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File No.: 254656.00118/14797

ICBC 2013 REVENUE REQUIREMENTS EXHIBIT B-7

BY E-MAIL

British Columbia Utilities Commission
6th floor, 900 Howe Street
Vancouver, BC V6Z 2N3

Attention: Erica Hamilton
Commission Secretary

Dear Sirs/Mesdames:

**Re: Insurance Corporation of British Columbia 2013 Revenue Requirements
Application - Comments of Mr. Landale on ICBC's IR Responses**

I am writing in response to Mr. Landale's letter of November 28, 2013, which was addressed to ICBC and me (as ICBC's counsel in this matter).

ICBC appreciates Mr. Landale's willingness to provide specifics regarding his complaints about ICBC's responses to information requests ("IRs"), and appreciates the opportunity to respond to his comments.

As a general comment, ICBC has endeavoured to treat Mr. Landale with respect throughout this process. ICBC regulatory staff have fielded questions informally from Mr. Landale about the Commission's process and other matters, and have endeavoured to assist where possible. ICBC has also conscientiously responded to his information requests as it would the information requests of the Commission. It is evident that Mr. Landale's concerns arise from:

- his disagreement with ICBC's approach to responding to IRs relating to costs that are covered by Optional insurance; and
- ICBC's use of conventions when responding to IRs, with which Mr. Landale may not be familiar.

I will address both points.

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* Fasken Martineau DuMoulin LLP is a limited liability partnership and includes law corporations.

On the first point, while ICBC understands that Mr. Landale wants more information on specific issues related to the Transformation Program, this Application is not the forum for his pursuit of that information. The reasons why this is the case are: (i) the Commission only regulates Basic insurance (and the costs relevant to it), not Optional insurance (and the costs relevant to it); (ii) by virtue of the Government directive of April 19, 2010 with respect to the Transformation Program approved by Order in Council 222/10, April 29, 2010, the development costs of the Transformation Program are being paid for by the Optional insurance business and are not affecting the PY 2013 Basic insurance revenue requirement that is the subject of this Application.

ICBC notes the following comments in the Commission's recent procedural order that have bearing on this point:

The jurisdiction of the Commission with respect to the regulation of ICBC's revenue requirements and rates is restricted by legislation to Basic Insurance. The Commission has no jurisdiction over ICBC's Optional Insurance business.

...

The Commission Panel reminds Interveners that all matters raised must be within the Commission's jurisdiction of Basic Insurance and have rate implications on this Revenue Requirements Proceeding. The Commission Panel also reminds Interveners that the Commission must follow Special Direction IC2 including any Government directives.

ICBC has provided some information on the Transformation Program in responses in an effort to be helpful. For instance, Mr. Landale requested the date the Transformation Program began, but that information is neither here nor there to the determination of PY 2013 rates; knowing the specific day in 2010 when ICBC staff started working on the Program (which Mr. Landale appears to want) certainly isn't material to the outcome of this proceeding. ICBC has thus acted reasonably in treating some of Mr. Landale's IRs as being beyond the scope of this Application.

On the second point, ICBC interprets Mr. Landale's comment about being treated with "Contempt" and desiring a response "To ME" to relate to the fact that ICBC had provided only a brief response to his question(s) and then directed Mr. Landale to a response to an IR asked by another party where the answer to his question is more fully explained. ICBC's approach of referring Mr. Landale to another IR where a similar response is given is a well-established protocol that improves the efficiency of the proceeding by avoiding duplicate answers to similar questions and an unnecessarily large written record. All parties and the Commission benefit from this approach. Mr. Landale

will find that this approach is not unique to his IRs; a similar approach is taken with respect to responses to IRs from all parties. It mirrors what is done in any number of other proceedings involving other regulated entities. ICBC can assure Mr. Landale and the Commission that ICBC respects Mr. Landale and gave all of his questions due consideration.

Thank you for your consideration of these submissions.

Yours truly,

FASKEN MARTINEAU DuMOULIN LLP

[Original signed by]

Matthew Ghikas

MTG/fxm