



Canadian Office and Professional Employees Union Local 378  
2nd Floor, 4595 Canada Way, Burnaby, BC V5G 1J9  
TEL 604-299-0378 TOLL FREE IN BC 1-800-665-6838 FAX 604-299-8211 www.cope378.ca

Our File No.: LF/COPE/ORGN/BCUC/ICBC

March 5, 2014

Via Email: [commission.secretary@bcuc.com](mailto:commission.secretary@bcuc.com)

British Columbia Utilities Commission  
6<sup>th</sup> Floor, 900 Howe Street  
Vancouver, BC V6Z 2N3

Attention: Erica Hamilton, Commission Secretary

Dear Mesdames/Sirs:

**Re: An Application by Insurance Corporation of British Columbia for Approval of the Revenue Requirements for Universal Compulsory Automobile Insurance Effective November 1, 2013 and Approval of a New Basic Insurance Capital Management Plan**

These are the submissions of the Canadian Office and Professional Employees' Union, Local 378, in this proceeding.

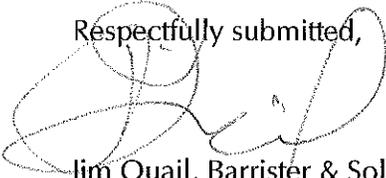
While COPE and its members have a direct interest in a wide range of issues in this matter, because that interest tends to align with that of the Corporation in this proceeding we are content to provide brief comments concerning staffing levels and compensation for the unionized workforce.

We note that the entire cost of compensating our members represents only seven per cent of the Corporation's revenue requirement [T: vol. 6 p 910, lines 17 – 24]. The recent elimination of 274 positions (mostly non-union) flowing from the government's Review yielded a minuscule 0.6 per cent revenue requirement reduction [T: vol. 6 p 910 line 25 – p 911 line 6]. The material cost drivers behind the premium increases sought by ICBC lie elsewhere. The fact that actuarial and capital cost drivers, together with factors like the representation rate, have occupied most of the attention of the parties throughout the proceeding confirms this to be the case.

We agree with the Corporation's comments in Part 3 section E of its Final Submission, entitled "Reductions in Operating Expenses Have Favourable Impact." We wish to emphasize that ICBC's employees have already absorbed severe job cuts, that the terms and conditions of our members' employment are the product of a history of collective bargaining, and that collective bargaining on the employer's side of the table has operated within the aegis of the BC Public Sector Employers' Council [T: vol. 6 p 906 line 4 – p 909 line 11].

We submit that the our members' compensation for the work they do, keeping the Corporation operating and delivering services to the British Columbia public, is appropriate and that they continue to labour under excessive workloads because of staff reductions. (Ms. Prior characterizes this situation somewhat more euphemistically in testimony reproduced at paragraphs 49 through 51 of the Corporation's Final Submission).

Respectfully submitted,



Jim Quail, Barrister & Solicitor  
Legal and Regulatory Director



Leigha Worth  
Barrister & Solicitor

/j:b:usw2009

cc: Parties of record, by email