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BCUC File 60848

July 10, 2019

British Columbia Utilities Commission  
Suite 410  
900 Howe Street  
Vancouver, BC V6Z 2N3

Attention: Mr. Patrick Wruck, Commission Secretary and Manager, Regulatory Services

**Re: Modernizing Passenger Transportation Services Tariff Amendments Application**

Dear Mr. Wruck:

On July 8, 2019, by Order in Council (OIC) No. 411 (OIC 411/19), the Lieutenant Governor in Council approved the Government Directive of June 26, 2019 with respect to Modernizing Passenger Transportation Services Tariff Amendments (the 2019 Government Directive regarding Modernizing Passenger Transportation Services). This Government Directive directs ICBC to apply to the British Columbia Utilities Commission (BCUC) by July 19, 2019 for approval of rate amendments as set out in the amended Basic Insurance Tariff (Tariff) pages attached in that Government Directive.

On July 8, 2019, the Lieutenant Governor in Council also approved OIC 412/19, which amends *Special Direction IC2 to the British Columbia Utilities Commission, BC Regulation 307/2004 (Special Direction IC2)*. This amendment directs the BCUC to approve the aforementioned Tariff amendments within 20 days of ICBC's applying to the BCUC pursuant to the 2019 Government Directive regarding Modernizing Passenger Transportation Services.

In accordance with the above, enclosed is ICBC's Modernizing Passenger Transportation Services Tariff Amendments Application. The specific order sought is set out in the Draft Order attached as Appendix D of this Application.

Yours truly,

Angela Wright  
Manager, Corporate Regulatory Affairs  
/avg

Cc: Bill Carpenter, Vice President, Insurance, ICBC

Enclosure



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# **CHAPTER 1**

## **INTRODUCTION AND OVERVIEW**



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## **A APPLICATION**

1. In this Application, ICBC is seeking approval from the British Columbia Utilities Commission (BCUC) to implement the changes to Basic insurance that have been prescribed by Government in its directions to ICBC and the BCUC. These changes pertain to:

- Updating rates for existing taxi insurance products to make rates more reflective of risk.
- The implementation of a new insurance product for ride-hailing/transportation network services (TNS).
- The implementation of a new insurance product for vehicle-sharing/peer-to-peer vehicle rental services (P2P).

2. In accordance with the Government Directive of June 26, 2019 with respect to Modernizing Passenger Transportation Services Tariff Amendments, approved by Order in Council 411, July 8, 2019 (the 2019 Government Directive regarding Modernizing Passenger Transportation Services), these changes are to take effect on September 1, 2019 for taxi rates, and on September 16, 2019 for TNS and P2P.

3. This Application describes the changes, provides an overview of ICBC's approach to managing the implementation of these changes, outlines the legislative and regulatory framework guiding these changes, and seeks the BCUC's approval of the required amendments to the Basic Insurance Tariff (Tariff) in accordance with this framework.

## **B OVERVIEW OF THE MODERNIZATION OF PASSENGER TRANSPORTATION AND VEHICLE RENTAL**

4. Developments in mobile technology have led to the emergence of new types of vehicle use, such as TNS and P2P, for which existing Basic insurance products are not specifically designed. A TNS company utilizes an online platform to connect drivers with potential passengers, a service which is also known as ride-hailing. A P2P company utilizes an online platform to connect vehicle owners who rent out their vehicles with potential customers, a service known as P2P vehicle rental.

5. The changes outlined in this Application reflect the Government's objectives as set out in the 2019 Government Directive regarding Modernizing Passenger Transportation Services. The Government Directive, including attached Tariff amendments, are provided in Appendix A of this Application. These changes enable ICBC to provide insurance products that meet the



specialized needs of TNS/P2P providers and more accurately reflect the insurance risk levels associated with taxi services.

6. In accordance with the 2019 Government Directive regarding Modernizing Passenger Transportation Services, ICBC is implementing the changes to taxi insurance rates over a 10-year transition period to smooth out the impact to taxi owners over this period. In alignment with taxis, TNS pricing will also have prescribed insurance rates that transition over a 10 year period. For P2P, the prescribed insurance rates are the same in the first and subsequent years.

## **B.1 LEGISLATIVE AND REGULATORY FRAMEWORK**

7. ICBC's Basic insurance rates are guided by the legislative and regulatory framework. The changes presented in this Application are based on and consistent with these frameworks, including government directives. More information on the legislative and regulatory framework is provided in Chapter 2 of this Application.

## **B.2 TAXI, TNS, AND P2P PORTFOLIOS**

### **B.2.1 ACTUARIAL PRICING FOR TAXIS**

8. ICBC will transition from the current pricing for taxis to actuarial indicated insurance rates over a period of 10 years, while maintaining the existing rate classes and rating territories. More information on these elements is provided in Chapter 3, Section B. The 10 years of Basic insurance rates for taxis are provided in the rate tables in amendments to the Tariff included in the 2019 Government Directive regarding Modernizing Passenger Transportation Services and provided in Appendix A of this Application.

### **B.2.2 DISTANCE-BASED PRICING FOR TNS**

9. One element of insuring TNS is the creation of a new insurance product, known as a blanket certificate. This blanket certificate will provide required coverage for vehicles operated for TNS use that are not otherwise insured for passenger-directed transportation use. This blanket certificate will be purchased by TNS companies whose ride-hailing online platforms are used to connect drivers and potential passengers.

10. A second element of insurance for TNS is the use of distance-based (cents per kilometre) insurance pricing. Per kilometre pricing is used for similar services in several jurisdictions across Canada, including Ontario, Saskatchewan, and Alberta.



11. A third element of insuring TNS is that the price per kilometre is based on three geographic zones and determined by the zone in which the passenger is picked up. The prescribed TNS rates are scheduled to change over a 10 year period. More information on all of these elements is provided in Chapter 3, Section C. The 10-year rate tables for TNS Basic insurance rates are provided in the amendments to the Tariff included in the 2019 Government Directive regarding Modernizing Passenger Transportation Services and provided in Attachment A.

### **B.2.3 DAILY PRICING FOR P2P**

12. A new blanket insurance product is also being created that will allow P2P companies to purchase coverage on behalf of their customers. The P2P blanket certificate will use a per day insurance price with the pricing based on current territory mapping. The territory will be determined by the pick-up location of the rented vehicle. The vehicle type (e.g., motor vehicle, trailer, motorhome, or motorcycle) will also affect the per day price. More information on all of these elements is provided in Chapter 3, Section D. The amendments to the Tariff for the new P2P Basic insurance rates are included in the 2019 Government Directive regarding Modernizing Passenger Transportation Services, provided in Appendix A.

### **B.3 SUMMARY OF FINANCIAL IMPACTS**

13. It is generally expected that there will be an overall increase in the premium collected, all else equal, with the introduction of new Basic insurance products for TNS and P2P. As both TNS and P2P are new classes of business, there are no dislocations or pricing impacts to existing customers that need to be considered. Taxi insurance rates will move to actuarial indicated rates, which means some taxi operators will see rate increases whilst others will see decreases. The impacts to taxi operators are discussed further in Chapter 3. The methodology used in determining pricing for all three of these portfolios is provided in Chapter 3, Section E.

## **C CHANGE MANAGEMENT**

14. The changes outlined in this Application are for vehicles involved with the provision of passenger directed transportation (i.e., taxis and TNS) and P2P vehicle rental services. These changes will impact taxi operators, companies interested in establishing online platforms for TNS and P2P services, and customers interested in operating on these online platforms. Lastly, these changes will impact brokers and ICBC employees who provide insurance and claims-related services to these customers.





# **CHAPTER 3**

## **TAXI, TNS, AND P2P CHANGES**



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## C OVERVIEW OF TNS BLANKET CERTIFICATE

### C.1 TNS OPERATING MODEL

8. A TNS company, commonly referred to as a ride-hailing company, is focused on the provision of passenger directed transportation through its online platform. Vehicle owners (for the purposes of this Application, they are the TNS drivers) offer rides to the market (prospective customers or passengers) through this online platform.

### C.2 TNS INSURANCE MODEL

9. The TNS Basic insurance blanket certificate is designed to allow ICBC customers who do not have vehicles rated for commercial passenger transportation use to participate in passenger directed transportation without having to declare commercial passenger transportation use. The blanket certificate is mandatory for TNS companies to purchase. All TNS drivers must carry an underlying Owner's Certificate of Insurance (APV250) or a Temporary Operation Permit (APV16)<sup>2</sup> that would provide insurance coverage when the TNS blanket certificate is not in effect, as discussed below in paragraph 11.

10. Drivers operating under the TNS model move between four distinct phases of use:

- **Offline:** The TNS driver has not activated the TNS online platform.
- **Available:** The TNS driver has status set to "available" on a TNS online platform, but has no confirmed ride.
- **En Route:** The TNS driver has confirmed a ride on a TNS online platform and is travelling to pick up the passenger(s).
- **On Trip:** The TNS driver has picked up the paying passenger(s) and is transporting them to their destination(s).

11. As indicated in Figure 3.2 below, the blanket certificate only provides coverage in the TNS phase when the vehicle is "En Route" with a confirmed ride or when it is "On Trip" with a paying passenger in the vehicle. The owner's certificate provides coverage when the TNS driver is "Offline", or when the status of the TNS online platform is set to "Available" but there is no confirmed ride.

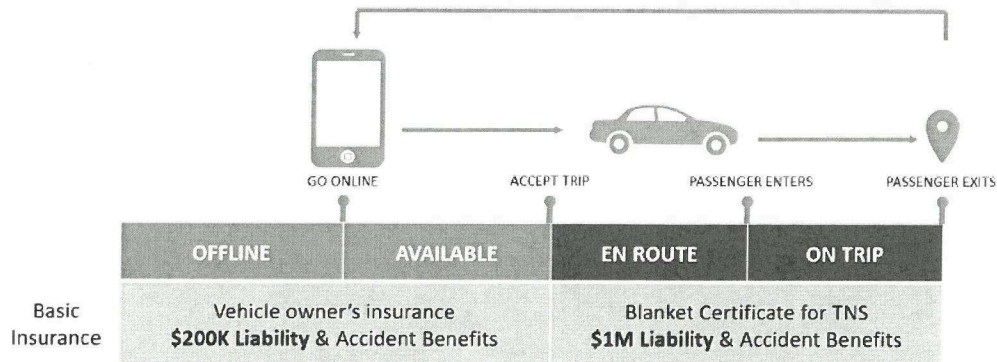
12. Accordingly, distance-based pricing for TNS begins upon a TNS driver setting their status as En Route in the TNS online platform and ends upon completion of each trip. The

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<sup>2</sup> The Owner's Certificate of Insurance and the Temporary Operation Permit are both considered as a vehicle "owner's certificate."

minimum Basic insurance third party liability coverage required to engage in En Route and On Trip phases of active TNS operation is \$1 million.

**Figure 3.2 – TNS Insurance Model**



13. Claims experience is used as a basis to apply a discount or surcharge for most ICBC insurance products and it will also be used to apply a discount or surcharge for TNS blanket certificates. At this time there is no claims experience for TNS companies; therefore, the discount on Basic insurance premiums for TNS companies will be set at 44% for the first two years that a company has purchased a blanket certificate and thereafter, it will be based on their claims experience. The discount aligns with the average province-wide discount received by taxis. The Tariff amendments attached in the 2019 Government Directive regarding Modernizing Passenger Transportation Services include a new Schedule AC: Blanket Discount and Surcharge, which specifies this discount information.

14. ICBC currently offers "retrospective rating" to fleets over 200 vehicles or with \$100,000 or more in annual premium after discount, as set out in Schedule K of the Tariff. Retrospective rating enables a participating fleet to earn a return in premium of up to 35% based on the fleet's loss ratio or 10% overcharge if its loss ratio is above 65%. The loss ratio is reviewed at 6, 18, and 30 months after the policy expiration. Retrospective rating will be available for TNS blanket certificates, as described in Tariff Schedule AD: Blanket Certificate Premium Adjustment Agreement. This is also a new Tariff schedule and is included in the Tariff amendments attached in the 2019 Government Directive regarding Modernizing Passenger Transportation Services. The program mirrors the Fleet Premium Adjustment Agreement as set out in the Tariff but removes the 200 vehicle eligibility rule. TNS blanket insurance coverage is based on distance travelled and not the number of vehicles; therefore, it is not possible to apply a vehicle-based requirement.



**C.3 ADMINISTRATION OF DISTANCE-BASED BLANKET PRICING FOR TNS**

**C.3.1 BUYING AND RENEWING INSURANCE**

15. In buying or renewing a blanket certificate, part of the administration task for TNS companies is to report the distance travelled/driven to ICBC.

**C.3.2 TRACKING DISTANCE**

16. Figure 3.3 below identifies the three TNS zones, tracked by the TNS online platform, which will differentiate pricing. The grouping of territories into zones was developed using taxi rate class and territory claims history in order to balance the relative risk differences with administrative simplicity of reporting distance driven. TNS will also have prescribed rate tables for 10 years, similar to taxis' 10-year transition to actuarial indicated rates. These tables are set in accordance with the Tariff amendments attached in the 2019 Government Directive regarding Modernizing Passenger Transportation Services, which is included in Appendix A of this Application. The applicable rates can be found in the Basic Insurance Premiums, sub-section 2.F.17.1.1.

**Figure 3.3 – Zone to Territory Mapping**

<b>Zone 1</b>	<b>Zone 2</b>	<b>Zone 3</b>
D - Lower Mainland	E - Maple Ridge/Pitt Meadows G - Pemberton/Hope H - Fraser Valley L - Okanagan W - Urban <sup>1</sup>	F - Squamish/Whistler N - Kootenays P - Cariboo R - Prince George S - Northern Coast V - Peace River W - Rural <sup>1</sup> X - Mid Island/Sunshine Coast Y - North Island

<sup>1</sup>Southern Vancouver Island and all other islands off the west coast of the mainland.

17. For vehicles involved in the provision of TNS, tracking of their distance travelled is based on their kilometres driven while in the En Route and On Trip phases of TNS use.

18. Assignment of a zone for En Route and On Trip phases will be based on the location of passenger pick-up. For situations where pick-ups for multiple passengers from separate trip requests occur during the same trip, the zone will be based on the first trip request pick-up location. This zone will apply for all trip requests occurring during the same trip until the last passenger is dropped off.



### **C.3.3 REPORTING DISTANCE**

19. An initial estimate by the TNS company of their annual kilometres per zone will be required in the application for the blanket certificate. A deposit premium equating to three months of the estimated annual premium will be collected at the time of initial application for the blanket certificate or certificate renewal. At the end of each month, monthly kilometres accrued per zone are reported to ICBC by the TNS company (or via the TNS company's broker) and a monthly instalment of premium is paid. Beginning on the tenth monthly instalment of the annual certificate, the deposit premium will be used to pay the remaining instalments.

20. While ICBC expects that it will collect additional Basic insurance premium when it sells the TNS product, it is unable to determine what the adoption levels will be, or the full amount of Basic insurance premium that will be collected, given that there is no experience in this market at this time.

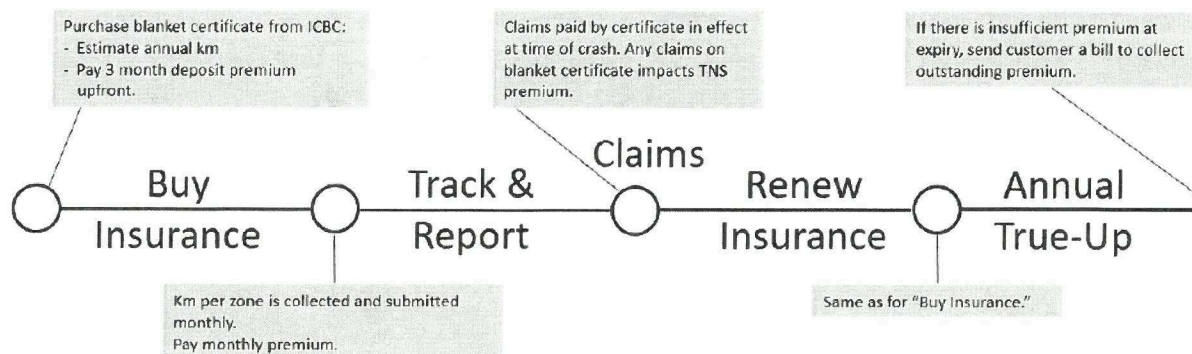
### **C.3.4 ANNUAL TRUE-UP**

21. On the last instalment payment, a true-up bill will be sent to the TNS company to collect the outstanding premium, if the remaining deposit premium is insufficient to pay the outstanding last instalment. If there is any surplus at the end of the policy period, the TNS company would be issued a refund.

### **C.3.5 ADMINISTRATIVE PROCESS OVERVIEW**

22. Figure 3.4 below provides an overview of the process for administering distance-based blanket pricing for TNS companies.

**Figure 3.4 – Administration of Distance-Based Blanket Pricing and Premium Collection for TNS**



## D OVERVIEW OF P2P BLANKET CERTIFICATE

### D.1 P2P OPERATING MODEL

23. A P2P company's business is focused on operation and facilitation of an online platform whereby vehicle owners offer their vehicles for rent to prospective customers through this online platform.

### D.2 P2P INSURANCE MODEL

24. The P2P blanket certificate is designed to provide ICBC's customers who wish to rent their vehicles using a P2P online platform, with the convenience of not having to declare vehicle rental use to ICBC (U-drive rate class) each time they wish to rent out their vehicle(s).

25. The P2P insurance model provides that a blanket certificate of insurance is available but not mandatory for P2P companies to purchase. If P2P companies do not purchase a blanket certificate, a vehicle being rented on the P2P online platform must be appropriately rated for U-drive use by the vehicle owner on the vehicle owner's certificate. All P2P vehicle owners are required to carry an underlying Owner's Certificate of Insurance or a Temporary Operation Permit that would provide insurance coverage when not engaged in P2P. The minimum Basic insurance third party liability coverage required to engage in P2P use is \$200,000.

26. There are two phases of use associated with vehicles involved in the provision of P2P:

- **Pick-Up/Drop-Off:** The P2P owner is delivering/retrieving the vehicle to/from a confirmed renter.





insurance to derive predictions based on historical experience, was the key underlying method to obtain the rate factors. ICBC will transition to this rate over a period of 10 years as discussed in Section B.

## **E.2 TNS**

36. In the absence of TNS data in BC, the TNS distance-based pricing was based on ICBC's taxi data which represents similar usage rate classes. The total claims and expense data from the taxis was then adjusted to reflect differences in broker commission structures (lower for TNS than for taxi) and expense loadings (higher for TNS than for taxi) since owner's certificates for taxis and blanket certificates are administered differently. This adjusted claims and expense amount was then divided by the estimated average annual kilometres travelled by taxis to develop a per kilometre rate for TNS.

37. Average annual kilometres travelled by taxis were estimated for each taxi rate class and territory based on odometer readings collected during the semi-annual taxi vehicle inspections.

38. The taxi rates and average annual kilometres driven were summarized to combine all taxi rate classes and all territories into the three consolidated zones using exposures as weights, and converted to a distance-based rate by using the following formula:

Year 10 TNS per kilometre rate in each zone = Adjusted actuarial indicated rate for taxis in each zone divided by the average annual kilometres driven by taxis in each zone.

TNS will transition to these rates over a period of 10 years as discussed in Section C.3.2.

## **E.3 P2P**

39. In the absence of P2P data in BC, the per day based pricing developed for P2P was based on the actuarial indicated rates from the eligible or comparable rate classes (U-drive rate classes where available) for each vehicle type (e.g., motor vehicle, motorhome, trailer, and motorcycle) as well as non-BC data provided by a P2P company, to adjust for any observable risk difference between the comparable rate classes and P2P. The resulting rates were also adjusted to reflect the differences in broker commission structure, expense loading and discount levels between these rate classes and the P2P blanket certificates. As noted in paragraph 36 there are differences in commission structure and expense loading because owner's certificates and blanket certificates are administered differently. In addition, there

June 26, 2019

Ms. Joy MacPhail  
Board of Directors, Executive Office  
Insurance Corporation of British Columbia  
517-151 West Esplanade  
North Vancouver BC V7M 3H9

Dear Ms. MacPhail:

Re: Letter of Direction – Modernizing Passenger Transportation Services Tariff Amendments

I am writing to provide direction to the Insurance Corporation of British Columbia (ICBC) regarding changes to be made to ICBC's Basic insurance rates in support of modernizing passenger transportation services.

A rating framework is required for blanket certificates to be issued to transportation network service companies and peer-to-peer vehicle rental companies.

In the August 3, 2018 Letter of Direction to ICBC on Rate Design Tariff Amendments (OIC 458/2018), ICBC was directed to exclude taxi base rates from the adjustments to rates associated with territory and rate class while government undertook a broader review of modernizing passenger transportation. ICBC is now directed to have taxi base rates associated with territory and rate class reflect recent historical loss data. In order to enhance rate stability and predictability, the impact of these changes are to be spread over a 10 year period.

The necessary changes to the rating framework and the taxi base rates are included in the amended Tariff pages attached to this letter, and are to be effective on the dates specified in those Tariff pages.

ICBC is hereby directed to apply to the BCUC by July 19, 2019 for approval of rate amendments as set out in the amended Tariff pages attached to this letter.

ICBC is directed to incorporate any necessary consequential amendments to the attached Tariff pages, and other Tariff pages, for example to reflect any changes to the Tariff approved by the BCUC prior to the effective date of the attached pages.

.../2

Ms. Joy MacPhail  
Page 2

This letter of direction, including the attached Tariff pages, is a government directive within the meaning of that term defined in Special Direction IC2 to the British Columbia Utilities Commission (B.C. Reg. 307/2004).

Yours truly,

A handwritten signature in black ink, appearing to read 'D. Eby', written in a cursive style.

David Eby, QC  
Attorney General

Enclosure

- 2. F.5 APV 38 Binder for Owner's Interim Certificate of Insurance
- 2. F.6 APV 44 Vintage Motor Vehicle Certificate
- 2. F.7 APV 49 Unlicensed Farm Tractor Certificate
- 2. F.8 Licence and Certificate of Insurance (Manufacturer, Trailer Floater)
- 2. F.9 APV 317 Collector Multi Vehicle Licence and Certificate of Insurance
- 2. F.10 APV 116A Special Agreement Vehicle Licence and Certificate of Insurance
- 2. F.11 Transporter's / Demonstration / Repairer's Licence and Certificate of Insurance
- 2. F.12 Limited Access Island Certificate
- 2. F.13 SECTION 2.F.13 IS NO LONGER IN EFFECT
- 2. F.14 Special Event Certificates
- 2. F.15 Unusual Vehicle Certificates
- 2. F.16 APV 40 Temporary Change of Use and/or Territory Endorsement
- 2. F.17 APV 383 Blanket Certificates

| N

2.G. Premium Payable for Driver's Certificates

2.G.1 Premium Payable for Driver's Certificates

2.G.2 Application of Other Basic Insurance Tariff Provisions and IVR Sections

2.H. Refunds on Cancellations

2.H.1 Refunds on Cancellations

2.H.2 Per Diem Calculations

2.I. Minimum Premiums and Minimum Retained Premiums

2.I.1 Minimum Premiums

2.I.2 Minimum Retained Premiums

2.J. Interest on Unpaid Premium and Service Charge for Returned Cheques

2.K. Charges for Changes, Cancellations or Surrenders

2.K.1 Premiums or Refunds for Changes

2.K.2 Other Refunds

2.K.3 Prorating

2.L. Recovery of Unpaid Premiums

2.M. Short Term Premium Surcharge

2.M.1 General

2.M.2 Calculation of Surcharge

2.N. Premium for Vehicles Licensed under Section 9 of the Motor Vehicle Act

2.O. Learner Premium

Amended effective: September 16, 2019

Accepted: \_\_\_\_\_

Order: \_\_\_\_\_

Commission Secretary: \_\_\_\_\_

## 2.F.17 APV 383 Blanket Certificate

### 2.F.17.1 – Calculation of Premium for Blanket Certificates

#### 2.F.17.1.1 Calculation of Premium for TNS Blanket Certificates

This coverage is issued on a TNS blanket certificate (APV383). It may be issued for an annual term only.

In this section:

“**distance driven**” means, with respect to each request for transportation through an online platform, the distance driven in kilometres by a vehicle that is insured under a TNS blanket certificate:

- a) to travel to pick up passengers by or for whom a ride in the vehicle has been requested through the use of the online platform, including, if the request is cancelled, the distance driven until the request to cancel is received; and
- b) to transport the passengers referred to in paragraph (a),

but where more than one request from the same online platform results in passengers from those requests being transported at the same time, the distance driven with respect to all such requests will be determined as if they were a single request starting when the first request is received and ending when the last of such passengers are no longer being transported.

“**zone**” means any one of zone 1, zone 2 and zone 3 as described in Column 1 of Table 1.

The annual premium payable for a TNS blanket certificate is the sum of 12 consecutive monthly payments payable in accordance with the terms of the TNS blanket certificate and calculated as follows for each month using Table 1 below:

- a) allocate the distance driven during the month by all vehicles, for each request for transportation through an online platform, to each zone, as set out in Column 1, based on:
  - i. where the vehicle picked up the passengers; and
  - ii. if a request for transportation was cancelled, where the passengers would have been picked up,

but where more than one request from the same online platform results in passengers from those requests being transported at the same time, the distance driven with respect to all such requests will be allocated to the zone applicable to the first request.

Effective: September 16, 2019

Accepted: \_\_\_\_\_

Order: \_\_\_\_\_

Commission Secretary: \_\_\_\_\_

N

- b) sum the distance driven for each zone for all requests, as allocated in step (a), rounded for each zone to the nearest kilometre and a distance ending in .5 kilometres shall be raised to the next higher kilometre,
- c) apply a blanket certificate discount or blanket certificate surcharge in accordance with sections 2.F.17.2 or 2.F.17.3 of this Basic Insurance Tariff to the Rate/km in each row of Column 2 of Table 1;
- d) multiply the distances driven for each zone determined in step (b) by the corresponding discounted or surcharged Rate/km as determined in step (c);
- e) sum the amounts calculated in accordance with step (d) rounded to the nearest dollar and an amount ending in 50 cents shall be raised to the next higher dollar.

**Table 1 – Rate/km by Zone (in dollars)**

Effective Date	Zone 1	Zone 2	Zone 3
Sept. 16, 2019	0.190625	0.109688	0.087572
Sept. 1, 2020	0.193868	0.111729	0.087807
Sept. 1, 2021	0.197165	0.113809	0.088043
Sept. 1, 2022	0.200519	0.115928	0.088280
Sept. 1, 2023	0.203930	0.118086	0.088518
Sept. 1, 2024	0.207398	0.120284	0.088756
Sept. 1, 2025	0.210926	0.122523	0.088994
Sept. 1, 2026	0.214514	0.124804	0.089234
Sept. 1, 2027	0.218163	0.127127	0.089474
Sept. 1, 2028	0.221874	0.129494	0.089714

Zone 1: Territory D

Zone 2: Territories E, G, H, L and those parts of Territory W within the boundaries of Victoria, Saanich, North and Central Saanich, Esquimalt, Oak Bay and Sidney

Zone 3: Territories F, N, P, R, S, V, X, Y and those parts of Territory W not included in zone 2

For some blanket certificates a portion of the premium may be adjusted in accordance with a Blanket Certificate Premium Adjustment Agreement – see Section 2.F.17.4.

**2.F.17.1.2 – Calculation of Premium for P2P Blanket Certificates**

This coverage is issued on a P2P blanket certificate (APV383). It may be issued for an annual term only.

In this section:

“**days rented**” means the number of days on which a vehicle is rented for all or part of a day, regardless of the number of rental agreements applicable to a given day.

Effective: September 16, 2019

Accepted: \_\_\_\_\_

Order: \_\_\_\_\_

Commission Secretary: \_\_\_\_\_

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