

TO: Jake Garn, Utah Chief Financial Examiner, Chair of the Blanks (E) Working Group

FROM: Judy Weaver, Chair of the Financial Analysis (E) Working Group

DATE: November 12, 2021

RE: 2021-11BWG – New Supplement to Detail Direct Exposures Written and Earned

The Financial Analysis (E) Working Group (FAWG) would like to thank you for the opportunity to comment on proposal 2021-11BWG. It is FAWG's understanding that the proposed annual supplements to the property and casualty statement would capture direct exposure by state and territory for the home and private passenger lines of business and would add a new column for direct earned and written exposure for all lines of business within Parts 1 (Loss Experience) and 2 (Direct Premiums Written) of the quarterly statement.

During a November 3, 2021 FAWG meeting, the members of the Working Group discussed the proposal with the understanding that the intention would be to provide a means for the calculation of average written premium and average earned premium. The FAWG does not believe that the addition of this data would provide measurable benefit in its review of insurers or that of financial regulators in general (i.e. state analysts).

Again, thank you for the opportunity to comment, feel free to contact me regarding any questions.

cc: Andy Daleo, Senior P/C Analysis Manager – NAIC Financial Regulatory Services