

January 7, 2020

VIA EMAIL: darren.christle@gov.mb.ca

Dr. Darren Christle  
Board Secretary and Executive director  
The Public utilities Boardroom  
400 – 330 Portage Avenue  
Winnipeg, MB  
R3C 0C4

Dear Dr. Christle:

**Re: MPI Application to Review and Vary Order 176/19**

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Thank you for the opportunity to provide a response to the MPI Application to Review and Vary Order 176/19. The Coalition of Manitoba Motorcycle Groups (CMMG) comments as follows:

Directive 13.10

CMMG does not object to the proposed revision.

Directive 13.7(a)

CMMG would like to echo the comments of the Consumers' Association of Canada (CAC) regarding the concerns that the Directive be held in abeyance at MPI's sole discretion. CMMG is in favour of the proposed modification of the wording of 13.7(a) by MPI to read:

*(a) File information in the 2021 GRA as to the timeline and major milestones for determination of which rating model it intends to proceed with;*

CMMG does not object to the proposal of MPI that material changes to the DSR be brought before PUB for approval by way of dedicated rate design application.

Road Safety Technical Conference

CMMG supports MPI's comments that the 2021 Conference allow time for all parties to speak to strategies, initiatives, activities and overall contribution to safety in Manitoba.

Driver Training and Testing Data Collection

CMMG acknowledges that while an individual's knowledge of good road safety practices does not necessarily translate into good choices behind the wheel, information regarding gaps in knowledge may assist to inform public awareness strategies that can be implemented in the future. Data in this regard will help to inform updated and improved driver training as well as planned road safety initiatives.

Finally, data collected regarding knowledge gaps of in Manitoba drivers, will provide further information to inform our understanding at the Road Safety Technical Conference scheduled for 2021.

CMMG appreciates the opportunity to provide comments on these matters.

Sincerely,

**BD OAKES JARDINE KANESKI UNRUH LLP**

**PER:**



**CHARLOTTE MEEK**

Cc:

Coalition of Manitoba Motorcycle Groups  
Manitoba Public Insurance  
Registered interveners  
PUB Legal Counsel