

August 9, 2022

VIA EMAIL

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

Attention: Dr. Darren Christle, Secretary

Dear Sir:

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

This is in response to Mr. Guerra's letter dated August 8, 2022.

The miscommunication referred to in our previous letter is as follows. In brief compass, it was understood that Bike Winnipeg Inc. would seek to intervene in the GRA on its own accord (much as it had done with its participation at the most recent Technical Conference). In that regard, it was further understood that should Bike Winnipeg Inc. be granted intervenor status, the undersigned would then represent them in the GRA. As is now known, the Application to Intervene was not filed, either by the undersigned or Bike Winnipeg Inc. However, as soon as this was known, steps were taken to do so.

The undersigned and Bike Winnipeg Inc. recognize the inconvenience that this late filing may create, however, as noted in Mr. Guerra's letter, the Board has permitted late intervention applications in the recent past. In addition, Mr. Guerra also recognizes Bike Winnipeg Inc.'s historical participation in GRAs and the unique perspective that it brings. Mr. Guerra goes on to provide that Bike Winnipeg Inc. would likely contribute significantly to this proceeding in a manner that would be of assistance to the PUB (if permitted to do so on the limited issue of road safety).

Therefore, should Bike Winnipeg Inc. be permitted to intervene at this juncture of the proceedings, it would have no issue abiding by the existing timelines as set out in Procedural Order 85/22, including being limited to one round of information requests. In addition, Bike Winnipeg Inc. would also limit the scope of its intervention to road safety issues and the issue of cost containment or loss prevention as it relates to road safety issues.

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

cc: K. McCandless and PUB Advisors

C. Klassen/B. Williams, counsel for Consumers Association of Canada (Manitoba Branch)

C. Meeks, counsel Coalition of Manitoba Motorcycle Groups

K. Whitman, counsel for Taxi Coalition

C. Unfried/J. Sokal, counsel for the Insurance Brokers Association of Manitoba