

MANITOBA PUBLIC INSURANCE
2023 GENERAL RATE APPLICATION
Round 1 Information Requests
August 30, 2022

Taxi Coalition (TC)



**MANITOBA
PUBLIC INSURANCE**

TC (MPI) 1-1

Part and Chapter:	Part V - ProFormas	Page No.:	20 of 29
PUB Approved Issue No:	4) Financial Forecast		
Topic:	Pro Forma Presentation under IFRS 9 & 17		
Sub Topic:			

Preamble to IR:

MPI has presented a consolidated view of the Statement of Operations, that is consistent with IFRS 9 and 17 accounting standards.

Question:

- a) Please explain if MPI has or will consider including as subheadings to the consolidated view, the same categories provided in the current Pro Forma. For instance, the breakdown between vehicle and driver premium earned?
- b) Please explain if MPI has or will consider a way to allow future GRA Pro-Forma schedules to be compared to those in past GRAs.

Rationale for Question:

To understand the implications to regulatory oversight, from the proposed changes to pro-formas.

RESPONSE:

- a) Yes, to the extent where the same categories exist, MPI may include subheadings to the consolidated view of the Pro Forma statements.

- b) MPI is aware of the upcoming presentational changes (pre- and post-IFRS) that it will need to make in the 2024 GRA and beyond.

MPI recognizes that the PUB and intervenors requires a reasonable comparative view to support the regulatory rigor of the current application process. MPI believes it is neither sustainable nor reasonable to prepare and maintain two separate forecasts for each rate application. However, MPI also recognizes the need for continuity of reporting and is committed to working with the PUB and intervenors to ensure the satisfaction of regulatory requirements while balancing the IFRS changes faced by the insurance industry. MPI is committed to continued discussions with the PUB to understand and address the future implication of IFRS changes on regulatory oversight.

TC (MPI) 1-2

Part and Chapter:	Part V - Revenues	Page No.:	9 of 36
PUB Approved Issue No:	2) Ratemaking, 4) Financial Forecast		
Topic:	HTA Policy Year Earned Units		
Sub Topic:			

Preamble to IR:

Figure REV-5 shows the Public Major Class has had 4 years of decreasing Units since 2016/17, with three of those years included in the averages.2020/21 units.

Question:

- a) Please explain what factors MPI understands to be causing the declines in the Public Major Class units since 2016/17.
- b) Please specify insurance uses that have been leading the declines, if feasible, by providing a table with annual details by insurance use.
- c) Please identify MPI’s confidence in the 21/22 % change of -11.57%, and explain if the factors understood to cause this decline are similar to the Commercial Major Class results in 21/22.
- d) Please explain the effect that decreasing HTA units in the Public Major Class has on the required rate for the major class.
- e) Please explain the rational for selecting the 10 - year average for HTA growth in the Public major class, and why something close to the 5-year average was selected for Private Passenger and Commercial major classes.

Rationale for Question:

To understand the source and effect of decreasing units on the Public Major Class, over the last number of years, and the basis for MPI’s forecast.

RESPONSE:

a) and b)

MPI understands that the decrease in units for the Rental Vehicle insurance use (U-Drive) drove the declines in the Public Major Class since 2016/17. Since 2016/17, on average, rental vehicles comprise the majority of the Public Major Class (at 59%). As such, movements for this insurance use significantly impact the overall unit change for this major class.

The following figure illustrates the decline of the Public Major Class since 2016/17:

Figure 1 Public vs. Rental Vehicle Policy Year Earned Units – 2015/16 to 2019/20

Line No.	Public		Rental Vehicle		
	Year	Units	% Change	Units	% Change
1					
2					
3					
4	2015/16	12359		7015	
5	2016/17	12296	-0.50%	6984	-0.43%
6	2017/18	12991	5.65%	7789	11.52%
7	2018/19	12984	-0.05%	7604	-2.38%
8	2019/20	12348	-4.90%	7106	-6.55%

c) The reason for larger than normal decrease for the class “Public” in 2021/22 is primarily due to corporate customers. The effective/renewal dates of the corporate policies are not uniformly spread over the year as most corporate customers renew at the beginning of the year. Due to the change in fiscal year, the earned units for these customers were attached to 2020 as opposed to 2021. This is similar to the Commercial Major Class results in 2021/22.

- d) MPI performed a sensitivity analysis, assuming the forecast for claims remains constant, and only adjusting the exposure. If HTA units in the Public Major Class decrease (increase) by 10%, the required rate for Public increases (decreases) by approximately 20bps. This does not materially impact the overall required rate of 0.9%.
- e) The units for the Public Major Class, compared to other major classes, are small. Historically, year over year unit movements for Commercial and Private Passenger did not fluctuate significantly. Conversely, the change in units for the Public Major Class has been volatile with movements as high as 5.65% to as low as -5.16% with no identifiable trend. Therefore, MPI selected a long term, 10-year average, for the Public Major Class.

TC (MPI) 1-3

Part and Chapter:	Part V – Revenues Part II - VFH	Page No.:	14 of 36 22 of 35
PUB Approved Issue No:	2) Ratemaking, 10) VFH		
Topic:	Fleet Rebates and proposed Blanket VFH insurance		
Sub Topic:			

Preamble to IR:

MPI proposes blanket VFH insurance that retrospectively adjusts premium, based on actual loss experience. MPI’s fleet program operates in a similar manner.

Question:

Please compare and contrast the Fleet Program with MPI’s proposed blanket policy, in terms of:

- a) Cost to administer – the Fleet program has been described as administratively burdensome. Does MPI expect a significant administrative burden associated with VFH Blanket Policies?
- b) Rebate Surcharge Scale – The Fleet program scale extends from a 33% rebate to a 50% surcharge. What is the expected scale for VFH blanket policies, and what are the considerations and implications for either a wider or narrower scale being adopted for blanket policies.
- c) Magnitude of net rebates – The Fleet program has net rebates that now exceed \$21 million, and have grown steadily every year. Does MPI anticipate predictable and/or substantial blanket policy rebates?
- d) Funding for Net Rebates – Does MPI expect that blanket policy rebates will be funded by all MPI customers, just as the Fleet Program?

- e) Effect of rebates on driver behavior – The Fleet program has been described as successful in incentivizing safe driving behavior among fleet operators, as evidenced by the significant fleet rebates. Does MPI anticipate a similar effect with the VFH Blanket Policies?
- f) Any other dimension of comparison that MPI believes is relevant.

Rationale for Question:

To conceptually understand the VFH Blanket Policy, and similarities/differences with the Fleet Program.

RESPONSE:

- a) MPI does not expect the administration of the Blanket policy to be administratively burdensome. First, MPI expects a significantly lower number of Transportation Network Companies (TNC) customers relative to Fleet customers. Second, MPI will build the Blanket policy into Duck Creek and as a result, the process will largely be automated and thus require few manual tasks (unlike the Fleet Program today).
- b) As it is currently under actuarial development, MPI cannot comment on the design of the expected Blanket Rebate/Surcharge Scale. Upon its finalization, MPI will provide details on considerations and implications.
- c) MPI anticipates that the Blanket policy rebates will be relatively predictable and consistent as the actuarial development of the model uses existing Passenger Vehicle for Hire (VFH) data and future VFH insurance premiums will reflect the loss experience of each TNC.
- d) This level of detail is still unknown but will be available in conjunction with the actuarial development of the blanket policy. MPI will provide all product and pricing details in the 2024 GRA.

- e) MPI made the decision to introduce the Basic blanket policy based on the results of the VFH framework review and extensive stakeholder consultation. With the implementation of the blanket policy, TNCs will assume the role of the policyholders providing VFH insurance coverage. As a result, TNCs may adopt methods to further incentivize safe driving among their drivers, leading to more favourable loss ratios.

- f) While the Blanket policy and the insurance model of the Fleet program may share certain conceptual similarities, it is important to note that MPI is currently developing the Blanket policy with the focus on VFH and, specifically, for the Passenger VFH experience.

TC (MPI) 1-4

Part and Chapter:	Part V Claims Incurred	Page No.:	20 of 95
PUB Approved Issue No:	9) Claims Forecasting		
Topic:	Forecasted impact to ultimates related to working from home		
Sub Topic:			

Preamble to IR:

MPI states:

"As shown in the figure below, approximately half of Manitobans currently working from home will expect to do so in the future.

(...)

As driving behaviour directly affects Collision, Property Damage, and PIPP claims, MPI applied a 5% reduction to Collision, Property Damage, Weekly Indemnity, and ABO Indexed claim frequency. This 5% is approximately half of the reduction in collision claim frequency observed over the 2021/22 accident year shown in Figure CI-8."

Question:

- a) Please clearly define what is meant by "driving behavior" in the above referenced quote. Does driving behavior in this context mean time on road, or distance travelled, or some combination of the two?

- b) Please explain if this adjustment to forecast ultimates is conceptually similar to the rationale supporting the VFH time-band model, where a customer purchasing one time band, pays roughly 25% the price of a customer who buys all 4 time bands.

- c) Please confirm that the rationale discussed in part (b) would apply to a VFH part-time model.
- d) Please explain which major classes and which insurance uses will benefit from the forecasted reduction in ultimates.
- e) Please explain how MPI determined a 5% reduction in ultimates corresponds to the 21% of those surveyed who hold an expectation of continuing to work from home. If necessary, please also explain how half the observed reduction in collision claim frequency observed in 2021/22 corresponds to the survey results.

Rationale for Question:

To understand the rationale for adjustment in ultimates, and parallels to other instances.

RESPONSE:

- a) MPI defines "driving behaviour" in this context as referring to the multiple factors that increase the risk that a claim will occur. These include things like the time of day in which a person drives, how often they drive, the conditions of the road during their drives (e.g., increased congestion or an increased number of vehicles on the road).
- b) MPI applied the adjustment to the forecast after 2 years of actual experience involving changes in driving behavior across the Basic fleet. The Time Band Model is an insurance model developed to capture risk associated with full- and part-time operation across multiple VFH operators. At the time of its development, MPI did not have part-time VFH and passenger VFH experience. As a result and given the guiding principles of the model at the time, MPI assumed that each time band across all groups equated to approximately an additional 25% of claims exposure and priced it accordingly. MPI continues to lack part-time experience across all VFH groups because the majority of all VFH operators select the full time band (i.e., VFH4) and have done so since the inception of the Time Band Model in 2018.

- c) MPI is currently assessing the viability of a part-time model based on the results of the Telematics Pilot, which will help MPI understand potential uptake and part-time experience.
- d) All major classes and insurance uses benefit from the work from home (WFH) reduction, which reduces forecasted ultimate claims in PIPP, Collision and Property Damage.
- e) As outlined in *Claims Incurred Chapter CI.2.11*, collision frequency in 2021/22 varies from 10% to 20% below the 2015/16-2019/20 trended frequency (i.e., the baseline forecast excluding any COVID-19 impacts). MPI attributes this decrease to the impact of WFH.

Based on the survey results, approximately half of Manitobans working from home in 2021, expect to continue to WFH in the future (i.e, 21% of 35%). Therefore, MPI expects the impact of WFH to be reduced, from 10% to 5% below the 2015/16 – 2019/20 trended frequency.

TC (MPI) 1-5

Part and Chapter:	Part V Claims Incurred	Page No.:	47 of 95
PUB Approved Issue No:	9) Claims Forecasting		
Topic:	Severity Growth Trend		
Sub Topic:			

Preamble to IR:

"A 5.25% severity growth was selected which follows the 3-year trend and reflects the recent increase in inflation."

Question:

- a) Please explain which inflation index MPI has relied on to inform the 5.25% severity growth. Please detail the composition of the inflation index (i.e. the basket of goods).
- b) Please also explain what efforts MPI made to isolate for inflation in the automotive repair industry (e.g. parts and labour), and what steps MPI took to remove the effects of items not related to automotive repair (e.g. food and fuel inflation, consumer goods, real estate etc.), if those items were present in the inflation index used.
- c) Please provide the base (from part a) and adjusted (from part b) inflation indexes.
- d) Please explain MPI's expectations for future inflation, and comment as necessary, on MPI's confidence in the Bank of Canada to manage inflation to target.
- e) Please explain why the 5 year trend was not selected.

Rationale for Question:

To fully understand the basis for the selection.

RESPONSE:

- a) For collision claim severity, MPI references the Manitoba Consumer Price Index (CPI) as presented in *Investments Chapter Figure INV-8* and the forecasted Manitoba CPI as shown in *Investments Chapter Figure INV-40*, which shows inflation increasing to 4.2% in 2022/23. MPI does not use any one specific index to increase collision claim severity (as there are other items in the basket of goods that do not affect collision severity). However, MPI uses inflation as a leading indicator of current and future severity growth, as there are related items such as labour rates, part costs, and material costs like paint reflected in the index. This is why MPI selected 5.25% as the growth rate for collision repair severity claims.
- b) MPI uses Manitoba CPI as a leading indicator of the current and future severity growth of collision claims. MPI did not remove the effects of items unrelated to automotive repairs.
- c) MPI is unable to calculate a revised Manitoba CPI by removing items unrelated to automotive repairs. However, the cost of passenger vehicle parts, maintenance and repairs in Manitoba grew by 7.6% from March 2021 to March 2022 compared to the year prior of only 2.6%¹.
- d) A consensus of forecasts from the Canadian chartered banks and Global Insight informs the inflation expectations of MPI. MPI reviews the indexation factor for Personal Injury Protection Plan (PIPP), which its executives approve on a quarterly basis. MPI has yet to approve the indexation factor for June 30. The latest consensus forecast (as of July 2022) shows the following:

¹ Statistics Canada. Table 18-10-0004-07 [Consumer Price Index, monthly, percentage change, not seasonally adjusted, Canada, provinces, Whitehorse and Yellowknife — Transportation](#)

Projections	2022	2023	2024	2025	2026
Canada Annual CPI	6.7%	3.4%	1.5%	2.0%	2.0%
Manitoba Annual CPI	7.2%	3.7%	1.0%	1.9%	2.0%

MPI believes the Bank of Canada can manage inflation within its target range over the long-term.

- e) MPI selected 5.25% using a 3-year trend as it is more reflective of the current high inflationary environment. The 5-year trend did not reflect the recent increases in inflation.

TC (MPI) 1-6

Part and Chapter:	Part V Claims Incurred	Page No.:	47 of 95
PUB Approved Issue No:	9) Claims Forecasting		
Topic:	Total Collision loss severity		
Sub Topic:			

Preamble to IR:

MPI states:

"During 2020, MPI introduced a new online auctioning system. This allowed potential buyers to make bids online. The online system increased the number of potential buyers of salvage vehicles, which has resulted in favourable increases on overall salvage amounts. This has helped to reduce claims costs and TL severity."

Question:

Please compare the reduction in claims costs and TL severity to the cost of the online auctions, including a break down of the higher than expected online auction fees of 2.9 million.

Rationale for Question:

To understand the cost-benefit of the online auction system.

RESPONSE:

The move to the online auction system came with two different expense items as listed below:

1. Service fee –paid by MPI to the vendor on a per unit basis. This is based on improvement over base revenue that exceeds \$1,446. After September 1 2021, this is a maximum of \$120 per unit.

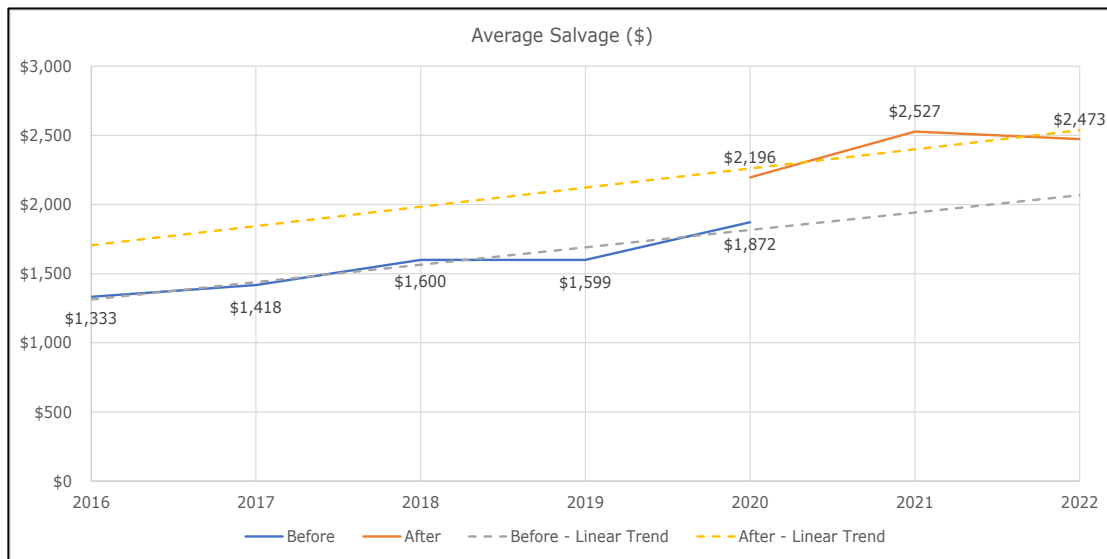
Figure 1 Online Auction Service Fees

Line No.	Effective Date	% of Revenue Improvement	Maximum Unit
1	Sep 1, 2020 to Sep 2021	25%	\$150
2	Thereafter	20%	\$120

2. Licensing fee – paid by MPI to the vendor at a fixed annual cost of \$996,000. The licensing fee includes an inventory management software system and a tow application.

The average salvage increased by approximately \$327 per vehicle sold at auction, net of the service fee. After the licensing fee, this results in an estimated \$11.3 million in savings since implementation in 2020.

Figure 2 Impact of Online Auction - Average Salvage



TC (MPI) 1-7

Part and Chapter:	Part VI DSR	Page No.:	9 of 15
PUB Approved Issue No:	11) DSR		
Topic:	DSR Transition scenarios		
Sub Topic:			

Preamble to IR:

MPI proposed to adopt scenario 4, applied to DSR levels 9 through 17.

Question:

- a) Please explain why, of the 4 scenarios MPI presented, three were clustered towards small changes in DSR discounts, and low overall adjustments to base rates. Please explain why MPI did not present scenarios across the range of possible adjustments.
- b) Noting that MPI does not consider a 15.6% adjustment to base rates acceptable for customers, please explain if an 8%, or 4% adjustment to base rates would be acceptable (or more acceptable)?
- c) Please present DSR adjustment scenarios that result in 4%, 8% and 12% adjustments to base rates, with discounts distributed among the DSR levels 9 through 17, weighted to those DSR levels with the largest difference between current and indicated.
- d) Please discuss the tradeoffs inherent in a slow transition to actuarially indicated DSR discounts, in terms of ongoing unfairness to the safest drivers, and implications for price signals for safe driving, and road safety generally.

- e) Please explain what factors MPI expects to consider when determining if the DSR scale should extend beyond +20.

Rationale for Question:

To fully understand MPI's proposed adjustment to the DSR discounts.

RESPONSE:

- a) MPI presented scenarios that would ensure little impact to customer rates resulting from changes in DSR discounts. MPI determined Scenario 1 by fitting a line, using a polynomial fit, to the indicated rate. For scenario 2, MPI judgmentally increased DSR discounts for +15 to +17 by 2% and applied a factor to DSR +1 to +14. For scenario 3, MPI judgmentally increased DSR discounts for +16 and +17 by 2% and applied a factor to DSR +10 to +14. MPI selected the factor to ensure that the overall DSR impact was approximately -2.2% (the preliminary rate indication calculated before the revised indication of -0.9% filed for the 2023 GRA).
- b) Unless unavoidable, MPI believes that rates should not be subject to large movements over a one-year period. While smaller movements in rates would be preferable (e.g., 4% preferable to 8%, and 8% preferable to 15.6%), this may not always be appropriate from an actuarial standpoint, as it accentuates the effect of cross-subsidization. Therefore, MPI must consider the acceptability of an adjustment to base rates on a case-by-case basis and by striking the right balance.
- c) Figure 1 below shows the results of using 4%, 8% and 12% adjustments to the base rates and by distributing the rate impact to DSR levels 9 through 17:

Figure 1 Hypothetical Adjustments to Base Rates

Line No.	DSR Level	Average Rate		
		4 % Rate Impact	8 % Rate Impact	12 % Rate Impact
1	17	44%	46%	51%
2	16	44%	46%	51%
3	15	44%	46%	51%
4	14	36%	45%	50%
5	13	35%	44%	49%
6	12	34%	43%	47%
7	11	32%	41%	45%
8	10	30%	38%	42%
9	9	28%	35%	39%
10	8	25%	25%	25%
11	7	25%	25%	25%
12	6	20%	20%	20%
13	5	15%	15%	15%
14	4	15%	15%	15%
15	3	10%	10%	10%
16	2	10%	10%	10%
17	1	5%	5%	5%
18	DSR Impact	-4.9%	-8.9%	-12.9%
19	Rate Impact	4.0%	8.0%	12.0%
20	Overall	-0.9%	-0.9%	-0.9%

For this analysis, given that there are no current discounts for DSR 17 and no experience for DSR 16, MPI left them equal to DSR 15.

- d) Whereas the actuarially determined DSR levels provide a more equitable pricing basis, a sudden change in the discount levels may not be practically possible. In the case of a gradual shift, an implicit subsidy between various DSR levels would continue until the transition is complete. However, a transition in this way would ensure the rate movement is smooth.
- e) The DSR discount levels and risk segmentations may vary based on the introduction of a new pricing framework. Therefore, MPI cannot comment on the factors considered to extend the DSR scale beyond +20. For further details, please refer to DSR Directive 11.5.

TC (MPI) 1-8

Part and Chapter:	Part VI DSR Appendix 1	Page No.:	2 of 13
PUB Approved Issue No:	11) DSR		
Topic:	Primary Driver Model Implementation Plan		
Sub Topic:			

Preamble to IR:

MPI states as part of it’s Primary Driver Model implementation plan:

“c) Consult with stakeholders regarding the new PD Model, including:

- *PUB, CAC, CMMG*
- *IBAM*
- *the public”*

And goes on to explain other features of the plan.

Question:

- a) Please explain if MPI would expect to consult with the VFH industry, and Taxi operators in particular, as part of its stakeholder consultation.
- b) Please confirm that VFH operators generally face the same issues with the registered owner model as households – namely that the registered owner’s driving record may not reflect that of the regular drivers.
- c) Please confirm that a VFH operator, who employs multiple drivers, may require guidance on how to declare a primary driver, and/or redeclare a primary driver as staffing changes through-out the year.

- d) Please also confirm that VFH operators, who operate multiple vehicles with multiple drivers, may require guidance on how to declare a primary driver.
- e) Please discuss any consultation efforts MPI may consider for non-fleet commercial customers that may be impacted by these changes.
- f) Please further discuss the requirement of a PD pricing examination to require 3 years of PD history to achieve credibility standards. Please specify the standards, and how they will be met with three years of data. Please also discuss how changes to the declared PDs over this time frame may impact the credibility.
- g) Please provide examples of amendments to the DSR plan and regulations that would be required in the first and second stages, to move to a PD rating model. Please discuss if any individual driver's DSR rating would be impacted by these envisioned changes, or if rules for movement along the DSR scale would be impacted. Please explain if amendments to regulation are required to accommodate new DSR levels above +15 and changes to discount rates, and the process and timeframe associated with those changes (if any).
- h) Please provide the definition of 'personal information' under FIPPA. Does MPI consider that a name and associated driver's license number is considered personal information? Please list the information fields MPI currently has in its custody for each licensed driver in Manitoba.
- i) Please explain when MPI expects to begin the process steps illustrated on page 13, if not January 2023.

Rationale for Question:

To fully understand the details of MPI's proposed implementation plan.

RESPONSE:

- a) The five-year plan includes time to develop definitions and business rules. MPI did not intend for the list to be exhaustive. MPI may consult with other stakeholders, including the VFH industry and taxi operators, depending on the specific features of any new driver model.
- b) MPI generally agrees with this statement. The issues may be slightly different for VFH operators, especially those vehicles with multiple drivers, as there may be more regular drivers in this case compared to a typical household.
- c) MPI agrees with this statement.
- d) MPI agrees with this statement.
- e) See response to part a) above.
- f) In general, a minimum of three years of data is needed to lend credibility to an actuarial analysis. Fewer years of data may lead to results that are erratic and unstable. MPI is currently deciding whether to use Primary Driver as a rating factor and, if so, the best way to collect this information. MPI would determine more details regarding the impact on credibility as MPI makes further progress.
- g) In stage 1, MPI will need to collect information about the primary driver of vehicles in order to conduct a detailed pricing study. To collect this information, MPI would require the registered owner of every vehicle to submit the information required for the study as part of their reassessment or renewal process.

The information required for this study will sometimes be about people other than the registered owner. Under [The Freedom of Information and Protection of Privacy Act](#), personal information can only be collected directly from the person it is about. While there are exemptions, none of them would apply to the collection of information for the purpose of developing a new pricing model. Therefore, MPI does not have the authority to collect information about primary drivers (who are

not also the registered owners) from registered owners without the knowledge and consent of the primary drivers. As such, new legislation would need to be created authorizing MPI to collect such information.

This legislation would likely take the form of an amendment to *The Automobile Insurance Plan Regulation*, M.R. 49/2019 (Plan Regulation) which would add a new provision requiring the registered owner to submit the information as part of their renewal or reassessment. However, the specific drafting approach to be used has not yet been determined and will involve significant consultation with Legislative Counsel in the Department of Justice.

At this time, it is not possible to provide a precise description of the amendments required to implement Phase 2 until the new model has been developed. At a minimum, amendments will be needed to both *The Driver Safety Rating System Regulation* M.R. 13/2009 (DSR Regulation) and the Plan Regulation. Both regulations specify that vehicle premium discounts are determined based on the Driver Safety Rating of the registered owner. The regulations will need to be amended to instead make the discount based on the DSR of the primary driver.

In addition, several new sections will need to be developed, including a definition for "primary driver", rules for determining who is the primary driver of an insured vehicle, and a mechanism to require customers to complete a declaration as to the primary driver of an insured vehicle. Any consequences for customers who make a false declaration may also need to be specified in regulation. Finally, there will need to be new provisions created to govern the transition of customers to the new model.

It is also possible that a need to make consequential amendments to other regulations will be identified as work on developing the new model advances. As in Phase 1, the determination as to the specific drafting approach to be used will involve significant consultation with legislative counsel in the Department of Justice.

The regulatory changes required to implement both phases 1 and 2 would likely require significant time and effort to create. It is likely that they would be deemed to include regulatory requirements under *The Statutes and Regulations Act* and therefore trigger a requirement for public consultation. Since there would be a cost to implement them, it is also possible that Treasury Board review would be required. Finally, as noted in the DSR chapter, MPI does not decide whether a particular regulatory amendment will proceed or, if it is to proceed, the timing of when it will occur. The decision about whether these regulations can be made ultimately lies with the government.

Please discuss if any individual driver's DSR rating would be impacted by these envisioned changes, or if rules for movement along the DSR scale would be impacted.

MPI does not expect so. The intention of any new model would be to calculate the vehicle premium discount based on the DSR of a person other than the registered owner, rather than to change how MPI calculates the DSR of the registered owner. However, as MPI has yet to establish any business rules, this could change depending on the final form of the model.

Please explain if amendments to regulation are required to accommodate new DSR levels above +15 and changes to discount rates, and the process and timeframe associated with those changes

Changes to the discount rates do not require regulatory changes.

Adding new levels to the scale requires amendments to the DSR regulation. However, unlike the changes needed to implement a primary driver model these changes are very minor and not comparable to the work required to implement a primary driver model. Section 2 of *The Driver Safety Rating System Regulation, amendment M.R. 10/2022* added the +16 level after the 2022 GRA.

Changing the number at the highest level on the scale was all that was required to make this change, nonetheless it took several months. The timeline to make this regulation was as follows:

- PUB issued order approving creation of +16 level: December 15th, 2021.
- RAC Review of draft regulation: February 3rd, 2022.
- Cabinet Approval of regulation: February 15th, 2022.
- Renewal notices begin to indicate creation of new +16 level: on or about February 15th (i.e., 45 days prior to April 1st).
- Regulation in force and implementation of new DSR level: April 1st, 2022.

This regulation was not deemed to contain regulatory requirements and therefore did not require a public consultation period, nor was Treasury Board review required. Nonetheless, even with the simple change to increase the scale and full government support to make the regulations quickly, the timeframe to make the new regulation in, from PUB approval to the start of the new insurance year, is already very limited.

- h) The definition of "personal information" under FIPPA
(<https://web2.gov.mb.ca/laws/statutes/ccsm/f175e.php>) is:

"personal information" means recorded information about an identifiable individual, including

- (a) the individual's name,
- (b) the individual's address, telephone or facsimile number or e-mail address,
- (c) information about the individual's age, sex, sexual orientation, marital or family status,
- (d) information about the individual's ancestry, race, colour, nationality, or national or ethnic origin,
- (e) information about the individual's religion or creed, or religious belief, association or activity,
- (f) personal health information about the individual,
- (g) the individual's blood type, fingerprints or other hereditary characteristics,

- (h) information about the individual's political belief, association or activity,
- (i) information about the individual's education, employment or occupation, or educational, employment or occupational history,
- (j) information about the individual's source of income or financial circumstances, activities or history,
- (k) information about the individual's criminal history, including regulatory offences,
- (l) the individual's own personal views or opinions, except if they are about another person,
- (m) the views or opinions expressed about the individual by another person, and
- (n) an identifying number, symbol or other particular assigned to the individual;

MPI is also required to protect "personal health information" defined under PHIA (<https://web2.gov.mb.ca/laws/statutes/ccsm/p033-5e.php>):

"personal health information" means recorded information about an identifiable individual that relates to

- (a) the individual's health, or health care history, including genetic information about the individual,
 - (b) the provision of health care to the individual, or
 - (c) payment for health care provided to the individual,
- and includes
- (d) the PHIN and any other identifying number, symbol or particular assigned to an individual, and
 - (e) any identifying information about the individual that is collected in the course of, and is incidental to, the provision of health care or payment for health care;

As such, MPI considers a name and associated driver's license number to be "personal information".

The information fields MPI currently has in its custody for each licensed driver in Manitoba includes:

- Front of driver licence card, also be available in AOL (Autopac On-line):

- Legal Family Name
 - Legal Given Name(s)
 - Date of birth
 - Issue Date
 - Expiry Date
 - DL number (PIC)
 - Document Discriminator Number (DD)
 - Address
 - Class/Stage
 - Endorsements (N,A, I, or S)
 - Restrictions
 - Gender (M/F/X/Blank)
 - Height (cm)
 - Eye Colour
 - GDL Date Code
- There is also information on the back of the physical card:
 - 2D barcode which contains the customer's:
 - Personal information
 - Driver's Licence Class
 - Restriction Codes
 - Endorsement Codes (if applicable)
 - Driver's Licence Number
 - Document Discriminator Number
 - A unique serial number assigned by the producer
 - Document Control Number
 - The Class Licence System pictograph
 - Class/Stage
 - Endorsements
 - Restrictions
 - Intermediate to Full Stage, if applicable
 - DAR Restriction End – Class 1-5, if applicable
 - Eligible to Supervise Class 5 Learner, if applicable

In DLS, (Driver Licence System), MPI maintains the driving history, which may contain the following if applicable:

- Convictions
- Suspensions
- Prohibitions
- Accidents
- Medical/ADAP/Driver Fitness involvement
- Conditions/ Board Appeal info
- Mandatory Entry-Level Training

As well as:

- Accounting Status
- Photo card expiry date
- Licence effective and expiry
- Previous licence effective and expiry
- Test year (normally last highest class they tested for)
- And the same info as on licence.

- i) Directive 11.13 from Order 134/12 directs MPI to bring forward in the 2023 GRA, a five-year plan for the implementation of the Primary Driver rating model. Whether Directive 11.13 is a validly issued directive is currently before the Manitoba Court of Appeal. Any implementation of this plan will be known once the issues before the Court of Appeal are decided.

TC (MPI) 1-9

Part and Chapter:	Part VI DSR Appendix 3	Page No.:	11 of 13
PUB Approved Issue No:	11) DSR		
Topic:	DSR Actuarial Review		
Sub Topic:			

Preamble to IR:

MPI states:

"As stated in section 1, the discounts and surcharges reflect the collective loss experience of the drivers of vehicles registered to owners with the same DSR level. This implies the following:

- The discounts and surcharges do not reflect the relative risk of drivers at different DSR levels.*
- The vehicle discount for a registered owner at DSR level 15 would be greater than 56.0% given that the discount was calculated including the loss experience of other drivers with a DSR level lower than 15 (i.e. drivers with worse driving behavior); conversely, DSR level 15 would be lower than 56.0% given that the discount was calculated including the loss experience of registered owners with a DSR level potentially higher than 15. Therefore, MPI did not adjust the vehicle discount for DSR 15 at this moment in time. Further, MPI currently does not have an indication for DSR 16 since their claims experience are not available until the end of the rating year 2022/23. As such, indications for the higher DSR levels will also have a one year lag."*

Question:

- a) Please explain if MPI intends to examine the relative risk of drivers at different DSR levels, as opposed to the collective loss experience of drivers of vehicles registered to owners with the same DSR level.
- b) Please explain how such an analysis might vary in approach or results, from the analysis presented in DSR Appendix 3

Rationale for Question:

To understand the appropriateness of the analysis presented.

RESPONSE:

- a) At this stage, MPI does not intend to examine the relative risk of drivers at different DSR levels. To conduct a detailed pricing analysis on the relative risks of drivers, MPI would need to collect information about the primary driver of vehicles, which it cannot do absent the consent of the customer.

Further, Directive 11.13 from the Order 134/12 directs MPI to bring forward in the 2023 GRA, a five-year plan for the implementation of the Primary Driver rating model. Whether Directive 11.13 is a validly issued directive is currently before the Manitoba Court of Appeal. Any implementation of this plan will occur once the issues before the Court of Appeal are decided.

- a) Please refer *Driver Safety Rating DSR Appendix 2 - Compliance with PUB Directive 11.15*, where MPI discusses modernizing a more actuarially sound pricing framework.

TC (MPI) 1-10

Part and Chapter:	Paret VII – RSR	Page No.:	6 of 24
PUB Approved Issue No:	18) Capital Management Plan		
Topic:	RSR Target and Range		
Sub Topic:			

Preamble to IR:

MPI states:

"MPI submits that the Reserves Regulation requires MPI to set the bottom of the RSR range at 100% MCT. Maintaining the balance of the RSR at an amount that is below 100% MCT is contrary to the Reserves Regulation and does not resolve the volatility issue raised above.

(...)

The upper level represents the minimum amount for a rebate to make economic and operational sense to customers and MPI respectively, while balancing stability and predictability"

And then goes on to explain various aspects of the revised CMP proposal.

Question:

- a) Please confirm that the initial iteration of the CMP envisioned that the RSR would be in the vicinity of 100% MCT, meaning actual RSR value may be above or below 100 MCT.
- b) Please confirm that the initial intent of the reserves regulation was consistent with the initial intent of the CMP, described in part a above.

- c) Please cite the sections of the Reserves Regulation which would establish 100% MCT as the minimum. Please explain why these sections were not binding on the initial Capital Management Plan.
- d) Please provide the dollar values of the 20% range in MCT (i.e. from 100% to 120%) in each of the forecast years for this application.
- e) Please provide a cost estimate of the rebate mechanism (paper check, or other means enabled by Project NOVA) expected in each of the forecast years for this application. Please provide the cost estimate to apply a capital release to the indicated rate change, in each of the forecast years of this application.
- f) Please explain why the denomination of \$100 rebate checks is relevant to the rebate trigger.
- g) Please provide MPI's estimate of the opportunity cost of funds not rebated to customers. If no such estimate has been previously made, please prepare one.
- h) Please explain the benefit to policy holders of MPI holding the amounts described in part (d).
- i) Please describe where MPI derives the authority to determine rebate application process the PUB will follow in hearing a rebate application (e.g. "by application only, no hearing"), and how procedural fairness and natural justice can be met without the PUB considering the particular situation of the case before it, and hearing positions of parties impacted by the decision.
- j) Please compare the total costs of a capital rebate approach and the capital release approach. Please quantify as many costs as possible.
- k) Please elaborate on why the FCT does not assess the risk associated with the purpose of the RSR. Please include in the answer, MPI's understanding of the purpose of the RSR.

- l) Please describe the actions taken by SGI when capital exceeds 140% MCT, and by Insurance Corporation of British Columbia (ICBC) when capital exceeds 100% MCT.
- m) Please describe the accuracy of MPI's forecasting process at T+4 and T+5 years. Please provide an analysis of pro forma variances from past GRA T+4 and T+5 forecasts to actuals for at least 5 years.
- n) Using scenario 2 of Figure RSR-1, and the current GRA Starting MCT, please estimate the annual excess capital held by MPI in each of the forecast years, illustrated by scenario 2.
- o) Please confirm there is an inherent asymmetry to the build and rebate trigger points – that the build trigger point is at T+2 years, and the rebate trigger point is at T+5 years.
- p) Please explain who conducted the audit of assumptions used within the P&C1 and MCT calculations, and if an audit report is available, please provide it.

Rationale for Question:

To fully understand the revised CMP proposal.

RESPONSE:

- a) Confirmed. The initial iteration of the Capital Management Plan (CMP) as filed in the 2020 GRA, indicated the minimum amount MPI must maintain in the Rate Stabilization Reserve (RSR) was based on 100% MCT. A capital build would be applied for if the MCT was below 100% and a capital release would be applied for if the MCT were above 100%. The intent being that the MCT would be maintained at or always hover at 100% with the CMP acting as the mechanism to achieve that goal.

- b) MPI believes that its response in part a) above is consistent with the *Reserves Regulation*, Man. Reg. 76/2019.
- c) Section 2(a) of the *Reserves Regulation* requires that MPI maintain an amount in the RSR equal to an MCT ratio of at least 100%:

Amount to be held in reserves

2 For the purpose of section 18 of the Act, the minimum amount the corporation must maintain

(a) in its rate stabilization reserve is the amount determined using a MCT ratio of 100%.

MPI does not claim that the above section does not apply to its CMP.

- d) Please see Figure 1 below:

Figure 1 Total Capital Margin required at 100% and 120% MCT

Line No.		2021-2022	2022-2023	2023-2024	2024-2025	2025-2026
		Current Year	Forecast Base Year	Forecast Year	Forecast Year	Forecast Year
1	Total Capital (Margin) Required at 120%	461,294	446,036	467,971	489,091	502,694
2	Total Minimum Capital (Margin) Required at 100%	384,412	371,696	389,976	407,575	418,912
3	Difference in Total Capital (Margin) between 100% and 120%	76,882	74,339	77,995	81,515	83,782

- e) Please refer to CAC (MPI) 1-57(b) which describes the estimated annual cost for issuing rebates.
- f) The reference to \$100 rebate checks was simply to further support the upper level 120% MCT limit. From an operational and economic perspective, issuing rebate cheques more frequently and in lower denominations would be costly due to the cost of mailing the cheques and administering the rebate cheque process.
- g) The cost of capital can be found in Value Management VM Appendix 10 Figure App 10-1.

- h) The benefits to policyholders for using a range between 100% and 120% MCT, rather than a target, is that a range ensures that MPI has sufficient capital in the RSR to limit price fluctuations and ensure that policyholders have stable and consistent rates (i.e., building or returning capital). Holding capital above the minimum level will also provide policyholders with confidence that MPI can absorb unexpected losses from adverse events (e.g., higher inflation levels, lower investment yields, etc.) and protect policyholders from future capital builds.
- i) Please refer to PUB (MPI) 1-76(a).
- j) Please refer to CAC (MPI) 1-57(b) of this year's GRA which provides the associated costs from the last round of rebate cheques. The cost of administrative effort for both a capital rebate and capital release is marginal and deemed to be not materially different.
- k) The purpose of the RSR is outlined on page 4,

To protect motorists from rate increases that would otherwise have been necessary due to unexpected variances from forecasted results and due to events and losses arising from non-recurring events or factors.

The purpose of the FCT is outlined on page 10,

Using the FCT is not ideal since the purpose of the FCT is about understanding the impact of select adverse scenarios on the company's capital and how management actions can lessen those effects.

These selected scenarios are meant to stress test and determine if MPI could maintain satisfactory financial condition at specific probability levels and the required management action. Ideally, the FCT should not be used as a tool to set capital targets to meet compliance as outlined in section 1 of CIA Financial Condition Testing Educational Note,

The principal goals of the FCT are to identify possible threats to the financial condition of the insurer and appropriate risk management

or corrective actions to address those threats, while considering the ORSA solvency analysis, conclusions, and recommendations. The FCT process should not be viewed as merely a compliance exercise.

- l) The capital management policy of SGI includes a capital release provision that would release 1/5 of the surplus above the Operating MCT Target (140%) into the Auto Fund basic insurance rate every year. The capital build provision requires the Auto Fund to recover 1/5 of the deficiency in capital below the Operating MCT Target every year in the base insurance rate. The capital release and build are approved by the Board and not by SRRP.

The capital management policy of ICBC includes an Operating MCT Target of 145%. If its MCT ratio is higher than 160% MCT, it releases capital through the issuance of a customer renewal credit. Its build component is currently suspended and under review.

- m) MPI endeavors to provide its best estimate of the future financial outlook based on tested methodologies, business decisions and assumptions from historical experience and third-party estimates. It submits these methodologies, business decisions and assumptions to the PUB with participative discussion from interveners throughout the application process. Further, MPI cannot comment on the accuracy of forecasts provided by third parties, nor on any forecasts of significant events (such as a global pandemic or impairments).

Please refer to Figure 2 below for a comparison of summarized financial proforma results between actual and forecast base for the past five years preceding the pandemic.

Figure 2 Financial Summary - Actual vs GRA Forecast Base (Provisional)

Line No.	2014/15			2015/16			2016/17			2017/18			2018/19			2019/20*			
	2015 GRA Forecast	Higher/ (Lower) than Forecast	Actual	2016 GRA Forecast	Higher/ (Lower) than Forecast	Actual	2017 GRA Forecast	Higher/ (Lower) than Forecast	Actual	2018 GRA Forecast	Higher/ (Lower) than Forecast	Actual	2019 GRA Forecast	Higher/ (Lower) than Forecast	Actual	2020 GRA Forecast	Higher/ (Lower) than Forecast	Actual	
1	Statement of Operations Items:																		
2	824,865	828,564	(3,699)	888,365	890,176	(1,811)	923,789	932,181	(8,392)	994,593	998,341	(3,748)	1,058,027	1,076,138	(18,111)	1,107,425	1,120,680	(13,255)	
3	823,357	820,279	3,078	881,416	883,443	(2,027)	927,893	933,751	(5,858)	982,991	986,406	(3,415)	1,051,503	1,059,512	(8,009)	1,116,446	1,118,682	(2,236)	
4	745,837	624,776	121,061	666,404	588,900	77,504	860,035	681,770	178,265	767,239	843,373	(76,134)	892,258	831,017	61,241	761,455	855,391	(93,936)	
5	873,774	752,376	121,398	798,045	721,441	76,604	993,537	820,279	173,258	923,722	990,858	(67,136)	1,030,667	981,835	48,832	905,513	1,007,075	(101,562)	
6	135,594	134,751	843	135,383	136,207	(824)	140,323	143,660	(3,337)	141,165	143,586	(2,421)	151,855	150,317	1,538	149,940	156,345	(6,405)	
7	(186,011)	(66,848)	(119,163)	(52,012)	25,795	(77,807)	(205,967)	(30,188)	(175,779)	(81,896)	(148,038)	66,142	(131,019)	(72,640)	(58,379)	60,993	(44,738)	105,731	
8	188,451	28,807	159,644	(4,038)	(10,830)	6,792	82,897	16,794	66,103	116,320	102,478	13,842	209,856	82,203	127,653	59,614	73,392	(13,778)	
9	2,440	(38,042)	40,482	(56,050)	14,965	(71,015)	(123,070)	(13,394)	(109,676)	34,424	(45,560)	79,984	78,837	9,563	69,274	120,607	28,654	91,953	
10	Statement of Changes in Equity Items:																		
11	213,079	132,738	80,341	231,000	233,246	(2,246)	181,000	217,128	(36,128)	210,845	220,128	(9,283)	249,692	254,420	(4,728)	406,225	234,766	171,459	
12	195,127	n/a	-	164,631	n/a	-	108,134	146,666	(38,532)	155,177	150,823	4,354	203,766	210,766	(7,000)	371,262	178,253	193,009	
13	365,554	n/a	-	342,459	n/a	-	366,039	333,742	32,297	349,600	369,013	(19,413)	395,393	303,315	92,078	350,820	345,452	5,368	
14	MCT Ratio	53%	n/a	-	48%	n/a	-	30%	44%	-14%	44%	41%	3%	52%	70%	-18%	106%	52%	54%

15 *After Capital maintenance provision
16 MCT Ratios are unadjusted post 2021/22 External Audit

n) The scenarios depicted in the line graph of Figure RSR 1 are not part of any current forecast but rather are illustrative scenarios that could occur when the actual starting MCT is at 120%. The intent of illustrating Scenario 2 is to demonstrate that no action may occur when in a declining capital environment. Based on the current GRA, the annual excess capital held by MPI in each of the forecast years can be found in Rate Stabilization Reserve Appendix 1 Figure RSR App-1-2, Line 34.

- o) Confirmed. However, MPI does not agree with the quoted trigger point for a capital rebate. The asymmetry in trigger points between the capital build and capital rebate would vary and be based on the actual and forecasted results. While the capital build has a constant fixed trigger point of T+2 years, the trigger point for a rebate can occur anywhere from T to T+4 years. For example, the current base forecast shows that MPI projects a capital rebate for the 2025/26 fiscal year. Assuming the forecast actualizes, MPI would apply for a rebate in or around the 2027 GRA (i.e., T+ 4 year). Alternatively, the current base forecast may be updated and call for a capital rebate in the fiscal year 2022/23. Assuming the forecast actualizes, a rebate would be applied for around the 2024 GRA (i.e., T+1 year).
- p) Meyers Norris Penny completed the audit of assumptions used within the P&C and MCT calculations. Please see Attachment A - Internal Auditor MCT Report - Confidential Internal Auditor MCT Report, which MPI will file through the confidential process.

**Attachment A:
MNP Internal Audit MCT Report**

This material is the subject of a confidential motion.

TC (MPI) 1-11

Part and Chapter:	Various	Page No.:	Various
PUB Approved Issue No:	18) Capital Management Plan		
Topic:	Expected filing date of various materials		
Sub Topic:			

Preamble to IR:**Question:**

Please provide expected filing dates for:

- a) Revised MCT calculations per the 2023 IFRS MCT
- b) The Financial Condition Test (Part VII – FCT)

Rationale for Question:

To understand when various items will be made available to the public record.

RESPONSE:

- a) MPI is currently working with our external auditors to finalize the 2023 IFRS MCT. Revised calculations per the 2023 IFRS MCT are expected to be completed in fiscal Q4, prior to the commencement of 2023/24.
- b) The Financial Condition Test will be provided with the updated rate filing on October 12th.

TC (MPI) 1-12

Part and Chapter:	Part II – VFH	Page No.:	14 of 35
PUB Approved Issue No:	10) VFH		
Topic:	Jurisdictional Scan		
Sub Topic:			

Preamble to IR:

MPI provides a summary of VFH products offered by SGI and ICBC.

Question:

- a) Please describe if ICBC or SGI have taken steps to reflect the risk associated with multiple drivers of a single VFH, and or multiple drivers of multiple VFHs.
- b) Are there mechanisms to address this issue with either commercial or private passenger vehicles?

Rationale for Question:

To understand if and how other crown insurers address issues facing VFH in Manitoba.

RESPONSE:

- a) Insurance Corporation of British Columbia (ICBC) took steps to reflect the risk associated with multiple drivers, through implementation of the Combined Driver Factor (CDF) in its rate design for all non-Fleet Basic customers, including Vehicle for Hire (VFH). When any customer purchases ICBC Basic insurance, they must list all drivers expected to drive their vehicle. This method provides an assessment of the combined risk of the listed drivers of a vehicle and ensures premiums reflect the risk for all listed drivers of the vehicle. In the event that an unlisted driver

causes a collision, the registered owner must pay an unlisted driver surcharge. The CDF applies for non-fleet drivers at all times, even when drivers are on a TNC blanket policy or the distance-based taxi model. To the knowledge of MPI, ICBC uses the Fleetplan (a fleet program) to assess the risk associated with multiple drivers of multiple vehicles, including qualifying VFH. Please see 2022 GRA PUB (MPI) 1-4, for more detail on the Fleetplan and taxi VFH.

As discussed in Vehicle for Hire Chapter VFH.3.3.2, VFH in Saskatchewan qualify for the SGI Business Recognition Program, which SGI uses to address risk associated with multiple drivers of a single vehicle and multiple drivers of multiple vehicles.

- b) MPI understands there could be many potential mechanisms to address the risk associated with multiple drivers of a single vehicle and multiple drivers of multiple vehicles for both passenger and commercial vehicles. To its knowledge, this may include listing all drivers of a vehicle and basing the premium on the combined risk of all drivers to address the risk of multiple drivers to a single vehicle, as well as the application of escalating surcharges for at-fault collisions to motivate safer driving habits.

In instances where there are multiple vehicles of multiple drivers, there are Fleet type programs, provided customers meet the minimum fleet size threshold, where the earned premium and total severity of claims of the entire fleet, across a given time period, determines the loss ratio.

The above is not exhaustive, but represents the information of which MPI is currently aware.

TC (MPI) 1-13

Part and Chapter:	Part II – VFH	Page No.:	22 of 35
PUB Approved Issue No:	10) VFH		
Topic:	VFH Blanket Policy		
Sub Topic:			

Preamble to IR:

MPI states:

"At policy year end, MPI will finalize the premium based on the actual annual kilometers travelled by and the actual claims experience of all of their vehicles. MPI will then use a rebate/surcharge scale to determine whether a rebate or surcharge is required and, if so, the amount of the rebate or surcharge."

Question:

- a) Please explain in more detail how MPI will rely on actual annual kilometers driven, and actual loss experience to determine the surcharge/rebate. Please provide an illustrative example.

- b) Please explain how MPI will set and/or adjust the single starting rate for all VFH dispatchers. Will this starting rate be reset each year, and will it vary between VFH dispatchers after the first year?

- c) Please explain if and how changes to the starting rate will be calculated (if at all). Please include in the discussion, details of the credibility approach to calculate changes, and any other factors that may influence starting rates from year to year, or between VFH dispatchers.

Rationale for Question:

To understand details related to the proposed VFH Blanket policy.

RESPONSE:

- a) Please see *PUB (MPI) 1-67(a)*, for more detail on requested information.

- b) As MPI continues to complete actuarial development on the blanket policy, it cannot confirm the requested details at this time. MPI will provide full actuarial development in the 2024 GRA.

- c) As MPI continues to complete actuarial development on the blanket policy, it cannot confirm the requested details at this time. MPI will provide full actuarial development in the 2024 GRA.

TC (MPI) 1-14

Part and Chapter:	Part II – VFH	Page No.:	23 of 35
PUB Approved Issue No:			
Topic:			
Sub Topic:			

Preamble to IR:

MPI lists the basic requirements for a VFH blanket policy.

Question:

- a) Please provide examples or a description of the “technological capacity to track and report distance travelled in ridesharing periods P2 and P3”.
- b) Is MPI aware of any commercially available off the shelf solutions that provide this functionality? If so, please provide details.
- c) Must this tracking functionality be automated?
- d) Please provide details as to how MPI expects the reporting to take place.

Rationale for Question:

To understand the minimum requirements for VFH blanket policy.

RESPONSE:

- a) There are many existing technologies that provide dispatching, geo-locational and street address data and MPI has no preference for any one technology, methodology, or company. However, Basic blanket policies will require a dispatching system or online platform that can capture specific attributes of driver trips. As MPI continues to develop this level of detail, it cannot at this time provide a final listing of requirements. At minimum, this will likely include the following:
- Represent trip start and end points by their latitude and longitude coordinates
 - Represent kilometers travelled by their actual route taken and not by an inferred route taken or by a straight-line point-to-point
 - Categorize all trips travelled on a trip as either Period 2 or 3
 - Report data monthly in both Periods 2 and 3
- b) MPI does not know whether any companies offer the specific functionality required.
- c) Yes, please see the response to a) above.
- d) MPI will require Transportation Network Companies (TNCs) to electronically submit an active vehicle listing (including plates and Vehicle Identification Number) and kilometer data in aggregate across all active vehicles, across both Periods 2 and 3 on a monthly basis to the VFH administrator. The exact electronic method around the data sharing is still being confirmed. The MPI VFH administrator will regularly correspond with TNCs to receive the monthly data, maintain a repository, and facilitate the year end and renewal processes with them.

TC (MPI) 1-15

Part and Chapter:	Part II – VFH	Page No.:	27 of 35
PUB Approved Issue No:	10) VFH		
Topic:	Implementation Plan		
Sub Topic:			

Preamble to IR:

MPI has provided details of its implementation plan for the new VFH Framework. The existing VFH framework is understood to have had some implementation irregularities.

Question:

- a) Please confirm that at upon implementation of the current VFH Framework, individual VFH were permitted to self select insurance use, which resulted in certain Taxi/Livery insureds (who operated wheelchair vans) to move from Taxi VHF insurance use to Accessible VFH insurance use.
- b) Please indicate the number of such Taxis that were able to switch insurance use.
- c) Please confirm if any pricing or loss experience adjustments were made in respect of this self selection. If adjustments were made, please explain. If adjustments were not made, please attempt to estimate the direction and magnitude of pricing impacts.
- d) Please explain if other VFH insureds could have self selected cheaper insurance uses. For example, could Limo or Taxi VFH have selected Passenger VFH insurance use?
- e) Please explain if the revised VFH framework will have any avenues for favorable self-selection.

- f) Please explain if a Passenger VFH would be permitted to select Pleasure insurance coverage to be combined with the VFH Blanket Policy.
- g) Please explain the reasons why MPI would default Passenger VFH to All-purpose coverage.

Rationale for Question:

To fully understand the implementation plan for the new VFH Framework.

RESPONSE:

- a) Concerning the 2018 Vehicle for Hire (VFH) framework implementation, MPI asked customers to declare their insurance based on the communicated eligibility requirements associated with each VFH insurance use. This resulted in eligible customers in taxi/livery who had vehicles that met the requirements, to insure as Accessible VFH.
- b) MPI did not and does not capture data related to how many Taxi/livery vehicles specifically had accessible capabilities prior to the 2018 implementation. As a result, MPI cannot indicate the number of taxi/livery that would have been eligible to select Accessible VFH. As communicated in the Taxi townhall, it would have been any vehicles that were equipped with a wheelchair ramp/lifts or mobility aids.
- c) Upon implementation, MPI assumed the overall loss exposure for Accessible VFH would not change and, as a result, it made no loss experience adjustments. MPI is unable to estimate the magnitude of pricing impacts as the volume for Accessible VFH is not sufficient to render any credibility for a quantitative analysis.
- d) A customer could only declare their insurance use if they met eligibility requirements which are based on the intended use of the vehicle. Concerning Limo and Taxi VFH, they do not meet requirements for Passenger VFH and as a result, could not select that insurance use.

- e) MPI will only allow customers to select the insurance use for which they are eligible, none of which will be “favourable self-selection.”
- f) This level of detail is currently still under development.
- g) All-purpose passenger vehicle represents the large majority of the Basic Fleet and is the highest rated of the personal insurance uses. Accordingly, MPI anticipates Transportation Network Company drivers will likely declare All-purpose for their personal use (Periods 0 and 1). Thus, it is reasonable for the default insurance use to be All-purpose during the implementation period.

TC (MPI) 1-16

Part and Chapter:	Part V – REV	Page No.:	
PUB Approved Issue No:	11) DSR		
Topic:	DSR Impact on Taxi VFH		
Sub Topic:			

Preamble to IR:

Taxi VFH, and other VFH subcategories are eligible for DSR discounts.

Question:

Please update Figure 1 & 2 from TC(MPI) 1-1 in the 2022 GRA.

Rationale for Question:

To understand the impact of DSR discounts on the subcategories of VFH and assess the reasonableness of the DSR upgrade forecast.

RESPONSE:

Please see Figures 1 and 2 below.

Figure 1 Number of VFH Policies by DSR Level and VFH Subcategory

Line No.	DSR Level	Discount Percent	Rate Model as of November 1, 2021					DSR Level	Discount Percent	Rate Model as of November 1, 2020				
			Passenger VFH	Taxicab VFH	Accessible VFH	Limousine VFH	Total VFH			Passenger VFH	Taxicab VFH	Accessible VFH	Limousine VFH	Total VFH
1	17	38	-	-	-	-	-	-	-	-	-	-	-	-
2	16	38	-	-	-	-	-	-	-	-	-	-	-	0
3	15	37	105	171	17	3	296	16	37	-	-	-	-	0
4	14	34	24	22	3	-	49	15	37	137	157	21	-	315
5	13	32	22	19	7	2	50	14	32	21	22	4	3	50
6	12	31	15	28	4	-	47	13	31	25	26	7	-	58
7	11	30	34	52	4	-	90	12	30	33	21	5	2	61
8	10	28	23	29	2	-	54	11	29	31	23	6	-	60
9	9	26	31	23	5	-	59	10	27	43	53	9	-	105
10	8	25	45	26	2	-	73	9	25	35	27	2	-	64
11	7	25	44	24	1	1	70	8	25	33	20	5	2	60
12	6	20	58	16	4	1	79	7	25	47	19	4	-	70
13	5	15	54	16	5	1	76	6	20	37	28	3	-	68
14	4	15	58	23	5	-	86	5	15	57	15	4	1	77
15	3	10	50	34	7	2	93	4	15	62	17	8	-	87
16	2	10	88	18	9	-	115	3	10	56	24	8	1	89
17	1	5	91	21	3	2	117	2	10	84	30	9	-	123
18	0 (Individual)*	0	111	29	14	2	156	1	5	78	18	7	1	104
19	0 (Corporate)**	0	55	28	57	33	173	0 (Individual)*	0	120	29	11	-	160
20	-1	0	26	3	2	-	31	0 (Corporate)**	0	58	27	54	25	164
21	-2	0	25	5	1	-	31	-1	0	30	7	3	-	40
22	-3	0	17	3	3	-	23	-2	0	23	7	2	-	32
23	-4	0	18	7	4	-	29	-3	0	9	7	2	-	18
24	-5	0	14	1	1	-	16	-4	0	14	3	4	-	21
25	-6	0	8	3	-	-	11	-5	0	18	7	3	-	28
26	-7	0	4	3	-	-	7	-6	0	11	1	1	-	13
27	-8	0	2	2	1	-	5	-7	0	6	9	1	-	16
28	-9	0	3	5	1	-	9	-8	0	3	2	3	-	8
29	-10	0	6	3	2	-	11	-9	0	5	1	-	-	6
30	-11	0	3	1	-	-	4	-10	0	8	3	-	1	12
31	-12	0	3	1	-	-	4	-11	0	3	1	1	-	5
32	-13	0	4	-	1	-	5	-12	0	4	-	-	-	4
33	-14	0	2	1	-	-	3	-13	0	2	-	-	-	2
34	-15	0	-	2	-	-	2	-14	0	1	1	-	-	2
35	-16	0	-	1	1	-	2	-15	0	3	1	2	-	6
36	-17	0	-	-	-	-	-	-16	0	2	-	-	-	2
37	-18	0	-	-	1	-	1	-17	0	1	-	-	-	1
38	-19	0	1	-	-	-	1	-18	0	-	-	-	-	-
39	-20	0	1	1	1	-	3	-19	0	-	1	-	-	1
40	Total		1,045	621	168	47	1,881	Total	0	1,102	609	190	36	1,937

41 * Individual customer types qualify for DSR discounts

42 ** Corporate customer types do not qualify for DSR discounts

Number of VFH Policies by DSR Level and VFH Subcategory (cont'd)

Line No.	DSR Level	Discount Percent	Rate Model as of November 1, 2019					DSR Level	Discount Percent	Rate Model as of November 1, 2018				
			Passenger VFH	Taxicab VFH	Accessible VFH	Limousine VFH	Total VFH			Passenger VFH	Taxicab VFH	Accessible VFH	Limousine VFH	Total VFH
1														
2														
3	15	33	107	167	22	2	298	15	33	65	155	12	1	233
4	14	30	17	16	1	1	35	14	30	13	36	1	-	50
5	13	29	25	25	3	4	57	13	29	13	22	2	-	37
6	12	28	16	23	4	-	43	12	28	8	20	2	3	33
7	11	27	30	27	8	1	66	11	27	19	29	4	1	53
8	10	26	32	28	3	2	65	10	26	20	34	6	7	67
9	9	25	26	39	6	4	75	9	25	18	22	2	3	45
10	8	25	24	23	4	-	51	8	25	20	29	2	3	54
11	7	25	33	25	5	2	65	7	25	17	26	2	-	45
12	6	20	25	20	6	-	51	6	20	29	29	2	2	62
13	5	15	35	25	2	-	62	5	15	23	12	4	1	40
14	4	15	50	15	3	2	70	4	15	24	18	1	-	43
15	3	10	38	16	10	1	65	3	10	38	10	6	1	55
16	2	10	41	23	6	-	70	2	10	43	17	6	-	66
17	1	5	47	26	6	1	80	1	5	28	22	6	-	56
18	0 (Individual)*	0	92	28	15	2	137	0 (Individual)*	0	54	29	10	-	93
19	0 (Corporate)**	0	58	29	72	52	211	0 (Corporate)**	0	41	58	60	60	219
20	-1	0	20	9	1	-	30	-1	0	9	8	1	-	18
21	-2	0	17	9	2	-	28	-2	0	8	6	1	1	16
22	-3	0	5	5	3	1	14	-3	0	8	7	1	-	16
23	-4	0	14	7	2	-	23	-4	0	16	5	-	-	21
24	-5	0	13	6	1	1	21	-5	0	5	5	3	-	13
25	-6	0	3	4	3	-	10	-6	0	1	5	-	3	9
26	-7	0	9	3	2	-	14	-7	0	7	3	6	-	16
27	-8	0	3	3	1	-	7	-8	0	2	6	2	-	10
28	-9	0	3	1	-	-	4	-9	0	1	4	-	-	5
29	-10	0	3	4	2	-	9	-10	0	2	3	2	-	7
30	-11	0	-	4	-	-	4	-11	0	-	-	-	-	-
31	-12	0	7	1	-	1	9	-12	0	-	-	-	-	-
32	-13	0	1	1	-	-	2	-13	0	3	2	2	-	7
33	-14	0	-	1	1	-	2	-14	0	1	1	-	-	2
34	-15	0	-	1	3	-	4	-15	0	-	1	-	-	1
35	-16	0	1	-	-	-	1	-16	0	1	-	-	-	1
36	-17	0	2	-	-	-	2	-17	0	-	1	-	-	1
37	-18	0	-	-	-	-	-	-18	0	-	-	-	-	-
38	-19	0	-	1	-	-	1	-19	0	-	-	-	-	-
39	-20	0	-	2	1	-	3	-20	0	3	-	2	-	5
40	Total		797	617	198	77	1,689	Total		540	625	148	86	1,399

41 * Individual customer types qualify for DSR discounts
42 ** Corporate customer types do not qualify for DSR discounts

Figure 2 Discount by VFH Subcategory

		As of Nov 1, 2018			
Line No.	VFH Group	Undisc Premium	Disc Premium	Discount	Percent Discount
1	Passenger VFH	1,296,008	1,108,158	187,850	14.49%
2	Taxicab VFH	6,449,849	5,114,961	1,334,888	20.70%
3	Accessible VFH	349,075	321,753	27,322	7.83%
4	Limousine VFH	255,642	238,911	16,731	6.54%
5	Total	8,350,574	6,783,783	1,566,791	18.76%
		As of Nov 1, 2019			
Line No.	VFH Group	Undisc Premium	Disc Premium	Discount	Percent Discount
9	Passenger VFH	2,200,872	1,877,107	323,765	14.71%
10	Taxicab VFH	6,237,385	4,926,169	1,311,216	21.02%
11	Accessible VFH	494,921	445,393	49,528	10.01%
12	Limousine VFH	207,624	193,844	13,780	6.64%
13	Total	9,140,802	7,442,513	1,698,289	18.58%
		As of Nov 1, 2020			
Line No.	VFH Group	Undisc Premium	Disc Premium	Discount	Percent Discount
17	Passenger VFH	4,025,921	3,417,679	608,242	15.11%
18	Taxicab VFH	6,748,633	5,207,092	1,541,541	22.84%
19	Accessible VFH	535,277	468,370	66,907	12.50%
20	Limousine VFH	102,356	95,169	7,187	7.02%
21	Total	11,412,187	9,188,310	2,223,877	19.49%
		As of Nov 1, 2021*			
Line No.	VFH Group	Undisc Premium	Disc Premium	Discount	Percent Discount
25	Passenger VFH	4,643,211	3,971,356	671,855	14.47%
26	Taxicab VFH	6,851,773	5,200,766	1,651,007	24.10%
27	Accessible VFH	505,900	449,004	56,896	11.25%
28	Limousine VFH	140,512	133,147	7,365	5.24%
29	Total	12,141,396	9,754,273	2,387,123	19.66%
30	*Based on applied for rates and vehicle premium discounts				

TC (MPI) 1-17

Part and Chapter:	Part VI – RM Appendix 9	Page No.:	
PUB Approved Issue No:	9) Claims Forecasting		
Topic:	Public Major Class and VFH Rates		
Sub Topic:			

Preamble to IR:

Passenger VFH rates are determined in accordance with Major Class 1, Private Passenger, while the remaining VFH subcategories are determined in accordance with Major Class 3, Public.

Question:

Please file the rationale for Factor Selection for Collision, Comprehensive and Property damage used in the 2023 GRA (see TC(MPI) 1-4 from the 2022 GRA for reference).

Rationale for Question:

To understand the basis for factor selection relevant to the Private and Public Major Classes, and VFH.

RESPONSE:

Please see *Appendix 1 - Factor Selection Rationale*.

Rationale for Factor Selection for Collision, Comprehensive and Property Damage

2023 GRA

(Note: Unless mentioned, the selected factor is unchanged from last year.)

Collision

<u>Major Class</u>	<u>Selected</u>
1 – Private Passenger	<p>12-24 – 5-year weighted avg. adjusted:</p> <ul style="list-style-type: none"> • Adjustment = Overall selected / Overall 5-year weighted avg. <p>24-36 – Overall:</p> <ul style="list-style-type: none"> • Indicated factors for the MC are not significantly different than the overall.
2 – Commercial	<p>12-24 to 36-48 – 5-year weighted hi-lo avg.</p> <p>48-60 & 72-84 – Overall:</p> <ul style="list-style-type: none"> • Indicated factors for the MC are not significantly different than the overall. • Last year - selected based on the indicated factors.
3 – Public	<p>12-24 – 5-year weighted hi-lo avg.</p> <p>24-36 – 5-year weighted hi-lo avg.:</p> <p>36-48 to 60-72 – 5-year weighted hi-lo avg</p> <ul style="list-style-type: none"> • Last year – judgment selected based on the indicated factors.
4 – Motorcycles	<p>12-24 – 5-year weighted hi-lo avg.:</p> <ul style="list-style-type: none"> • Last Year – 7-year weighted hi-lo avg. <p>24-36 & 36-48 – 5-year weighted hi-lo avg.</p>
5 – Trailers	<p>12-24 – 5-year weighted hi-lo avg.</p> <ul style="list-style-type: none"> • Last Year – 3-year weighted avg. <p>24-36 to 48-60 – 5-year weighted hi-lo avg.</p>

Comprehensive

<u>Major Class</u>	<u>Selected</u>
1 – Private Passenger	<p>12-24 – 5-year weighted avg. adjusted:</p> <ul style="list-style-type: none"> • Adjustment = Overall selected / Overall 5-year weighted avg. <p>24-36 – Overall adjusted:</p> <ul style="list-style-type: none"> • Adjustment = Overall selected / Overall 5-year weighted avg. • Last Year – Difference in the 5-year weighted hi-lo avg. between MC and overall. <p>36-48 to 48-60 – Overall:</p> <ul style="list-style-type: none"> • Indicated factors for the MC are not significantly different than the overall.
2 – Commercial	<p>12-24 – 5-year weighted hi-lo avg.</p> <p>24-36 – 5-year weighted hi-lo avg.</p> <ul style="list-style-type: none"> • Second high point removed with addition of 1 year • Last Year – 7-year weighted hi-lo avg • Two significantly higher points in the five most current years. • The 7-year weighted hi-lo avg. removes the highest point, and gives less weight to the other higher point. • Balance between stability and responsiveness. • Last Year – 5-year weighted hi-lo avg.

	<p>36-48 & 48-60 – 5-year weighted hi-lo avg.</p> <ul style="list-style-type: none"> To be consistent with 12-24 & 24-36 selection Last year – Selected based on the variance between the indicated factors for the MC and for Overall (ten most current years).
3 – Public	<p>12-24 & 24-36 – 5-year weighted hi-lo avg. 36-48 & 48-60 – 5-year weighted hi-lo avg.</p> <ul style="list-style-type: none"> Last year – judgement selected based on the variance between the indicated factors for the MC and for Overall (ten most current years).
4 – Motorcycles	N/A
5 – Trailers	<p>12-24 & 24-36 – 5-year weighted hi-lo avg. 36-48 to 60-72 – Overall</p> <ul style="list-style-type: none"> Last year – judgement selected based on the variance between the indicated factors for the MC and for Overall (ten most current years).

Property Damage

<u>Major Class</u>	<u>Selected</u>
1 – Private Passenger	<p>12-24 – 5-year weighted avg. 24-36 – 5-year weighted avg. 36-48 – 5-year weighted avg.</p> <ul style="list-style-type: none"> Last year 5-year weighted hi-lo avg.
2 – Commercial	<p>12-24 – 5-year weighted hi-lo avg.:</p> <ul style="list-style-type: none"> Last Year – Judgment. <p>24-36 – 10-year weighted avg.:</p> <ul style="list-style-type: none"> A longer term average was chosen since indicated factors exhibit significant fluctuation. Last year – 9-year weighted avg. <p>36-48 – 5-year weighted hi-lo avg.:</p> <ul style="list-style-type: none"> Decision to use this method for Major Classes 1, 2 & 3.
3 – Public	<p>12-24 – 5-year weighted hi-lo avg.: 24-36 – 5-year weighted hi-lo avg. 36-48 – 5-year weighted hi-lo avg.:</p> <ul style="list-style-type: none"> Decision to use this method for Major Classes 1, 2 & 3.
4 – Motorcycles	<p>12-24 to 36-48 – Overall:</p> <ul style="list-style-type: none"> Impact is not significant.
5 – Trailers	<p>12-24 to 36-48 – Overall:</p> <ul style="list-style-type: none"> Impact is not significant.

TC (MPI) 1-18

Part and Chapter:	Part VI - RM	Page No.:	
PUB Approved Issue No:	2) Ratemaking		
Topic:	Supporting Data Update		
Sub Topic:			

Preamble to IR:

TC (MPI) 1-18 in the 2022 GRA

Question:

Similar to TC (MPI) 1-18 in the 2022 GRA

- a) Please provide Vehicle for Hire loss experience by territory. 5 years of data preferred, by territory, with Earned Units, Earned Premiums, Incurred Claims, Incurred Claim Counts, and Average Premium. Claims should be split between Serious and Non-Serious Losses and also split between Serious and Non-Serious Claim Counts.

- b) Please provide Taxis loss experience by coverage, by territory, and by year. 5 years of data preferred, by territory, by coverage, with Earned Units, Earned Premiums, Incurred Claims, Incurred Claim Counts, and Average Premium. Claims and claim counts should be split between Serious and Non-Serious.

- c) Please provide 10 years of data:
 - i. With historical premium, losses (split between serious and non-serious), claim counts (split between serious and non-serious, exposures by coverage.

- ii. For Taxis, passenger vehicles for hire, public major class, private passenger major class.

Rationale for Question:

Certain data are needed to complete an analysis.

RESPONSE:

a) and b)

Please refer to Appendix 1 - Figure App 1-1 and Figure App 1-2

c) Appendix 2 - Figure App 2-1 and Figure App 2-2.

Figure App 1-1 Taxi and VFH Claim Counts

Line No.	Classification	Incident Insurance Year	Territory	Non-Serious Loss		Serious Loss			Collision	Comprehensive	PD	Total Incurred	Earned Unit	Earned Premium	Average Premium	Loss Ratio
				ABO	IRI	ABO	IRI	BI								
1	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
2	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
3	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
4	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
5	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
6	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2017		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
7	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	1	26,468.28	21,155.94	0.00	0.00	0.00	728,366.94	38,790.76	50,229.08	865,011.00	365.05	670,335.69	1,836.28	129.04%
8	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	2	1,714.55	92.23	0.00	0.00	0.00	51,595.30	10,096.92	2,000.00	65,499.00	59.80	96,291.66	1,610.12	68.02%
9	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	3	0.00	0.00	0.00	0.00	0.00	0.00	11,138.11	500.00	11,638.11	4.64	6,528.34	1,407.64	178.27%
10	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	4	0.00	0.00	0.00	0.00	0.00	0.00	11.52	1,784.76	1,796.28	12.82	21,207.14	1,654.36	8.47%
11	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	5	4,317.79	15,651.44	0.00	0.00	0.00	36,185.16	176.71	0.00	56,331.10	10.15	22,543.98	2,222.13	249.87%
12	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2018		32,500.61	36,899.61	0.00	0.00	0.00	816,147.40	60,214.02	54,513.84	1,000,275.48	452.46	816,906.80	1,805.49	122.45%
13	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	1	59,686.08	62,376.09	0.00	0.00	0.00	1,081,753.47	107,631.70	82,171.42	1,393,618.76	603.39	1,149,035.91	1,904.30	121.29%
14	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	2	1,312.69	520.03	0.00	0.00	0.00	98,036.55	12,518.18	4,454.36	116,841.81	85.30	142,541.80	1,670.98	81.97%
15	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	3	0.00	0.00	0.00	0.00	0.00	11,927.40	1,183.36	970.40	14,081.16	9.47	14,943.30	1,577.25	94.23%
16	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	4	0.00	0.00	0.00	0.00	0.00	3,949.48	271.29	500.00	4,720.77	19.70	32,486.44	1,648.67	14.53%
17	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	5	485.85	33.84	0.00	0.00	0.00	108,017.29	3,413.00	8,902.03	120,852.01	29.59	66,809.69	2,258.08	180.89%
18	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2019		61,484.61	62,929.96	0.00	0.00	0.00	1,303,684.19	125,017.53	96,998.21	1,650,114.50	747.46	1,405,817.14	1,880.79	117.38%
19	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	1	29,495.06	28,770.68	0.00	0.00	0.00	851,466.37	183,453.58	48,567.55	1,141,753.25	810.54	1,723,346.63	2,126.16	66.25%
20	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	2	5,974.05	0.00	0.00	0.00	0.00	99,151.95	42,760.05	11,921.93	159,807.98	88.25	161,973.32	1,835.30	98.66%
21	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	3	0.00	0.00	0.00	0.00	0.00	31,978.87	3,042.39	2,037.50	37,058.76	10.83	19,709.42	1,820.35	188.03%
22	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	4	0.00	0.00	0.00	0.00	0.00	5,026.23	2,430.13	0.00	7,456.36	23.63	40,773.95	1,725.25	18.29%
23	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	5	0.00	0.00	0.00	0.00	0.00	58,228.72	283.24	0.00	58,511.96	39.51	88,272.01	2,233.99	66.29%
24	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2020		35,469.11	28,770.68	0.00	0.00	0.00	1,045,852.14	231,969.39	62,526.98	1,404,588.31	972.77	2,034,075.33	2,091.01	69.05%
25	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	1	180,854.95	101,668.57	0.00	0.00	0.00	1,894,329.29	139,393.90	144,055.79	2,460,302.50	854.58	2,076,037.81	2,429.30	118.51%
26	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	2	15,263.48	2,852.50	0.00	0.00	0.00	179,472.72	570.84	12,403.45	210,562.99	79.96	168,146.64	2,102.85	125.23%
27	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	3	0.00	0.00	0.00	0.00	0.00	3,431.17	1,661.00	1,500.00	6,592.17	12.73	25,240.47	1,982.26	26.12%
28	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	4	0.00	0.00	0.00	0.00	0.00	19,284.12	585.95	0.00	19,870.07	25.03	48,630.18	1,942.84	40.86%
29	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	5	1,225.00	0.00	0.00	0.00	0.00	100,644.35	625.92	3,953.63	106,448.90	36.01	84,352.41	2,342.35	126.20%
30	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2021		197,343.42	104,521.07	0.00	0.00	0.00	2,197,161.65	142,837.61	161,912.87	2,803,776.62	1,008.32	2,402,407.52	2,382.58	116.71%
31	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
32	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
33	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
34	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
35	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
36	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2017		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%

Figure App 1-1 Taxi and VFH Claim Counts (cont'd)

Line No.	Classification	Incident Insurance Year	Territory	Non-Serious Loss		Serious Loss			Collision	Comprehensive	PD	Total Incurred	Earned Unit	Earned Premium	Average Premium	Loss Ratio
				ABO	IRI	ABO	IRI	BI								
37	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	1	1,130.50	0.00	0.00	0.00	0.00	18,715.07	3,348.61	5,902.86	29,097.04	6.30	9,437.94	1,499.06	308.30%
38	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	2	0.00	0.00	0.00	0.00	0.00	0.00	313.94	0.00	313.94	1.95	2,865.20	1,468.82	10.96%
39	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.14	184.72	1,321.99	0.00%
40	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.39	529.28	1,350.95	0.00%
41	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	5	0.00	0.00	0.00	0.00	0.00	0.00	196.79	0.00	196.79	1.28	1,664.45	1,303.00	11.82%
42	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2018		1,130.50	0.00	0.00	0.00	0.00	18,715.07	3,859.34	5,902.86	29,607.77	10.06	14,681.57	1,460.06	201.67%
43	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	1	0.00	0.00	0.00	0.00	0.00	5,493.39	0.00	0.00	5,493.39	6.80	10,484.25	1,542.85	52.40%
44	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.90	5,564.33	1,427.06	0.00%
45	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	3	0.00	0.00	0.00	0.00	0.00	0.00	355.69	0.00	355.69	2.24	3,607.09	1,606.96	9.86%
46	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.16	1,524.21	1,315.71	0.00%
47	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.89	3,534.97	1,223.62	0.00%
48	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2019		0.00	0.00	0.00	0.00	0.00	5,493.39	355.69	0.00	5,849.08	16.99	24,714.84	1,454.96	23.67%
49	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	1	0.00	0.00	0.00	0.00	0.00	0.00	489.78	0.00	489.78	6.60	11,059.39	1,676.67	4.43%
50	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5.38	8,234.09	1,530.57	0.00%
51	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	3	0.00	0.00	0.00	0.00	0.00	0.00	2,524.98	0.00	2,524.98	1.57	2,593.44	1,656.06	97.36%
52	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	4	0.00	0.00	0.00	0.00	0.00	0.00	95.22	0.00	95.22	1.41	1,858.28	1,317.41	5.12%
53	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.69	3,821.57	1,420.44	0.00%
54	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2020		0.00	0.00	0.00	0.00	0.00	0.00	3,109.98	0.00	3,109.98	17.64	27,566.76	1,562.50	11.28%
55	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	750.00	750.00	4.16	8,096.95	1,946.89	9.26%
56	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	2	0.00	0.00	0.00	0.00	0.00	10,703.72	656.48	0.00	11,360.20	4.00	6,982.10	1,744.33	162.70%
57	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	3	0.00	0.00	0.00	0.00	0.00	2,400.00	2,505.10	500.00	5,405.10	2.81	4,502.03	1,601.70	120.06%
58	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.54	544.59	1,009.01	0.00%
59	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.75	849.12	1,127.01	0.00%
60	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2021		0.00	0.00	0.00	0.00	0.00	13,103.72	3,161.58	1,250.00	17,515.30	12.27	20,974.78	1,710.05	83.51%
61	Accessible Vehicle-for-Hire	2017	1	25,314.23	18,875.74	0.00	0.00	0.00	134,033.24	0.00	17,248.16	195,471.38	108.15	205,502.05	1,900.11	95.12%
62	Accessible Vehicle-for-Hire	2017	2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
63	Accessible Vehicle-for-Hire	2017	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
64	Accessible Vehicle-for-Hire	2017	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
65	Accessible Vehicle-for-Hire	2017	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
66	Accessible Vehicle-for-Hire	Total 2017		25,314.23	18,875.74	0.00	0.00	0.00	134,033.24	0.00	17,248.16	195,471.38	108.15	205,502.05	1,900.11	95.12%
67	Accessible Vehicle-for-Hire	2018	1	45,779.55	2,918.33	0.00	0.00	0.00	289,677.84	26,687.37	26,412.45	391,475.54	157.16	311,140.59	1,979.82	125.82%
68	Accessible Vehicle-for-Hire	2018	2	0.00	0.00	0.00	0.00	0.00	17,349.56	0.00	10,643.97	27,993.53	6.47	5,290.55	817.21	529.12%
69	Accessible Vehicle-for-Hire	2018	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.39	314.47	802.12	0.00%
70	Accessible Vehicle-for-Hire	2018	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.97	1,872.67	949.34	0.00%
71	Accessible Vehicle-for-Hire	2018	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
72	Accessible Vehicle-for-Hire	Total 2018		45,779.55	2,918.33	0.00	0.00	0.00	307,027.40	26,687.37	37,056.42	419,469.07	165.99	318,618.28	1,919.45	131.65%

Figure App 1-1 Taxi and VFH Claim Counts (cont'd)

Line No.	Classification	Incident Insurance Year	Territory	Non-Serious Loss		Serious Loss			Collision	Comprehensive	PD	Total Incurred	Earned Unit	Earned Premium	Average Premium	Loss Ratio
				ABO	IRI	ABO	IRI	BI								
73	Accessible Vehicle-for-Hire	2019	1	9,191.43	3,640.47	0.00	0.00	0.00	308,909.02	65,360.25	17,875.10	404,976.27	187.72	382,638.22	2,038.37	105.84%
74	Accessible Vehicle-for-Hire	2019	2	0.00	0.00	0.00	0.00	0.00	19,930.71	0.00	0.00	19,930.71	10.69	8,863.05	829.10	224.87%
75	Accessible Vehicle-for-Hire	2019	3	0.00	0.00	0.00	0.00	0.00	0.00	230.60	0.00	230.60	0.71	564.87	801.17	40.82%
76	Accessible Vehicle-for-Hire	2019	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.92	2,700.12	925.32	0.00%
77	Accessible Vehicle-for-Hire	2019	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
78	Accessible Vehicle-for-Hire	Total 2019		9,191.43	3,640.47	0.00	0.00	0.00	328,839.73	65,590.85	17,875.10	425,137.58	202.03	394,766.27	1,953.99	107.69%
79	Accessible Vehicle-for-Hire	2020	1	6,214.22	4,268.86	0.00	0.00	0.00	252,134.65	36,421.66	18,185.65	317,225.04	177.43	391,336.59	2,205.60	81.06%
80	Accessible Vehicle-for-Hire	2020	2	927.85	0.00	0.00	0.00	0.00	21,721.41	0.00	0.00	22,649.26	9.54	9,239.78	968.96	245.13%
81	Accessible Vehicle-for-Hire	2020	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.09	793.38	727.60	0.00%
82	Accessible Vehicle-for-Hire	2020	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.13	2,696.59	1,263.48	0.00%
83	Accessible Vehicle-for-Hire	2020	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
84	Accessible Vehicle-for-Hire	Total 2020		7,142.07	4,268.86	0.00	0.00	0.00	273,856.06	36,421.66	18,185.65	339,874.30	190.19	404,066.34	2,124.55	84.11%
85	Accessible Vehicle-for-Hire	2021	1	32,840.56	6,324.00	0.00	0.00	0.00	435,585.19	55,965.69	26,884.81	557,600.25	166.09	387,707.70	2,334.31	143.82%
86	Accessible Vehicle-for-Hire	2021	2	8,813.84	0.00	0.00	0.00	0.00	39,888.71	0.00	938.16	49,640.71	9.50	10,995.56	1,157.59	451.46%
87	Accessible Vehicle-for-Hire	2021	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.30	236.21	790.99	0.00%
88	Accessible Vehicle-for-Hire	2021	4	0.00	0.00	0.00	0.00	0.00	0.00	1,650.00	0.00	1,650.00	1.00	1,762.10	1,762.10	93.64%
89	Accessible Vehicle-for-Hire	2021	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
90	Accessible Vehicle-for-Hire	Total 2021		41,654.40	6,324.00	0.00	0.00	0.00	475,473.90	57,615.69	27,822.97	608,890.96	176.89	400,701.58	2,265.28	151.96%
91	Limousine Vehicle-for-Hire	2017	1	9,735.08	700.90	0.00	0.00	0.00	65,853.88	9,496.42	2,799.45	88,585.73	97.61	306,667.98	3,141.83	28.89%
92	Limousine Vehicle-for-Hire	2017	2	0.00	0.00	0.00	0.00	0.00	54,089.57	185.25	0.00	54,274.82	23.10	38,264.77	1,656.48	141.84%
93	Limousine Vehicle-for-Hire	2017	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.01	1,875.60	1,865.37	0.00%
94	Limousine Vehicle-for-Hire	2017	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
95	Limousine Vehicle-for-Hire	2017	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
96	Limousine Vehicle-for-Hire	Total 2017		9,735.08	700.90	0.00	0.00	0.00	119,943.45	9,681.67	2,799.45	142,860.55	121.71	346,808.35	2,849.38	41.19%
97	Limousine Vehicle-for-Hire	2018	1	775.05	0.00	0.00	0.00	0.00	54,029.61	10,405.16	5,214.91	70,424.73	72.29	215,007.89	2,974.09	32.75%
98	Limousine Vehicle-for-Hire	2018	2	0.00	0.00	0.00	0.00	0.00	24,991.48	42.37	0.00	25,033.85	21.97	37,298.00	1,698.04	67.12%
99	Limousine Vehicle-for-Hire	2018	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.00	1,438.37	1,434.44	0.00%
100	Limousine Vehicle-for-Hire	2018	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
101	Limousine Vehicle-for-Hire	2018	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
102	Limousine Vehicle-for-Hire	Total 2018		775.05	0.00	0.00	0.00	0.00	79,021.09	10,447.53	5,214.91	95,458.58	95.26	253,744.26	2,663.65	37.62%
103	Limousine Vehicle-for-Hire	2019	1	633.00	0.00	0.00	0.00	0.00	45,820.10	52,668.44	5,657.17	104,778.71	60.17	173,751.85	2,887.89	60.30%
104	Limousine Vehicle-for-Hire	2019	2	0.00	0.00	0.00	0.00	0.00	28,354.09	3,640.60	0.00	31,994.69	15.47	25,215.95	1,630.38	126.88%
105	Limousine Vehicle-for-Hire	2019	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.52	766.87	1,485.05	0.00%
106	Limousine Vehicle-for-Hire	2019	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
107	Limousine Vehicle-for-Hire	2019	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
108	Limousine Vehicle-for-Hire	Total 2019		633.00	0.00	0.00	0.00	0.00	74,174.19	56,309.04	5,657.17	136,773.40	76.15	199,734.66	2,622.97	68.48%

Figure App 1-1 Taxicab and VFH Claim Counts (cont'd)

Line No.	Classification	Incident Insurance Year	Territory	Non-Serious Loss		Serious Loss			Collision	Comprehensive	PD	Total Incurred	Earned Unit	Earned Premium	Average Premium	Loss Ratio
				ABO	IRI	ABO	IRI	BI								
109	Limousine Vehicle-for-Hire	2020	1	883.33	0.00	0.00	0.00	0.00	29,223.25	0.00	2,034.88	32,141.46	27.83	84,585.60	3,039.51	38.00%
110	Limousine Vehicle-for-Hire	2020	2	0.00	0.00	0.00	0.00	0.00	41,439.83	1,368.13	0.00	42,807.96	12.15	20,180.31	1,660.77	212.13%
111	Limousine Vehicle-for-Hire	2020	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
112	Limousine Vehicle-for-Hire	2020	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
113	Limousine Vehicle-for-Hire	2020	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
114	Limousine Vehicle-for-Hire	Total 2020		883.33	0.00	0.00	0.00	0.00	70,663.08	1,368.13	2,034.88	74,949.42	39.98	104,765.91	2,620.47	71.54%
115	Limousine Vehicle-for-Hire	2021	1	2,450.00	0.00	0.00	0.00	0.00	73,296.08	37,515.19	3,502.64	116,763.91	32.93	98,454.17	2,989.37	118.60%
116	Limousine Vehicle-for-Hire	2021	2	0.00	0.00	0.00	0.00	0.00	2,188.05	0.00	750.00	2,938.05	9.03	14,254.87	1,578.67	20.61%
117	Limousine Vehicle-for-Hire	2021	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
118	Limousine Vehicle-for-Hire	2021	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
119	Limousine Vehicle-for-Hire	2021	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
120	Limousine Vehicle-for-Hire	Total 2021		2,450.00	0.00	0.00	0.00	0.00	75,484.13	37,515.19	4,252.64	119,701.96	41.96	112,709.04	2,685.82	106.20%
121	Taxicab Vehicle-for-Hire	2017	1	268,197.94	184,068.48	268,053.33	253,717.30	0.00	2,303,174.20	82,032.23	167,998.54	3,527,242.01	488.81	4,731,921.54	9,680.44	74.54%
122	Taxicab Vehicle-for-Hire	2017	2	7,063.43	7,795.29	0.00	0.00	0.00	228,042.63	7,382.28	27,595.01	277,878.64	152.41	780,396.09	5,120.34	35.61%
123	Taxicab Vehicle-for-Hire	2017	3	1,929.18	0.00	0.00	0.00	0.00	111,980.37	13,677.41	4,936.82	132,523.78	51.04	292,057.64	5,722.00	45.38%
124	Taxicab Vehicle-for-Hire	2017	4	0.00	0.00	0.00	0.00	0.00	24,947.67	15,173.96	1,500.00	41,621.63	26.43	154,579.33	5,849.48	26.93%
125	Taxicab Vehicle-for-Hire	2017	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
126	Taxicab Vehicle-for-Hire	Total 2017		277,190.55	191,863.77	268,053.33	253,717.30	0.00	2,668,144.87	118,265.88	202,030.37	3,979,266.06	718.69	5,958,954.59	8,291.40	66.78%
127	Taxicab Vehicle-for-Hire	2018	1	236,432.01	84,265.80	269,384.07	345,589.50	0.00	2,293,667.99	146,701.46	220,826.44	3,596,867.26	464.36	3,769,672.88	8,117.98	95.42%
128	Taxicab Vehicle-for-Hire	2018	2	4,578.55	4,858.37	0.00	0.00	0.00	208,280.52	31,195.15	10,539.03	259,451.62	111.99	552,220.11	4,930.78	46.98%
129	Taxicab Vehicle-for-Hire	2018	3	212.50	0.00	0.00	0.00	0.00	81,173.23	14,611.97	5,523.51	101,521.21	48.88	236,099.48	4,829.96	43.00%
130	Taxicab Vehicle-for-Hire	2018	4	0.00	0.00	0.00	0.00	0.00	3,178.91	0.00	500.00	3,678.91	11.71	63,015.25	5,381.44	5.84%
131	Taxicab Vehicle-for-Hire	2018	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
132	Taxicab Vehicle-for-Hire	Total 2018		241,223.06	89,124.17	269,384.07	345,589.50	0.00	2,586,300.65	192,508.58	237,388.98	3,961,518.99	636.95	4,621,007.71	7,254.93	85.73%
133	Taxicab Vehicle-for-Hire	2019	1	234,997.09	128,597.71	15,627.91	245,084.10	0.00	2,296,487.01	152,878.09	188,680.60	3,262,352.51	471.19	3,875,297.67	8,224.56	84.18%
134	Taxicab Vehicle-for-Hire	2019	2	58,810.03	28,150.14	0.00	0.00	0.00	252,733.31	34,438.93	17,845.87	391,978.27	101.94	458,315.53	4,496.09	85.53%
135	Taxicab Vehicle-for-Hire	2019	3	125.00	0.00	0.00	0.00	0.00	115,640.02	23,398.90	4,887.48	144,051.40	44.67	229,145.03	5,129.64	62.86%
136	Taxicab Vehicle-for-Hire	2019	4	0.00	0.00	0.00	0.00	0.00	14,184.24	38.74	1,000.00	15,222.98	7.81	37,797.49	4,839.73	40.28%
137	Taxicab Vehicle-for-Hire	2019	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
138	Taxicab Vehicle-for-Hire	Total 2019		293,932.12	156,747.84	15,627.91	245,084.10	0.00	2,679,044.58	210,754.66	212,413.95	3,813,605.16	625.60	4,600,555.72	7,353.79	82.89%
139	Taxicab Vehicle-for-Hire	2020	1	251,790.65	106,796.07	0.00	0.00	0.00	1,264,889.58	130,929.84	71,333.03	1,825,739.17	475.94	4,151,645.36	8,722.97	43.98%
140	Taxicab Vehicle-for-Hire	2020	2	196,095.08	6,294.70	0.00	0.00	0.00	174,255.60	77,991.40	9,526.03	464,162.80	105.89	494,532.91	4,670.18	93.86%
141	Taxicab Vehicle-for-Hire	2020	3	13,824.72	0.00	0.00	0.00	0.00	74,640.16	39,784.44	3,044.00	131,293.32	46.54	256,524.68	5,511.63	51.18%
142	Taxicab Vehicle-for-Hire	2020	4	371.32	224.57	0.00	0.00	0.00	4,031.57	575.62	636.00	5,839.07	5.86	31,523.08	5,379.11	18.52%
143	Taxicab Vehicle-for-Hire	2020	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
144	Taxicab Vehicle-for-Hire	Total 2020		462,081.76	113,315.33	0.00	0.00	0.00	1,517,816.91	249,281.30	84,539.06	2,427,034.37	634.24	4,934,226.04	7,779.77	49.19%

Figure App 1-1 Taxi and VFH Claim Counts (cont'd)

Line No.	Classification	Incident Insurance Year	Territory	Non-Serious Loss		Serious Loss			Collision	Comprehensive	PD	Total Incurred	Earned Unit	Earned Premium	Average Premium	Loss Ratio
				ABO	IRI	ABO	IRI	BI								
145	Taxicab Vehicle-for-Hire	2021	1	334,211.49	89,305.91	0.00	0.00	0.00	1,761,669.10	77,090.91	131,153.39	2,393,430.80	470.20	4,069,423.12	8,654.64	58.81%
146	Taxicab Vehicle-for-Hire	2021	2	10,951.85	2,942.99	0.00	0.00	0.00	215,801.71	11,082.11	15,782.50	256,561.16	108.72	533,873.16	4,910.64	48.06%
147	Taxicab Vehicle-for-Hire	2021	3	6,575.00	2,674.28	0.00	0.00	0.00	99,113.05	11,019.82	6,585.50	125,967.65	45.62	247,881.73	5,433.98	50.82%
148	Taxicab Vehicle-for-Hire	2021	4	0.00	0.00	0.00	0.00	0.00	5,133.69	120.75	0.00	5,254.44	4.78	26,224.45	5,488.49	20.04%
149	Taxicab Vehicle-for-Hire	2021	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
150	Taxicab Vehicle-for-Hire	Total 2021		351,738.34	94,923.18	0.00	0.00	0.00	2,081,717.55	99,313.59	153,521.39	2,781,214.04	629.31	4,877,402.46	7,750.35	57.02%
151	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
152	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
153	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
154	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
155	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
156	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2017		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
157	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	1	26,468.28	21,155.94	0.00	0.00	0.00	728,366.94	38,790.76	50,229.08	865,011.00	365.05	670,335.69	1,836.28	129.04%
158	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	2	1,714.55	92.23	0.00	0.00	0.00	51,595.30	10,096.92	2,000.00	65,499.00	59.80	96,291.66	1,610.12	68.02%
158	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	3	0.00	0.00	0.00	0.00	0.00	0.00	11,138.11	500.00	11,638.11	4.64	6,528.34	1,407.64	178.27%
159	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	4	0.00	0.00	0.00	0.00	0.00	0.00	11.52	1,784.76	1,796.28	12.82	21,207.14	1,654.36	8.47%
159	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	5	4,317.79	15,651.44	0.00	0.00	0.00	36,185.16	176.71	0.00	56,331.10	10.15	22,543.98	2,222.13	249.87%
160	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2018		32,500.61	36,899.61	0.00	0.00	0.00	816,147.40	60,214.02	54,513.84	1,000,275.48	452.46	816,906.80	1,805.49	122.45%
161	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	1	59,686.08	62,376.09	0.00	0.00	0.00	1,081,753.47	107,631.70	82,171.42	1,393,618.76	603.39	1,149,035.91	1,904.30	121.29%
162	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	2	1,312.69	520.03	0.00	0.00	0.00	98,036.55	12,518.18	4,454.36	116,841.81	85.30	142,541.80	1,670.98	81.97%
162	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	3	0.00	0.00	0.00	0.00	0.00	11,927.40	1,183.36	970.40	14,081.16	9.47	14,943.30	1,577.25	94.23%
163	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	4	0.00	0.00	0.00	0.00	0.00	3,949.48	271.29	500.00	4,720.77	19.70	32,486.44	1,648.67	14.53%
163	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	5	485.85	33.84	0.00	0.00	0.00	108,017.29	3,413.00	8,902.03	120,852.01	29.59	66,809.69	2,258.08	180.89%
164	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2019		61,484.61	62,929.96	0.00	0.00	0.00	1,303,684.19	125,017.53	96,998.21	1,650,114.50	747.46	1,405,817.14	1,880.79	117.38%
165	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	1	29,495.06	28,770.68	0.00	0.00	0.00	851,466.37	183,453.58	48,567.55	1,141,753.25	810.54	1,723,346.63	2,126.16	66.25%
166	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	2	5,974.05	0.00	0.00	0.00	0.00	99,151.95	42,760.05	11,921.93	159,807.98	88.25	161,973.32	1,835.30	98.66%
165	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	3	0.00	0.00	0.00	0.00	0.00	31,978.87	3,042.39	2,037.50	37,058.76	10.83	19,709.42	1,820.35	188.03%
166	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	4	0.00	0.00	0.00	0.00	0.00	5,026.23	2,430.13	0.00	7,456.36	23.63	40,773.95	1,725.25	18.29%
166	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	5	0.00	0.00	0.00	0.00	0.00	58,228.72	283.24	0.00	58,511.96	39.51	88,272.01	2,233.99	66.29%
167	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2020		35,469.11	28,770.68	0.00	0.00	0.00	1,045,852.14	231,969.39	62,526.98	1,404,588.31	972.77	2,034,075.33	2,091.01	69.05%
168	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	1	180,854.95	101,668.57	0.00	0.00	0.00	1,894,329.29	139,393.90	144,055.79	2,460,302.50	854.58	2,076,037.81	2,429.30	118.51%
169	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	2	15,263.48	2,852.50	0.00	0.00	0.00	179,472.72	570.84	12,403.45	210,562.99	79.96	168,146.64	2,102.85	125.23%
168	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	3	0.00	0.00	0.00	0.00	0.00	3,431.17	1,661.00	1,500.00	6,592.17	12.73	25,240.47	1,982.26	26.12%
169	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	4	0.00	0.00	0.00	0.00	0.00	19,284.12	585.95	0.00	19,870.07	25.03	48,630.18	1,942.84	40.86%
169	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	5	1,225.00	0.00	0.00	0.00	0.00	100,644.35	625.92	3,953.63	106,448.90	36.01	84,352.41	2,342.35	126.20%
170	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2021		197,343.42	104,521.07	0.00	0.00	0.00	2,197,161.65	142,837.61	161,912.87	2,803,776.62	1,008.32	2,402,407.52	2,382.58	116.71%

Figure App 1-1 Taxi and VFH Claim Counts (cont'd)

Line No.	Classification	Incident Insurance Year	Territory	Non-Serious Loss		Serious Loss			Collision	Comprehensive	PD	Total Incurred	Earned Unit	Earned Premium	Average Premium	Loss Ratio
				ABO	IRI	ABO	IRI	BI								
171	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
172	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
173	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
174	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
175	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
176	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2017		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
177	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	1	1,130.50	0.00	0.00	0.00	0.00	18,715.07	3,348.61	5,902.86	29,097.04	6.30	9,437.94	1,499.06	308.30%
178	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	2	0.00	0.00	0.00	0.00	0.00	0.00	313.94	0.00	313.94	1.95	2,865.20	1,468.82	10.96%
179	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.14	184.72	1,321.99	0.00%
180	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.39	529.28	1,350.95	0.00%
181	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	5	0.00	0.00	0.00	0.00	0.00	0.00	196.79	0.00	196.79	1.28	1,664.45	1,303.00	11.82%
182	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2018		1,130.50	0.00	0.00	0.00	0.00	18,715.07	3,859.34	5,902.86	29,607.77	10.06	14,681.57	1,460.06	201.67%
183	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	1	0.00	0.00	0.00	0.00	0.00	5,493.39	0.00	0.00	5,493.39	6.80	10,484.25	1,542.85	52.40%
184	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.90	5,564.33	1,427.06	0.00%
185	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	3	0.00	0.00	0.00	0.00	0.00	0.00	355.69	0.00	355.69	2.24	3,607.09	1,606.96	9.86%
186	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.16	1,524.21	1,315.71	0.00%
187	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.89	3,534.97	1,223.62	0.00%
188	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2019		0.00	0.00	0.00	0.00	0.00	5,493.39	355.69	0.00	5,849.08	16.99	24,714.84	1,454.96	23.67%
189	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	1	0.00	0.00	0.00	0.00	0.00	0.00	489.78	0.00	489.78	6.60	11,059.39	1,676.67	4.43%
190	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5.38	8,234.09	1,530.57	0.00%
191	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	3	0.00	0.00	0.00	0.00	0.00	0.00	2,524.98	0.00	2,524.98	1.57	2,593.44	1,656.06	97.36%
192	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	4	0.00	0.00	0.00	0.00	0.00	0.00	95.22	0.00	95.22	1.41	1,858.28	1,317.41	5.12%
193	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.69	3,821.57	1,420.44	0.00%
194	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2020		0.00	0.00	0.00	0.00	0.00	0.00	3,109.98	0.00	3,109.98	17.64	27,566.76	1,562.50	11.28%
195	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	750.00	750.00	4.16	8,096.95	1,946.89	9.26%
196	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	2	0.00	0.00	0.00	0.00	0.00	10,703.72	656.48	0.00	11,360.20	4.00	6,982.10	1,744.33	162.70%
197	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	3	0.00	0.00	0.00	0.00	0.00	2,400.00	2,505.10	500.00	5,405.10	2.81	4,502.03	1,601.70	120.06%
198	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.54	544.59	1,009.01	0.00%
199	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.75	849.12	1,127.01	0.00%
	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2021		0.00	0.00	0.00	0.00	0.00	13,103.72	3,161.58	1,250.00	17,515.30	12.27	20,974.78	1,710.05	83.51%
200	Accessible Vehicle-for-Hire	2017	1	25,314.23	18,875.74	0.00	0.00	0.00	134,033.24	0.00	17,248.16	195,471.38	108.15	205,502.05	1,900.11	95.12%
201	Accessible Vehicle-for-Hire	2017	2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
202	Accessible Vehicle-for-Hire	2017	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
203	Accessible Vehicle-for-Hire	2017	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
204	Accessible Vehicle-for-Hire	2017	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
205	Accessible Vehicle-for-Hire	Total 2017		25,314.23	18,875.74	0.00	0.00	0.00	134,033.24	0.00	17,248.16	195,471.38	108.15	205,502.05	1,900.11	95.12%

Figure App 1-1 Taxi and VFH Claim Counts (cont'd)

Line No.	Classification	Incident Insurance Year	Territory	Non-Serious Loss		Serious Loss			Collision	Comprehensive	PD	Total Incurred	Earned Unit	Earned Premium	Average Premium	Loss Ratio
				ABO	IRI	ABO	IRI	BI								
206	Accessible Vehicle-for-Hire	2018	1	45,779.55	2,918.33	0.00	0.00	0.00	289,677.84	26,687.37	26,412.45	391,475.54	157.16	311,140.59	1,979.82	125.82%
207	Accessible Vehicle-for-Hire	2018	2	0.00	0.00	0.00	0.00	0.00	17,349.56	0.00	10,643.97	27,993.53	6.47	5,290.55	817.21	529.12%
208	Accessible Vehicle-for-Hire	2018	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.39	314.47	802.12	0.00%
209	Accessible Vehicle-for-Hire	2018	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.97	1,872.67	949.34	0.00%
210	Accessible Vehicle-for-Hire	2018	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
211	Accessible Vehicle-for-Hire	Total 2018		45,779.55	2,918.33	0.00	0.00	0.00	307,027.40	26,687.37	37,056.42	419,469.07	165.99	318,618.28	1,919.45	131.65%
212	Accessible Vehicle-for-Hire	2019	1	9,191.43	3,640.47	0.00	0.00	0.00	308,909.02	65,360.25	17,875.10	404,976.27	187.72	382,638.22	2,038.37	105.84%
213	Accessible Vehicle-for-Hire	2019	2	0.00	0.00	0.00	0.00	0.00	19,930.71	0.00	0.00	19,930.71	10.69	8,863.05	829.10	224.87%
214	Accessible Vehicle-for-Hire	2019	3	0.00	0.00	0.00	0.00	0.00	0.00	230.60	0.00	230.60	0.71	564.87	801.17	40.82%
215	Accessible Vehicle-for-Hire	2019	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.92	2,700.12	925.32	0.00%
216	Accessible Vehicle-for-Hire	2019	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
217	Accessible Vehicle-for-Hire	Total 2019		9,191.43	3,640.47	0.00	0.00	0.00	328,839.73	65,590.85	17,875.10	425,137.58	202.03	394,766.27	1,953.99	107.69%
218	Accessible Vehicle-for-Hire	2020	1	6,214.22	4,268.86	0.00	0.00	0.00	252,134.65	36,421.66	18,185.65	317,225.04	177.43	391,336.59	2,205.60	81.06%
219	Accessible Vehicle-for-Hire	2020	2	927.85	0.00	0.00	0.00	0.00	21,721.41	0.00	0.00	22,649.26	9.54	9,239.78	968.96	245.13%
220	Accessible Vehicle-for-Hire	2020	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.09	793.38	727.60	0.00%
221	Accessible Vehicle-for-Hire	2020	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.13	2,696.59	1,263.48	0.00%
222	Accessible Vehicle-for-Hire	2020	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
223	Accessible Vehicle-for-Hire	Total 2020		7,142.07	4,268.86	0.00	0.00	0.00	273,856.06	36,421.66	18,185.65	339,874.30	190.19	404,066.34	2,124.55	84.11%
224	Accessible Vehicle-for-Hire	2021	1	32,840.56	6,324.00	0.00	0.00	0.00	435,585.19	55,965.69	26,884.81	557,600.25	166.09	387,707.70	2,334.31	143.82%
225	Accessible Vehicle-for-Hire	2021	2	8,813.84	0.00	0.00	0.00	0.00	39,888.71	0.00	938.16	49,640.71	9.50	10,995.56	1,157.59	451.46%
226	Accessible Vehicle-for-Hire	2021	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.30	236.21	790.99	0.00%
227	Accessible Vehicle-for-Hire	2021	4	0.00	0.00	0.00	0.00	0.00	0.00	1,650.00	0.00	1,650.00	1.00	1,762.10	1,762.10	93.64%
228	Accessible Vehicle-for-Hire	2021	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
229	Accessible Vehicle-for-Hire	Total 2021		41,654.40	6,324.00	0.00	0.00	0.00	475,473.90	57,615.69	27,822.97	608,890.96	176.89	400,701.58	2,265.28	151.96%
230	Limousine Vehicle-for-Hire	2017	1	9,735.08	700.90	0.00	0.00	0.00	65,853.88	9,496.42	2,799.45	88,585.73	97.61	306,667.98	3,141.83	28.89%
231	Limousine Vehicle-for-Hire	2017	2	0.00	0.00	0.00	0.00	0.00	54,089.57	185.25	0.00	54,274.82	23.10	38,264.77	1,656.48	141.84%
232	Limousine Vehicle-for-Hire	2017	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.01	1,875.60	1,865.37	0.00%
233	Limousine Vehicle-for-Hire	2017	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
234	Limousine Vehicle-for-Hire	2017	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
235	Limousine Vehicle-for-Hire	Total 2017		9,735.08	700.90	0.00	0.00	0.00	119,943.45	9,681.67	2,799.45	142,860.55	121.71	346,808.35	2,849.38	41.19%
236	Limousine Vehicle-for-Hire	2018	1	775.05	0.00	0.00	0.00	0.00	54,029.61	10,405.16	5,214.91	70,424.73	72.29	215,007.89	2,974.09	32.75%
237	Limousine Vehicle-for-Hire	2018	2	0.00	0.00	0.00	0.00	0.00	24,991.48	42.37	0.00	25,033.85	21.97	37,298.00	1,698.04	67.12%
238	Limousine Vehicle-for-Hire	2018	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.00	1,438.37	1,434.44	0.00%
239	Limousine Vehicle-for-Hire	2018	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
240	Limousine Vehicle-for-Hire	2018	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
241	Limousine Vehicle-for-Hire	Total 2018		775.05	0.00	0.00	0.00	0.00	79,021.09	10,447.53	5,214.91	95,458.58	95.26	253,744.26	2,663.65	37.62%

Figure App 1-1 Taxi and VFH Claim Counts (cont'd)

Line No.	Classification	Incident Insurance Year	Territory	Non-Serious Loss		Serious Loss			Collision	Comprehensive	PD	Total Incurred	Earned Unit	Earned Premium	Average Premium	Loss Ratio
				ABO	IRI	ABO	IRI	BI								
242	Limousine Vehicle-for-Hire	2019	1	633.00	0.00	0.00	0.00	0.00	45,820.10	52,668.44	5,657.17	104,778.71	60.17	173,751.85	2,887.89	60.30%
243	Limousine Vehicle-for-Hire	2019	2	0.00	0.00	0.00	0.00	0.00	28,354.09	3,640.60	0.00	31,994.69	15.47	25,215.95	1,630.38	126.88%
244	Limousine Vehicle-for-Hire	2019	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.52	766.87	1,485.05	0.00%
245	Limousine Vehicle-for-Hire	2019	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
246	Limousine Vehicle-for-Hire	2019	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
247	Limousine Vehicle-for-Hire	Total 2019		633.00	0.00	0.00	0.00	0.00	74,174.19	56,309.04	5,657.17	136,773.40	76.15	199,734.66	2,622.97	68.48%
248	Limousine Vehicle-for-Hire	2020	1	883.33	0.00	0.00	0.00	0.00	29,223.25	0.00	2,034.88	32,141.46	27.83	84,585.60	3,039.51	38.00%
249	Limousine Vehicle-for-Hire	2020	2	0.00	0.00	0.00	0.00	0.00	41,439.83	1,368.13	0.00	42,807.96	12.15	20,180.31	1,660.77	212.13%
250	Limousine Vehicle-for-Hire	2020	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
251	Limousine Vehicle-for-Hire	2020	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
252	Limousine Vehicle-for-Hire	2020	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
253	Limousine Vehicle-for-Hire	Total 2020		883.33	0.00	0.00	0.00	0.00	70,663.08	1,368.13	2,034.88	74,949.42	39.98	104,765.91	2,620.47	71.54%
254	Limousine Vehicle-for-Hire	2021	1	2,450.00	0.00	0.00	0.00	0.00	73,296.08	37,515.19	3,502.64	116,763.91	32.93	98,454.17	2,989.37	118.60%
255	Limousine Vehicle-for-Hire	2021	2	0.00	0.00	0.00	0.00	0.00	2,188.05	0.00	750.00	2,938.05	9.03	14,254.87	1,578.67	20.61%
256	Limousine Vehicle-for-Hire	2021	3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
257	Limousine Vehicle-for-Hire	2021	4	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
258	Limousine Vehicle-for-Hire	2021	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
259	Limousine Vehicle-for-Hire	Total 2021		2,450.00	0.00	0.00	0.00	0.00	75,484.13	37,515.19	4,252.64	119,701.96	41.96	112,709.04	2,685.82	106.20%
260	Taxicab Vehicle-for-Hire	2017	1	268,197.94	184,068.48	268,053.33	253,717.30	0.00	2,303,174.20	82,032.23	167,998.54	3,527,242.01	488.81	4,731,921.54	9,680.44	74.54%
261	Taxicab Vehicle-for-Hire	2017	2	7,063.43	7,795.29	0.00	0.00	0.00	228,042.63	7,382.28	27,595.01	277,878.64	152.41	780,396.09	5,120.34	35.61%
262	Taxicab Vehicle-for-Hire	2017	3	1,929.18	0.00	0.00	0.00	0.00	111,980.37	13,677.41	4,936.82	132,523.78	51.04	292,057.64	5,722.00	45.38%
263	Taxicab Vehicle-for-Hire	2017	4	0.00	0.00	0.00	0.00	0.00	24,947.67	15,173.96	1,500.00	41,621.63	26.43	154,579.33	5,849.48	26.93%
264	Taxicab Vehicle-for-Hire	2017	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
265	Taxicab Vehicle-for-Hire	Total 2017		277,190.55	191,863.77	268,053.33	253,717.30	0.00	2,668,144.87	118,265.88	202,030.37	3,979,266.06	718.69	5,958,954.59	8,291.40	66.78%
266	Taxicab Vehicle-for-Hire	2018	1	236,432.01	84,265.80	269,384.07	345,589.50	0.00	2,293,667.99	146,701.46	220,826.44	3,596,867.26	464.36	3,769,672.88	8,117.98	95.42%
267	Taxicab Vehicle-for-Hire	2018	2	4,578.55	4,858.37	0.00	0.00	0.00	208,280.52	31,195.15	10,539.03	259,451.62	111.99	552,220.11	4,930.78	46.98%
268	Taxicab Vehicle-for-Hire	2018	3	212.50	0.00	0.00	0.00	0.00	81,173.23	14,611.97	5,523.51	101,521.21	48.88	236,099.48	4,829.96	43.00%
269	Taxicab Vehicle-for-Hire	2018	4	0.00	0.00	0.00	0.00	0.00	3,178.91	0.00	500.00	3,678.91	11.71	63,015.25	5,381.44	5.84%
270	Taxicab Vehicle-for-Hire	2018	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
271	Taxicab Vehicle-for-Hire	Total 2018		241,223.06	89,124.17	269,384.07	345,589.50	0.00	2,586,300.65	192,508.58	237,388.98	3,961,518.99	636.95	4,621,007.71	7,254.93	85.73%
272	Taxicab Vehicle-for-Hire	2019	1	234,997.09	128,597.71	15,627.91	245,084.10	0.00	2,296,487.01	152,878.09	188,680.60	3,262,352.51	471.19	3,875,297.67	8,224.56	84.18%
273	Taxicab Vehicle-for-Hire	2019	2	58,810.03	28,150.14	0.00	0.00	0.00	252,733.31	34,438.93	17,845.87	391,978.27	101.94	458,315.53	4,496.09	85.53%
274	Taxicab Vehicle-for-Hire	2019	3	125.00	0.00	0.00	0.00	0.00	115,640.02	23,398.90	4,887.48	144,051.40	44.67	229,145.03	5,129.64	62.86%
275	Taxicab Vehicle-for-Hire	2019	4	0.00	0.00	0.00	0.00	0.00	14,184.24	38.74	1,000.00	15,222.98	7.81	37,797.49	4,839.73	40.28%
276	Taxicab Vehicle-for-Hire	2019	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
277	Taxicab Vehicle-for-Hire	Total 2019		293,932.12	156,747.84	15,627.91	245,084.10	0.00	2,679,044.58	210,754.66	212,413.95	3,813,605.16	625.60	4,600,555.72	7,353.79	82.89%

Figure App 1-1 Taxi and VFH Claim Counts (cont'd)

Line No.	Classification	Incident Insurance Year	Territory	Non-Serious Loss		Serious Loss			Collision	Comprehensive	PD	Total Incurred	Earned Unit	Earned Premium	Average Premium	Loss Ratio
				ABO	IRI	ABO	IRI	BI								
278	Taxicab Vehicle-for-Hire	2020	1	251,790.65	106,796.07	0.00	0.00	0.00	1,264,889.58	130,929.84	71,333.03	1,825,739.17	475.94	4,151,645.36	8,722.97	43.98%
279	Taxicab Vehicle-for-Hire	2020	2	196,095.08	6,294.70	0.00	0.00	0.00	174,255.60	77,991.40	9,526.03	464,162.80	105.89	494,532.91	4,670.18	93.86%
280	Taxicab Vehicle-for-Hire	2020	3	13,824.72	0.00	0.00	0.00	0.00	74,640.16	39,784.44	3,044.00	131,293.32	46.54	256,524.68	5,511.63	51.18%
281	Taxicab Vehicle-for-Hire	2020	4	371.32	224.57	0.00	0.00	0.00	4,031.57	575.62	636.00	5,839.07	5.86	31,523.08	5,379.11	18.52%
282	Taxicab Vehicle-for-Hire	2020	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
283	Taxicab Vehicle-for-Hire	Total 2020		462,081.76	113,315.33	0.00	0.00	0.00	1,517,816.91	249,281.30	84,539.06	2,427,034.37	634.24	4,934,226.04	7,779.77	49.19%
284	Taxicab Vehicle-for-Hire	2021	1	334,211.49	89,305.91	0.00	0.00	0.00	1,761,669.10	77,090.91	131,153.39	2,393,430.80	470.20	4,069,423.12	8,654.64	58.81%
285	Taxicab Vehicle-for-Hire	2021	2	10,951.85	2,942.99	0.00	0.00	0.00	215,801.71	11,082.11	15,782.50	256,561.16	108.72	533,873.16	4,910.64	48.06%
286	Taxicab Vehicle-for-Hire	2021	3	6,575.00	2,674.28	0.00	0.00	0.00	99,113.05	11,019.82	6,585.50	125,967.65	45.62	247,881.73	5,433.98	50.82%
287	Taxicab Vehicle-for-Hire	2021	4	0.00	0.00	0.00	0.00	0.00	5,133.69	120.75	0.00	5,254.44	4.78	26,224.45	5,488.49	20.04%
288	Taxicab Vehicle-for-Hire	2021	5	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
289	Taxicab Vehicle-for-Hire	Total 2021		351,738.34	94,923.18	0.00	0.00	0.00	2,081,717.55	99,313.59	153,521.39	2,781,214.04	629.31	4,877,402.46	7,750.35	57.02%

Figure App 1-2 Taxi and VFH Claim Counts

Line No.	Classification	Incident Insurance Year	Territory	BI	Collision	Comprehensive	PD
1	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	1	0	0	0	0
2	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	2	0	0	0	0
3	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	3	0	0	0	0
4	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	4	0	0	0	0
5	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	5	0	0	0	0
6	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2017		0	0	0	0
7	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	1	0	178	33	59
8	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	2	0	18	12	4
9	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	3	0	0	8	1
10	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	4	0	0	3	3
11	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	5	0	9	1	0
12	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2018		0	205	57	67
13	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	1	0	229	55	90
14	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	2	0	23	12	8
15	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	3	0	2	6	1
16	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	4	0	1	4	1
17	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	5	0	21	4	4
18	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2019		0	276	81	104
19	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	1	0	207	100	66
20	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	2	0	27	16	5
21	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	3	0	5	3	3
22	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	4	0	1	4	0
23	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	5	0	14	1	0
24	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2020		0	254	124	74
25	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	1	0	372	72	129
26	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	2	0	47	7	13
27	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	3	0	2	4	2
28	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	4	0	3	3	0
29	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	5	0	20	1	3
30	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total 2021		0	444	87	147
31	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	1	0	0	0	0
32	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	2	0	0	0	0
33	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	3	0	0	0	0
34	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	4	0	0	0	0
35	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	5	0	0	0	0
36	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2017		0	0	0	0
37	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	1	0	3	1	1
38	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	2	0	0	2	0
39	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	3	0	0	0	0
40	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	4	0	0	0	0
41	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	5	0	0	1	0
42	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2018		0	3	4	1
43	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	1	0	3	0	0
44	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	2	0	0	0	0
45	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	3	0	0	2	0
46	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	4	0	0	0	0
47	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	5	0	0	0	0
48	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2019		0	3	2	0
49	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	1	0	1	2	0
50	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	2	0	0	0	0
51	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	3	0	0	1	0
52	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	4	0	0	1	0
53	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	5	0	0	0	0
54	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2020		0	1	4	0

Figure App 1-2 Taxi and VFH Claim Counts (cont'd)

Line No.	Classification	Incident Insurance Year	Territory	BI	Collision	Comprehensive	PD
55	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	1	0	0	0	1
56	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	2	0	2	1	0
57	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	3	0	1	4	1
58	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	4	0	0	0	0
59	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	5	0	0	0	0
60	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total 2021		0	3	5	2
61	Accessible Vehicle-for-Hire	2017	1	0	16	1	22
62	Accessible Vehicle-for-Hire	2017	2	0	0	0	0
63	Accessible Vehicle-for-Hire	2017	3	0	0	0	0
64	Accessible Vehicle-for-Hire	2017	4	0	0	0	0
65	Accessible Vehicle-for-Hire	2017	5	0	0	0	0
66	Accessible Vehicle-for-Hire	Total 2017		0	16	1	22
67	Accessible Vehicle-for-Hire	2018	1	0	54	33	25
68	Accessible Vehicle-for-Hire	2018	2	0	2	0	3
69	Accessible Vehicle-for-Hire	2018	3	0	0	0	0
70	Accessible Vehicle-for-Hire	2018	4	0	0	0	0
71	Accessible Vehicle-for-Hire	2018	5	0	0	0	0
72	Accessible Vehicle-for-Hire	Total 2018		0	56	33	28
73	Accessible Vehicle-for-Hire	2019	1	0	78	67	30
74	Accessible Vehicle-for-Hire	2019	2	0	3	0	0
75	Accessible Vehicle-for-Hire	2019	3	0	0	3	0
76	Accessible Vehicle-for-Hire	2019	4	0	0	0	0
77	Accessible Vehicle-for-Hire	2019	5	0	0	0	0
78	Accessible Vehicle-for-Hire	Total 2019		0	81	70	30
79	Accessible Vehicle-for-Hire	2020	1	0	43	55	23
80	Accessible Vehicle-for-Hire	2020	2	0	5	0	0
81	Accessible Vehicle-for-Hire	2020	3	0	0	0	0
82	Accessible Vehicle-for-Hire	2020	4	0	0	0	0
83	Accessible Vehicle-for-Hire	2020	5	0	0	0	0
84	Accessible Vehicle-for-Hire	Total 2020		0	48	55	23
85	Accessible Vehicle-for-Hire	2021	1	0	74	40	21
86	Accessible Vehicle-for-Hire	2021	2	0	7	0	1
87	Accessible Vehicle-for-Hire	2021	3	0	0	0	0
88	Accessible Vehicle-for-Hire	2021	4	0	0	1	0
89	Accessible Vehicle-for-Hire	2021	5	0	0	0	0
90	Accessible Vehicle-for-Hire	Total 2021		0	81	41	22
91	Limousine Vehicle-for-Hire	2017	1	0	14	4	4
92	Limousine Vehicle-for-Hire	2017	2	0	13	1	0
93	Limousine Vehicle-for-Hire	2017	3	0	0	0	0
94	Limousine Vehicle-for-Hire	2017	4	0	0	0	0
95	Limousine Vehicle-for-Hire	2017	5	0	0	0	0
96	Limousine Vehicle-for-Hire	Total 2017		0	27	5	4
97	Limousine Vehicle-for-Hire	2018	1	0	9	5	6
98	Limousine Vehicle-for-Hire	2018	2	0	9	1	0
99	Limousine Vehicle-for-Hire	2018	3	0	0	0	0
100	Limousine Vehicle-for-Hire	2018	4	0	0	0	0
101	Limousine Vehicle-for-Hire	2018	5	0	0	0	0
102	Limousine Vehicle-for-Hire	Total 2018		0	18	6	6
103	Limousine Vehicle-for-Hire	2019	1	0	13	9	7
104	Limousine Vehicle-for-Hire	2019	2	0	8	1	0
105	Limousine Vehicle-for-Hire	2019	3	0	0	0	0
106	Limousine Vehicle-for-Hire	2019	4	0	0	0	0
107	Limousine Vehicle-for-Hire	2019	5	0	0	0	0
108	Limousine Vehicle-for-Hire	Total 2019		0	21	10	7

Figure App 1-2 Taxi and VFH Claim Counts (cont'd)

Line No.	Classification	Incident Insurance Year	Territory	BI	Collision	Comprehensive	PD
109	Limousine Vehicle-for-Hire	2020	1	0	5	0	2
110	Limousine Vehicle-for-Hire	2020	2	0	8	1	0
111	Limousine Vehicle-for-Hire	2020	3	0	0	0	0
112	Limousine Vehicle-for-Hire	2020	4	0	0	0	0
113	Limousine Vehicle-for-Hire	2020	5	0	0	0	0
114	Limousine Vehicle-for-Hire	Total 2020		0	13	1	2
115	Limousine Vehicle-for-Hire	2021	1	0	9	3	5
116	Limousine Vehicle-for-Hire	2021	2	0	1	0	1
117	Limousine Vehicle-for-Hire	2021	3	0	0	0	0
118	Limousine Vehicle-for-Hire	2021	4	0	0	0	0
119	Limousine Vehicle-for-Hire	2021	5	0	0	0	0
120	Limousine Vehicle-for-Hire	Total 2021		0	10	3	6
121	Taxicab Vehicle-for-Hire	2017	1	0	533	17	218
122	Taxicab Vehicle-for-Hire	2017	2	0	52	6	31
123	Taxicab Vehicle-for-Hire	2017	3	0	26	10	6
124	Taxicab Vehicle-for-Hire	2017	4	0	7	5	3
125	Taxicab Vehicle-for-Hire	2017	5	0	0	0	0
126	Taxicab Vehicle-for-Hire	Total 2017		0	618	38	258
127	Taxicab Vehicle-for-Hire	2018	1	0	580	140	222
128	Taxicab Vehicle-for-Hire	2018	2	0	54	13	16
129	Taxicab Vehicle-for-Hire	2018	3	0	21	33	9
130	Taxicab Vehicle-for-Hire	2018	4	0	1	0	1
131	Taxicab Vehicle-for-Hire	2018	5	0	0	0	0
132	Taxicab Vehicle-for-Hire	Total 2018		0	656	186	248
133	Taxicab Vehicle-for-Hire	2019	1	0	582	203	212
134	Taxicab Vehicle-for-Hire	2019	2	0	61	18	17
135	Taxicab Vehicle-for-Hire	2019	3	0	24	41	6
136	Taxicab Vehicle-for-Hire	2019	4	0	4	1	2
137	Taxicab Vehicle-for-Hire	2019	5	0	0	0	0
138	Taxicab Vehicle-for-Hire	Total 2019		0	671	263	237
139	Taxicab Vehicle-for-Hire	2020	1	0	324	206	113
140	Taxicab Vehicle-for-Hire	2020	2	0	40	33	15
141	Taxicab Vehicle-for-Hire	2020	3	0	16	35	5
142	Taxicab Vehicle-for-Hire	2020	4	0	2	1	1
143	Taxicab Vehicle-for-Hire	2020	5	0	0	0	0
144	Taxicab Vehicle-for-Hire	Total 2020		0	382	275	134
145	Taxicab Vehicle-for-Hire	2021	1	0	431	111	145
146	Taxicab Vehicle-for-Hire	2021	2	0	50	12	16
147	Taxicab Vehicle-for-Hire	2021	3	0	20	19	10
148	Taxicab Vehicle-for-Hire	2021	4	0	2	2	0
149	Taxicab Vehicle-for-Hire	2021	5	0	0	0	0
150	Taxicab Vehicle-for-Hire	Total 2021		0	503	144	171

Figure App 2-1 Taxi and VFH and Major Class Loss Experience

Line No.	Classification	Incident Insurance Year	Non-Serious Loss		Serious Loss			Collision	Comprehensive	PD	Total Incurred	Earned Unit	Earned Premium	Average Premium	Loss Ratio
			ABO	IRI	ABO	IRI	BI								
1	Passenger Vehicle-for-Hire (Passenger Vehicle)	2012	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
2	Passenger Vehicle-for-Hire (Passenger Vehicle)	2013	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
3	Passenger Vehicle-for-Hire (Passenger Vehicle)	2014	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
4	Passenger Vehicle-for-Hire (Passenger Vehicle)	2015	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
5	Passenger Vehicle-for-Hire (Passenger Vehicle)	2016	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
6	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
7	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	32,500.61	36,899.61	0.00	0.00	0.00	816,147.40	60,214.02	54,513.84	1,000,275.48	452.46	816,906.80	1,805.49	122.45%
8	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	61,484.61	62,929.96	0.00	0.00	0.00	1,303,684.19	125,017.53	96,998.21	1,650,114.50	747.46	1,405,817.14	1,880.79	117.38%
9	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	35,469.11	28,770.68	0.00	0.00	0.00	1,047,175.94	231,969.39	63,497.38	1,406,882.51	972.77	2,034,075.33	2,091.01	69.17%
10	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	197,343.42	104,521.07	0.00	0.00	0.00	2,157,215.23	146,808.40	153,227.63	2,759,115.75	1,591.51	2,402,407.52	1,509.52	114.85%
11	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total	326,797.75	233,121.32	0.00	0.00	0.00	5,324,222.76	564,009.34	368,237.06	6,816,388.23	3,764.20	6,659,206.79	1,769.09	102.36%
12	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2012	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
13	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2013	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
14	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2014	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
15	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2015	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
16	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2016	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
17	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00%
18	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	1,130.50	0.00	0.00	0.00	0.00	18,715.07	3,859.34	5,902.86	29,607.77	10.06	14,681.57	1,460.06	201.67%
19	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	0.00	0.00	0.00	0.00	0.00	5,493.39	355.69	0.00	5,849.08	16.99	24,714.84	1,454.96	23.67%
20	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	0.00	0.00	0.00	0.00	0.00	0.00	3,109.98	0.00	3,109.98	17.64	27,566.76	1,562.50	11.28%
21	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	0.00	0.00	0.00	0.00	0.00	13,094.64	3,161.58	500.00	16,756.22	19.10	20,974.78	1,098.25	79.89%
22	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total	1,130.50	0.00	0.00	0.00	0.00	37,303.10	10,486.59	6,402.86	55,323.05	63.78	87,937.95	1,378.70	62.91%
23	Taxicab Vehicle-for-Hire	2012	365,745.87	215,872.72	439,365.48	368,810.79	0.00	3,066,002.56	79,866.97	274,410.72	4,810,075.11	721.19	3,919,163.74	5,434.32	122.73%
24	Taxicab Vehicle-for-Hire	2013	226,730.00	233,409.11	0.00	0.00	815.06	3,343,387.60	130,795.11	288,269.31	4,223,406.19	723.08	4,136,113.09	5,720.16	102.11%
25	Taxicab Vehicle-for-Hire	2014	403,463.63	300,106.00	514,492.55	195,957.49	2,480.00	2,639,736.93	185,021.85	195,580.86	4,436,839.30	734.88	4,615,704.99	6,280.87	96.12%
26	Taxicab Vehicle-for-Hire	2015	190,668.71	75,957.31	0.00	0.00	0.00	2,511,193.57	122,178.03	241,847.33	3,141,844.94	733.07	5,087,909.05	6,940.56	61.75%
27	Taxicab Vehicle-for-Hire	2016	369,851.53	359,614.49	18,748.30	294,569.07	0.00	2,734,622.09	80,292.67	257,520.11	4,115,218.25	727.46	5,544,258.46	7,621.38	74.22%
28	Taxicab Vehicle-for-Hire	2017	277,190.55	191,863.77	268,053.33	253,717.30	0.00	2,667,271.96	118,265.88	201,530.37	3,977,893.15	718.69	5,958,954.59	8,291.40	66.75%
29	Taxicab Vehicle-for-Hire	2018	241,223.06	89,124.17	269,384.07	345,589.50	0.00	2,586,300.65	192,508.58	237,388.98	3,961,518.99	636.95	4,621,007.71	7,254.93	85.73%
30	Taxicab Vehicle-for-Hire	2019	293,932.12	156,747.84	15,627.91	245,084.10	0.00	2,678,754.68	209,254.66	213,109.05	3,812,510.36	625.60	4,600,555.72	7,353.79	82.87%
31	Taxicab Vehicle-for-Hire	2020	462,081.76	113,315.33	0.00	0.00	0.00	1,518,198.59	250,336.94	84,138.69	2,428,071.32	634.24	4,934,226.04	7,779.77	49.21%
32	Taxicab Vehicle-for-Hire	2021	351,738.34	94,923.18	0.00	0.00	0.00	2,045,682.15	97,663.93	157,790.23	2,747,797.82	969.85	4,877,402.46	5,029.01	56.34%
33	Taxicab Vehicle-for-Hire	Total	3,182,625.57	1,830,933.92	1,525,671.62	1,703,728.24	3,295.06	25,791,150.77	1,466,184.62	2,151,585.65	37,655,175.44	7,225.01	48,295,295.83	6,684.46	77.97%
34	Public Major Class	2012	1,426,765.53	998,683.51	1,151,940.55	1,258,352.43	145,315.94	9,067,663.07	802,014.27	1,487,211.07	16,337,946.38	11,035.40	17,780,925.25	1,611.26	91.88%
35	Public Major Class	2013	1,556,979.45	887,397.52	357,621.78	453,601.60	202,772.13	10,026,963.66	1,174,264.53	1,169,800.34	15,829,401.00	11,626.85	18,684,911.08	1,607.05	84.72%
36	Public Major Class	2014	1,315,771.92	536,870.09	676,221.73	713,882.61	221,549.25	8,599,741.23	1,000,288.64	1,178,471.68	14,242,797.15	12,227.33	20,410,757.77	1,669.27	69.78%
37	Public Major Class	2015	1,213,829.68	422,774.19	1,683,479.12	2,803,453.61	35,730.23	9,052,355.16	1,275,158.63	1,167,396.90	17,654,177.52	12,293.29	21,747,401.24	1,769.05	81.18%
38	Public Major Class	2016	1,156,892.60	631,716.28	514,352.59	1,722,979.42	282,622.74	10,679,598.62	1,285,877.19	1,160,197.85	17,434,237.30	12,292.36	23,157,836.97	1,883.92	75.28%
39	Public Major Class	2017	1,073,895.51	506,139.76	2,312,682.36	1,573,600.02	0.00	11,857,425.22	921,802.70	1,059,179.11	19,304,724.68	12,861.29	25,699,952.15	1,998.24	75.12%
40	Public Major Class	2018	1,370,200.48	658,857.51	556,754.48	1,632,316.95	128,676.27	12,073,618.41	1,458,675.77	1,102,164.43	18,981,264.30	12,815.87	24,808,211.72	1,935.74	76.51%
41	Public Major Class	2019	1,741,326.89	1,332,428.82	382,801.47	1,246,505.85	49,408.43	11,923,154.13	1,632,196.02	1,083,988.54	19,391,810.15	12,898.59	25,264,175.18	1,958.68	76.76%
42	Public Major Class	2020	1,116,749.02	327,416.33	0.00	0.00	123,408.49	9,378,153.50	1,234,718.79	640,025.30	12,820,471.42	11,821.56	24,387,265.76	2,062.95	52.57%
43	Public Major Class	2021	1,013,367.09	325,498.93	0.00	0.00	0.00	10,903,410.22	1,674,588.99	855,918.21	14,772,783.44	16,930.69	23,148,137.99	1,367.23	63.82%
44	Public Major Class	Total	12,985,778.17	6,627,782.94	7,635,854.07	11,404,692.50	1,189,483.48	103,562,083.22	12,459,585.54	10,904,353.44	166,769,613.35	126,803.24	225,089,575.11	1,775.11	74.09%

Figure App 2-1 Taxi and VFH and Major Class Loss Experience (cont'd)

Line No.	Classification	Incident Insurance Year	Non-Serious Loss		Serious Loss			Collision	Comprehensive	PD	Total Incurred	Earned Unit	Earned Premium	Average Premium	Loss Ratio
			ABO	IRI	ABO	IRI	BI								
45	Private Passenger Major Class	2012	37,924,075.25	19,083,123.80	19,891,681.55	40,391,868.10	3,372,826.56	289,623,638.03	62,876,149.38	37,183,729.21	510,347,091.88	742,802.44	680,298,720.49	915.85	75.02%
46	Private Passenger Major Class	2013	38,520,920.05	18,730,819.81	9,246,639.81	24,519,031.16	3,356,913.31	325,972,622.67	63,147,117.38	41,181,842.91	524,675,907.09	753,354.87	682,186,512.49	905.53	76.91%
47	Private Passenger Major Class	2014	35,622,171.54	14,459,097.80	14,027,186.26	34,080,525.56	4,275,183.59	281,453,191.03	50,333,114.28	36,998,114.40	471,248,584.46	762,950.04	713,762,204.87	935.53	66.02%
48	Private Passenger Major Class	2015	38,391,452.97	17,859,920.58	19,935,801.03	39,434,460.71	3,984,135.49	313,904,173.99	89,560,072.69	36,829,620.73	559,899,638.18	776,329.44	763,566,070.49	983.56	73.33%
49	Private Passenger Major Class	2016	40,507,733.65	18,814,739.93	30,761,906.03	42,202,349.47	4,236,467.53	343,862,533.05	87,158,084.32	38,581,943.06	606,125,757.04	787,205.30	802,755,987.70	1,019.75	75.51%
50	Private Passenger Major Class	2017	38,512,011.81	18,895,742.62	26,582,659.59	39,454,831.14	4,239,359.43	363,099,402.81	50,761,831.01	42,105,242.88	583,651,081.29	798,035.15	849,013,414.56	1,063.88	68.74%
51	Private Passenger Major Class	2018	35,244,479.77	17,639,913.15	21,320,225.29	33,391,174.80	5,039,152.16	364,937,342.93	84,192,152.85	38,726,708.83	600,491,149.77	806,039.89	902,911,233.70	1,120.18	66.51%
52	Private Passenger Major Class	2019	32,915,505.40	20,504,881.23	18,309,150.59	27,002,226.13	3,138,016.67	366,471,452.28	63,031,423.65	34,802,351.72	566,175,007.65	811,906.82	955,443,965.28	1,176.79	59.26%
53	Private Passenger Major Class	2020	32,141,560.44	13,230,490.60	21,930,786.54	7,642,093.90	1,837,780.25	301,137,693.23	62,673,907.91	25,723,486.38	466,317,799.25	886,770.61	1,071,233,461.66	1,208.02	43.53%
54	Private Passenger Major Class	2021	37,604,923.59	9,657,438.12	8,047,956.24	3,219,143.74	1,190,048.60	382,787,897.89	67,098,461.23	32,575,144.56	542,181,013.97	1,273,449.95	980,939,856.62	770.30	55.27%
55	Private Passenger Major Class	Total	367,384,834.48	168,876,167.63	190,053,992.91	291,337,704.69	34,669,883.59	3,333,249,947.90	680,832,314.69	364,708,184.67	5,431,113,030.57	8,398,844.50	8,402,111,427.85	1,000.39	64.64%

Figure App 2-2 Taxi and VFH and Major Class Claim Counts

Line No.	Classification	Incident Insurance Year	BI	Collision	Comprehensive	PD
1	Passenger Vehicle-for-Hire (Passenger Vehicle)	2012	0	0	0	0
2	Passenger Vehicle-for-Hire (Passenger Vehicle)	2013	0	0	0	0
3	Passenger Vehicle-for-Hire (Passenger Vehicle)	2014	0	0	0	0
4	Passenger Vehicle-for-Hire (Passenger Vehicle)	2015	0	0	0	0
5	Passenger Vehicle-for-Hire (Passenger Vehicle)	2016	0	0	0	0
6	Passenger Vehicle-for-Hire (Passenger Vehicle)	2017	0	0	0	0
7	Passenger Vehicle-for-Hire (Passenger Vehicle)	2018	0	205	57	67
8	Passenger Vehicle-for-Hire (Passenger Vehicle)	2019	0	276	81	104
9	Passenger Vehicle-for-Hire (Passenger Vehicle)	2020	0	254	124	73
10	Passenger Vehicle-for-Hire (Passenger Vehicle)	2021	0	444	87	147
11	Passenger Vehicle-for-Hire (Passenger Vehicle)	Total	0	1,179	349	391
12	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2012	0	0	0	0
13	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2013	0	0	0	0
14	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2014	0	0	0	0
15	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2015	0	0	0	0
16	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2016	0	0	0	0
17	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2017	0	0	0	0
18	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2018	0	3	4	1
19	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2019	0	3	2	0
20	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2020	0	1	4	0
21	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	2021	0	3	5	2
22	Passenger Vehicle-for-Hire (Truck 4,499 kg or less GVW)	Total	0	10	15	3
23	Taxicab Vehicle-for-Hire	2012	0	731	37	317
24	Taxicab Vehicle-for-Hire	2013	1	807	60	289
25	Taxicab Vehicle-for-Hire	2014	1	617	45	260
26	Taxicab Vehicle-for-Hire	2015	0	655	46	236
27	Taxicab Vehicle-for-Hire	2016	0	664	45	256
28	Taxicab Vehicle-for-Hire	2017	0	618	38	258
29	Taxicab Vehicle-for-Hire	2018	0	656	186	248
30	Taxicab Vehicle-for-Hire	2019	0	671	263	237
31	Taxicab Vehicle-for-Hire	2020	0	382	275	134
32	Taxicab Vehicle-for-Hire	2021	0	503	144	171
33	Taxicab Vehicle-for-Hire	Total	2	6,304	1,139	2,406

Figure App 2-2 Taxi and VFH and Major Class Claim Counts

Line No.	Classification	Incident Insurance Year	BI	Collision	Comprehensive	PD
34	Public Major Class	2012	2	2,568	449	1,058
35	Public Major Class	2013	6	2,869	512	1,079
36	Public Major Class	2014	2	2,359	451	994
37	Public Major Class	2015	2	2,428	536	926
38	Public Major Class	2016	4	2,594	595	1,030
39	Public Major Class	2017	0	2,695	549	1,069
40	Public Major Class	2018	4	2,714	778	1,026
41	Public Major Class	2019	2	2,574	865	955
42	Public Major Class	2020	5	1,821	764	596
43	Public Major Class	2021	0	2,050	606	755
44	Public Major Class	Total	27	24,672	6,105	9,488
45	Private Passenger Major Class	2012	68	105,532	53,357	38,254
46	Private Passenger Major Class	2013	90	111,927	51,176	40,048
47	Private Passenger Major Class	2014	100	97,307	50,927	34,976
48	Private Passenger Major Class	2015	78	97,269	66,049	34,985
49	Private Passenger Major Class	2016	68	103,048	68,192	36,031
50	Private Passenger Major Class	2017	68	103,296	60,287	36,888
51	Private Passenger Major Class	2018	69	101,672	69,108	35,596
52	Private Passenger Major Class	2019	67	96,575	64,652	33,302
53	Private Passenger Major Class	2020	32	75,721	68,057	22,907
54	Private Passenger Major Class	2021	59	80,753	49,213	29,495
55	Private Passenger Major Class	Total	699	973,100	601,018	342,482

TC (MPI) 1-19

Part and Chapter:	Part VI – RM Appendix 9 Part VI – RM Appendix 12	Page No.:	155 of 165 and 102 of 112
PUB Approved Issue No:	2) Ratemaking		
Topic:	Indicated Rate Calculation		
Sub Topic:			

Preamble to IR:

Directive 11.3 states:

11.3 In the 2023 GRA, the Corporation shall provide an alternative rate indication by use and territory. For this alternative rate indication:

- a) The Corporation shall remove actual serious losses (consistent with the current approach) and allocate serious losses based on the frequency of collision claims for each vehicle type;
- b) The Corporation shall split vehicle type among passenger vehicle, light truck, heavy truck, bus, motorcycle, trailer, and off-road vehicle; and
- c) The Corporation shall consider whether this approach is expected to result in less volatility for smaller uses or territories, and whether an adjustment to its credibility standard or minimum credibility may be warranted.

Question:

- a) Please confirm the rate indication for Passenger Vehicle-for-Hire (Passenger Vehicle) for Territory 1 is +6.84%.
- b) Please confirm the indication from (a) uses actual serious losses from the specific insurance use to determine the serious loss loading.

- c) Please confirm the alternative rate indication as part of Order 134/21 for Passenger Vehicle-for-Hire (Passenger Vehicle) for Territory 1 is +410.15%.
- d) Please confirm the indication from c) uses collision frequency by vehicle type to determine a serious loss loading.
- e) Given the large gap in the two indications calculated, what is MPI's view on the appropriate serious loss loading methodology to use in the GRA?
- f) Is the methodology in e) appropriate for insurance uses with low units?
- g) Please provide a response to directive 11.3 (c) "The Corporation shall consider whether this approach is expected to result in less volatility for smaller uses or territories, and whether an adjustment to its credibility standard or minimum credibility may be warranted."

Rationale for Question:

To allow for examination of the reasonableness of MPI's assumptions for the purposes of ratemaking.

RESPONSE:

- a) MPI confirms the rate indication for Passenger Vehicle-for-Hire (Passenger Vehicle) for Territory 1 is +6.84%.
- b) MPI confirms the indication from (a) uses actual serious losses for Passenger Vehicle-for-Hire (Passenger Vehicle) to determine the serious loss loading.
- c) MPI confirms the alternative rate indication as part of Order 134/21 for Passenger Vehicle-for-Hire (Passenger Vehicle) for Territory 1 is +410.15%. However, please refer to the revised calculations per PUB (MPI) 1-8, where MPI states that the alternative rate indication for Passenger Vehicle-for-Hire (Passenger Vehicle) for Territory 1 is +15.55%.

- d) MPI confirms the rate indication from c) uses the collision frequency by vehicle type to determine serious loss loading. However, the method used to determine the overall frequency shifted slightly. Please see PUB (MPI) 1-8 for the revised methodology.
- e) As indicated in PUB (MPI) 1-8, the revised rate indications are similar. Accordingly, MPI does not intend to change the methodology it currently uses in its GRA filing to determine serious loss loading.
- f) Given that it uses data for the past 10 years, MPI considers the methodology it uses in its GRA filing to be statistically credible for insurance uses with low units. MPI may introduce new methodology as it updates its pricing framework.
- g) The approach recommended by PUB Directive 11.3 may result in less volatility for some specific insurance uses. Therefore, MPI may consider adjusting the credibility standard as it updates the pricing framework.

TC (MPI) 1-20

Part and Chapter:	Part III – Benchmarking	Page No.:	11 of 30
PUB Approved Issue No:	12) Operational Benchmarking		
Topic:	Benchmarking		
Sub Topic:			

Preamble to IR:

MPI States:

"MPI model: In Manitoba, taxis are rated based on vehicle use, and territory. The vehicle year, make, model is not a rating factor. Taxi's operators are eligible to receive a premium discount based on their Driver Safety Rating (DSR discount)."

Question:

Given the results of the Large Vehicle study, why are vehicle make and model not rating factors?

Rationale for Question:

To allow for examination of the reasonableness of MPI's assumptions for the purposes of ratemaking.

RESPONSE:

In response to 2021 GRA TC (MPI) 1-14, MPI provided the following reason for flat rating (i.e., why it does not consider make and model as rating factors), which reason it adopts for the purpose of responding to this information request:

"To not restrict the use of newer and more expensive vehicles – This is the situation with Taxi VFH and Limousine VFH. In general, when the insurance use is not flat rated, newer, and more expensive vehicles are rated higher. By flat rating, all taxi operators pay the same rate regardless of the vehicle driven. Taxi operators can renew their vehicle without any additional insurance cost."

TC (MPI) 1-20

Part and Chapter:	Part VI – RM Appendix 9	Page No.:	15 of 165
PUB Approved Issue No:			
Topic:			
Sub Topic:			

Preamble to IR:

Bodily Injury selects a pure premium trend that seems to be based from the Indicated Exponential Trend - All Years.

The R-squared value for this calculation is about half of that for the Latest 10 Years calculation.

Question:

- a) Why was the lower R-squared calculation chosen as the predictor of next year's pure premium?
- b) Given that the indicated trends are in opposite directions, why was 0% not chosen as an appropriate trend?

Rationale for Question:

To allow for examination of the reasonableness of MPI's assumptions for the purposes of ratemaking.

RESPONSE:

- a) MPI selected the pure premium trend using a consistent method as in prior years given the low R-squared in both statistical analysis. Further, MPI noticed a

decrease in pure premiums in the most recent two years (2020/21 and 2021/22). As such, MPI selected all years to apply less weight to the most recent two years.

- b) Please see response to a). MPI did not select 0% to be conservative. Removing the most recent two years will result in a positive trend using the latest 10 years.

TC (MPI) 1-21

Part and Chapter:	Part VI – Ratemaking Part VI – RM Appendix 9	Page No.:	37 of 62 15 of 165
PUB Approved Issue No:	2) Ratemaking		
Topic:	Trends		
Sub Topic:			

Preamble to IR:

Part VI - Ratemaking pages 37-38 of 62 states:

"For Collision and Property Damage, the initial selected trend was based on the overall indicated exponential trend for pure premiums for 2007/08 to 2021/22 i.e., a 15-year trend. Ultimate incurred claims and pure premiums for accident year 2020/21 was excluded to remove the effect of COVID-19 on claims costs; and"

Part VI - RM Appendix 9 Table 6 footnotes state:

"[f] Based on the 'Indicated Exponential Trend - All Years' for Bodily Injury, Property Damage and Comprehensive; based on the 'Indicated Exponential Trend - Most Recent 10 Years' for Collision".

Question:

- a) Please confirm which indicated trend is used for the selection of the Collision trend
- b) Why was the indicated trend in (a) chosen over the other indicated calculation (All years vs 10-years)?

Rationale for Question:

To allow for examination of the reasonableness of MPI’s assumptions for the purposes of ratemaking.

RESPONSE:

- a) MPI confirms that the statement in Part VI – Ratemaking pages 37-38 is correct. The footnote in *Ratemaking RM Appendix 9, Table 6* should have said: “Based on the ‘Indicated Exponential Trend – All Years’” filed per *MPI Exhibit 15*.

- b) MPI selected the all-year’s trend, excluding the accident year 2020/21, based on the higher R-squared; 0.9 for All Years compared to 0.7 for the most recent 10 Years.