



Date: 5/26/22

Virtual Meeting

PROPERTY AND CASUALTY RISK-BASED CAPITAL (E) WORKING GROUP

Tuesday, June 7, 2022

2:00 – 3:00 p.m. ET / 1:00 – 2:00 p.m. CT / 12:00 – 1:00 p.m. MT / 11:00 a.m. – 12:00 p.m. PT

ROLL CALL

Tom Botsko, Chair	Ohio	Anna Krylova	New Mexico
Wanchin Chou, Vice Chair	Connecticut	Halina Smosna	New York
Charles Hale	Alabama	Will Davis	South Carolina
Robert Ridenour	Florida	Miriam Fisk	Texas
Judy Mottar	Illinois	Adrian Jaramillo	Wisconsin

NAIC Support Staff: Eva Yeung

AGENDA

1. Discuss Comments Regarding Proposal 2022-02-P (Underwriting Risk Line 1 Factors)
—*Tom Botsko (OH)* Attachment A
2. Discuss Any Other Matters Brought Before the Working Group—*Tom Botsko (OH)*
3. Adjournment

Capital Adequacy (E) Task Force

RBC Proposal Form

- | | | |
|---|---|--|
| <input type="checkbox"/> Capital Adequacy (E) Task Force | <input type="checkbox"/> Health RBC (E) Working Group | <input type="checkbox"/> Life RBC (E) Working Group |
| <input type="checkbox"/> Catastrophe Risk (E) Subgroup | <input type="checkbox"/> Investment RBC (E) Working Group | <input type="checkbox"/> Operational Risk (E) Subgroup |
| <input type="checkbox"/> C3 Phase II/ AG43 (E/A) Subgroup | <input checked="" type="checkbox"/> P/C RBC (E) Working Group | <input type="checkbox"/> Longevity Risk (A/E) Subgroup |

DATE: <u>4/26/22</u>	<u>FOR NAIC USE ONLY</u>
CONTACT PERSON: <u>Eva Yeung</u>	Agenda Item # <u>2022-02-P</u>
TELEPHONE: <u>816-783-8407</u>	Year <u>2022</u>
EMAIL ADDRESS: <u>eyeung@naic.org</u>	<u>DISPOSITION</u>
ON BEHALF OF: <u>P/C RBC (E) Working Group</u>	<input type="checkbox"/> ADOPTED _____
NAME: <u>Tom Botsko</u>	<input type="checkbox"/> REJECTED _____
TITLE: <u>Chair</u>	<input type="checkbox"/> DEFERRED TO _____
AFFILIATION: <u>Ohio Department of Insurance</u>	<input type="checkbox"/> REFERRED TO OTHER NAIC GROUP
ADDRESS: <u>50 West Town Street, Suite 300</u>	<input type="checkbox"/> EXPOSED _____
<u>Columbus, OH 43215</u>	<input type="checkbox"/> OTHER (SPECIFY) _____

IDENTIFICATION OF SOURCE AND FORM(S)/INSTRUCTIONS TO BE CHANGED

- | | | |
|--|--|--|
| <input type="checkbox"/> Health RBC Blanks | <input checked="" type="checkbox"/> Property/Casualty RBC Blanks | <input type="checkbox"/> Life and Fraternal RBC Instructions |
| <input type="checkbox"/> Health RBC Instructions | <input type="checkbox"/> Property/Casualty RBC Instructions | <input type="checkbox"/> Life and Fraternal RBC Blanks |
| <input type="checkbox"/> OTHER _____ | | |

DESCRIPTION OF CHANGE(S)

The proposed change would update the Line 1 Factors for PR017 and PR018.

REASON OR JUSTIFICATION FOR CHANGE **

The proposed change would provide routine annual update of the industry underwriting factors (premium and reserve) in the PCRBC formula.

Additional Staff Comments:

** This section must be completed on all forms.

Revised 2-2019

PR017 Line 1 Reserves

Schedule P Line of Business	LOB	Proposed for adoption - 2022 Industry Average Development Ratio	2021 Industry Average Development	2020 Industry Average Development	2019 Industry Average Development	2018 Industry Average Development	2017 Industry Average Development	2016 Industry Average Development	2015 Industry Average Development	2014 Industry Average Development	2013 Industry Average Development	2012 Industry Average Development	2011 Industry Average Development	2010 Industry Average Development	2009 Industry Average Development	2008 Industry Average Development	2007 Industry Average Development
H/F	A	1.001	0.998	0.993	0.989	0.989	0.984	0.972	0.962	0.967	0.960	0.949	0.962	0.984	0.983	0.983	0.995
PPA	B	1.022	1.025	1.035	1.026	1.022	1.012	1.002	1.002	0.994	0.986	0.991	0.989	0.992	0.998	1.003	1.007
CA	C	1.082	1.083	1.078	1.087	1.060	1.034	1.015	0.987	0.979	0.986	0.998	0.992	1.015	1.031	1.045	1.062
WC	D	0.906	0.912	0.916	0.955	0.952	0.971	0.971	0.961	0.986	0.980	0.990	0.999	1.005	1.016	1.033	1.051
CMP	E	1.037	0.999	1.016	0.992	0.967	0.956	0.942	0.938	0.941	0.927	0.932	0.952	0.962	0.993	1.034	1.037
MM Occurrence	F1	0.887	0.874	0.861	0.864	0.871	0.868	0.841	0.966	0.966	0.991	1.072	1.048	1.213	1.251	1.343	1.333
MM Clms Made	F2	0.983	0.973	0.940	0.907	0.886	0.854	0.822	0.839	0.808	0.824	0.887	0.925	0.981	1.033	1.083	1.140
SL	G	0.990	0.976	0.963	0.938	0.933	0.926	0.919	0.975	0.990	0.954	0.942	0.931	0.998	1.043	1.060	1.108
OL	H	0.995	0.964	0.968	0.971	0.966	0.952	0.929	0.923	0.916	0.919	0.914	0.954	0.959	0.963	1.006	1.015
Fidelity / Surety	K	0.842	0.915	0.907	0.995	0.996	1.016	1.035	1.016	1.050	1.126	1.194	1.191	1.253	1.247	1.290	1.274
Special Property	I	0.993	0.978	0.977	0.972	0.971	0.982	0.973	0.991	0.992	1.035	1.113	1.097	1.144	1.097	1.102	1.102
Auto Physical Damage	J	1.011	0.989	0.993	0.996	1.000	1.001	0.995	0.995	1.005	1.054	1.105	1.105	1.155	1.107	1.110	1.106
Other (Credut, A&H)	L	0.955	0.965	0.971	0.973	0.976	0.981	0.986	1.041	1.061	1.113	1.138	1.177	1.277	1.262	1.325	1.282
Financial / Mortgage Guaranty	S	0.694	0.723	0.682	0.788	0.870	0.820	0.853	1.185	1.444	1.256	1.087	1.276	0.841	0.893	1.483	1.495
Intl	M	3.041	1.104	1.162	1.037	0.851	0.855	0.897	1.350	0.742	0.813	0.869	1.015	1.102	1.181	1.175	1.291
Rein. Property & Financial Lines	NP	0.917	0.893	0.886	0.872	0.834	0.814	0.814	1.002	0.976	0.934	0.921	0.937	0.965	0.969	1.025	1.048
Rein. Liability	O	1.008	0.989	0.985	0.955	0.945	0.914	0.896	0.938	0.905	1.009	1.089	1.169	1.304	1.259	1.314	1.296
PL	R	0.867	0.879	0.900	0.913	0.921	0.935	0.937	1.072	1.018	0.981	0.978	1.009	1.063	1.073	1.109	1.112
Warranty	T	0.998	1.007	1.013	1.017	1.015	0.989	0.977	0.994	1.040	1.082	1.197	1.268	1.717	1.634	n/a	n/a

Intl 1.212 Weighted average with 3 largest removed 3 largest have 85% of ultimate and 63% of data
 Intl 1.137 Average of capped ratios

PR018 Line 1 Premiums

Schedule P Line of Business	LOB	Proposed 2022 Industry Average Loss & Expense Ratio	2021 Industry Average Loss & Expense Ratio	2020 Industry Average Loss & Expense Ratio	2019 Industry Average Loss & Expense Ratio	2018 Industry Average Loss & Expense Ratio	2017 Industry Average Loss & Expense Ratio	2016 Industry Average Loss & Expense Ratio	2015 Industry Average Loss & Expense Ratio	2014 Industry Average Loss & Expense Ratio	2013 Industry Average Loss & Expense Ratio	2012 Industry Average Loss & Expense Ratio	2011 Industry Average Loss & Expense Ratio	2010 Industry Average Loss & Expense Ratio	2009 Industry Average Loss & Expense Ratio	2008 Industry Average Loss & Expense Ratio	2007 Industry Average Loss & Expense Ratio
H/F	A	0.665	0.681	0.678	0.681	0.687	0.688	0.701	0.701	0.713	0.725	0.728	0.726	0.736	0.737	0.742	0.750
PPA	B	0.793	0.795	0.810	0.810	0.806	0.800	0.792	0.786	0.780	0.784	0.792	0.804	0.815	0.821	0.831	0.836
CA	C	0.761	0.761	0.759	0.737	0.724	0.706	0.689	0.684	0.676	0.668	0.669	0.679	0.705	0.737	0.763	0.784
WC	D	0.664	0.682	0.705	0.726	0.744	0.751	0.752	0.751	0.749	0.750	0.755	0.766	0.78	0.805	0.83	0.847
CMP	E	0.661	0.673	0.672	0.666	0.664	0.647	0.648	0.655	0.652	0.653	0.644	0.654	0.674	0.695	0.710	0.727
MM Occurrence	F1	0.750	0.731	0.726	0.730	0.780	0.777	0.767	0.880	0.883	0.874	0.916	0.952	1.031	1.104	1.195	1.231
MM Clms Made	F2	0.829	0.821	0.797	0.768	0.747	0.722	0.691	0.697	0.680	0.695	0.718	0.771	0.860	0.928	1.003	1.091
SL	G	0.585	0.593	0.603	0.593	0.569	0.567	0.572	0.630	0.645	0.649	0.597	0.599	0.582	0.673	0.709	0.732
OL	H	0.637	0.635	0.639	0.638	0.633	0.629	0.618	0.616	0.617	0.620	0.637	0.662	0.687	0.714	0.738	0.758
Fidelity / Surety	K	0.366	0.394	0.384	0.399	0.417	0.430	0.464	0.462	0.473	0.496	0.528	0.555	0.584	0.586	0.583	0.582
Special Property	I	0.547	0.559	0.553	0.554	0.563	0.555	0.559	0.571	0.572	0.574	0.562	0.559	0.565	0.575	0.590	0.568
Auto Physical Damage	J	0.718	0.726	0.732	0.730	0.732	0.727	0.711	0.703	0.686	0.681	0.683	0.681	0.692	0.697	0.705	0.716
Other (Credit, A&H)	L	0.698	0.693	0.684	0.682	0.709	0.712	0.699	0.706	0.754	0.778	0.794	0.786	0.691	0.697	0.737	0.789
Financial / Mortgage Guaranty	S	0.203	0.252	0.513	0.811	1.099	1.175	1.293	1.096	1.242	1.271	1.206	1.142	0.738	0.605	0.805	0.827
Intl	M	1.166	0.769	0.758	0.795	0.584	0.565	0.607	1.150	1.131	1.093	0.931	0.937	0.954	0.956	0.930	0.874
Rein. Property & Financial Lines	NP	0.566	0.558	0.534	0.522	0.486	0.459	0.512	0.723	0.764	0.766	0.757	0.805	0.828	0.924	0.977	0.994
Rein. Liability	O	0.725	0.713	0.708	0.679	0.666	0.609	0.600	0.749	0.748	0.782	0.841	0.915	1.010	1.107	1.165	1.164
PL	R	0.601	0.617	0.645	0.656	0.671	0.670	0.684	0.715	0.716	0.683	0.697	0.714	0.747	0.780	0.802	0.822
Warranty	T	0.665	0.681	0.691	0.695	0.732	0.645	0.611	0.799	0.789	0.864	0.862	0.916	0.860	0.800	n/a	n/a

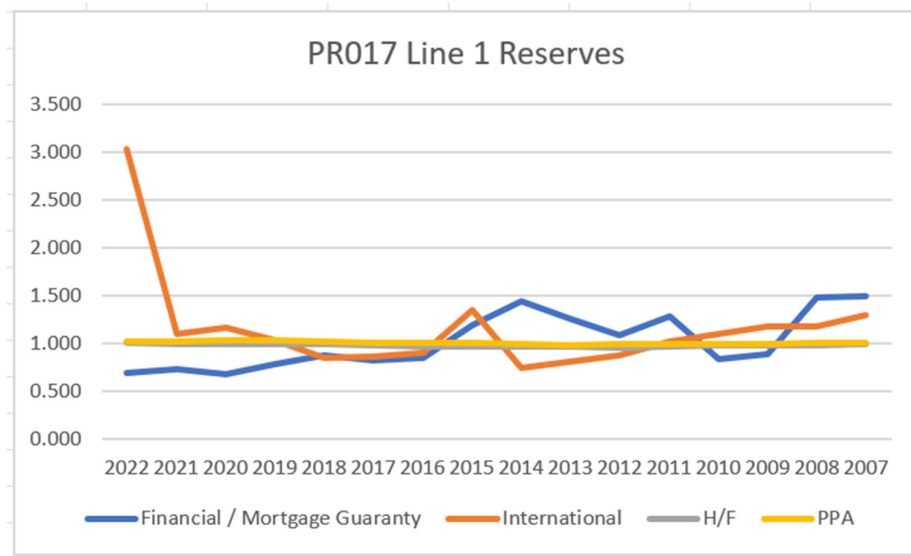
From: Chou, Wanchin <Wanchin.Chou@ct.gov>
Sent: Sunday, May 22, 2022 7:25 AM
To: Yeung, Eva K. <EYeung@naic.org>
Cc: Botsko, Thomas <thomas.botsko@insurance.ohio.gov>
Subject: FW: Exposure Draft Notice: Property and Casualty Risk-Based Capital (E) Working Group

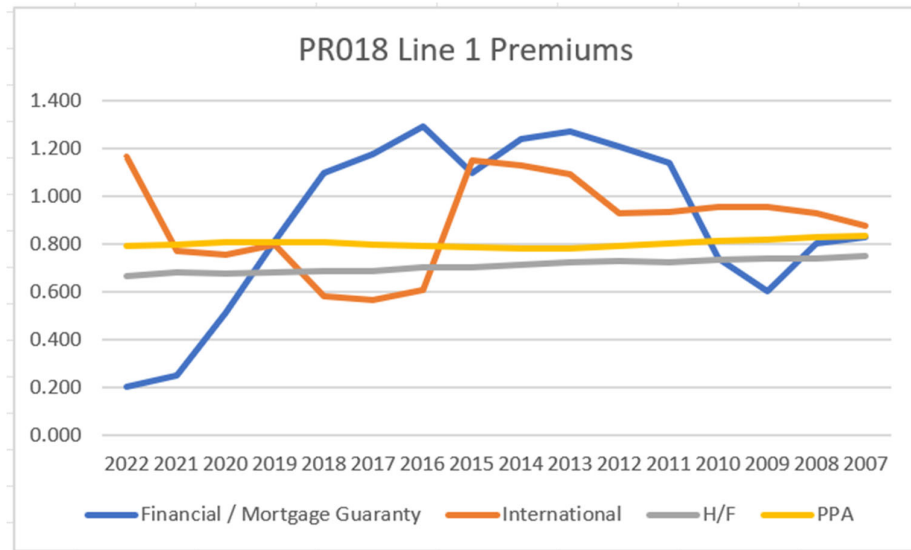
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Hi Eva,

CID appreciates the opportunity to comment on the Proposal 2022-02-P (Underwriting Risk Line 1 Factors). A few suggestions for your consideration:

1. The PR017 Line 1 Reserves and PR018 Line 1 Premiums factors for Financial/Mortgage Guaranty and International lines are very volatile. There are only 75 companies included in the PR017 and PRO18 reporting as international comparing with 737 and 844 for PPA and H/F separately. It is recommended the WG considers the credibility of the Financial and International reporting lines in the future. Please see the summary graphs below:





2. Proposal 2022-02-P (Underwriting Risk Line 1 Factors) indicated that 3 largest companies have 85% of ultimate and 63% of data for Line 1 Reserves. Based on the annual Reports of those companies, it seems that they write political risk and cross border trade credit out of Bermuda. They also write E&S out of London and Lloyd's. To meet the RBC requirements for monitoring the financial solvency regulation of the companies and the international line, we would suggest that the PC RBC WG to consider how international line statistics should be reported and a referral to Blank WG for further discussion.
3. AAA might be able to study the credibility of the international line reporting and suggest a better methodology in the future. For this reporting year, I would suggest that the PC RBC WG consider using 1.14 for PR017 Line 1 Reserves and 1.072 for PR018 Line 1 Premiums. I would not suggest that the statistics from the largest companies be ignored or keep current method in calculating the PR017 and PR018 Line 1 factors.

The Capped Reserve Factor takes the "Ultimate" column divided by the "Data" column and caps each factor at 4.0 for each company. Then a straight average of the 63 capped factors for each company results in the 1.14 factor. The current 3.041 factor is the result of the total of the "Ultimate" divided by the total "Data" columns.

The Premium factors are calculated by looking at the Incurred Loss and NEP by line for the international business. Each company for the international business calculated LR is capped at 3.0 for each company. Then took the average of the company LRs that resulted in 1.072.

Best Regards,

Wanchin W. Chou, FCAS, MAAA, CPCU, CSPA, CCRMP
 Chief Insurance Actuary and Asst. Deputy Commissioner
 State of Connecticut Insurance Department
 Mail: PO Box 816, Hartford, CT 06142-0816
 Del: 153 Market St., Hartford, CT 06103
 Office Phone: 860-297-3943

PR017 Line 1 Reserves

Schedule P Line of Business	LOB	Proposed for adoption - 2022 Industry Average Development Ratio	2021 Industry Average Development	2020 Industry Average Development	2019 Industry Average Development	2018 Industry Average Development	2017 Industry Average Development	2016 Industry Average Development	2015 Industry Average Development	2014 Industry Average Development	2013 Industry Average Development	2012 Industry Average Development	2011 Industry Average Development	2010 Industry Average Development	2009 Industry Average Development	2008 Industry Average Development	2007 Industry Average Development
H/F	A	1.001	0.998	0.993	0.989	0.989	0.984	0.972	0.962	0.967	0.960	0.949	0.962	0.984	0.983	0.983	0.995
PPA	B	1.022	1.025	1.035	1.026	1.022	1.012	1.002	1.002	0.994	0.986	0.991	0.989	0.992	0.998	1.003	1.007
CA	C	1.082	1.083	1.078	1.087	1.060	1.034	1.015	0.987	0.979	0.986	0.998	0.992	1.015	1.031	1.045	1.062
WC	D	0.906	0.912	0.916	0.955	0.952	0.971	0.971	0.961	0.986	0.980	0.990	0.999	1.005	1.016	1.033	1.051
CMP	E	1.037	0.999	1.016	0.992	0.967	0.956	0.942	0.938	0.941	0.927	0.932	0.952	0.962	0.993	1.034	1.037
MM Occurrence	F1	0.887	0.874	0.861	0.864	0.871	0.868	0.841	0.966	0.966	0.991	1.072	1.048	1.213	1.251	1.343	1.333
MM Clms Made	F2	0.983	0.973	0.940	0.907	0.886	0.854	0.822	0.839	0.808	0.824	0.887	0.925	0.981	1.033	1.083	1.140
SL	G	0.990	0.976	0.963	0.938	0.933	0.926	0.919	0.975	0.990	0.954	0.942	0.931	0.998	1.043	1.060	1.108
OL	H	0.995	0.964	0.968	0.971	0.966	0.952	0.929	0.923	0.916	0.919	0.914	0.954	0.959	0.963	1.006	1.015
Fidelity / Surety	K	0.842	0.915	0.907	0.995	0.996	1.016	1.035	1.016	1.050	1.126	1.194	1.191	1.253	1.247	1.290	1.274
Special Property	I	0.993	0.978	0.977	0.972	0.971	0.982	0.973	0.991	0.992	1.035	1.113	1.097	1.144	1.097	1.102	1.102
Auto Physical Damage	J	1.011	0.989	0.993	0.996	1.000	1.001	0.995	0.995	1.005	1.054	1.105	1.105	1.155	1.107	1.110	1.106
Other (Credut, A&H)	L	0.955	0.965	0.971	0.973	0.976	0.981	0.986	1.041	1.061	1.113	1.138	1.177	1.277	1.262	1.325	1.282
Financial / Mortgage Guaranty	S	0.694	0.723	0.682	0.788	0.870	0.820	0.853	1.185	1.444	1.256	1.087	1.276	0.841	0.893	1.483	1.495
Intl	M	1.140	1.104	1.162	1.037	0.851	0.855	0.897	1.350	0.742	0.813	0.869	1.015	1.102	1.181	1.175	1.291
Rein. Property & Financial Lines	NP	0.917	0.893	0.886	0.872	0.834	0.814	0.814	1.002	0.976	0.934	0.921	0.937	0.965	0.969	1.025	1.048
Rein. Liability	O	1.008	0.989	0.985	0.955	0.945	0.914	0.896	0.938	0.905	1.009	1.089	1.169	1.304	1.259	1.314	1.296
PL	R	0.867	0.879	0.900	0.913	0.921	0.935	0.937	1.072	1.018	0.981	0.978	1.009	1.063	1.073	1.109	1.112
Warranty	T	0.998	1.007	1.013	1.017	1.015	0.989	0.977	0.994	1.040	1.082	1.197	1.268	1.717	1.634	n/a	n/a

PR018 Line 1 Premiums

Schedule P Line of Business	LOB	Proposed 2022 Industry Average Loss & Expense Ratio	2021 Industry Average Loss & Expense Ratio	2020 Industry Average Loss & Expense Ratio	2019 Industry Average Loss & Expense Ratio	2018 Industry Average Loss & Expense Ratio	2017 Industry Average Loss & Expense Ratio	2016 Industry Average Loss & Expense Ratio	2015 Industry Average Loss & Expense Ratio	2014 Industry Average Loss & Expense Ratio	2013 Industry Average Loss & Expense Ratio	2012 Industry Average Loss & Expense Ratio	2011 Industry Average Loss & Expense Ratio	2010 Industry Average Loss & Expense Ratio	2009 Industry Average Loss & Expense Ratio	2008 Industry Average Loss & Expense Ratio	2007 Industry Average Loss & Expense Ratio
H/F	A	0.665	0.681	0.678	0.681	0.687	0.688	0.701	0.701	0.713	0.725	0.728	0.726	0.736	0.737	0.742	0.750
PPA	B	0.793	0.795	0.810	0.810	0.806	0.800	0.792	0.786	0.780	0.784	0.792	0.804	0.815	0.821	0.831	0.836
CA	C	0.761	0.761	0.759	0.737	0.724	0.706	0.689	0.684	0.676	0.668	0.669	0.679	0.705	0.737	0.763	0.784
WC	D	0.664	0.682	0.705	0.726	0.744	0.751	0.752	0.751	0.749	0.750	0.755	0.766	0.78	0.805	0.83	0.847
CMP	E	0.661	0.673	0.672	0.666	0.664	0.647	0.648	0.655	0.652	0.653	0.644	0.654	0.674	0.695	0.710	0.727
MM Occurrence	F1	0.750	0.731	0.726	0.730	0.780	0.777	0.767	0.880	0.883	0.874	0.916	0.952	1.031	1.104	1.195	1.231
MM Clms Made	F2	0.829	0.821	0.797	0.768	0.747	0.722	0.691	0.697	0.680	0.695	0.718	0.771	0.860	0.928	1.003	1.091
SL	G	0.585	0.593	0.603	0.593	0.569	0.567	0.572	0.630	0.645	0.649	0.597	0.599	0.582	0.673	0.709	0.732
OL	H	0.637	0.635	0.639	0.638	0.633	0.629	0.618	0.616	0.617	0.620	0.637	0.662	0.687	0.714	0.738	0.758
Fidelity / Surety	K	0.366	0.394	0.384	0.399	0.417	0.430	0.464	0.462	0.473	0.496	0.528	0.555	0.584	0.586	0.583	0.582
Special Property	I	0.547	0.559	0.553	0.554	0.563	0.555	0.559	0.571	0.572	0.574	0.562	0.559	0.565	0.575	0.590	0.568
Auto Physical Damage	J	0.718	0.726	0.732	0.730	0.732	0.727	0.711	0.703	0.686	0.681	0.683	0.681	0.692	0.697	0.705	0.716
Other (Credit, A&H)	L	0.698	0.693	0.684	0.682	0.709	0.712	0.699	0.706	0.754	0.778	0.794	0.786	0.691	0.697	0.737	0.789
Financial / Mortgage Guaranty	S	0.203	0.252	0.513	0.811	1.099	1.175	1.293	1.096	1.242	1.271	1.206	1.142	0.738	0.605	0.805	0.827
Intl	M	1.072	0.769	0.758	0.795	0.584	0.565	0.607	1.150	1.131	1.093	0.931	0.937	0.954	0.956	0.930	0.874
Rein. Property & Financial Lines	NP	0.566	0.558	0.534	0.522	0.486	0.459	0.512	0.723	0.764	0.766	0.757	0.805	0.828	0.924	0.977	0.994
Rein. Liability	O	0.725	0.713	0.708	0.679	0.666	0.609	0.600	0.749	0.748	0.782	0.841	0.915	1.010	1.107	1.165	1.164
PL	R	0.601	0.617	0.645	0.656	0.671	0.670	0.684	0.715	0.716	0.683	0.697	0.714	0.747	0.780	0.802	0.822
Warranty	T	0.665	0.681	0.691	0.695	0.732	0.645	0.611	0.799	0.789	0.864	0.862	0.916	0.860	0.800	n/a	n/a