



August 12, 2019

Via E-Mail

The Public Utilities Board
400 – 330 Portage Avenue
Winnipeg, MB R3C 0C4

Attention: Mr. Darren Christle, Board Secretary and Executive Director

Dear Mr. Christle:

RE: Manitoba Public Insurance (MPI) 2020 General Rate Application (GRA) Round One Information Request (IR) Filing

Please find accompanying this letter, MPI's responses to first round Information Requests (IRs). The responses have been added to the Application PDF, and are available for download through MPI's secure FTP site. The link to the download is available in the email sending this letter.

Relating to first round IR responses, please be advised of the following:

1. MPI is unable to provide answers to certain IRs, for various reasons listed below. Please see the specific IR responses identified below for a more detailed explanation.
 - a) The information requested is subject cabinet confidentiality. Please see:
 - CAC(MPI) 1-8
 - CAC(MPI) 1-29 a)
 - PUB(MPI) 1-21
 - b) The information requests were withdrawn. Please see:
 - PUB(MPI) 1-73
 - PUB(MPI) 1-90
 - c) The information requests seek the production of new evidence, for which the time and cost exceed the value. Please see:
 - CAC(MPI) 1-15
 - CAC(MPI) 1-23
 - CAC(MPI) 1-24 e)
2. MPI is seeking confidential treatment of the following IR responses, and will be filing these materials confidentially per the PUB's Commercially Sensitive Information (CSI) process:
 - a) The following responses will be circulated to all parties who have signed the MPI confidentiality agreement:

mpi.mb.ca

- CAC(MPI) 1-1 Attachments A & B, and Appendices 18 – 21 will be filed in the CSI module only
- CAC(MPI) 1-31 Appendix 1 – 11 will be filed in the CSI module, with redacted versions on the public record
- PUB(MPI) 1-49 Attachment A will be filed in the CSI module only
- PUB(MPI) 1-84 Appendix 1 will be filed in the CSI module only

b) PUB(MPI) 1-85 b) Attachment A, and PUB(MPI) 1-86 a) & b) Appendix 1 & 2 have requested production of over 500 pages of project close out reports (447 pages), change requests (87 pages), and other information.

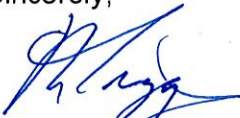
At the time of filing MPI has been unable to confirm if confidential or commercially sensitive information is contained within the reports. Therefore MPI will file the material confidentially, pending a final determination of the sensitivity of the contents. This material will be circulated to all parties who have signed the MPI non-disclosure agreement. In discussions with Board Counsel it was agreed that for the purposes of the close out reports it would be sufficient to publicly file 2 larger and 1 smaller reports.

c) CAC(MPI) 1-4 a), and PUB(MPI) 1- 40 request production of reports prepared by third parties. MPI is in the process of obtaining consent to file confidentially, from the study authors and participants. MPI will circulate confidentiality agreements for signatures once all parties have agreed to proceed.

3. MPI will be filing corrections to EXP Appendix 17 (per the response to PUB(MPI) 1-65 parts c & d), and EXP Appendix 19 (related to the answer in PUB(MPI) 1-64 part b), in a forthcoming errors and omission filing.

Finally, MPI anticipates that it will be able to file responses to PUB CSI round 1 IRs on Monday August 19th, and responses to CAC CSI round 1 IRs on Monday August 26th.

Sincerely,



Michael Triggs
General Counsel and Corporate Secretary

MT/st

Encl.

cc: K. McCandless and PUB Advisors
2019 GRA Registered Interveners