

18 July 2018

Via Email

Board of Commissioners of Public Utilities
120 Torbay Road
Prince Charles Building, Suite E-210
St. John's, NL, A1A 5B2

Attention: Jacqueline H. Glynn (Legal Counsel)

Re: Application to Question Aviva Canada Inc., as made by the Campaign to Protect Accident Victims

We agree that the Aviva written submission as well as any oral presentation should be subject to questioning from any party to the proceeding, who may wish to question Aviva. Put plainly, the parties should be allowed to elicit a full understanding of Aviva's positions via oral examination, which examination we suspect may in turn produce evidence important for the Board's consideration.

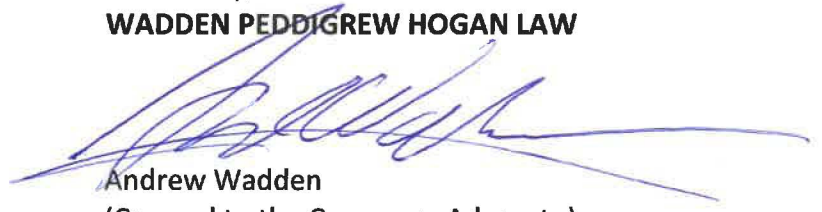
With a view to making such examination efficient, in the first instance it may be beneficial for any party who wishes to question Aviva to submit questions first in writing. A date for written replies could be imposed upon Aviva. While this does not mean oral questions from parties should be dispensed with, it may cause such questioning to be expedited.

Further, s.19 of the *Board of Commissioners of Public Utilities Regulations* under the *Public Utilities Act* allows examination by or on behalf of an applicant, an intervenor, or the board. This in and of itself affords the Campaign and other parties to question Aviva, in our view.

Lastly, the Consumer Advocate is conscious of the time we have allotted in September to presumably complete the Automobile Insurance Review. With that in mind, and realizing that September 6,7, 10-14 will go quickly, questioning of Aviva should have a prescribed timeframe. We submit that any party who wishes to question Aviva should have such questioning limited to 1 hour. Further, no party may surrender their time to another party, should they not elect to avail of the opportunity to question Aviva.

Should the Board or parties wish to convene a meeting to further discuss the Campaign's Application, the Consumer Advocate is certainly available.

Yours truly,
WADDEN PEDDIGREW HOGAN LAW



Andrew Wadden
(Counsel to the Consumer Advocate)

AW/tg

- cc **Campaign to Protect Accident Victims (Colin Feltham)**
Atlantic Provinces Trial Lawyers Association (Ernest Gittens)
Spinal Cord Injury NL (Thomas Fraize Q.C.)
Insurance Bureau of Canada (Kevin Stamp Q.C. & Terry Rowe Q.C.)