



**PUBLIC
INTEREST
LAW
CENTRE**



**CENTRE
JURIDIQUE
DE
L'INTÉRÊT
PUBLIC**



**AN INDEPENDENT
SERVICE OF
LEGAL AID
MANITOBA
L'AIDE JURIDIQUE
DU MANITOBA**



**SUPPORTED BY
LEGAL AID MANITOBA
THE
MANITOBA LAW
FOUNDATION
AND MEMBERS
OF THE
MANITOBA
BAR
ASSOCIATION**

**200 – 393 PORTAGE AVE
WINNIPEG, MANITOBA
R3B 3H6**

TEL: 204.985.8540

FAX: 204.985.8544



E-MAIL: centre@pilc.mb.ca

Writer's direct line: (204) 985-5220
Email: kadil@legalaid.mb.ca

September 18, 2018

Manitoba Public Utilities Board
400-330 Portage Avenue
Winnipeg, MB R3C 0C4

Attention: Darren Christle, Secretary and Executive Director

Dear Mr Christle:

Re: Manitoba Public Insurance General Rate Application 2019/20 – CAC Manitoba Response to MPI Round 2 Information Requests Rule 13 Motion

The Manitoba Branch of the Consumers' Association of Canada (CAC Manitoba) has reviewed the motion filed by Manitoba Public Insurance (MPI) under Rule 13 of the Public Utilities Board (PUB) Rules of Practice and Procedure regarding one second round information request response.

Pursuant to Rule 22(4) of the PUB Rules of Practice and Procedure¹ and to Board counsel's email of September 16, 2018, the purpose of this letter is to provide CAC Manitoba's response to MPI's motion.

Overall, CAC Manitoba does not object to MPI's request that the PUB receive in confidence the documents identified in MPI's motion.

CAC Manitoba acknowledges that treating these documents as confidential will impair the public interest in the disclosure of the information as they will not be disclosed on the public record. Based upon its review of MPI's materials, however, CAC Manitoba believes that MPI's proposed conditions on access constitute minimal impairment to the public interest in the disclosure of the information.

Similarly to its recommendation regarding MPI's previous Rule 13 motions, which was accepted in Board Orders 89/18 and 123/18, CAC Manitoba would request that if any Intervener files a report as evidence in the GRA based upon or referring to the information contained in the confidential documents, that evidence would be filed in confidence with the Board and MPI on October 3, 2018, per Order 123/18. The Intervener would then consult with MPI and determine the need for, and prepare, a redacted version for public disclosure, if applicable, to be filed by October 9, 2018, per Order 123/18.

CAC Manitoba recognizes the efforts made by MPI to ensure that the Corporation's second round information requests Rule 13 motion is limited in

¹ 22(4): Any party who wishes to respond to a motion shall file and serve on all parties a written answer no later than 2:00 p.m. two days before the day the motion is heard.

scope and that the proposed conditions on access contemplate disclosure to the appropriate interveners to ensure minimal impairment to the public interest in the disclosure of the information.

CAC Manitoba appreciates the opportunity to make these comments regarding MPI's motion pursuant to Rule 13 of the PUB Rules of Practice and Procedure regarding one second round information request.

Yours truly,

A handwritten signature in black ink, appearing to read "Katrine Dilay". The signature is fluid and cursive, with the first name being more prominent.

Katrine Dilay
Attorney
KD/ab

cc: Board Counsel
MPI
Intervenors