

**IN THE MATTER OF:**

**An Application by The Manitoba Public Insurance Corporation to The Public Utilities Board of Manitoba for review and approval of its rate bases and premiums charged with respect to compulsory driver and vehicle insurance effective March 1, 2019.**

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**NOTICE OF MOTION**

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**MANITOBA PUBLIC INSURANCE**

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Winnipeg, MB R3C 4A4

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**IN THE MATTER OF:**            **An Application by The Manitoba Public Insurance Corporation to The Public Utilities Board of Manitoba for review and approval of its rate bases and premiums charged with respect to compulsory driver and vehicle insurance effective March 1, 2019.**

**NOTICE OF MOTION**

The Manitoba Public Insurance Corporation (“MPI” or the “Corporation”) will make a motion before a panel of members of the Public Utilities Board of Manitoba (“PUB”) on **Friday, August 10, 2018 at 9:00 a.m.**, or as soon before or after that time as the motion can be heard, at the Office of the PUB, 400-330 Portage Avenue, in Winnipeg, Manitoba.

**THE MOTION IS FOR:**

- 1) leave to file all or portions of the responses to the following Round One Information Requests with the PUB, in confidence and on any terms it considers appropriate in the public interest, namely:

i.	PUB (MPI) 1 027 (Parts A, B and Attachment “C”)
ii.	PUB (MPI) 1 049 (Part C)
iii.	PUB (MPI) 1 055
iv.	PUB (MPI) 1 057
v.	PUB (MPI) 1 058 (Part A and B)
vi.	PUB (MPI) 1 059
vii.	PUB (MPI) 1 061

viii.	PUB (MPI) 1 062
ix.	PUB (MPI) 1 067 (Part A – Appendix “1”)
x.	PUB (MPI) 1 072
xi.	CAC (MPI) 1 056 (Appendix “1”)
xii.	CAC (MPI) 1 060 (Part A)
xiii.	CAC (MPI) 1 063 (Part A and C)
xiv.	CAC (MPI) 1 066 (Part B)

(the “Confidential Information”); and

- 2) such further and other relief as counsel may advise and the PUB may permit.

**THE GROUNDS FOR THE MOTION ARE:**

- 1) Rule 13(2) of the Rules of Practice and Procedure (the “PUB Rules”);
- 2) The disclosure of the Confidential Information could reasonably be expected to result in undue financial loss or gain to or significantly harm the competitive position of a person directly or indirectly affected by the proceeding;
- 3) the Confidential Information is personal, financial, commercial, scientific or technical in nature, has been consistently treated as confidential by persons directly affected by the proceeding and the interest in maintaining confidentiality over the Confidential Information outweighs the public interest in its disclosure; and
- 4) such further and other grounds as counsel may advise and the PUB may permit.

**THE FOLLOWING DOCUMENTARY EVIDENCE** will be used at the hearing of the motion:

1. the Affidavit of Jeffery Crozier, *to be sworn and filed*; and
2. such further and other evidence as counsel may provide and the PUB may permit.

Date: August 8, 2018

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