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St. John's, NL A1C 5W1

March 26, 2018

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

Attention: Cheryl Blundon, Director of Corporate Services and Board Secretary

Dear Madam:

Re: Concerns with Scheduling for Automobile Insurance Review

We write at this time to express the concern of the Campaign to Protect Accident Victims ("the Campaign") with the apparent timeline being implemented by the Board relative to the Automobile Insurance Review.

At this stage, we are nearing the end of March and still no formal hearing dates have been set by the Board for the review, nor has there been any consultation with stakeholders on the hearing dates or procedural aspects of the review. The latest media release published by the Board on March 21, 2018 confirms the availability of the first two reports in the review process. Both reports relate to the taxi industry. That media release requests written comments from interested parties be provided to the Board by April 4, 2018, just eight business days after the release of the report (considering the Good Friday and Easter Monday holidays).

There remains, according to the Board's work plan, at least four more reports to come from the Board relating to the review process before public hearings are to take place. The latest media release indicates that the insurance company profitability study should be released at the end of March and the closed claim study report released mid-April. The release also indicates that it is the Board's intention to proceed with mid-May hearing dates.

In our view, such a schedule does not allow sufficient time for stakeholders, such as the Campaign, to be able to prepare in a reasonable way to provide meaningful input to the Board by mid-May. The consultants retained by the Board to prepare the various reports commissioned by the Board have had several months to review source data, conduct

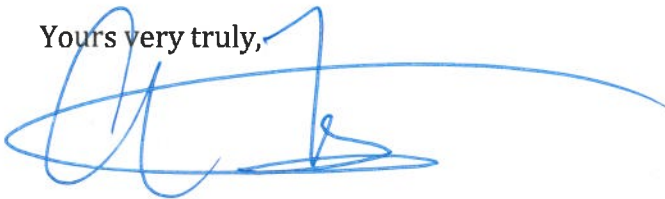
research and to prepare written reports. Even if the last report is issued from the Board by mid-April, that will leave just 30 days for stakeholders to review those reports, retain and instruct consultants of their own, for those consultants to carry out the required research and other work, as well as to retain/instruct counsel. Additionally, stakeholders may wish to have consultants attend at the Board public sessions. Sufficient lead time is needed to allow for those consultants to plan to travel and attend those sessions, generally from out-of-province or even out-of-country.

Further, it appears that the manner of setting dates for the review and the required procedural steps is not being undertaken in the fashion that has been fair and customary by the Board in dealing with normal regulatory process, where there has been consultation with the parties and intervenors relative to appropriate timelines and party and counsel availability.

Our concern is that the apparent response times and hearing dates being implemented by the Board make it impossible for stakeholders to be able to provide meaningful input into the issues under review. These issues are complex and wide in scope, are technical in many cases, and require the assistance of consulting expertise to be able to meaningfully respond to same. If these timelines are maintained, it is our view that the process will be rendered unfair to stakeholders, particularly those from outside the insurance industry.

We respectfully request that the Board revisit the process it has undertaken with respect to establishing timelines for this review and begin a consultative process with stakeholders to establish fair and appropriate submission and hearing timelines.

Yours very truly,

A handwritten signature in blue ink, appearing to read 'Colin D. Feltham', with a long horizontal flourish extending to the right.

COLIN D. FELTHAM