passenger Vehicle For Hire as
15 compared with other Vehicle For Hire stakeholders due
16 to the inherent differences in business models.

17 A further of area of focus for the Taxi
18 Coalition relates to rate making and potentially the
19 minimum credibility used as part of MPI's rate-making
20 methodology.

21 Previously, we'd been concerned about
22 the appropriateness of forecasting serial losses in
23 the Vehicle for Hire class and wanted to ensure that
24 rates reflect an appropriate expectation of future
25 costs. This continues to be a concern to the Taxi

1 Coalition. We also intend to examine MPI's compliance
2 with Orders, as well as any outstanding directives
3 from past Orders.

4 Finally, and perhaps most critically,
5 we intend to explore the parameters around the
6 development of a new or revised Vehicle for Hire
7 framework. In our view, the development of a new, or
8 revised, Vehicle for Hire framework ought not to be
9 held in abeyance indefinitely.

10 As much as we appreciate the
11 opportunity to intervene in past General Rate
12 Applications, the Taxi Coalition does not seek to
13 intervene indefinitely. And, ideally, we would like
14 to have some progress made in respect of this issue.

15 As part of our intervention, therefore,
16 we are looking to ensure that deadlines are put in
17 place or a timeframe is established for the
18 development of a new or revised Vehicle for Hire
19 framework.

20 On this issue I think it is important
21 to note that we have been having some discussions with
22 Manitoba Public Insurance legal's Counsel -- legal
23 Counsel, as well as discussions between the Taxi
24 Coalition and MPI directly.

25 In our view, and has been discussed

1 with MPI's Counsel, the best approach may be to
2 continue with the intervention, while at the same time
3 continuing a direct dialogue with MPI and our
4 respective clients as part of an attempt to develop an
5 approach that will work for all.

6 In terms of evidence, the Taxi
7 Coalition does not currently anticipate calling any
8 evidence, but would like to reserve the right to do so
9 once Round 1 Information Requests have been provided.
10 We are not, therefore, seeking to have any witnesses
11 qualified at this time.

12 We do, however, have expert consultants
13 that we intend to use in conjunction with CMMG in
14 support of the Taxi Coalition's Intervention. The
15 experts are from Dion Strategic and include Sylvain
16 Dion, an actuary fellow and Jason Wong, an actuarial
17 consultant.

18 If granted Intervener status, we intend
19 to seek an award of costs. As in prior years, the
20 Taxi Coalition will make every effort to collaborate
21 with other Interveners to avoid any overlap or
22 duplication and to keep costs to a minimum.

23 We note that our preliminary budget was
24 inadvertently omitted from our initial application,
25 but was subsequently submitted and we trust it has

1 been received by the Board. And I'm seeing Dr.
2 Christle nod 'yes', so I'm taking that as an
3 affirmative response.

4 Finally, we would like to file the
5 following exhibits on behalf of the Taxi Coalition.
6 As Exhibit TC-1, we would like to file the Taxi
7 Coalition Intervener Application for the 2026/2027 MPI
8 General Rate Application, which includes both the
9 application form, the Attachment 'A' and our
10 preliminary budget.

11 Next, the curriculum vitae of our
12 Expert Sylvain Dion, we would like to file as TC-2 and
13 then finally, the curriculum vitae of our expert,
14 Jason Wong, we would like to file as TC-3.

15 Subject to any questions the Board may
16 have, that concludes our opening remarks.

17

18 --- EXHIBIT NO. TC-1: Taxi Coalition
19 Intervener Application
20 for the 2026/2027 MPI
21 General Rate
22 Application.

23

24 --- EXHIBIT NO. TC-2: Curriculum vitae of
25 Sylvain Dion.

1

2 --- EXHIBIT NO. TC-3: Curriculum vitae of
3 Jason Wong.

4

5 PANEL CHAIRPERSON: Thank you, Ms.
6 Wittman. Ms. Sokal ...?

7 MS. JENNIFER SOKAL: Good morning
8 again. As mentioned, I'm Jennifer Sokal. I'm with
9 MLT Aikins, and we represent the Manitoba Motor
10 Dealers Association, which I will refer to as MMDA
11 throughout these submissions.

12 I'll first give a brief overview of
13 MMDA and then I'll canvas its intended intervention
14 and, in doing so, will address the Information
15 requested by Mr. Andres.

16 So, the MMDA represents the new vehicle
17 franchise dealerships in Manitoba and deals with
18 provincial issues that affect the wellbeing of
19 franchised automotive -- automotive, pardon me, auto -
20 - automobile dealers.

21 The MMDA represents forty-seven (47)
22 dealer members who collectively cover approximately
23 half of all collision repairs in Manitoba. The
24 organization's mission is to be the singular voice of
25 all franchise new automotive -- automobile dealers in

1 Manitoba and its vision is that it is a trade
2 association providing dealers with a strong and
3 unified voice to government, community and
4 manufacturers.

5 MMDA works with various stakeholders,
6 including specifically it has a good relationship with
7 MPI and it is committed to continue to work
8 collaborate -- collaboratively with MPI. It
9 participates in MPI's external stakeholder committee
10 on loss prevention. The loss prevention initiatives
11 undertaken by MPI seek to identify and implement
12 programs to address the primary drivers of claims and
13 claim costs, with the intention of reducing the social
14 and financial impacts to ratepayers.

15 The MMDA also sits on the technical and
16 parts committees of MPI and the program and
17 accreditation committee of MPI, which consists of
18 members, both of MMDA and of the Automotive Trades
19 Association, otherwise known as ATA.

20 These committees cover issues ranging
21 from parts, business rules, estimating standards,
22 quality of repair, direct repair, performance
23 recognition programs, shop measures, training
24 requirements, accreditation agreements and
25 compensation. It also sits on the glass committee

1 with MPI.

2 Moreover, there's been a shortfall of
3 qualified skill -- skilled workers in Manitoba, being
4 automotive service technicians and body shop
5 technicians.

6 MMDA works with Red River College to
7 help recruit people to its program and is involved in
8 an international recruitment program.

9 MMDA is also consulted by MPI
10 respecting compensation rates to collision and repair
11 centers. However, there's no agreement on
12 compensation rates that's reached as between MPI and
13 the MMDA directly; rather, MPI imposes the
14 compensation rates on individual repair centers after
15 consultation with MMDA and ATA.

16 I'm told by my client that the rates
17 are presented to the individual repair centers as a
18 take it or leave it offer and are not negotiated.
19 But, of course, as I mentioned, those rates are
20 reached by MPI after the consultation process with
21 MMDA and ATA.

22 In terms of its intended intervention,
23 MMDA was presented with the compensation rates for
24 2025 through 2027, which were determined by MPI in
25 only mid June of 2025 -- 2025. It's highly concerned

1 that the repair -- the rates proposed are not keeping
2 up with inflation and the needs of the industry in
3 order to ensure the industry's viability and to ensure
4 that safe repairs are conducted.

5 During the consultation process, MPI
6 advised that the reason for -- that the repair centers
7 could not receive higher compensation rates was due to
8 MPI's own financial struggles, including low reserves
9 and high volumes of hail claims.

10 As a result, this is the reason for
11 MMDA's proposed intervention in that it appears that
12 inadequate compensation rates for repair centers are
13 subsidizing MPI, such that a higher rate at this or
14 future GRAs may be required in order to ensure that
15 repair centers can be adequately paid to ensure the
16 continued viability of the industry and driver safety.

17 MMDA has applied to intervene in these
18 proceedings in order to inform the Board about its
19 concerns respecting the under-insurance of high-end
20 vehicles and how that comes into play during repairs
21 and how inadequate compensation to repair centers
22 negatively impacts ratepayers as a whole and, as such,
23 is not merely focusing on its own business interests.

24 The MMDA is aware that this Board has
25 no jurisdiction to order that MPI pay at increased

1 rates. And it seeks intervention to instead ensure
2 that fulsome information as to the real costs of
3 repairs in Manitoba are before the Board.

4 Repair costs are one of the most
5 significant parts of MPI's costs and so it is critical
6 that this issue be fully considered in order to
7 determine if the requested rate is, indeed, fair and
8 reasonable.

9 MMDA intends to participate in the
10 discovery process and to provide oral submissions in
11 this proceeding. As MMDA only very recently made the
12 decision to intervene, it is not yet determined if it
13 will be bringing evidence before the Board including
14 expert evidence. I expect that this decision will be
15 impacted by the content of the Information Requests
16 and responses. Importantly, if MPI is able to provide
17 the Board with certain information through the
18 Information Requests that MMDA makes, it may not be
19 necessary for the MMDA to call witnesses.

20 In any event, MMDA understands the
21 strict schedule the Hearing operates on and would
22 advise the Board Counsel as soon as possible if it
23 does anticipate calling any witnesses.

24 Further, given its extremely recent
25 decision to seek intervention status, MMDA and my

1 office have not yet had the opportunity to consult
2 with any of the other Interveners, Board Counsel or
3 MPI's Counsel regarding their proposed interventions
4 or submissions. We intend to do so and to ensure that
5 there's no duplication as between MMDA's intervention
6 and the other interventions.

7 And I would be remiss not to note that
8 I have also not received ATA's application materials,
9 and so I'm not aware of the issues that it intend --
10 intends to raise. I would not be surprised if there
11 is some consistency between the two (2) organizations
12 as to the issues of import to them. And so, I expect
13 that we would, assuming intervention status is
14 afforded to both organizations, I assume we would be
15 collaborate -- collaborating quite closely on the
16 interventions.

17 In that vein, MMDA only intends to
18 participate as far as necessary to ensure that the
19 fulsome evidence respecting repair costs and
20 forecasting is before the Board. It will only be
21 attending relevant hearing days and will only examine
22 witnesses on the issues relevant to its intervention.

23 You have heard me mention road safety a
24 few times. MMDA is aware that road safety is not an
25 issue in this GRA and is, instead, going to be

1 considered in the next GRA. While I expect that there
2 may be some references to road safety on behalf of
3 MMDA throughout the proceeding, MMDA certainly does
4 not intend to address road safety, given the matters
5 that are at issue in this year's GRA.

6 We expect then that the core focus of
7 MMDA's intervention will be on the cost of operation
8 and, in particular, claims costs, as well as claims
9 forecasting.

10 As acknowledged by MPI in Part 7 CF-
11 10.2 of the application, collision severity is
12 trending up. This has been anticipated by MMDA for
13 some time given that the complexity of vehicles has
14 gone up and so the cost of repairs for each vehicle
15 would have also increased.

16 As a simple example, is that a -- a --
17 a bumper replacement may now involve the checking
18 repair or replacements of various sensors that would
19 not have previously been there or impacted by a mere
20 fender bender, for instance. MMDA intends to test the
21 assumptions and trend forecasts that were submitted by
22 MPI in this regard.

23 Additionally, at CF 2.1 of the
24 application, MPI has acknowledged that inflation for
25 vehicle repair costs continues to impact claims

1 forecasting. MMDA intends to test how these inflated
2 costs have impacted MPI's bottom line and thus the
3 requested rate increase, or if those costs have been
4 disproportionately borne by repair shops.

5 Additionally, Directive 9 in PUB Order
6 number 2-25, MPI was ordered to develop key
7 performance indicators or KPIs to assist with cost
8 controls and that that be provided in this GRA.

9 MPI provided this information in Part 2
10 COM Appendix 3A and 3B and Part 10, Appendix 28 of the
11 application. The key performance indicators developed
12 by MPI all deal with collision claim costs.

13 At Appendix 3A of the GRA, MPI wrote,
14 and I quote:

15 "To create meaningful KPIs that
16 effectively support cost control,
17 MPI decided to focus on collision
18 claim costs, given their
19 significant contribution to
20 overall expenditures.

21 Within the claims process, the
22 following key dimensions were
23 selected as critical areas for
24 performance analysis: repair,
25 total loss, salvage and

1 subrogation.
2 These dimensions were selected due
3 to their considerable influence on
4 claims costs and their capacity to
5 yield actionable insights and
6 controls. Each dimension reflects
7 a critical phase in the claim's
8 life cycle, where targeted KPIs
9 can offer insights into cost
10 behavior and drive effective
11 outcomes. By monitoring these
12 indicators, MPI can better
13 understand performance trends,
14 identify areas requiring attention
15 and take corrective action to
16 support cost contain --
17 containment efforts."

18 None of these key performance
19 indicators focus on cost controls internal to MPI's
20 operations, which I believe was the crux of what my
21 friends at formerly CAC and now the -- the Consumer's
22 Coalition requested in last year's GRA in which
23 resulted in this direction. MMDA certainly intends to
24 collaborate with the Consumer's Coalition respecting
25 this issue to ensure that there is no duplication of

1 information respect -- requested regarding these KPIs.

2 But also, it has a -- a more specific
3 and -- and focused perspective than does CAC as it
4 relates to the cost of claims, such that, MMDA's
5 intervention would assist the Board in assessing the
6 KPIs that have recently been developed and submitted
7 by MPI.

8 We have no comments on the preliminary
9 issues list and would expect that MMDA's proposed
10 intervention would fit well within the issue list as
11 drafted. In particular, issue number 3, Compliance
12 with Past Orders, issue number 9, Expenses and issue
13 number 10, Claims Forecasting.

14 Turning lastly to costs, MMDA would be
15 requesting costs associated with its intervention if
16 it is granted. We've submitted a cost estimate along
17 with our application. I can answer questions that the
18 Board may have about it, but in short, it is
19 consistent with the estimates of Interveners in the
20 past. It compliments that myself, as the more junior
21 counsel on the team, would be doing most of the heavy
22 lifting, and that senior counsel would not be spending
23 a disproportionate amount of time in preparing for the
24 proceeding.

25 We intend to provide a revised

1 estimate, if MMDA does indeed intend to retain a
2 consultant on this matter, or call one as a witness.
3 At this time, I've included a placeholder tariff rate
4 so that our estimate reflects a consultant being
5 retained, but I will advise my friends with PUB
6 Counsel as to MMDA's intentions as soon as possible.

7 And so lastly, I'd just like to file as
8 an exhibit, the MMDA Application package for
9 Intervener status, which includes its cost estimate.
10 And those are MMDA submissions subject to any
11 questions the Board may have.

12 PANEL CHAIRPERSON: Thank you, Ms.
13 Sokal. Mr. Kreml ...?

14 MR. JORDAN KREML (TEAMS): Good
15 morning, Madam Chair. Again, Jordan Kreml here for
16 the Automotive Trades Association of Manitoba. I'll
17 refer to them as the ATA.

18 Now, the ATA is an association that
19 represents collision and glass repair shops located in
20 Manitoba, and it has a mandate of enabling the
21 automotive industry to survive and prosper, by helping
22 members produce a quality repair experience for
23 consumers at a fair price, for a fair profit.

24 Now, the reason for ATA's proposed
25 intervention here is to advocate for an increase in

1 premiums in excess of the proposed 2.7 percent. Now,
2 just by way of background here, compensation payable
3 to accredited repair shops are set out in schedules to
4 the Light Vehicle Accreditation Agreement between MPI
5 and these accredited repair shops. And I currently
6 understand that those rates have expired, and MPI has
7 proposed new rates.

8 However, the ATA voted not to accept
9 those rates as they're far below reasonable market
10 rates, and they're insufficient to account for
11 steadily increasing market inflation, minimum wage for
12 technicians, and the increased presence of EV vehicles
13 in Manitoba that require repair work.

14 So, all that said, there needs to be an
15 increase to the rates payable to collision repair
16 centers. Otherwise, there might be an impact on
17 ratepayers, for example, collision repair shops may
18 stop taking on work, as some already have, to
19 prioritize private work. Some of them -- it may be
20 the case that some are forced to cease work because
21 it's no longer economical, and they may just divert
22 their business into another province.

23 But at the end of the day, if the
24 compensation payable to these collision repair shops
25 is insufficient, it's going to have an impact on

1 ratepayers. Now, why this matters here, is that I
2 understand the source of funds for compensating these
3 reshar -- these repair shops are premium payments. So
4 there needs to be enough revenue, and a proper budget
5 to compensate these repair shops at reasonable market
6 rates.

7 Now, our -- our submissions are more
8 fully set out in our Intervener application, but the
9 ATA intends to address numerous issues, and one of
10 them being, the requested vehicle rate. As I already
11 mentioned, we intend to address what that rate needs
12 to be, upon consideration of the -- the source of the
13 funds for that compensation being the premium
14 payments. But we intend to address the rate-making
15 issue. We'll make submissions on the process of rate
16 making and the factors that need to be considered in
17 rate making.

18 We intend to address the financial
19 forecast issue, and make submissions on what needs to
20 be considered in the financial forecast process,
21 including compensation to collision repair shops at
22 reasonable market standards; tend to address the cost
23 of operations, and cost containment measures.

24 So, we'll -- we'll look at and explore
25 the reasonableness of expenses, particularly expenses

1 related to damaged claims, and compensating collision
2 repair shops. And further, we'll address -- we'll
3 address whether setting rates payable to accredited
4 repair shops is a cost containment measure that MPI is
5 adopting, and whether that's reasonable, particularly
6 in consideration of what that impact may have on
7 ratepayers.

8 And we intend to address the claims
9 forecasting issue and what needs to be considered in -
10 - in that process of forecasting claims.

11 And we intend to address operational
12 benchmarking and comparing Manitoba to other provinces
13 and why rates may be different. And -- and we'll
14 point out there, that rates are higher in other
15 provinces, one of the reasons being, is they need
16 sufficient revenue to compensate accredited repair
17 shops at reasonable market rates.

18 Now, what I will say is, I heard the
19 MMDA's submission and it sounds like there is a lot of
20 overlap between us. And I can forward our application
21 to the MMDA and maybe we'll discuss whether there
22 needs be -- whether we collaborate throughout this.
23 But I will say there does seem to be some overlap
24 there.

25 Now, in this process, the ATA intends

1 to call expert evidence who will opine on automo --
2 automobile repair rate industry norms, including the
3 prevailing market rates for labour and materials. And
4 we intend to call witnesses who have experience
5 working in and managing accredited repair shops, and
6 knowledge of the true cost of repairs related to
7 damage claims, and the impact that there may be, if
8 compensation payable to accredited repair shops isn't
9 at a reasonable market rate. And the ATA does intend
10 to see costs of this.

11 Now, we did submit a budget with a req
12 -- with a budget for experts. It may be the case that
13 retaining an expert with the MMDA may be appropriate
14 here. But, all that said, again, I just want to
15 reiterate that our submissions are more fully set out
16 in our Intervener application, and for the time being,
17 those will be our opening statements. Thank you.

18 PANEL CHAIRPERSON: Thank you, Mr.
19 Kreml. Mr. Guerra ...?

20 MR. ANTHONY GUERRA: Thank you, Madam
21 Chair. I will attempt to address each of the
22 Intervener applications in the order that they were
23 received, but my apologies if I do take them out of
24 the order.

25 In respect of the Consumers' Coalition,

1 that being, the Consumers' Association of Canada and
2 Manitoba Seniors Equity Action Coalition, MPI does not
3 oppose the Intervener application presented by the
4 Consumers' Coalition. However, the joint intervention
5 of the CAC and the Manitoba Seniors Equity Action
6 Coalition does raise some questions for MPI, and
7 maybe, perhaps the PUB as well. So, I'll just briefly
8 state them out here and it's something that perhaps
9 maybe the PUB should consider as it's considering this
10 joint application.

11 PUB rule 16 indicates that the PUB may
12 invite applications for Intervener status, if the
13 participation of the Intervener is likely to assist
14 the Board in gaining a better understanding of the
15 issues, or enable the perspective of different groups
16 of ratepayers to be fairly represented.

17 Considering the admirable job that the
18 Consumers' Association of Canada has done previously
19 to represent all MPI customers, especially those in
20 the private passenger, major class; and with the
21 benefit of input from focus groups, and stakeholder
22 engagement; and considering that the Consumers'
23 Coalition will be represented by the same lawyers
24 preventing individual members of that coalition from
25 advancing conflicting positions.

1 The question that MPI raises today is:
2 Does the addition of the Manitoba Seniors Equity
3 Action coalition truly enable the PUB to receive a
4 different perspective from that that would previously
5 have been advanced from the Consumers' Association of
6 Canada?

7 The next question that MPI asks is: Had
8 Manitoba Seniors Equity Action Coalition applied
9 separately for leave to intervene, it would've been
10 required to provide its own budget. However, as this
11 is a joint application, the costs are not so
12 separated. Therefore, the question that MPI asks
13 today, and that the PUB may wish to resolve or
14 consider as it's considering this application, is what
15 costs above those that would've been sought by the CAC
16 alone, will repairs incur in this GRA to receive the
17 perspective of this coalition?

18 In respect of the application from the
19 Coalition of Manitoba Motorcycle Groups, MPI does not
20 oppose the intervention of that application, and I
21 don't have any further comments to add in respect to
22 that application.

23 In regards to the application from the
24 Taxi Coalition, while MPI does not oppose the
25 Intervener application of the Taxi Coalition, it

1 raises questions about whether a Vehicle for Hire
2 should remain an issue to be canvassed in this rate
3 application and whether the scope of the Taxi
4 Coalition's intervention should be more limited than
5 that -- that being sought today. So, for example, in
6 the 2025 Generate Rate Application, the Taxi Coalition
7 identified two (2) chief areas of concern, one being
8 the Vehicle for Hire framework, future product
9 development and the telematics initiative.

10 And the second chief area of concern
11 for the Taxi Coalition last year, was the minimum
12 credibility standards for rate making. On that first
13 issue being the framework and telematics initiative,
14 the Taxi Coalition itself asked the PUB to issue
15 directives last year to assist in establishing more
16 concrete targets for progress.

17 In this rate application, MPI notes
18 that it presented the Taxi Coalition with an initial
19 taxi blanket model, which is currently under review by
20 the Taxi Coalition. Since the Taxi Coalition
21 advocated not to proceed with the Vehicle for Hire
22 technical conference this year, the issue is whether
23 there is anything left to canvas in the generate GRA
24 application with respect to Vehicle for Hire
25 framework, and specifically, the initial taxi blanket

1 model, or whether this should be deferred to the 2027
2 General Rate Application.

3 Regarding the taxi telematics
4 initiative, the tel -- the Taxi Coalition advocated in
5 the 2025 General Rate Application for MPI to provide a
6 report on the initiative in the 2026 General Rate
7 Application. However, the Taxi Coalition has since
8 raised concerns with the commercial sensitivity of the
9 data and has asked that it alone be the recipient of
10 that data. The 2026 General Rate Application provides
11 an update as to the status of the telematics
12 initiative, which indicates that the results are
13 expected this summer.

14 The question, at this point, is whether
15 there will be further discussion on the telematics
16 initiative in the 2026 GRA beyond the update that was
17 provided to date?

18 And, on the minimum credibility
19 standards for ratemaking in response to Order 145-23,
20 Directive 10.5, MPI filed a report in the 2025 General
21 Rate Application on whether the 10 percent minimum
22 credibility used for -- in the classification rate-
23 making process, remains appropriate or should be
24 changed. MPI argued that there was no basis to
25 disturb its judgmental selection of the 10 percent

1 minimum credibility, as it best balances limiting
2 volatility with reacting to emerging trends.

3 Taxi Coalition challenged MPI's
4 analysis calling instead on the PUB to direct MPI to
5 increase its selected minimum credibility standard
6 from 10 percent to 15 percent. And in the
7 alternative, asked the PUB to direct MPI to file in
8 the 2026 General Rate Application additional analysis.
9 The PUB did not accept the Taxi Coalition's
10 recommendation to increase the minimum credibility
11 selection to 15 percent, but did accept its
12 recommendation for further analysis.

13 And MPI complied with Directive 6 from
14 Order 2-25 and provided the additional analysis at the
15 RC chapter Appendix 10 A. The issue for us, at this
16 point in time is whether the Taxi Coalition continues
17 to view the 10 percent selection as problematic. And,
18 if so, is limited intervention on that basis
19 justified? So those are the questions that are posed
20 by MPI in respect of that application.

21 In respect of the application from the
22 Manitoba Motor Dealers Association, MPI notes that the
23 application states, MPI advised MMDA that it was
24 unable to offer proper compensation because MPI's own
25 financial struggles with the failed Project NOVA and

1 low reserves. For the record, MPI does not agree with
2 the accuracy of that statement and wishes to make that
3 clear today.

4 MPI does not oppose the Intervener's
5 application of the MMDA, however, but does make the
6 following observations, and poses the following
7 questions for the PUB to consider.

8 MMDA applies to intervene on issues
9 related to inadequate compensation under insurance of
10 vehicles and the impact of these on the repair
11 industry.

12 The Public Utilities Board does not
13 have jurisdiction to direct MPI on discussions,
14 negotiations with business partners, nor can it direct
15 changes in legislation. The PUB could, of course,
16 issue recommendations and direct MPI to conduct
17 studies or analyses, and report on its findings; and
18 could find that the MPI's rate request is insufficient
19 based upon its established need. And, of course, that
20 was the result of last year's application.

21 With that said, PUB Rule 17 now expands
22 the potential role of presenters to provide
23 submissions and evidence. And it -- and this, is --
24 sorry, and the question is is the participation as the
25 MMDA truly -- as an Intervener rather, truly

1 warranted, or is this a situation where their
2 intervention, or their participation I should say
3 rather, is best as a presenter as was the case in the
4 2021 GRA when the Manitoba Motor Dealers Association
5 participated as a presenter.

6 Now, with respect to the application of
7 the Automotive Trades Association, I think as -- as
8 correctly noted here, there are many areas of perhaps
9 common ground or overlap even, I should say, with
10 respect to the two (2) applications. And so the
11 question raised for MPI, at this point in time, is
12 with respect to that application. Although MPI would
13 not oppose the application, the -- the question that
14 would remain for MPI is whether or not there is a
15 possibility of such intervention being by way of a
16 joint Intervener application, similar to the
17 Consumers' Coalition that we see today.

18 The other issue that is -- that is
19 raised from the application of both the MMDA and the
20 ATA is access to confidential information. The Board
21 will note that in, for example, the claims forecasting
22 chapter, the actuaries based their forecasts for
23 future years on certain assumptions, including rates
24 for the repair industry a -- a rates. Sorry.

25 So, what I'm saying here, is that that

1 information has historically been kept confidential to
2 protect the integrity of the discussions and
3 negotiations that MPI has with the repair industry.
4 And certainly, in the event of the application being
5 granted for either of those two (2) organizations, MPI
6 would certainly want to make sure that access to
7 information is not to the prejudice of MPI in future
8 discussions and negotiations with the repair industry.

9 And then as I mentioned again, with
10 respect to MMDA, I think the same logic applies to ATA
11 with respect to whether or not its participation is
12 best as a presenter as opposed to an Intervener. And
13 again, I would remind the -- the Board today that the
14 ATA also presented in the 2021 General Rate
15 Application. And those are our submissions with
16 respect to the applications of the Interveners.

17 PANEL CHAIRPERSON: Thank you, Mr.
18 Guerra. I'll now go back to the perspective
19 Interveners and ask you to respond only to any new
20 issues that Mr. Guerra has raised. Ms. Dilay ...?

21 MS. KATRINE DILAY: Thank you, Madam
22 Chair. And we certainly appreciate the comments and
23 questions raised by Mr. Guerra, and are prepared to
24 provide brief comments in response.

25 As this Board may know, the Consumer'

1 Association of Canada, Manitoba Branch, regularly
2 intervenes in Manitoba Hydro proceedings, as well as
3 payday lending proceedings, and telecommunications
4 matters at the federal level, as part of a coalition
5 and not by itself. We've -- we have observed that
6 this strategy is beneficial for two (2) main reasons.

7 The first is that it increases the
8 breadth and depth of the understanding of the issues
9 by the clients as it adds an additional consumer
10 perspective, in this case, including for -- from a
11 group of consumers who may be disproportionately
12 impacted by higher rate increases.

13 The second reason is that intervening
14 as a coalition rather than as individual members
15 increases efficiency by not needing to seek other
16 counsel and other expert consultants, and rather
17 relying on the same team of technicians. So, this
18 second reason relating to efficiency also responds to
19 MPI's comment regarding the budget.

20 Based on our practice representing
21 coalitions in regulatory proceedings, as well as the
22 preliminary budget estimate that was filed yesterday
23 with the application to intervene, we do not expect
24 any additional costs to the intervention by the
25 addition of the Manitoba Seniors Equity Action

1 Coalition. Essentially, the coalition will rely on
2 the same legal team as CAC has in the past, and the
3 same team of consultants as CAC has in the past.

4 In our clients' view, this proposed
5 joint intervention is anticipated to reduce overall
6 regulatory costs relating to this hearing. As the
7 Manitoba Seniors Equity Action Coalition is not
8 seeking its own intervention as well as its own legal
9 counsel and expert consultants and rather, will share
10 the legal and consultant costs with CAC Manitoba. I
11 hope these comments are helpful, but happy to answer
12 any other questions. Thank you very much.

13 PANEL CHAIRPERSON: Thank you, Ms.
14 Meek, I'm assuming you have no comments.

15 MS. CHARLOTTE MEEK: No comments.
16 Thank you, Madam.

17 PANEL CHAIRPERSON: Thank you. Ms.
18 Wittman ...?

19 MS. KAREN WITTMAN: Thank you, Madam
20 Chair. And thank you to MPI for those comments. We
21 have a few comments in response.

22 With respect to our ongoing
23 involvement, the Taxi Coalition is of the view that it
24 is both useful and necessary. We anticipate that
25 there is additional information that we will be able

1 to canvas, and potentially follow up on, particularly
2 through the Information Request process. We are
3 concerned that without our ongoing intervention, the
4 Vehicle for Hire framework will not continue to
5 proceed and develop. It -- it needs to not be held in
6 abeyance any further.

7 We do appreciate that there has been
8 some blanket policy proposals and other proposals put
9 forward, but those were only put forward very
10 recently; and unfortunately, our clients have not had
11 a chance to fully review and consider those proposals.

12 As far as the telematics information is
13 concerned, we have not yet seen the results nor have
14 we seen what it is that MPI proposes to produce as a
15 report. We do have concerns about what might be
16 submitted, and we do -- would like to reserve the
17 right to make submissions in that regard.

18 I think we've addressed most of the
19 issues that were raised by MPI, but if the Board has
20 any specific questions of us, we'd be happy to answer
21 them.

22 PANEL CHAIRPERSON: Thank you. Ms.
23 Sokal ...?

24 MS. JENNIFER SOKAL: Just a few quick
25 points of reply. MMDA is aware of the CSI or

1 Commercially Sensitive Information process, and so, if
2 that's a concern for MPI, if -- if MMDA intends to
3 seek that information, it will do it in accordance
4 with that process.

5 With respect to the comments about a
6 joint intervention with ATA, I have no instructions in
7 that regard. Needless to say, we would be intending
8 to collaborate as far as possible with ATA on the
9 issues that there are overlap, which could include as
10 my friend from my ATA noted potentially a joint
11 retainer of experts. We just have not discussed this
12 at all. And so, I can't give any more information on
13 that to the Board at this point, or a sort of position
14 on -- on joint intervention.

15 Lastly, just in terms of the point made
16 regarding a public presentation being potentially
17 sufficient for the intended intervention, the public
18 presentation does not allow MMDA to participate in the
19 Information Request process or the discovery process.
20 And moreover, if MMDA were to give a public
21 presentation, this could arguably carry less weight
22 before the Board in terms of its considerations.

23 The information that the MMDA seeks to
24 ensure is before the Board, is relevant to what should
25 be considered by MPI in setting reasonable rates. And

1 so, it's critical that that information be placed
2 before the Board in a manner that it can fully
3 consider. Thank you.

4 PANEL CHAIRPERSON: Thank you. Mr.
5 Kreml ...?

6 MR. JORDAN KREML (TEAMS): Thank you.
7 So first addressing the confidential documents issue,
8 if that's the process that needs to happen and MPI
9 needs to protect themselves and that's necessary, then
10 -- then so be it.

11 Now, with respect to whether the ATA
12 should be a presenter or an Intervener, if I didn't
13 mention this in my opening remarks, ATA intends to
14 fully participate in these proceedings to ensure that
15 consideration is given to all factors in the budgeting
16 process, including the cost and expense of
17 compensating accredited repair shops. I think that
18 position and that information is relevant to these
19 proceedings.

20 The other thing is we're proposing to -
21 - to produce an expert witness. And, I know I didn't
22 mention this in my opening remarks, but that proposed
23 expert is Pamela Dupuis, and she's a CPA and she has
24 experienced generating reports with respect to
25 standard rates payable to collision repair centers,

1 including MPI's rates. So that information would be
2 beneficial here. And as an Intervener, we can make
3 sure that the Board has that information.

4 Lastly, addressing the potential joint
5 intervention between the ATA and the MMDA. As my
6 friend had said, I'm also not positioned to confirm
7 that we're able to do that. I don't have instructions
8 on that, but I'm sure the ATA and the MMDA could
9 jointly, on at least some issues, participating in
10 these proceedings together. So those are my reply
11 comments. Thank you.

12 PANEL CHAIRPERSON: Thank you, Mr.
13 Kreml. It is 10:30 right now, and I think it's
14 probably an appropriate time to take a break for the
15 morning and we'll come back and then address the
16 preliminary issues list. So, if we could be back at
17 quarter to 11:00, please.

18

19 --- Upon recessing at 10:31 a.m.

20 --- Upon resuming at 10:48 a.m.

21

22 PANEL CHAIRPERSON: Okay. Thank you.
23 We will now continue the pre-hearing conference. We
24 are dealing with preliminary issues list. I would
25 like to ask Mr. Guerra for any comments that you have

1 on the issues list, or procedural matters.

2 MR. ANTHONY GUERRA: Yes. Thank you,
3 Madam Chair. And just one (1) brief other
4 housekeeping item. Just I always want to make sure
5 that MPI's position on the record is -- is clarified,
6 that although we haven't taken a position against any
7 of their prospective Intervener applications, that
8 should not be interpreted as an endorsement to their
9 intervention or claims for costs.

10 And so, where MPI has not opposed those
11 interventions, we want to restate that we reserve the
12 right to challenge in part or in all the costs claim
13 by the Interveners where it's deemed appropriate to do
14 so. And we wish to avoid any claim that MPI is
15 estopped from challenging based upon representations
16 made this morning.

17 PANEL CHAIRPERSON: Thank you. Could
18 you please move the mic closer to yourself.

19 MR. ANTHONY GUERRA: My apologies.
20 With respect to the preliminary issues list, so the
21 Public Utilities Board established on an interim basis
22 the preliminary issues list for this rate Application
23 in Order 89/'25, which was delivered on June 16th,
24 2025.

25 In so doing, the Public Utilities Board

1 altered -- altered the list to incorporate feedback
2 from prospective Interveners or its own further
3 deliberations and included revisions to reflect the
4 cancellation of project NOVA, which was the addition
5 or changes to issue 21, clarifying that the IT
6 Strategic Plan and the IT expenses must include
7 modernization initiatives and other major programs,
8 that's issue 22, the addition of the EY organizational
9 review at issue 24, and added as an issue, the
10 traumatic brain injury claims handling independent
11 review report that the Public Utilities Board
12 recommended the Manitoba government commission through
13 Order 2-25, which you'll find at issue number 19.

14 At the issues workshop held on June
15 27th, the preliminary issues list was again discussed
16 in some more detail. And from MPI's perspective, the
17 following further amendments should be made, or at
18 least considered, in respect of the Basic deductible
19 change.

20 When MPI introduced product changes
21 under the compulsory extension review project, or
22 CERP, a few years ago, the Public Utilities Board
23 added the changes to the issues list as an issue
24 requiring more detailed consideration.

25 Therefore, MPI suggests in this case

1 that the issues -- the issues list be so amended so
2 that there would be -- in addition to issue 25, there
3 would be among -- sorry -- among those issues
4 requiring more detailed consideration, there would be
5 something to the effect of the impact of changes to
6 the Basic deductible to be enacted on April 1st, 2026.

7 So, we would suggest that that be the
8 new issue 25, which would move road safety to issue
9 26, which we know is deferred issue to the next GRA.

10 And as I discussed briefly in response
11 to the Application for Intervener status from the Taxi
12 Coalition, Vehicle for Hire is identified as issue 11
13 on the issues list to be canvassed in the normal
14 course.

15 However, in order 60-25, the Board
16 found that there was a change of circumstances that
17 justified rescinding directive 12 from Order 2-25,
18 which directed a Vehicle for Hire technical conference
19 this summer.

20 In so doing, the Board noted that MPI
21 could not confirm whether the results of its taxi
22 telematics initiative would be ready in time for the -
23 - for that conference and that the technical
24 conference would not likely include detailed
25 discussions about a taxi specific insurance model.

1 The Board will note that MPI did not
2 include a Vehicle for Hire centric chapter in this
3 rate Application. Instead, the Basic AutoPac
4 coverage, or BAC chapter, includes a section
5 addressing topics related to Vehicle for Hire, which
6 section confirms that MPI is not proposing any changes
7 to its existing Vehicle for Hire insurance model, the
8 time ban model, and continues to engage with
9 stakeholders on changes to that model.

10 MPI does not anticipate presenting a
11 Vehicle for Hire Panel at this Hearing in October.
12 Therefore, as the Taxi Coalition did not want to
13 participate in the technical conference and as the
14 General Rate Application demonstrates that there is
15 little information to be shared in terms of updates to
16 the Vehicle for Hire framework, the question for today
17 is whether it continues to make sense for Vehicle for
18 Hire to be identified as an issue for review in the
19 normal course or whether this issue should be deferred
20 to the 2027 GRA.

21 If there is interest in exploring the
22 results of the telematics initiative and the Vehicle
23 for Hire model, it may be best to leave this issue on
24 the list. However, MPI notes that it recommended that
25 time be dedicated to these issues through a technical

1 conference, which MPI submits would have been a more
2 efficient and more appropriate use of time than simply
3 canvassing the status of discussions between it and
4 the Taxi Coalition through Information Requests and
5 cross-examination.

6 So, those are our positions with
7 respect to the preliminary issues list.

8 PANEL CHAIRPERSON: Thank you. Ms.
9 Meek...?

10 MS. CHARLOTTE MEEK: I have no
11 comments to make in regard to the preliminary issues
12 list. Thank you, Madam Chair.

13 PANEL CHAIRPERSON: Thank you. Ms.
14 Dilay...?

15 MS. KATRINE DILAY: Thank you, Madam
16 Chair. The Consumers' Coalition thanks the Board for
17 consideration of its comments prior to the procedural
18 Order 89-25 being issued.

19 As a result of the previous comments
20 that our client submitted, we only have one (1)
21 further comment to make.

22 Similar to MPI's recommendation, the
23 Consumers' Coalition recommends that an issue be added
24 to the issues list, namely the impacts of MPI's
25 planned increase to the Basic deductible from seven

1 hundred and fifty dollars (\$750) to one thousand
2 dollars (\$1,000), and this is for two reasons.

3 First, the increase to the Basic
4 deductible is directly related to the rate being
5 sought by MPI in this rate Application, as can be seen
6 in part 8, RI Appendix 3, of the General Rate
7 Application.

8 And second, the increase to the Basic
9 deductible will have a direct impact on consumers as
10 can also be seen in the rate Application, specifically
11 in part 9, the Basic deductible change chapter.

12 As Mr. Guerra indicated, there is a
13 precedent for this type of issue to be added to the
14 issues list in a General Rate Application process.
15 The impact of changes to Basic coverage and
16 deductibles was examined by the PUB in past GRAs, more
17 -- most recently, in the 2021 GRA where issue 19 was
18 the impact of the changes to Basic coverage and
19 deductibles enacted on May 7th, 2020.

20 Otherwise, we have no additional
21 comments on the issues list. Thank you.

22 PANEL CHAIRPERSON: Thank you. Ms.
23 Wittman...?

24 MS. KAREN WITTMAN: Thank you, Madam
25 Chair. In response to the suggestion that Vehicle for

1 Hires doesn't -- number 11 doesn't necessarily need to
2 be maintained on the issues list, we submit that it
3 should.

4 In our view, it makes sense to leave it
5 there in order for us to be able to canvas whatever
6 proposals MPI is working through right now with the
7 Taxi Coalition, as well as to review some of the
8 telematics initiatives results, if appropriate. And
9 if it's -- so for those reasons, we think it should be
10 maintained on the list.

11 PANEL CHAIRPERSON: Thank you. Ms.
12 Sokal...?

13 MS. JENNIFER SOKAL: MMDA has no
14 comments on the issues list.

15 PANEL CHAIRPERSON: Thank you. Ms.
16 Kreml...?

17 MR. JORDAN KREML (by TEAMS): The ATA
18 also has no comments on the issues list. Thank you.

19 PANEL CHAIRPERSON: Thank you. Mr.
20 Guerra, any response?

21 MR. ANTHONY GUERRA: No. Our regular
22 submissions were sufficient. Thank you.

23 PANEL CHAIRPERSON: Thank you. Mr.
24 Guerra, do you intend to seek prequalification of any
25 expert witnesses?

1 MR. ANTHONY GUERRA: No, we do not.
2 But we reserve the -- the right to -- to present an
3 expert witness in response to any -- and Intervener
4 evidence that may be presented through the course of
5 this proceeding.

6 PANEL CHAIRPERSON: Thank you. Ms.
7 Dilay, anything further to add?

8 MS. KATRINE DILAY: No, Madam Chair.
9 As indicated, the Consumers Coalition does not
10 currently anticipate calling witnesses or filing
11 independent evidence, but we would reserve the right
12 to seek permission and direction from the Board after
13 reviewing the Information Request responses. Thank
14 you.

15 PANEL CHAIRPERSON: Thank you. Ms.
16 Meek...?

17 MS. CHARLOTTE MEEK: Thank you, Madam
18 Chair. Similarly to my friends, we're not seeking to
19 qualify an expert witness, but reserve the right to
20 later in the proceeding if necessary.

21 PANEL CHAIRPERSON: Ms. Wittman...?

22 MS. KAREN WITTMAN: We take the same
23 position as the other Interveners, not calling anybody
24 at this point and do not anticipate doing so, but
25 would like to reserve that right. Thank you.

1 PANEL CHAIRPERSON: Ms. Sokal...?

2 MS. JENNIFER SOKAL: Given its recent
3 decision to intervene, MMDA has not yet made a
4 decision about whether it will be calling any
5 witnesses. So, at this time, we're not seeking to
6 prequalify anyone, but we would touch base with Board
7 counsel as soon as possible if a decision is made in
8 the affirmative in that regard.

9 PANEL CHAIRPERSON: Thank you. Mr.
10 Kreml...?

11 MR. JORDAN KREML (by TEAMS): At this
12 point, the ATA does not seek to prequalify an expert,
13 but we would request the right to reserve to do so.
14 Thank you.

15 PANEL CHAIRPERSON: Thank you. We
16 will now move on to item number 5, commercially
17 sensitive information.

18 Mr. Guerra, do you propose any changes
19 to the CSI process from last year?

20 MR. ANTHONY GUERRA: We do not. I
21 would just note that the Consumers' Association of
22 Canada did raise concerns about the CSI process last
23 year, and specifically concerns about filing require -
24 - filing required confidential information too late
25 and which resulted in difficult to perhaps anticipate

1 and respond to claims of confidentiality, resulting in
2 inefficiencies and material disruptions.

3 The CAC recommended to MPI that those
4 situations be avoided to the extent possible and where
5 not possible, that MPI communicate its intentions to
6 provide additional confidential materials and the
7 materials themselves as early as possible.

8 And so, I can advise that MPI indicated
9 at the issues workshop that it's continuously looking
10 to improve the CSI process and has made additional
11 improvements this year that it hopes will make the
12 process more efficient and beneficial.

13 And also, MPI attempted to provide
14 advanced notice in its Application of information yet
15 to be filed, that it would seek confidential treatment
16 over.

17 And MPI will advise as soon as possible
18 if it expects to file anything confidentially that is
19 not planned to be shared, for example, in a response
20 to an Information Request.

21 MPI plans to provide all commercially
22 sensitive materials as soon as possible, acknowledging
23 past criticism, and is working with the teams within
24 its organization to make sure this is completed.

25 PANEL CHAIRPERSON: Thank you. Ms.

1 Dilay, any comments on CSI?

2 MS. KATRINE DILAY: No comments
3 relating to -- to process. CAC -- the Consumers'
4 Coalition does intend to request access to
5 confidential materials as it has in previous years and
6 appreciates the efforts from MPI to both streamline
7 the process and anticipate potential challenges.

8 And so, we will be working with -- with
9 MPI to provide the necessary documents in advance of
10 the procedural order being issued by the PUB. Thank
11 you.

12 PANEL CHAIRPERSON: Thank you. Ms.
13 Meek...?

14 MS. CHARLOTTE MEEK: No comments from
15 CMMG.

16 PANEL CHAIRPERSON: Ms. Whittman...?

17 MS. KAREN WITTMAN: No comments.

18 Thank you.

19 PANEL CHAIRPERSON: Ms. Sokal...?

20 MS. JENNIFER SOKAL: No comments.

21 Thank you.

22 PANEL CHAIRPERSON: Mr. Kreml...?

23 MR. JORDAN KREML (by TEAMS): No

24 comments. Thank you.

25 PANEL CHAIRPERSON: Thank you. We

1 will now move on to item number 6, which is the filing
2 in support of the October indicated rate update. You
3 have commented on this already, Mr. Guerra.

4 Is there anything further you would
5 like to add?

6 MR. ANTHONY GUERRA: Just the fact
7 that it's -- this year, it'll be a September 25th rate
8 update.

9 PANEL CHAIRPERSON: So noted. Thank
10 you. Any comments, Ms. Dilay...?

11 MS. KATRINE DILAY: Thank you, Madam
12 Chair. We don't have any comments at this time. But
13 our clients would reserve the right to provide
14 submissions regarding MPI's proposal to not file a
15 rate update going forward, recognizing our
16 understanding that MPI will provide submissions and
17 evidence in its rate update.

18 PANEL CHAIRPERSON: Thank you. Ms.
19 Meek ...?

20 MS. CHARLOTTE MEEK: No comments at
21 this time. Thank you, Madam Chair.

22 PANEL CHAIRPERSON: Ms. -- Ms.
23 Wittman...?

24 MS. KAREN WITTMAN: No comments.
25 Thank you.

1 PANEL CHAIRPERSON: Ms. Sokal...?

2 MS. JENNIFER SOKAL: No comments.

3 Thank you.

4 PANEL CHAIRPERSON: Mr. Kreml...?

5 MR. JORDAN KREML (by TEAMS): No

6 comments. Thank you.

7 PANEL CHAIRPERSON: Thank you. The
8 timetable. Could you bring the timetable up so that
9 we can all take a look at that.

10

11 (BRIEF PAUSE)

12

13 PANEL CHAIRPERSON: Thank you, Ms.

14 Schubert. So, this has been circulated in advance.

15 And I would just ask MPI and each of the prospective
16 Interveners if they have any comments with regard to
17 the timetable as we're looking at it right now.

18 Mr. Guerra...?

19 MR. ANTHONY GUERRA: So, MPI would
20 note that PUB counsel circulated this timetable on May
21 1st, 2025, and attempted to accommodate the various
22 considerations raised and discussed at the meeting of
23 counsel that occurred on April 15th, 2025.

24 I would note, if we go -- if we can
25 scroll down, please, towards the bottom end of this

1 timetable, you'll notice that there are spaces for the
2 filing and responding to pre-asks that would be items
3 23 and 24.

4 And that's a new addition to the
5 timetable structure this year, and it's something that
6 we would hope would be able to reduce the number of
7 undertakings and prefile -- pre-asks rather than are
8 responded to by MPI witnesses and supporting staff
9 during the conduct of the Hearing.

10 PANEL CHAIRPERSON: Thank you, Mr.
11 Guerra. Ms. Dilay...?

12 MS. KATRINE DILAY: No comments. And
13 we do appreciate the consideration by -- the
14 discussions between counsel regarding the timetable.
15 Thank you.

16 PANEL CHAIRPERSON: Thank you. Ms.
17 Meek...?

18 MS. CHARLOTTE MEEK: No comments,
19 Madam Chair.

20 PANEL CHAIRPERSON: Ms. Wittman...?

21 MS. KAREN WITTMAN: No comments.
22 Thank you.

23 PANEL CHAIRPERSON: Ms. Sokal...?

24 MS. JENNIFER SOKAL: No comments.
25 Thank you.

1 PANEL CHAIRPERSON: Mr. Kreml...?

2 MR. JORDAN KREML (by TEAMS): No
3 comments. Thank you.

4 PANEL CHAIRPERSON: Thank you very
5 much, everyone, for your participation this morning.
6 That ends the matters to be considered during the pre-
7 hearing conference.

8 Mr. Andres, do you have any final
9 comments?

10 MR. TODD ANDRES: Nothing further from
11 me, Madam Chair. Thank you.

12 PANEL CHAIRPERSON: Okay. Thank you.
13 The pre-hearing conference is adjourned. We'll see
14 everyone soon. Thank you.

15

16 --- Upon adjourning at 11:03 a.m.

17

18

19 Certified Correct,

20

21

22 _____

23 Wendy Woodworth, Ms.

24

25