

August 4, 2022

VIA EMAIL: publicutilities@gov.mb.ca**The Public Utilities Board of Manitoba**400 – 330 Portage Avenue
Winnipeg, MB R3C 0C4**Christian Monnin**
Direct Line: (204) 957-4621
E-mail: cmonnin@mltaikins.comTerri Hockin
Legal Assistant
Direct Line: (204) 957-4701
E-mail: thockin@mltaikins.com

File No.: 0144631.00001

Attention: Dr. Darren Christle, Secretary

Dear Sir:

**Re: Bike Winnipeg Inc. Application for Intervention Manitoba Public Insurance
General Rate Application 2023**

Further in this matter, I am writing to request that you consider the enclosed Intervener Application filed on behalf of Bike Winnipeg Inc.

I understand that the date requested for filing was July 22, 2022. However, due to a misunderstanding between the undersigned and Bike Winnipeg Inc., the enclosed Intervener Application was not submitted by that time.

In that regard, I bring to Board's attention its ability to take such steps as it considers just. Bike Winnipeg Inc. respectfully submits that it is a longstanding intervenor and that granting intervenor status at this early juncture in the proceedings would not lead to any delay or prejudice to Board, MPI, or to the within proceedings. Moreover, any perceived prejudice would be offset by Bike Winnipeg's meaningful contributions to these proceedings, which will be limited to a narrow scope of Road Safety and Loss Prevention issues.

I thank you in advance for your favourable consideration of the within Application.

Please do not hesitate to contact the undersigned should you have any questions or comments.

Yours truly,

MLT AIKINS LLP

Per:

**CHRISTIAN MONNIN**

CLM/tlh

Enc.

cc: Kathleen McCandless (via email mccandless@pitblado.com)

INTERVENER APPLICATION FORM

Application re Hearing:			
Name of Prospective Intervener (Organization Name or Individual):			
Prospective Intervener Contact Information			
Organization or Individual Address:			
Organization Contact Person(s) (if applicable):			
Contact Information:	Business:		Other Phone:
	Fax Number:		Email:
Representative Contact Information:			
Counsel or Representative Name(s):			
Organization (if different from above) :			
Address (if different from above):			
Contact Information (if different from above):	Business:		Other Phone:
	Fax Number:		Email:
Counsel Seniority:			
Years of Experience	_____ Years	Tariff Rate	\$ _____
Also representing (if applicable):			

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

Please state your reasons for intervening in this proceeding:

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

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:

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:

Please list the key issues you intend to address in the proceeding. Please be specific.		
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.		
Do you intend to request an award of costs for your participation? Please explain how you meet the criteria for an award of costs.		
Do you intend to retain experts or consultants? If yes, please attach copies of the <i>curriculum vitae</i> for any expert and/or consultant, as well as the following:		
Expert Consultant #1:		
Name:	Experience	Evidence to be provided on issues in scope:
	_____Years	
Telephone #:	Tariff Rate:	
	\$_____	
Address and Email:	Firm or Organization:	Brief explanation of experience relevant to evidence to be provided:

Expert Consultant #2:		
Name:	Experience:	Evidence to be provided on issues in scope:
	_____Years	
Telephone #:	Tariff Rate:	
	\$_____	
Address and Email:	Firm or organization:	Brief explanation of experience relevant to evidence to be provided:
Expert Consultant #3:		
Name:	Years of Experience:	Evidence to be provided on issues in scope:
	_____Years	
Telephone #:	Tariff Rate:	
	\$_____	
Address and Email:	Firm or organization:	Brief explanation of experience relevant to evidence to be provided:

Do you intend to provide evidence from witnesses other than experts and/or consultants? If yes, please provide:	
Witness #1:	
Name:	Evidence to be provided on issues in scope:
Email:	Brief explanation of relevant experience and/or knowledge to issues in scope:
Address and Phone number:	
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.	

SCHEDULE “A”

Overview

This document provides information with respect to the proposed intervention of Bike Winnipeg Inc. (“Bike Winnipeg”) in the proceeding relating to Manitoba Public Insurance’s (“MPI”) 2023 General Rate Application. In addition, this document provides responses to the questions in the Intervener Application Form, including:

- Who is Bike Winnipeg;
- Reasons for the proposed intervention;
- How is Bike Winnipeg directly affected by the Public Utilities Board’s decision in this matter;
- How does Bike Winnipeg represent a substantial number of ratepayers that are otherwise not represented on issues that are within the scope of this proceeding;
- How Bike Winnipeg’s experience, information or expertise relevant to this matter that would contribute to the Board’s decision-making;
- Key issues that Bike Winnipeg intends to address in this proceeding; and,
- Description of Bike Winnipeg’s proposed participation in this proceeding.

Should it be approved as an Intervener, Bike Winnipeg will file a detailed cost estimate as prescribed by the Public Utilities Board.

Bike Winnipeg’s Intervention

Bike Winnipeg seeks to intervene in the MPI 2023 General Rate Application to build upon its participation and contributions in previous General Rate Applications where it dealt with issues related to Road Safety and Loss Prevention.

In addition, Bike Winnipeg wishes to build upon its most recent participation in the Technical Conference which was held on prior to the 2023 General Rate Application.

Bike Winnipeg respectfully submits that Technical Conference contemplates that the issues identified therein are to be further considered in the context of the General Rate Application. In that regard, Bike Winnipeg wishes to intervene in order to build upon its participation at the Technical Conference and to assist the Public Utilities Board in critically evaluating the Loss Prevention and Road Safety sections of MPI’s filing, by testing the evidence and raising issues of concern and interest to vulnerable road users, which include but are not limited to cyclists (“Vulnerable Road Users”) and to Manitobans generally. In that regard, Bike Winnipeg seeks approval to intervene on the following general issues:

- The optimum size of MPI’s Road Safety and/or Loss Prevention budget and whether it is sufficient to enable a significant reduction and the costs to MPI of injuries to Vulnerable Road Users in the short and long term. This includes, but is not limited to, ensuring that MPI’s Road Safety and/or Loss Prevention budget is sufficient to meet MPI’s mandate to ensure an adequate standard of driver knowledge and safety;

- The adequacy of MPI's Road Safety and/or Loss Prevention programs with respect to fatal and severe injury of Vulnerable Road Users;
- The quality and clarity of MPI's data collection, analysis and accessibility, regarding collisions involving Vulnerable Road Users, generally and, particularly, in comparison to transportation safety programs from other local, national and international entities and jurisdictions; and,
- In addition to the foregoing, Bike Winnipeg seeks to intervene in order to assist the Public Utilities Board in understanding and considering the issues and matters flowing from and addressed within the Technical Conference and MPI's filing.

Bike Winnipeg intends to fully participate in this proceeding, including attendance at hearings, asking Information Requests and testing the evidence and cross-examination of witnesses as it relates to Road Safety and Loss Prevention issues. Bike Winnipeg does not currently have any plans to submit its own evidence in this proceeding.

Further, Bike Winnipeg intends to request an award of costs for its participation in this proceeding. As stated in the Intervener Cost Policy, in any proceeding, the Public Utilities Board may award costs to be paid to any Intervener who has:

- a) Made a significant contribution that is relevant to the proceeding and contributed to the better understanding, by all parties, of the issues before the Board;
- b) 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 a duplication of interventions;
- c) Represented interests beyond their sole business interests; and,
- d) A substantial interest in the outcome of the proceeding and represents the interest of a substantial number of rate payers.

Bike Winnipeg submits that it represents not only the interests of Vulnerable Road Users, but also Manitobans who have a substantial interest in the outcome of the proceeding when it comes to Road Safety. Bike Winnipeg submits that this is in line with MPI's Mission statement: *"Exceptional coverage and service, affordable rates and safer roads through public auto insurance."*

In addition, Bike Winnipeg respectfully submits, that as it has consistently done in past General Rate Applications, it will make a significant contribution to this proceeding. It will participate in a reasonable manner and it will cooperate with other Interveners who have common objectives and it will make every effort to ensure that its participation is not unduly repetitive of other interveners. All of this is consistent with Bike Winnipeg participation in previous General Rate Applications.

Subject to the approval from the Public Utilities Board, Bike Winnipeg looks forward to participating in the proceeding.