

## INTERVENER APPLICATION FORM

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

**Additional Information**

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

Please state your reasons for intervening in this proceeding:

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

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

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

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

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

Do you intend to provide evidence from witnesses other than experts and/or consultants? If yes, please provide:	
<b>Witness #1:</b>	
Name:	Evidence to be provided on issues in scope:
Email:	Brief explanation of relevant experience and/or knowledge to issues in scope:
Address and Phone number:	
Do you intent to seek approval for any other form of participation or provision of evidence, including for which you intend to seek an award of costs? If yes, please provide details and an explanation of the relation to issues in scope in the proceeding.	

**Additional Information:**

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

Duffy's Taxi (1996) Ltd. ("**Duffy's**") and Unicity Taxi Ltd. ("**Unicity**") (collectively, the "**Taxi Coalition**") are independently operated dispatch companies providing service in the city of Winnipeg and surrounding areas, which together represent approximately 80% of the Taxicab Vehicles-for-Hire (Taxi VFH), and 22% of the Accessible Vehicles-for-Hire in Manitoba. Duffy's and Unicity are collaborating for the purpose of this intervention on issues of common concern related to the premiums and characteristics of VFH insurance. The Taxi Coalition will continue consulting with smaller taxi dispatch companies throughout Manitoba to ensure broad representation of Taxi VFH interests in the City of Winnipeg and other municipalities such as Brandon and Thompson (all of these including Accessible VFH are referred to collectively as "**Manitoba Taxis**").

Please state your reasons for intervening in this proceeding:

The Taxi Coalition seeks to intervene in this proceeding in order to:

- 1) Test the reasonableness of the requested increase in insurance premiums for Manitoba Taxis, and the increase in Public Major Class rates generally. The Taxi Coalition will also assess taxi rate increases against those proposed for the Passenger VFH insurance use, which offer substantially similar services in the personal transportation services market.
- 2) Examine the proposed VFH Framework including:
  - a. an examination of the pricing for the proposed blanket policy VFH Framework;
  - b. an examination of the technological and/or data requirements to enable Manitoba Taxis to participate in the proposed blanket policy;
  - c. an examination of the timing for roll-out of the proposed VFH Framework and its ties with Project Nova;

Manitoba Public Insurance 2024 General Rate Application  
Taxi Coalition Intervener Application Form  
Attachment A

- d. an examination of the implications of the proposed VFH framework on Manitoba Taxis' as it relates to the CMP.
- 3) Review and assess MPI's compliance with Board directives stemming from PUB Orders 4/23 and 35/23.
- 4) Examine ratemaking approaches for VFH including:
  - a. Appropriateness of the Passenger VFH rates subsequent to the PUB directed 60% increase;
  - b. Ongoing implications of certain of ratemaking approaches for Manitoba Taxis specifically, and VFH generally, including credibility and serious loss loadings
  - c. Proposed changes to loss forecasting methods proposed by MPI, and implications for Manitoba Taxis specifically and VFH generally; and
  - d. Proposed changes to new money yield, and implications for Manitoba Taxis specifically and VFH generally.
- 5) Examine the implications of proposed changes to the Driver Safety Rating (DSR) system on Manitoba Taxis, including any implications from driver data collection on the taxi business, and for implications with the revised VFH Framework.
- 6) Test the reasonableness of the proposed Capital Management Plan (CMP), in the context of the PUB's mandate to approve just and reasonable rates, while encouraging clarity, transparency and accountability.
- 7) Test the reasonableness of MPI's proposed changes to the Fleet Program, including the nearly 10 fold increase in costs attributed to the public major class, and MPI's decision to apply for this change notwithstanding the flaws identified but not yet studied or rectified in the Fleet Program.
- 8) To assess MPI's progress towards implementation of Generalized Linear Models (GLM), and potentially provide insight from the private sector GLM experience.

The Taxi Coalition has been involved in consultations with MPI since the conclusion of the 2021 GRA in an effort to progress towards an improved VFH Framework. The Taxi

Manitoba Public Insurance 2024 General Rate Application  
Taxi Coalition Intervener Application Form  
Attachment A

Coalition appreciates the dialogue that has occurred thus far, and is mindful of progress towards the shared goal of an improved VFH framework as it plans its intervention.

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

This proceeding will determine rates charged for VFH insurance uses for the 2023/24 insurance year. Despite applying for a 0% overall rate change, MPI proposes rate increases to the Public Major Class, and the Taxi Vehicle for Hire insurance use.

The Manitoba Taxis are also impacted indirectly by insurance rates for Passenger VFH in an increasingly competitive vehicle for hire industry. Ensuring that premiums are fair, accurate, and cost-based will promote a level playing field in the industry, and serve the interest of Manitobans through fair and efficient competition within the industry.

The Taxi Coalition will be impacted by the proposed changes to the Driver's Safety Rating System, Fleet Program, New Money Yield and Capital Management Plan. As such, the Taxi Coalition intends to understand and test the application related to these issues, and any others that may be identified during the discovery process.

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

The Taxi Coalition has a substantial interest in insurance rates, as Taxis pay the highest premiums of any insurance use, and represent among the most acute risk. The Taxi Coalition also has an interest in an actuarially sound and modern approach to ratemaking, and in the revised VFH Framework. To the extent that the outcomes of these proceedings lay the groundwork to improve ratemaking and otherwise test the reasonableness of the VFH Framework proposed, the Taxi Coalition has a material interest in the outcome.

In terms of reach, the Taxi Coalition represents approximately eight of every ten taxicabs in Manitoba, and its efforts have been previously endorsed by taxi operators in Winnipeg and Manitoba's other major centres. The Taxi Coalition's participation will assist in improving the ratemaking process which benefits all insureds by sending correct price signals. In this regard, the Taxi Coalition's proposed intervention has a broad reach beyond Manitoba Taxis and extends to a substantial number of ratepayers.



Please describe your experience, information, or expertise relevant to this matter that would contribute to the Board's decision making or other decision-makers:

The Taxi Coalition made non-evidentiary submissions in the 2018 Interim Vehicles for Hire Application and the 2020 General Rate Application. .

In the 2021 GRA, the Taxi Coalition hired counsel and expert consultants with experience before the PUB and in the field of regulated auto insurance. The experts prepared evidence and delivered testimony on behalf of the Taxi Coalition, which contributed to 13 separate directives in PUB Order 1-21.

In the 2022 GRA, the Taxi Coalition provided actuarial evidence on several issues included generalized linear models, MPI's current credibility weighting procedure, and approach to serious losses.

In the 2023 GRA, through information requests, cross examination, and argument, the Taxi Coalition explored and made recommendations on a number of matters before the PUB including: key VFH issues, appropriate pricing for Passenger VFH insurance, issues with cross-subsidization in the Fleet Program, the adoption of GLMs for ratemaking, improved treatment of serious loss loading, and the appropriate implementation of the CMP.

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

The Taxi Coalition's key issues are identified in the section above that explains reasons for intervening. As to the specific issues, at this time the Taxi Coalition expects its intervention to focus the following issues, itemized in the PUB's Interim Procedural Order 64/23:

- 2) Large loss loading based on Order 4/23, Directive 2;**
- 3) Projected new money yield based on existing methodology, as well as split new money yield as based on Order 4/23, Directive 7;**
- 4) Compliance with Orders 4/23 and 35/23, and any outstanding directives from past orders;**

**5) Financial forecast;**

This will be examined to the extent applicable to the TC;

**6) Changes to integrated cost allocation methodology since the 2023 GRA;**

This will be examined to the extent applicable to the TC;

**8) Capital Management Plan;**

**11) Claims forecasting, including but not limited to PIPP and changes or enhancements to claims forecasting design;**

**12) Vehicles for Hire (VFH);**

**13) Driver Safety Rating (DSR);**

**20) Project Nova;**

Participation will be limited to issues related to the link between Project Nova timelines and the roll-out of the VFH Framework and the extent to which cost over-runs are affecting rates.

The Taxi Coalition may also examine other matters on the PUB's approved issues list should those matters prove relevant to the Taxi Coalition's interests, and not be sufficiently addressed by the efforts of other interveners.

Manitoba Public Insurance 2024 General Rate Application  
Taxi Coalition Intervener Application Form  
Attachment A

Do you intend to participate fully and actively, including attendance at hearings, submission of evidence, and testing of evidence and cross examination of witnesses?

If yes, please describe your intended participation.

Yes. To date the Taxi Coalition has participated in a meeting of counsel for potential interveners, and is preparing to have individual discussions with counsel for other interveners of record.

The Taxi Coalition expects to participate in discovery through first and second round information requests, including on materials yet to be filed. It will review CSI information for matters relevant to the Taxi Coalition.

The Taxi Coalition has not yet determined if evidence will be required, and does not anticipate making that determination until after the responses to second round IRs have been received.

The Taxi Coalition expects to fully participate in the oral hearing, including the cross examination of MPI witnesses and the provision of opening and closing submissions.

The Taxi Coalition intends to collaborate with the Consumers' Association of Canada (Manitoba) Inc. ("CAC") and the Coalition of Manitoba Motorcycle Groups ("CMMG") with respect to any overlapping issues in their respective interventions.

The Taxi Coalition hopes that any issues identified for oral hearing will be organized so it can limit its attendance to days on which issues relevant to the Taxi Coalition are addressed.

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

Yes, the Taxi Coalition intends to seek an award of costs.

The Intervener Cost Policy at Section 3.0 outlines the eligibility requirements for cost award. These are:

3.1 In any proceeding the Board may award costs to be paid to any Intervener who has:

Manitoba Public Insurance 2024 General Rate Application  
Taxi Coalition Intervener Application Form  
Attachment A

- (a) made a significant contribution that is relevant to the proceeding and contributed to a better understanding, by all parties, of the issues before the Board;
- (b) participated in the hearing in a responsible manner and cooperated with other Interveners who have common objectives in the outcome of the proceedings in order to avoid a duplication of intervention;
- (c) represented interests beyond their sole business interest; and
- (d) a substantial interest in the outcome of the proceeding and represents the interests of a substantial number of ratepayers.

The Taxi Coalition will satisfy part (a) by working with qualified and established legal counsel and expert consultants who have significant regulatory experience, both before this Board, and in the field of regulated auto insurance. The Taxi Coalition intends to build upon its contributions in the 2021, 2022 and 2023 GRA's, and assist the PUB in determining just and reasonable rates and the testing of the revised VFH Framework.

For part (b), the Taxi Coalition will coordinate with other interveners on matters of common interest to avoid duplication and promote efficient proceedings, including in particular the CAC and CMMG. The Taxi Coalition also anticipates retaining some of the same firms to provide expert consultation services. In this regard, the Taxi Coalition expects to reduce costs through certain jointly shared activities, such as reviewing the application and information requests (IR) responses.

For part (c), the Taxi Coalition intends to again consult with other dispatch companies in Manitoba to ensure the intervention represents the broadest cross section of Taxi VFH interests. Certain issues the Taxi Coalition intends to examine will contribute to a level playing field in the personal transportation services industry, which is to the benefit of all customers of that industry.

For part (d), the Taxi Coalition intends to represent interests of a significant majority of Taxi VFH insureds, as well as the general interests of customers of the personal transportation services industry.

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

**Expert Consultant #1:**

Jeff Crozier  
InterGroup Consultants Ltd.  
Suite 300, 259 Portage Ave, Winnipeg, MB R3B 2A9  
[jcrozier@intergroup.ca](mailto:jcrozier@intergroup.ca)  
cell: 204-880-1151

Tariff Rate: \$195/hr

**Experience:** 15+ professional experience, in the areas of Utility Rate Regulation, Auto-insurance Rate Regulation, and Competitive Wholesale and Retail Electricity Markets.

**Evidence to be provided on issues in scope:** The extent of the evidence, if any, to be adduced on behalf of the Taxi Coalition will be determined upon completion of discovery. It is expected to address the issues identified by the Taxi Coalition in this Application.

**Brief explanation of experience relevant to evidence to be provided:** Mr. Crozier is a consultant with InterGroup Consultants who specializes in utility rates and regulation. He has prepared evidence in proceedings before the Alberta Utilities Commission and in the 2021 MPI GRA before the Manitoba Public Utilities Board, and also assisted as a consultant in the 2022 and 2023 MPI GRAs. Prior to this, he was the Director of Regulatory Affairs at MPI from 2016 to 2020. In this capacity he was accountable for and oversaw the development of MPI's annual GRA and the regulatory process. Mr. Crozier has a working knowledge of regulated auto insurance in Manitoba, and the issues facing Taxi VFH customers.

Mr. Crozier's CV is attached.

**Expert Consultant #2:**

Sylvain Dion and Jason Wong  
Dion Strategic Consultants and Actuaries  
55 York Street, Suite 801  
Toronto, ON M5J 1R7  
416-222-4405

Tariff Rates: Sylvain Dion: \$530/hr; Jason Wong: \$280/hr

**Experience:**

Mr. Dion: 40+ years as strategic advisor and consulting actuary.

Mr. Wong: +15 Years with expertise in pricing, valuation and loss modelling.

**Evidence to be provided on issues in scope:** The extent of the evidence to be adduced on behalf of the Taxi Coalition will be determined upon completion of discovery. It is expected to address the ratemaking issues identified by the Taxi Coalition in this Application.

**Brief explanation of experience relevant to evidence to be provided:**

Mr. Dion is the founder of the Dion Strategic Consulting Group Inc. and a principal consultant to a number of major clients for the firm. Mr. Dion provides strategic advice in addition to consulting and actuarial services relating to optimal risk financing strategies and the evaluation of outstanding and future liabilities with respect to self-insurance and insurance programs.

Mr. Dion has over 40 years of experience as a strategic advisor and consulting actuary to his clients. He has been instrumental in the development of computerized risk models to assist organizations in the evaluation and selection of risk retention strategies for their various insurance programs and exposures to risk.

Mr. Wong is a Senior Actuarial Consultant and leads the Property & Casualty (P&C) Actuarial Practice at Dion Strategic Consulting Group. With over 15 years of experience in the P&C industry, Jason has developed expertise in a number of traditional actuarial areas including Pricing, Reserving (Valuation), and Loss Modelling.

Prior to joining the Dion Strategic Team, Jason held progressively senior roles at various insurance companies including Desjardins General Insurance Group. Jason has extensive experience with rate filings for the Ontario, Alberta, and Atlantic Canada markets.

Mr. Dion and Mr. Wong's CVs are attached.