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December 22, 2015

British Columbia Utilities Commission
Sixth Floor
900 Howe Street
Vancouver, BC V6Z 2N3

Attention: Ms. Erica Hamilton, Commission Secretary and Director

Re: 2015 Revenue Requirements Application – Round 1 Information Requests

Dear Ms. Hamilton:

In accordance with the Commission's December 14, 2015 Decision, Order G-201-15, attached are ICBC's responses to the following Information Requests from MoveUP (formerly known as the Canadian Office and Professional Employees Union, Local 378, or COPE) on ICBC's 2015 Revenue Requirements Application:

- 2015.1 RR COPE.19.2.
- 2015.1 RR COPE.19.3.
- 2015.1 RR COPE.19.4.
- 2015.1 RR COPE.19.6.a-f.
- 2014.1 RR COPE.19.7.
- 2014.1 RR COPE.19.8-10.

Yours truly,

A handwritten signature in blue ink that reads "June Elder". The signature is written in a cursive, flowing style.

June Elder
Manager, Regulatory Affairs

Cc: Registered Interveners
Steve Yendall, Vice President, Insurance and Driver Licensing, ICBC

Attachment

COPE, Local 378 Information Request No. 2015.1 RR COPE.19.2 Dated 20 November 2015 Insurance Corporation of British Columbia Response Issued 22 December 2015	Page 1 of 5
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2015.1 RR COPE.19.2 Reference: VERIFICATION OF PROPERTY DAMAGE ESTIMATES AND BILLINGS BY VALET SHOPS

ICBC Website

<http://www.icbc.com/claims/repair-replace/repair-your-vehicle/Pages/default.aspx>

Repairing your vehicle

ICBC c.a.r. shop VALET facilities guarantee their repairs. They're also certified to do on-site damage estimates and can help you with transportation while your car's being fixed.

Exhibit B-1 2014 Customer And Injury Services Operations Detailed Work Effort Study, Appendix B – Past and New Claims Job Hierarchy Descriptions, page 2, Estimating: Estimator: “Also performs rotational mobile services to support and audit vendors.”

Please confirm that:

- a) There was a previous practice of ICBC estimators performing random drop-in visits to VALET shops to inspect the work in progress on insured repairs.**
- b) Please provide a table showing the total number of Material Damages Claims and the number of random drop-in visits performed by ICBC estimators for 2010 onwards including a 2015 YTD figure.**
- c) There was a previous practice of ICBC estimators contacting policyholders after repairs were completed seeking to inspect the completed work in order to confirm that the invoiced work was completed and was completed properly.**
- d) Please provide a table showing the total number of MD claims and the number of times in each year ICBC estimators inspected the completed work in order to confirm that the invoiced work was completed and completed properly for 2010 onwards including a 2015 YTD.**
- e) When VALET shops have completed the estimation of repair jobs for policyholders they submit their estimate forms and photographs electronically to ICBC for approval.**
- f) If ICBC fails to provide approval within two hours of submission of the estimate it is deemed to be approved.**
- g) ICBC estimators receiving the electronic estimate documents have three potential dispositions for the approval of the estimates, namely:
 - i. Quick Approve**
 - ii. Approve**
 - iii. Site Visit****

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h) Selecting “Quick Approve” results in the estimate being approved without the file being opened and inspected.

i) Selecting “Approve” results in the estimate being approved after opening and inspecting the file.

j) Selecting “Site visit” results in approval of the estimate being withheld pending an on-site inspection of the vehicle and proposed repairs by an ICBC estimator.

k) Labour is charged to ICBC by the body shops on an hourly basis, billed at rates set according to the category of the shop (i.e., VALET or base rate).

l) ICBC’s computer system automatically assigns a set number of hours to some procedures, including “Remove and Install” (removing and replacing a particular part) and painting.

m) For other repair procedures (including straightening dented fenders, etc.) the amount of approved labour time is set as a matter of the estimator’s judgment and is referred to as “Judgment Time.”

n) VALET shops determine the judgment time for the repairs that they perform on policyholders’ vehicles, subject to the approval procedures described above.

and in all of these instances if a statement is not confirmed, please explain in detail why.

Response:

Several of the following responses to information requests refer to topics in the Express Repair Program Guide, which is publicly available from the business partners section of icbc.com at http://partners.icbc.com/material-damage/docs/express_repair_program_guide.pdf.

19.2.a

There was, and still is, a practice of using drop-in visits (DIVs) to inspect work in progress at a repair shop, including c.a.r. shop VALET facilities.

19.2.b

The following table shows the total number of material damage claims and the number of DIVs for the years requested. While a DIV is recorded, there is no tracking done to determine if the visit was on a random basis versus other criteria that necessitated the need for a DIV.

	Material Damage Claims*	Drop-In Visits
Oct YTD 2015	460,024	3,104
2014	478,481	6,610
2013	469,902	11,316
2012	472,168	13,711
2011	470,454	15,350
2010	485,054	13,426

*Excludes Glass claims.

Please also see the response to information request 2015.1 RR COPE.19.7 for a further explanation of the numbers of DIVs.

19.2.c

There was, and still is, a practice of ICBC estimators contacting policyholders to inspect completed work to ensure proper invoicing and that the repair work was completed properly.

19.2.d

This data is not available as ICBC does not currently track the number of times estimators inspected completed work.

19.2.e

ICBC confirms that when c.a.r. shop VALET facilities complete their estimate, appropriate documentation is submitted electronically to ICBC.

19.2.f

As noted above, the current Express Repair Program Guide is available from the business partners section of icbc.com; page 34 states that:

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If more than two (2) Provincial Centralized Express (hours listed on Express Repair home page) business hours have elapsed from the time the estimate or supplement request is successfully submitted to ICBC for approval, and the status of the estimate has not changed from New, the estimate or supplement will be considered to be accepted. This means the Express Repair participant is authorized to proceed with the vehicle repairs.

“Accepted” means the c.a.r. shop VALET facility can proceed with repairs, but until “Approved”, ICBC retains the right to modify the estimate. This allows the repair shop to efficiently manage repairs.

19.2.g

There are a total of four options available for selection by the reviewer. In addition to “Quick Approve”, “Approve”, and “Site Visit”, a selection titled “Review” is available. As noted above, the current Express Repair Program Guide is available from the business partners section of icbc.com; page 34 states that:

If the Estimator II changes the status of the estimate or supplement from New to Review, the Estimator II must contact the Express Repair participant within two (2) Provincial Centralized Express business hours of making the change.

The “Review” option allows the estimator to place an additional two hour hold on acceptance of the estimate in order to allow further time for review.

19.2.h

“Quick Approve” could result in the estimate being viewed and inspected as a PDF document outside of the estimating program. If nothing needs to change after viewing the PDF, the estimate can be quick-approved. However, changes can only be made by opening the actual estimate within the estimating application. Once the estimate has been opened in the estimating application, “Quick Approve” is no longer an option for selection.

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19.2.i

When the estimate is opened in the estimating application, there is no longer a “Quick Approve” option available. The estimator can open the estimate in the estimating application, make revisions, and then approve.

19.2.j

Selection of the “Site Visit” option could result in a physical inspection of the estimate at the c.a.r. shop VALET facility, or an in-depth virtual review of the estimate.

19.2.k

Labour is billed to ICBC on the basis of hourly billing rates established by ICBC. The rate schedules are publicly available at <http://partners.icbc.com/material-damage/rate-schedule.asp>.

19.2.l

ICBC estimates for c.a.r. shop VALET facilities are completed in an industry-accepted software application known as ADXE. This software does contain a database of industry-accepted labour times for many common procedures.

19.2.m

For some repair procedures, judgment is used to estimate necessary labour times. Judgment time is used when there is no systematically generated time for the particular repair procedure. Judgment time can be a component of any step of the repair process such as body work, mechanical, electrical, or frame repairs, and varies depending on the extent of damage.

19.2.n

ICBC c.a.r. shop VALET facilities write estimates that include judgment time. All these estimates are subject to the oversight procedures contained in the Express Repair Program Guide which, as noted above, is publicly available on icbc.com.

2015.1 RR COPE.19.3 Reference: VERIFICATION OF PROPERTY DAMAGE ESTIMATES AND BILLINGS BY VALET SHOPS

ICBC Website

<http://www.icbc.com/claims/repair-replace/repair-your-vehicle/Pages/default.aspx>

Repairing your vehicle

ICBC c.a.r. shop VALET facilities guarantee their repairs. They're also certified to do on-site damage estimates and can help you with transportation while your car's being fixed.

Exhibit B-1 2014 Customer And Injury Services Operations Detailed Work Effort Study, Appendix B – Past and New Claims Job Hierarchy Descriptions, page 2, Estimating: Estimator: “Also performs rotational mobile services to support and audit vendors.”

Please prepare a table showing the total number and percentage of VALET repair claims that were approved by way of Quick Approve, Approve and Site Visit, respectively, each year from 2010 onwards including a 2015 YTD figure.

Response:

The following table outlines the number of estimates written by c.a.r. shop VALET facilities and the percentages that fall into the three noted categories.

	Estimate Sheet Count	Quick Approve		Approve		Site Visit	
Year	Total	Count	Percent*	Count	Percent*	Count	Percent*
Oct YTD 2015	286,490	85,542	30%	196,459	69%	4,489	2%
2014	298,015	72,709	24%	219,341	74%	5,965	2%
2013	248,730	75,779	30%	168,027	68%	4,924	2%
2012	228,224	73,740	32%	149,933	66%	4,551	2%
2011	221,985	60,227	27%	157,128	70%	4,630	2%
2010	207,829	58,249	28%	146,143	70%	3,437	2%

*Percentages may not add due to rounding.

2015.1 RR COPE.19.4 Reference: VERIFICATION OF PROPERTY DAMAGE ESTIMATES AND BILLINGS BY VALET SHOPS

ICBC Website
<http://www.icbc.com/claims/repair-replace/repair-your-vehicle/Pages/default.aspx>

Repairing your vehicle

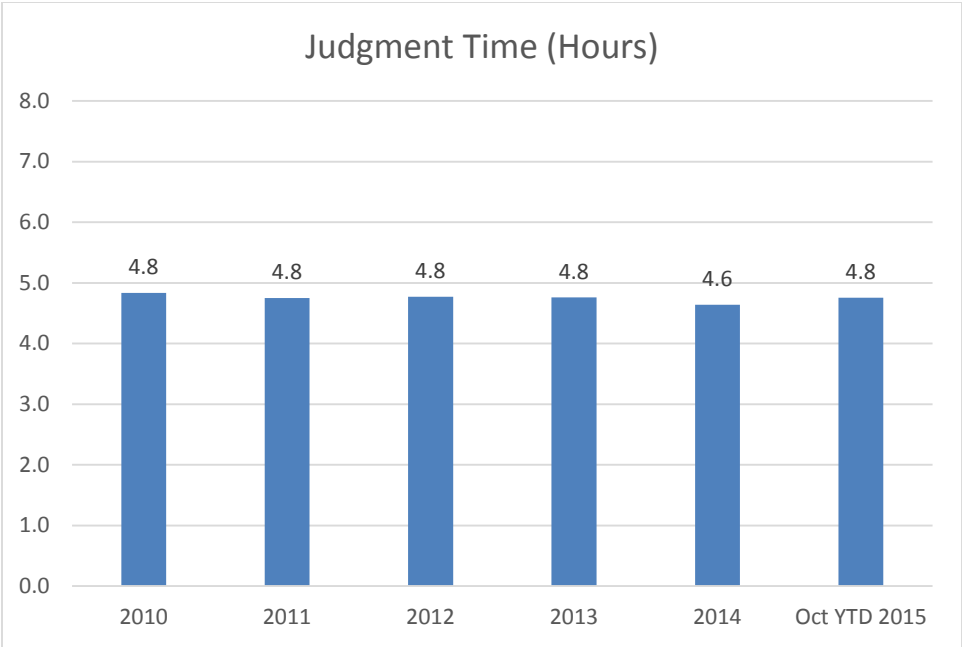
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Exhibit B-1 2014 Customer And Injury Services Operations Detailed Work Effort Study, Appendix B – Past and New Claims Job Hierarchy Descriptions, page 2, Estimating: Estimator: “Also performs rotational mobile services to support and audit vendors.”

Please prepare a graph showing the average judgment time per claim for repairs performed by VALET shops each year from 2010 onwards including a 2015 YTD figure.

Response:

Since some claims will not have an estimate (e.g., when there is no damage to a vehicle or when damage to an insured vehicle occurred out of province), and others can have multiple estimates, ICBC tracks judgment time on a per estimate basis, not on a per claim basis. The following graph shows the average judgment time per estimate. As shown in the graph below, judgment time per estimate has been stable for a number of years.



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2015.1 RR COPE.19.6.a-f Reference: VERIFICATION OF PROPERTY DAMAGE ESTIMATES AND BILLINGS BY VALET SHOPS

ICBC Website

<http://www.icbc.com/claims/repair-replace/repair-your-vehicle/Pages/default.aspx>

Repairing your vehicle

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Exhibit B-1 2014 Customer And Injury Services Operations Detailed Work Effort Study, Appendix B – Past and New Claims Job Hierarchy Descriptions, page 2, Estimating: Estimator: “Also performs rotational mobile services to support and audit vendors.”

Please confirm that:

a) ICBC’s computer system for estimators includes a component to require and track “Drop-In Visit” (DIV) procedures in relation to repair shops.

b) The system logs four different categories of reasons to require a DIV with respect to a repair, namely Recognition, Administrative Guidelines, Category A and Category B.

c) The “Recognition” category consists of the following items of concern about an estimate or invoice submitted by a repair shop:

- Estimate Quality**
- Cost Savings/ Cycle Time Efficiency**
- Customer Service**
- Photos**
- Repair Quality**
- Other**

d) The “Administrative Guidelines” category consists of the following items of concern:

- Exceeded Earned Authority/Two-Hour Rule**
- Confirm Kind of Loss**
- Estimate/Supplement Quality**
- Estimate Remarks**
- Total Loss Indicator**
- Photos**
- Depreciation**
- Other**

e) The “Category A” category consists of the following items of concern:

- Judgment Time**
- Repair vs. Replace**
- Recycled/Aftermarket Parts Usage**
- Pull & Align Unibody Not Warranted**
- Pull & Align Unibody vs. Sheet Metal**

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- **R&I of Parts to Assist Paint**
- **Paint Compliance**
- **Justified and Documented Customer Complaints**

f) The “Category B” category consists of the following items of concern:

- **Submitting and Estimate That includes Non-Existent Damage**
- **Submitting and Estimate/Supplement That Includes Unrelated Damage**
- **Billing for Labour Operation Not Performed or a Part Not Supplied**
- **Commencing Repairs Prior to Submitting an Estimate or Supplement**
- **Inflated/Exaggerated Estimates Resulting in Total Loss**
- **Repair Quality (attache completed c.a.r. shop quality inspection report)**
- **Billing for Pull & Align Unibody Repairs**
- **Changing Labour Codes in ADXE**

and in all of these instances please explain in detail why any of these statements is not confirmed.

Response:

As discussed in responses to other information requests, the Drop-in Visit (DIV) processes are explained in the Express Repair Program Guide, which is publicly available on icbc.com.

19.6.a

ICBC systems track all DIVs; however, there is no component of the Express Repair program that “requires” a DIV. DIVs are dependent on an estimator assessing the risk associated with a particular estimate or shop, and completing a DIV if appropriate for that estimate. DIVs represent compliance issues, which can be positive or negative. A site visit does not require a DIV. A DIV is completed if compliance issues are encountered.

19.6.b

Each DIV that is completed falls into one of the four noted categories: Recognition; Administrative Guidelines; Category A; and Category B, which is logged by ICBC systems.

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19.6.c

The Recognition category is meant to recognize good performance, not concerns. Compliance issues would be captured in the other three categories used in documenting DIVs.

19.6.d

Correct, although a more complete description can be found in the current Express Repair Program Guide, available from the business partners section of icbc.com, pages 31 to 42.

19.6.e

Correct, although a more complete description can be found in the current Express Repair Program Guide, available from the business partners section of icbc.com, pages 27 to 28.

19.6.f

Correct, although a more complete description can be found in the current Express Repair Program Guide, available from the business partners section of icbc.com, pages 29 to 30.

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2015.1 RR COPE.19.7 Reference: VERIFICATION OF PROPERTY DAMAGE ESTIMATES AND BILLINGS BY VALET SHOPS

ICBC Website

<http://www.icbc.com/claims/repair-replace/repair-your-vehicle/Pages/default.aspx>

Repairing your vehicle

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Exhibit B-1 2014 Customer And Injury Services Operations Detailed Work Effort Study, Appendix B – Past and New Claims Job Hierarchy Descriptions, page 2, Estimating: Estimator: “Also performs rotational mobile services to support and audit vendors.”

Please prepare a table showing the total number of DIV reports generated each year from 2010 through 2014 and the total number of DIV reports broken down into the four categories indicated above.

Response:

As discussed in the response to information request 2015.1 RR COPE.19.1, ICBC's Express Repair program is similar to many other Direct Repair processes used by insurers in North America. Customer service is improved by better accessibility to repairs through the Express Repair program, and results from recent customer research indicate that rather than first going to a claim centre, customers prefer going directly to c.a.r shop VALET facilities.

ICBC's Express Repair program is managed using a robust review framework, which includes monitoring estimates performed by ICBC c.a.r. shop VALET facilities for quality and compliance with established program standards. As outlined on pages 14 to 26 of the Express Repair Program Guide, ICBC monitors against Key Performance Indicators and uses a performance management process that is designed with the following objectives:

- Help identify potential opportunities to improve both the administrative and technical aspects of the collision repair process for the benefit of customers, ICBC, and Industry.
- Monitor and promote shop performance.
- Monitor and promote shop compliance with ICBC policies and standards.
- Minimize potential financial risks to ICBC through the use of appropriate auditing controls.

A Drop-In Visit (DIV) is one tool used in the overall management of the Express Repair program. The table below outlines a summary of DIVs from 2010 to 2015.

Drop-In Visit Summary 2010 - YTD 2015					
	Category A	Category B	Administrative Guidelines	Recognition	Total
2010	1,550	327	3,871	7,678	13,426
2011	1,296	304	3,730	10,020	15,350
2012	970	264	2,897	9,580	13,711
2013	1,152	241	3,655	6,268	11,316
2014	1,181	317	3,096	2,016	6,610
Oct YTD 2015	642	164	1,644	654	3,104
Totals	6,791	1,617	18,893	36,216	63,517

Please see the response to information request 2015.1 RR COPE.19.6.a-f for more detail on the four described categories.

As explained in the response to information request 2015.1 RR COPE.19.6.c, filed in the response to information request 2015.1 RR COPE.19.6.a-f, the Recognition category is meant to recognize good performance by a c.a.r. shop VALET facility, not concerns.

In 2014, with the implementation of the new claims management system, there was a conscious focus on reducing the number of DIVs to allow the estimating staff to concentrate on learning and becoming more productive in using the new system. Also in 2014, ICBC removed individual estimator targets for completed DIVs and placed a greater emphasis on Category A, Category B, and Administrative Guidelines DIVs. This has resulted in fewer overall DIVs, but with a focus on the DIV categories that have greater risk associated with them.

ICBC continually strives to improve its risk assessment criteria by making refinements to how repair shops are identified for increased monitoring using the principals of the performance management process.

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In 2015, refinements were made to how a repair shop was identified for increased monitoring. While this resulted in fewer c.a.r. shop VALET facilities being placed under increased monitoring, the overall management of the program's risk was not reduced. Estimating staff continued to focus their efforts based on identified risk.

Also in 2015, the Category B DIVs were refined based on industry feedback resulting in revisions to the Express Repair program. Those changes have been communicated to both industry and staff, but an updated Express Repair Program Guide has not yet been published. These changes have resulted in a more accurate assessment of risk based on completed DIVs.

The communication to the c.a.r. shop VALET facilities can be found in the "What's new" section of the Material damage services web page in the business partners section of icbc.com at <http://partners.icbc.com/material-damage/docs/Follow-up-ICBC-industry-info-sessions.pdf>.

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2015.1 RR COPE.19.8-10 Reference: VERIFICATION OF PROPERTY DAMAGE ESTIMATES AND BILLINGS BY VALET SHOPS

ICBC Website

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Repairing your vehicle

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Exhibit B-1 2014 Customer And Injury Services Operations Detailed Work Effort Study, Appendix B – Past and New Claims Job Hierarchy Descriptions, page 2, Estimating: Estimator: “Also performs rotational mobile services to support and audit vendors.”

19.8 Please describe in detail all of the procedures followed by ICBC to verify that estimates prepared by VALET shops are appropriate and that the work performed by these shops is properly performed.

19.9 Please prepare a table showing the percentage of claims that were subjected to the procedures listed in response to question 8 each year from 2010 onwards including a 2015 YTD figure.

19.10 Please confirm that the verification procedures listed in question 8 are the same as those used in 2010. If not, please provide every iteration of the verification procedures used by ICBC during that time period.

Response:

19.8

Estimating procedures are not specific to c.a.r. shop VALET facilities, but rather, apply to estimating at any type of repair shop; therefore, the answer to this question is the detail contained in the Material Damage Procedures Manual. There are two versions of the Material Damage Procedures Manual, one for estimates initiated in the old (legacy) claims system, and the other for estimates initiated in the new claims management system. The primary difference between the two would be system-specific, but the intent of the procedure would remain the same in either version of these manuals.

Both manuals can be accessed from the Material damage services section of the business partners page on icbc.com, under the “Most popular” section at <http://partners.icbc.com/material-damage/default.asp>.

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19.9

ICBC does not track the data requested. There is no systematic logging possible to show that an estimator applied specific sections of the Material Damage Procedures Manual when reviewing an estimate. ICBC estimating staff are expected to follow all estimating procedures as well as ICBC's Code of Ethics on every estimate written or reviewed. This is the basic function of an estimator's job, whether the estimator is writing an original estimate or reviewing an estimate created by a c.a.r. shop VALET facility.

Express Repair shops (also known as c.a.r. shop VALET facilities) are expected to follow all policy and procedures noted in the Express Repair Program Guide, as well as the Material Damage Procedures Manual.

As discussed in the response to 2015.1 RR COPE.19.1, the Express Repair Program Guide is publicly available from the Material damage services section of the business partners page of icbc.com; as discussed in the response to 2015.1 RR COPE.19.8 above, the Material Damage Procedures Manual can be accessed from the "Most popular" section of the Material damage services section of the business partners page of icbc.com.

19.10

As noted in the response to 2015.1 RR COPE.19.8 above, the verification procedures are contained in the two versions of the Material Damage Procedures Manual. These are the procedural guides for the estimating job. These procedures would not be the same today as they were in 2010.

The Material Damage Procedures Manual is updated on an ongoing basis for a variety of reasons. Updates are not limited to changes to estimating procedures and can include updates for such topics as parts price list changes, changes to other material damage vendors such as tow companies, changes in the layout of the manual, etc.

The last update to the Material Damage Procedures Manual for the old (legacy) claims system was in September 2013. Changes since that time have only been to the new version that is

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applicable to the new claims management system. In accordance with the Commission's Decision on disputed first round information requests, Order G-201-15, ICBC is not providing "every iteration of the verification procedures used by ICBC" since 2010.