

INTERVENER APPLICATION FORM

Application re Hearing:			
2022 MPI General Rate Application			
Name of Prospective Intervener (Organization Name or Individual):			
Coalition of Manitoba Motorcycle Groups (CMMG)			
Prospective Intervener Contact Information			
Organization or Individual Address:			
1345 Niakwa Road East (Unit A 109), Winnipeg, Manitoba, R2J 3T5			
Organization Contact Person(s) (if applicable):			
Doug Houghton			
Contact Information:	Business:		Other Phone:
	Fax Number:		Email:
			houghtnd@mymts.net
Representative Contact Information:			
Counsel or Representative Name(s):			
Charlotte Meek			
Organization (if different from above) :			
BD Oakes Jardine Kaneski UnRuh LLP			
Address (if different from above):			
387 Broadway, Winnipeg, Manitoba, R3C 0V5			
Contact Information (if different from above):	Business:		Other Phone:
	204-957-1717		204-957-8191 (direct line)
	Fax Number:		Email:
	204-949-9232		cmeek@bdoakes.com
Counsel Seniority:			
Years of Experience	2 Years	Tariff Rate	\$105.00

Also representing (if applicable):

N/A

Additional Information

(For organizations only) Please describe the mandate of your organization and provide a description of the membership, including the number of members. Please also confirm whether the organization's intervention in this proceeding is supported by a resolution of the governing body, if any. Please enclose the resolution, if any, with your Application, along with supporting documentation of your mandate and membership

The CMMG is a non-profit organization promoting the safety of Manitoba's motorcyclists by encouraging education, promoting legislative reform, and disseminating information to aid in a continued safe enjoyment of two wheeled motorized transportation. The objectives of the CMMG are to involve all organized motorcycle groups and individual motorcyclists in Manitoba in a coalition to:

1. Promote the safety of motorcyclists by encouraging education and liaison with organized safety counsels.
2. Promote legislative reform and organize events with government officials and representatives.
3. Disseminate information to aid in the continued safe enjoyment of two wheeled motorized transportation.
4. To participate in the PUB hearings into insurance rate applications to ensure just and reasonable rates for motorcyclists in the province.

CMMG advocates not only for the interests of it's members but also represents the interests of all motorcyclists throughout the province of Manitoba through it's intervention in the GRA.

Please state your reasons for intervening in this proceeding:

The CMMG has been granted intervener status in the MPI GRA since 1993. The CMMG's focus on their intervention is to advocate for just and reasonable rates for motorcyclists in the province. CMMG further seeks to review MPI's filings to test the reliability of MPI's forecasts, review the overall business health of the corporation, including investment strategies and use of public funds, to test whether the proposed rates are equally distributed amongst rate payers, and any proposed rebates are fairly assigned and distributed.

Please state how you are directly affected by the Board's decision in this matter:

CMMG represents the interests of over 17,000 motorcyclists in the province of Manitoba who will be directly impacted by the provision of rebates to rate payers, rate changes, changes to discounts and rebates. CMMG also advocates on behalf of the public in general outside of purely motorcyclists.

Please explain whether and how you represent a substantial number of ratepayers that are otherwise not represented on issues that are within the scope of this proceeding:

While the interests of motorcyclists are at times covered by other interveners in these applications, the motorcycle class has rates that are calculated and determined by specific parameters that do not relate to the general private passenger class or other MPI consumers. As a result, CMMG provides a focus for the motorcycle class to assist the Board in coming to a determination of just unreasonable rates while also providing commentary on the fairness of MPI's assumptions on a broader scope.

Please describe your experience, information, or expertise relevant to this matter that would contribute to the Board's decision making, including any other prior interventions in regulatory matters before this Board or other decision-makers:

Since 1993 CMMG has been actively involved in the PUB hearings examining MPI's application and the reasonableness of rates of insurance in Manitoba. CMMG is also actively involved in other legislative changes that impact driver safety and more specifically motorcycle safety within the province. CMMG's members are active participants in the motorcycle community in the province and can provide insight from consumers and their experiences with insurance premiums provided by MPI. CMMG has often collaborated with MPI on issues such as driver safety initiatives.

Please list the key issues you intend to address in the proceeding. Please be specific.

Based on the preliminary issues list from Order 56/21 the CMMG will focus on the following issues predominantly throughout this year's GRA:

1. Requested vehicle rate and any changes to other fees and discounts.
2. Rate making.
 - CMMG plans to focus on the rate indication and rate making methodology adopted by MPI. More specifically, the adoption of methodology changes regarding serious v. non-serious losses and changes to weighting applied to historical years.
3. Capital management plan.
 - CMMG plans to examine MPI's decision this year to remove the capital release and will examine the fairness of this change and its impact on the motorcycle class in particular, as well as other major vehicle classes.
4. Performance of the investment portfolio.
5. Claims forecasting.
6. Driver safety rating (DSR).
 - MPI has proposed changes to the current DSR system and CMMG plans to review the adequacy of these changes and examine the fairness of these changes.
7. Operational and financial impact of COVID-19.
 - CMMG understands that MPI plans to file an additional application for a special rebate which will be heard concurrently with the GRA. CMMG will be involved in the examining the impact of COVID-19 on MPI's financial results as well as the merits of a special rebate application.

- CMMG also understands that MPI is proposing to eliminate the 5% capital release provision and return excess capital to rate payers through the special rebate application instead. CMMG will examine the implications of this proposal.

Do you intend to participate fully and actively, including attendance at hearings, submission of evidence, and testing of evidence and cross examination of witnesses? If yes, please describe your intended participation.

CMMG plans to be fully involved in the GRA this year with attendance at the oral hearings, including cross-examination of MPI witnesses. CMMG will endeavor to reduce costs by collaborating with other interveners to appropriately assign cross-examination on various subjects to avoid duplication of efforts. At this time CMMG plans to retain the assistance of two consultants, but at this time does not anticipate submitting evidence.

Do you intend to request an award of costs for your participation? Please explain how you meet the criteria for an award of costs.

CMMG intends to seek an award of costs for its participation in this year's GRA. The Intervener Costs Policy indicates that the Board may award costs to an intervener who has demonstrated the following:

1. Made a significant contribution that is relevant to the proceeding and contributed to a better understanding by all parties of the issues before the Board.

- CMMG intends to, as it has in past years, make a significant contribution to this year's GRA by reviewing the MPI application in detail, assisting the Board in examining the information presented by MPI through the information request process.
- CMMG intends to cross-examine MPI witnesses to better understand and clarify methodologies used by MPI in determining the requested rate indication.
- CMMG plans to examine the modifications to the DSR model in determining whether MPI's proposed modifications are just unreasonable.

2. Participated in the hearing in a responsible manner and cooperated with other interveners who have common objectives in the outcome of the proceedings in order to avoid duplication of intervention.

- CMMG will participate in the hearings in a reasonable manner by coming to the hearings prepared with focused issues for review and examination. CMMG has already participated with other interveners in discussions regarding collaboration and common objectives in order to avoid duplication of efforts and in order to reduce costs of the application in general.

3. Represented interests beyond their sole business interest.

- While CMMG intends to focus much of its examination on the interests of motorcyclists within the province of Manitoba, a significant portion of CMMG's

examination will also benefit rate payers more generally in insuring that the rates MPI is seeking are just unreasonable and subsidies or discounts are applied in a fair and equitable manner.

4. A substantial interest in the outcome of the proceeding and represents the interests of a substantial number of rate payers.

- As CMMG represents over 17,000 motorcyclists in the province of Manitoba, the interests of this subgroup present a substantial portion of insureds in the province who have a vested interest in the outcome of the proceedings.

Do you intend to retain experts or consultants? If yes, please attach copies of the *curriculum vitae* for any expert and/or consultant, as well as the following:

Expert Consultant #1:

Name:	Experience	Evidence to be provided on issues in scope:
Jason Wong	16 Years	N/A
Telephone #:	Tariff Rate:	
1-647-795-8130	\$215	
Address and Email:	Firm or Organization:	Brief explanation of experience relevant to evidence to be provided:
York Street Suite 801 Toronto, Ontario M5J 1R7 jasonw@dionstrategic.com CV Attached	Dion Strategic Consulting Group	Jason Wong holds a Bachelor of Mathematics, Honours Actuarial Science from the University of Waterloo. As a Senior Actuarial Consultant, Jason leads the Property and Casualty (P&C) Actuarial Practice at Dion Strategic Consulting Group. With over 15 years of experience in the P&C industry, Jason has expertise in Actuarial Pricing, Modeling, Rate Filing, and Reserving. Dion Strategic Consulting Group is a strategic and actuarial consulting firm. Founded by Sylvain Dion who has over 40 years of experience as a Consulting Actuary, Dion Strategic provides consulting services for all spectrums of insurance products from Property and Casualty (Personal and Commercial Lines), Life Insurance, and Pensions."

Expert Consultant #2:		
Name:	Experience	Evidence to be provided on issues in scope:
Jeff Crozier	14 Years	N/A
Telephone #:	Tariff Rate:	
1-204-880-1151	\$195	
Address and Email:	Firm or Organization:	Brief explanation of experience relevant to evidence to be provided:
300-259 Portage Avenue Winnipeg, Manitoba R3B 2A9 jcrozier@intergroup.ca CV Attached	InterGroup Consultants Ltd.	Mr. Crozier is a consultant with InterGroup Consultants who specializes in utility rates and regulation. He has prepared evidence in proceedings before the Alberta Utilities Commission, and in the 2021 MPI GRA before the Manitoba Public Utilities Board. Prior to his role with InterGroup, he was the Director of Regulatory Affairs at MPI from 2016 to 2020. In this capacity he was accountable for and oversaw the development of MPI's annual General Rate Application, and the regulatory process. Mr. Crozier has a working knowledge of regulated auto insurance in Manitoba, and the issues facing motorcycle customers.
Do you intend to provide evidence from witnesses other than experts and/or consultants? If yes, please provide:		
CMMG at this time does not anticipate calling any witnesses but would like to reserve the right to seek permission from the Board to call a witness later on in the proceedings if necessary.		
Do you intent to seek approval for any other form of participation or provision of evidence, including for which you intend to seek an award of costs? If yes, please provide details and an explanation of the relation to issues in scope in the proceeding.		
Not at this time.		