

NATIONAL ASSOCIATION OF INSURANCE COMMISSIONERS

Draft date: 4/12/23

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

Monday, April 24, 2023

3:00 - 4:00 p.m. ET / 2:00 - 3:00 p.m. CT / 1:00 - 2:00 p.m. MT / 12:00 - 1:00 p.m. PT

ROLL CALL

Tom Botsko, Chair	Ohio	Sandra Darby	Maine
Wanchin Chou, Vice Chair	Connecticut	Anna Krylova	New Mexico
Charles Hale	Alabama	Ni Qin	New York
Rolf Kaumann	Colorado	Will Davis	South Carolina
Virginia Christy	Florida	Meriam Fisk	Texas
Judy Mottar	Illinois	Adrian Jaramillo	Wisconsin

NAIC Support Staff: Eva Yeung

AGENDA

1)	Consider Adoption of its Spring	National Meeting,	Minutes—Iom Bot	sko (OH)	Attachment One

- 2) Consider Adoption of Proposal 2023-02-P (Underwriting Risk Line 1 Factors) Attachment Two
 —Tom Botsko (OH)
- 3) Consider Forwarding the Referral Regarding the Deferral Adoption of Blanks Attachment Three Proposal 2023-01BWG to the Blanks (E) Working Group—*Tom Botsko (OH)*
- 4) Discuss Annual Statement Blanks Proposal 2022-15BWG—*Tom Botsko (OH)* Attachment Four
- 5) Hear Updates from the American Academy of Actuaries (Academy) on Current Property/Casualty (P/C) Risk-Based Capital (RBC) Projects

 —Tom Botsko (OH)
- 6) Discuss the Possibility of Reviewing and Analyzing the P/C RBC Charges That have Not Been Reviewed Since Developed—*Tom Botsko (OH)*
- 7) Discuss Any Other Matters Brought Before the Working Group

 —Tom Botsko (OH)
- 8) Adjournment

Draft Pending Adoption

Attachment --Capital Adequacy (E) Task Force 3/23/23

Draft: 3/23/23

Property and Casualty Risk-Based Capital (E) Working Group Louisville, Kentucky March 22, 2023

The Property and Casualty Risk-Based Capital (E) Working Group of the Capital Adequacy (E) Task Force met in Louisville, KY, March 22, 2023. The following Working Group members participated: Tom Botsko, Chair (OH); Wanchin Chou, Vice Chair (CT); Charles Hale (AL); Rolf Kaumann (CO); Virginia Christy (FL); Judy Mottar and Bruce Sartain (IL); Sandra Darby (ME); Will Davis (SC); Miriam Fisk (TX); and Amy Malm (WI). Also participating were: Kevin Dyke (MI); Michael Muldoon (NE); and Michael McKenney (PA).

1. Adopted its Jan. 30, 2023, and 2022 Fall National Meeting Minutes

Botsko said the Working Group conducted an e-vote that concluded Jan. 30, 2023, to adopt proposal 2022-12-CR (2022 U.S. and Non-U.S. Catastrophe Risk Event Lists), which the Working Group had exposed for a seven-day public comment period ending Jan. 25, 2023.

Chou made a motion, seconded by Darby, to adopt the Working Group's Jan. 30, 2023, (Attachment XX) and Dec. 13, 2022, (see NAIC Proceedings – Fall 2022, Capital Adequacy (E) Task Force, Attachment XX) minutes. The motion passed unanimously.

2. Adopted the Report of the Catastrophe Risk (E) Subgroup

Chou said the Catastrophe Risk (E) Subgroup met March 21, 2023, and took the following action: 1) adopted its Jan. 30, 2023, and 2022 Fall National Meeting minutes; 2) discussed its working agenda; 3) received a status update from its Catastrophe Model Technical Review Ad Hoc Group; 4) heard a presentation from Travelers on climate overview and scenario analysis; and 5) discussed the wildfire peril impact analysis.

Chou made a motion, seconded by Christy, to adopt the report of the Catastrophe Risk (E) Subgroup. The motion passed unanimously.

3. Exposed Proposal 2023-02-P (Underwriting Risk Line 1 Factors)

Botsko said proposal 2022-02-P (Attachment XXX) provided a routine annual update to the Line 1 premium and reserve industry underwriting factors in the property/casualty (P/C) risk-based capital (RBC) formula. He indicated that, as the Working Group discussed during the last April 2022 meeting, in some lines of business with smaller populations, such as the international line of business, both reserve and premium are driven by a handful of companies and could fluctuate or be biased due to different factors. Botsko also stated that the American Academy of Actuaries (Academy) is in the process of reviewing the Line 1 calculation methodology. Based on the Working Group's last discussion, the new methodology may not completely fix this issue entirely. He encouraged all the interested parties to participate in the discussion after receiving recommendations from the Academy in the near future.

The Working Group agreed to expose proposal 2023-02-P for a 30-day public comment period ending April 21.

4. Discussed Annual Statement Blanks Proposal 2023-01BWG

Draft Pending Adoption

Attachment --Capital Adequacy (E) Task Force 3/23/23

Botsko said this proposal (Attachment xxx) removes pet insurance from the inland marine line of business and adds a pet insurance line within the existing P/C Annual Statement Blank for the Underwriting and Investment Exhibits, Exhibit of Premiums and Losses (State Page), and Insurance Expense Exhibit. It also adds new Schedule P, Parts 1 through 4, specific to pet insurance for 2024 reporting. He also stated that the primary reason for this proposal is that the pet insurance industry has grown rapidly, and there is currently no public or regulatory visibility into the vast amount of pet insurance industry financial reporting. Botsko indicated that the Blanks (E) Working Group is currently exposing this proposal for a 52-day public comment period ending April 28. He encouraged the industry to: 1) review the proposal and provide feedback to the Blanks (E) Working Group; and 2) determine how to quantify this line of business in the RBC formula. Kaumann suggested that the Working Group may want to reach out to the Property and Casualty (C) Committee and the Market Regulation and Consumer Affairs (D) Committee to gain more information related to this proposal before the next meeting. Botsko said the Working Group will continue this discussion during its upcoming meeting.

5. Discussed Annual Statement Blanks Proposal 2022-15BWG

Botsko said the Blanks (E) Working Group adopted proposal 2022-15BWG (Attachment xxx) during its March 7 meeting. He stated that the proposal's purpose is to remove the current 5% of premium filing exemption on the Schedule H, Part 5 for P/C annual statement filing to be consistent with the life annual statement since the life annual statement does not have 5% of premium file exemption in the Schedule H, Part 5. Botsko raised a question on whether the 5% rule should be removed in the P/C RBC formula to be consistent with the change in the annual statement, Schedule H, Part 5. He urged the interested parties to review this proposal and provide comments to the Working Group during its upcoming meeting.

6. <u>Discussed its Working Agenda</u>

Botsko summarized the changes to the Working Group's 2023 working agenda. He said the Working Group eliminated the following items: 1) evaluate the possibility of allowing additional third-party models or adjustments to the vendor models to calculate the catastrophe (CAT) model losses; and 2) evaluate the possibility of enhancing the independent model instructions. He also indicated that the following three items were added to the new items section: 1) review and analyze the P/C RBC charges that have not been reviewed since being developed; 2) quantify the R5 Ex-CAT factors for wildfire peril (for informational purposes only); and 3) evaluate the impact of flood peril to the insurance market.

Chou made a motion, seconded by Kaumann, to adopt the revised 2023 working agenda. The motion passed unanimously.

7. Heard Updates on Current P/C RBC Projects from the Academy

Botsko said the American Academy of Actuaries' (Academy's) Property and Casualty Risk-Based Capital Committee (Academy Committee) continues its effort to recalibrate portions of the reserve and premium risk of the R4 and R5 components. Ronald Wilkins (Academy) said this presentation (Attachment xxx) includes the following items:

1) background of the components of the P/C RBC formula; 2) the need for the new present value methodology due to the 2022 interest rate increases; 3) investment income offset and adjustment for loss runoff risk horizon;4) safety level for the reserve and premium charges of the formula; and 5) year-over-year capping approaches. Wilkins stated that the Academy Committee would like to receive feedback from the Working Group regarding:

1) present value methodology; 2) adjustment to match loss runoff horizon to risk horizon; 3) statistical safety level;

Draft Pending Adoption

Attachment --Capital Adequacy (E) Task Force 3/23/23

and 4) minimum risk charge and year-over-year capping approaches. Botsko said he agrees with the assumption that the Academy provided in this presentation, and the Working Group will provide further evaluation after final reports become available. He also said the Working Group appreciates Wilkins providing updates on their projects and is looking forward to reviewing the detailed report for each project.

8. <u>Discussed the Possibility of Reviewing or Analyzing the P/C RBC Charges</u>

Botsko said the P/C RBC formula, factors, and methodology have been in development for almost 30 years. He stated that some of the risks, such as underwriting risks and some of the investment risks, have been continuously evaluated over the years. However, some of them have never been reviewed since being developed. Botsko said the Capital Adequacy (E) Task Force is considering establishing an ad hoc group to: 1) re-evaluate some of the missing risks to determine if it should now include them in the RBC calculation, or whether it appropriately handles those risks utilizing other regulatory methods; and 2) review those factors and instructions that have never been reviewed since development to determine if modifications should be made. Botsko encouraged all the parties to contact NAIC staff if anyone interested is in joining the new ad hoc group.

Having no further business, the Property and Casualty Risk-Based Capital (E) Working Group adjourned.

SharePoint/NAIC Support Staff Hub/Member Meetings/Spring 2023 National Meeting/Task Forces/CapAdequacy/PCRBCWG/03-22propertyrbcwg.docx

Capital Adequacy (E) Task Force RBC Proposal Form

☐ Capital Adequacy (E) Ta	ask Force \Box Health RBC (E) Working Gro	pup 🗆 Life RBC (E) Working Group
☐ Catastrophe Risk (E) Su	bgroup Investment RBC (E) Workin	g Group
☐ Variable Annuities Capit (E/A) Subgroup	al. & Reserve 🛛 P/C RBC (E) Working Group	RBC Investment Risk & Evaluation(E) Working Group
	DATE: <u>3/22/23</u>	FOR NAIC USE ONLY
CONTACT PERSON:	Eva Yeung	Agenda Item # 2023-02-P Year
TELEPHONE:	816-783-8407	DISPOSITION
EMAIL ADDRESS:	eyeung@naic.org	ADOPTED:
ON BEHALF OF:	P/C RBC (E) Working Group	☐ TASK FORCE (TF) ☐ WORKING GROUP (WG)
NAME:	Tom Botsko	☐ SUBGROUP (SG)
TITLE:		EXPOSED: TASK FORCE (TF)
	Chair	 ✓ WORKING GROUP (WG) 3/22/23
AFFILIATION:	Ohio Department of Insurance	SUBGROUP (SG)
ADDRESS:	50 West Town Street, Suite 300	REJECTED: □ TF □ WG □ SG
	Columbus, OH 43215	OTHER:
	•	☐ DEFERRED TO
		☐ REFERRED TO OTHER NAIC GROUP ☐ (SPECIFY)
IC	PENTIFICATION OF SOURCE AND FORM(S)/INST	RUCTIONS TO BE CHANGED
☐ Health RBC Blanks	□ Property/Casualty RBC Blanks □	Life and Fraternal RBC Blanks
☐ Health RBC Instructions	, ,,	
☐ Health RBC Formula☐ OTHER		Life and Fraternal RBC Formula
	DESCRIPTION/REASON OR JUSTIFICATION	ON OF CHANGE(S)
The proposed change would PCRBC formula.	d provide routine annual update of the industry (underwriting factors (premium and reserve) in the
	Additional Staff Commer	nts:
** This section must be co	ompleted on all forms.	

Attachment Two

Schedule P Line of Business	LOB	Proposed for adoption - 2023 Industry Average Development Ratio	2022 Industry Average Development	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
H/F	Α	1.004	1.001	0.998	0.993	0.989	0.989	0.984	0.972	0.962	0.967
PPA	В	1.047	1.022	1.025	1.035	1.026	1.022	1.012	1.002	1.002	0.994
CA	С	1.106	1.082	1.083	1.078	1.087	1.060	1.034	1.015	0.987	0.979
WC	D	0.834	0.906	0.912	0.916	0.955	0.952	0.971	0.971	0.961	0.986
CMP	E	0.991	1.037	0.999	1.016	0.992	0.967	0.956	0.942	0.938	0.941
MM Occurrence	F1	0.906	0.887	0.874	0.861	0.864	0.871	0.868	0.841	0.966	0.966
MM Clms Made	F2	0.984	0.983	0.973	0.940	0.907	0.886	0.854	0.822	0.839	0.808
SL	G	0.994	0.990	0.976	0.963	0.938	0.933	0.926	0.919	0.975	0.990
OL	Н	0.969	0.995	0.964	0.968	0.971	0.966	0.952	0.929	0.923	0.916
Fidelity / Surety	K	0.852	0.842	0.915	0.907	0.995	0.996	1.016	1.035	1.016	1.050
Special Property	I	0.983	0.993	0.978	0.977	0.972	0.971	0.982	0.973	0.991	0.992
Auto Physical Damage	J	1.016	1.011	0.989	0.993	0.996	1.000	1.001	0.995	0.995	1.005
Other (Credut, A&H)	L	0.946	0.955	0.965	0.971	0.973	0.976	0.981	0.986	1.041	1.061
Financial / Mortgage Guaranty	S	0.674	0.694	0.723	0.682	0.788	0.870	0.820	0.853	1.185	1.444
Intl	М	2.414	3.041	1.104	1.162	1.037	0.851	0.855	0.897	1.350	0.742
Rein. Property & Financial Lines	NP	0.924	0.917	0.893	0.886	0.872	0.834	0.814	0.814	1.002	0.976
Rein. Liability	0	1.024	1.008	0.989	0.985	0.955	0.945	0.914	0.896	0.938	0.905
PL	R	0.874	0.867	0.879	0.900	0.913	0.921	0.935	0.937	1.072	1.018
Warranty	Т	0.995	0.998	1.007	1.013	1.017	1.015	0.989	0.977	0.994	1.040

Attachment Two

Schedule P Line of Business	LOB	Proposed 2023 Industry Average Loss & Expense Ratio	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
H/F	A	0.679	0.665	0.681	0.678	0.681	0.687	0.688	0.701	0.701	0.713
PPA	В	0.791	0.793	0.795	0.810	0.810	0.806	0.800	0.792	0.786	0.780
CA	С	0.777	0.761	0.761	0.759	0.737	0.724	0.706	0.689	0.684	0.676
WC	D	0.651	0.664	0.682	0.705	0.726	0.744	0.751	0.752	0.751	0.749
CMP	Е	0.671	0.661	0.673	0.672	0.666	0.664	0.647	0.648	0.655	0.652
MM Occurrence	F1	0.767	0.750	0.731	0.726	0.730	0.780	0.777	0.767	0.880	0.883
MM Clms Made	F2	0.815	0.829	0.821	0.797	0.768	0.747	0.722	0.691	0.697	0.680
SL	G	<u>0.578</u>	0.585	0.593	0.603	0.593	0.569	0.567	0.572	0.630	0.645
OL	Н	0.641	0.637	0.635	0.639	0.638	0.633	0.629	0.618	0.616	0.617
Fidelity / Surety	K	0.363	0.366	0.394	0.384	0.399	0.417	0.430	0.464	0.462	0.473
Special Property		<u>0.550</u>	0.547	0.559	<u>0.553</u>	0.554	0.563	<u>0.555</u>	0.559	0.571	0.572
Auto Physical Damage	J	0.727	0.718	0.726	0.732	0.730	0.732	0.727	0.711	0.703	0.686
Other (Credit, A&H)	L	0.702	0.698	0.693	0.684	0.682	0.709	0.712	0.699	0.706	0.754
Financial / Mortgage Guaranty	S	0.209	0.203	0.252	0.513	0.811	1.099	1.175	1.293	1.096	1.242
Intl	М	<u>1.136</u>	<u>1.166</u>	0.769	<u>0.758</u>	0.795	<u>0.584</u>	0.565	0.607	1.150	1.131
Rein. Property & Financial Lines	NP	<u>0.578</u>	<u>0.566</u>	<u>0.558</u>	<u>0.534</u>	0.522	<u>0.486</u>	<u>0.459</u>	0.512	0.723	0.764
Rein. Liability	0	<u>0.743</u>	<u>0.725</u>	<u>0.713</u>	<u>0.708</u>	<u>0.679</u>	<u>0.666</u>	<u>0.609</u>	0.600	0.749	0.748
PL	R	0.597	0.601	0.617	0.645	0.656	0.671	0.670	0.684	0.715	0.716
Warranty	Т	0.652	0.665	0.681	0.691	0.695	0.732	0.645	0.611	0.799	0.789



MEMORANDUM

TO: Pat Gosselin (NH), Chair of the Blanks (E) Working Group

FROM: Tom Botsko (OH), Chair of the Property and Casualty Risk-Based Capital (E) Working Group

DATE: April 24, 2023

RE:

Request for Deferral of Adoption of Blanks Proposal 2023-01BWG

Thank you for the opportunity to provide feedback on the blanks proposal 2023-01BWG.

We suggest that this proposal be delayed for at least one year. This will allow us to collect industry information through other means. Collecting industry data through the Supplemental Data option is one alternative. This information is also provided on March 1 with the annual statement submittal, and it provides industry information for analysis.

Please keep in mind that cyber is also a significantly growing line of business and has not been added to the annual statement but is currently using the Supplemental Data option.

Another option would be to use an Interrogatory for this data. This data will be available on March 1, along with the other annual statement information. The data provided under the Interrogatory is accessible through the annual statement databases.

While pet insurance seems to have grown significantly in the past few years, no data has been shared to evaluate this specific line of business. The data will provide valuable insight and potential support for separating this product.

In addition, it appears there are only a few carriers that write this line of business. At this time, it is not clear if this supports adding an additional line of business, which may be costly to the industry.

If industry data is available, it would be helpful to share this information to better understand the significance of this line and determine if the data supports the separation of this line of business.

One additional recommendation is removing the word "insurance" from the added line. No other lines of business include the word "insurance" in their description.

Thank you for the opportunity to provide input to this exposure. We are happy to discuss this with you and the Working Group at your convenience.

Washington, DC 444 North Capitol Street NW, Suite 700, Washington, DC 20001-1509

p | 202 471 3990

Kansas City 1100 Walnut Street, Suite 1500, Kansas City, MO 64106-2197

p | 816 842 3600

New York One New York Plaza, Suite 4210, New York, NY 10004

p | 212 398 9000

If you have any questions regarding this request, please contact Eva K. Yeung at eyeung@naic.org.

cc: Mary K. Caswell, Kris DeFrain, Eva K. Yeung

NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

		FOR NAIC USE ONLY
	DATE: <u>11/4/2022</u>	Agenda Item # 2023-01BWG
CONTACT PERSON:	Debbie Doggett (MO DCI) & Gavin Friedman (American	Year <u>2024</u>
	Pet Ins Co; ZPIC Ins Co)	Changes to Existing Reporting [X]
TELEPHONE:	Debbie (573) 526-2944 / Gavin (310) 254-5256	New Reporting Requirement []
		REVIEWED FOR ACCOUNTING PRACTICES AND
EMAIL ADDRESS:	debbie.doggett@insurance.mo.gov / gavin.friedman@trupanion.com	PROCEDURES IMPACT
	gavin.meuman@nupamon.com	No Impact [X] Modifies Required Disclosure []
ON BEHALF OF:	Joint submission by (i) the MO Dept of Commerce and	Is there data being requested in this proposal
	Insurance and (ii) American Pet Ins Co and ZPIC Ins Co	which is available elsewhere in the
NAME:	Debbie Doggett	Annual/Quarterly Statement? [No]
		If Yes, complete question below DISPOSITION
TITLE:	Chief Financial Analyst	<u>=::: </u>
AFFILIATION:	Missouri DCI	[] Rejected For Public Comment
ADDRESS	204 W. History (F20) Inffarence City, MO (F404	[] Referred To Another NAIC Group [] Received For Public Comment
ADDRESS:	301 W Hight St. #530, Jefferson City, MO 65101	[] Adopted Date
		[] Rejected Date
		[] Deferred Date
	BLANK(S) TO WHICH PROPOSAL APP	PLIES
[X] ANNUAL STATE [X] QUARTERLY ST		[X] CROSSCHECKS
[] Life, Accident 8 [X] Property/Casua [] Health	K Health/Fraternal [] Separate Accounts alty [] Protected Cell [] Health (Life Supplement)	[] Title [] Other
Anticipated Effective Dat	e: <u>January 1, 2024</u>	
	IDENTIFICATION OF ITEM(S) TO CHA	NGE
	om Inland Marine line of business and add a new line of	of business to Appendix – P/C Lines of Business.
	vithin the existing P/C Blank for the Underwriting and	
losses (State Page), and	Insurance Expense Exhibit. Add new Schedule P Parts	1 through 4 specific to Pet Insurance.
See Page 2 for detailed r	REASON, JUSTIFICATION FOR AND/OR BENEFIT eason and justification for change.	OF CHANGE**
***IF THE DATA IS AVA	ILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STA	TEMENT, PLEASE NOTE WHY IT IS REQUIRED
	FOR THIS PROPOSAL***	
	NAIC STAFF COMMENTS	
Comment on Effective Re	eporting Date:	
Other Comments:		
* This section must be c	ompleted on all forms.	Revised 11/17/2022

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE

Pet insurance is reported today as an Inland Marine product. Separating Pet Insurance from Inland Marine for financial reporting purposes within the existing Blank is warranted for a number of reasons, including:

- There is no public or regulator visibility into the vast majority of the pet insurance industry's financial reporting. Other than for a monoline insurer that writes only pet insurance, the rest of the industry's pet insurance business financial reporting is included in Inland Marine, along with anything else in that broadly-defined line that the respective insurer has written. In short, regulators do not have clear visibility into even the most basic information about pet insurers and the pet insurance market, such as who is underwriting pet coverage, the volume being sold, losses, and who is selling it.
- The pet insurance industry has grown rapidly, and this high growth rate continues. The industry's self-reported data shows growth in annual gross written premium from \$836.5 M in 2016 to \$2.59 B in 2021, including more than 30% annual growth from 2020 to 2021. This growth rate makes the absence of visibility into each participating company's financial information more an acute challenge with each passing year.
- Relying on regulator data calls to gather basic information such as premium written and loss information is time-consuming for all involved, and prone to inconsistencies and errors.
- The NAIC's D Committee is proceeding with MCAS for pet insurance. It would be inapposite and
 have potential for inconsistent data, to require MCAS reporting while not requiring dedicated pet
 insurance financial reporting. In addition, separate financial reporting will be a useful complement
 to MCAS reporting, both to supplement the MCAS information and to validate it.
- Dedicated financial reporting of pet insurance will be helpful to state regulators' assessment of the appropriate amount of surplus insurers writing this business should hold. It is anticipated that once sufficient history is obtained, a separate RBC factor for pet insurance can be established.

APPENDIX

PROPERTY AND CASUALTY LINES OF BUSINESS

These definitions should be applied when reporting all applicable amounts for the following schedules: Underwriting and Investment Exhibit Parts 1, 1A, 1B, 2, and 2A; Exhibit of Premiums and Losses (Statutory Page 14); and the Insurance Expense Exhibit. Policy fees, service charges or membership charges are to be included with the line of business or in Other Income, as determined by SSAP No. 53—Property and Casualty Contracts – Premiums.



Detail Eliminated to Conserve Space



Line 9.1 – Inland Marine

Coverage for property that may be in transit, held by a bailee, at a fixed location, a movable good that is often at different locations (e.g., off-road construction equipment) or scheduled property (e.g., Homeowners Personal Property Floater), including items such as live animals, property with antique or collector's value, etc. This line also includes instrumentalities of transportation and communication, such as bridges, tunnels, piers, wharves, docks, pipelines, power and phone lines, and radio and television towers.

Animal Mortality

Coverage that provides a death benefit to the owner of a policy in the event of the death of the insured livestock.

EDP Policies

Coverage to protect against losses arising out of damage to or destruction of electronic data processing equipment and its software.

Pet Insurance Plans

Veterinary care plan insurance policy providing care for a pet animal (e.g., dog or cat) of the insured owner in the event of its illness or accident.

Communication Equipment (Cellular Telephones)

Provides insured subscribers of Communications Equipment Service Provider replacement coverage for loss of and damage, theft or mechanical breakdown to communications equipment. Communications equipment means wireless telephones and pagers, and any other devices incorporating wireless phone and pager capabilities, including but not limited to personal digital assistants (PDA) and wireless aircards.

<u>Line 9.2 – Pet Insurance Plans</u>

Veterinary care plan insurance policy providing care for a pet animal (e.g., dog or cat) of the insured owner in the event of its illness or accident.

SCHEDULE P

SCHEDULE P - PART 1

Part 1 – Summary is the total of the Schedule P lines. For the property lines, it is necessary to supplement the data in the individual sections of Schedule P in order to complete the Part 1 – Summary for all lines for all years. Non-proportional assumed reinsurance – Property, Liability and Financial Lines can be summed together as reported.



Detail Eliminated to Conserve Space

ANNUAL STATEMENT BLANKS - PROPERTY/CASUALTY

UNDERWRITING AND INVESTMENT EXHIBIT PART 1 – PREMIUMS EARNED

		PART 1 – PREMIU			
	Line of Business	1 Net Premiums Written per Column 6, Part 1B	2 Unearmed Premiums Dec. 31 Prior Year- per Col. 3, Last Year's Part 1	3 Unearned Premiums Dec. 31 Current Year- per Col. 5 Part 1A	Premiums Earned During Year (Cols. 1 + 2 - 3)
1.	Fire				
2.1	Allied lines				
2.2	Multiple peril crop				
2.3					
	Federal flood				
2.4	Private crop				
2.5	Private flood				
3.	Farmowners multiple peril				
4.	Homeowners multiple peril				
5.1	Commercial multiple peril (non-liability portion)				
5.2					
5.2	Commercial multiple peril (liability portion)				
6.	Mortgage guaranty				
8.	Ocean marine				
9.1	Inland marine				
9.2.	Pet Insurance Plans				
10.	Financial guaranty				
11.1	Medical professional liability—occurrence				
11.2	Medical professional liability—claims-made				
12.	Earthquake				
13.1	Comprehensive (hospital and medical)				
13.1					
	individual				
13.2	Comprehensive (hospital and medical) group				
14.	Credit accident and health				
1	(group and individual)				
15 1					
15.1	Vision only				
15.2	Dental only				
15.3	Disability income				
15.4	Medicare supplement				
	Medicaid Title XIX				
15.5					
15.6	Medicare Title XVIII				
15.7	Long-term care				
15.8	Federal employees health benefits plan				
15.9	Other health				
16.	Workers' compensation				
17.1	Other liability—occurrence				
17.2	Other liability—claims-made				
17.3	Excess workers' compensation				
18.1	Products liability—occurrence				
18.2	Products liability—claims-made				
19.1	Private passenger auto no-fault (personal injury				
	protection)				
19.2	Other private passenger auto liability				
19.3	Commercial auto no-fault (personal injury				
19.3	4 2 2				
	protection)				
19.4	Other commercial auto liability				
21.1	Private passenger auto physical damage				
21.2	Commercial auto physical damage				
22.	Aircraft (all perils)				
23.	Fidelity				
24.	Surety				
26.	Burglary and theft				
27.	Boiler and machinery		I		
28.	Credit				
29.	International				
30.	Warranty				
31.	Reinsurance-nonproportional				
1	assumed property		1		
32.	Reinsurance-nonproportional				
32.					
	assumed liability				
33.	Reinsurance-nonproportional				
	assumed financial lines				
34.	Aggregate write-ins for other lines				I
34.	55 5		1		1
	of business				
35.	TOTALS		<u> </u>	<u>l</u>	<u> </u>
DETA	ILS OF WRITE-INS				<u> </u>
3401.					
3402.					
3403.					
3498.	Sum. of remaining write-ins for				
	Line 34 from overflow page				
3499.	Totals (Lines 3401 through 3403				
	plus 3498) (Line 34 above)				
	1 / (/ /		<u> </u>	i .	1

UNDERWRITING AND INVESTMENT EXHIBIT

		ART 1A – RECAPITULATI 1	2	3	4	5
	Line of Business	Amount Unearned (Running One Year or Less from Date of Policy) (a)	Amount Unearmed (Running More Than One Year from Date of Policy) (a)	Earned but Unbilled Premium	Reserve for Rate Credits and Retrospective Adjustments Based on Experience	Total Reserve for Unearned Premiums Cols. 1+2+3+4
1.	Fire					
2.1	Allied lines					
2.2	Multiple peril crop					
2.3	Federal flood					
2.4 2.5	Private crop					
3.	Farmowners multiple peril					
4.	Homeowners multiple peril					
5.1	Commercial multiple peril (non-liability					
	portion)					
5.2	Commercial multiple peril (liability portion)					
6.	Mortgage guaranty					
8.	Ocean marine					
9. <u>1</u> 9.2	Inland marine					
10.	Pet Insurance Plans Financial guaranty					
11.1	Medical professional liability—occurrence					
11.2	Medical professional liability—claims-made					
12.	Earthquake					
13.1	Comprehensive (hospital and medical)					
	individual					
13.2	Comprehensive (hospital and medical) group					
14.	Credit accident and health(group and					
individu 15.1	Vision only					
15.1	Dental only					
15.3	Disability income					
15.4	Medicare supplement					
15.5	Medicaid title XIX					
15.6	Medicare title XVIII					
15.7	Long-term care					
15.8	Federal employees health benefits plan					
15.9	Other health					
16.	Workers' compensation					
17.1 17.2	Other liability—occurrence Other liability—claims-made					
17.3	Excess workers' compensation					
18.1	Products liability—occurrence					
18.2	Products liability—claims-made					
19.1	Private passenger auto no-fault (personal injury					
	protection)					
19.2	Other private passenger auto liability					
19.3	Commercial auto no-fault (personal injury protection)					
19.4	Other commercial auto liability					
21.1	Private passenger auto physical damage					
21.2	Commercial auto physical damage					
22.	Aircraft (all perils)					
23.	Fidelity					
24.	Surety					
26.	Burglary and theft					
27.	Boiler and machinery					
28. 29.	Credit International					
30.	Warranty					
31.	Reinsurance-nonproportional					
	assumed property					
32.	Reinsurance-nonproportional					
	assumed liability					
33.	Reinsurance-nonproportional					
2.4	assumed financial lines					
34. 35.	Aggregate write-ins for other lines of business. TOTALS					
36.	Accrued retrospective premiums based on experie	ence.	<u> </u>	I	<u> </u>	
30. 37.	Earned but unbilled premiums					
38.	Balance (Sum of Lines 35 through 37)					
	S OF WRITE-INS					
3401						
3402						
	ım. of remaining write-ins for					
Li	ne 34 from overflow page					
	otals (Lines 3401 through 3403					
pl	us 3498) (Line 34 above)	l	i	1	1	

UNDERWRITING AND INVESTMENT EXHIBIT PART 1B - PREMIUMS WRITTEN

		1	Reinsurano	e Assumed	Reinsura	ance Ceded	6
			2	3	4	5	Net Premiums
		Direct		From		To	Written
		Business	From	Non-	To	Non-	Cols. 1+2+3-
	Line of Business	(a)	Affiliates	Affiliates	Affiliates	Affiliates	4-5
1.	Fire						
2.1	Allied lines						
2.2	Multiple peril crop						
2.3	Federal flood						
2.4	Private crop						
2.5	Private flood						
3.	Farmowners multiple peril						
4.	Homeowners multiple peril						
5.1	Commercial multiple peril (non-liability						
	portion)						
5.2	Commercial multiple peril (liability portion)						
6.	Mortgage guaranty						
8.	Ocean marine						
9. <u>1</u>	Inland marine						
9.2	Pet Insurance Plans			<u></u>			
10.	Financial guaranty						
11.1	Medical professional liability—occurrence						
11.2	Medical professional liability—claims-made						
12.	Earthquake						
13.1	Comprehensive (hospital and medical)						
12.2	individual						
13.2 14.							
14.	Credit accident and health (group and individual)						
15.1	Vision only						
15.1	Dental only						
15.3	Disability income						
15.4	Medicare supplement						
15.5	Medicaid Title XIX						
15.6	Medicare Title XVIII						
15.7	Long-term care						
15.8	Federal employees health benefits plan						
15.9	Other Health						
16.	Workers' compensation						
17.1	Other liability—occurrence						
17.2	Other liability—claims-made						
17.3	Excess workers' compensation						
18.1	Products liability—occurrence						
18.2	Products liability—claims-made						
19.1	Private passenger auto no-fault (personal						
	injury protection)						
19.2	Other private passenger auto liability						
19.3	Commercial auto no-fault (personal injury						
	protection)						
19.4	Other commercial auto liability						
21.1	Private passenger auto physical damage						
21.2	Commercial auto physical damage						
22.	Aircraft (all perils)						
23.	Fidelity						
24.	Surety						
26.	Burglary and theft						
27.	Boiler and machinery						
28.	Credit						
29.	International						
30.	Warranty						
31.	Reinsurance-nonproportional assumed property	XXX					
32.	Reinsurance-nonproportional	ллл					
32.	assumed liability	XXX					
33.	Reinsurance-nonproportional	ллл					
33.	assumed financial lines	XXX					
34.	Aggregate write-ins for other lines of business.	ллл					
35.	TOTALS						
			<u> </u> 	<u> </u> 	<u> </u>	<u> </u> 	<u> </u>
	LS OF WRITE-INS						
3401.							
3402.							
3403.	m of remaining write ing fer						
	m. of remaining write-ins for ine 34 from overflow page						
	otals (Lines 3401 through 3403						
	lus 3498) (Line 34 above)						
pı	us stroj (Line st above)		l	l	l .	l	I

(a)	Does the company's direct premiur	ns written include premiums	recorded on an installment basis?	Yes [] No []	
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UNDERWRITING AND INVESTMENT EXHIBIT PART 2 – LOSSES PAID AND INCURRED

		I		- LOSSES PAID AND IT s Paid Less Salvage	NCUKKED	5	6	7	0 1
		1	Losse 2	s raid Less Saivage	4	٠ ،	б	/	Boroantogo of
		Direct	2 Reinsurance	Reinsurance	4 Net Payments	Net Losses Unpaid Current Year	Net Losses Unpaid	Losses Incurred Current Year	Percentage of Losses Incurred (Col. 7, Part 2) to Premiums Earned
	Line of Business	Business	Assumed	Recovered	(Cols. 1 + 2 - 3)	(Part 2A, Col. 8)	Prior Year	(Cols. 4 + 5 - 6)	(Col. 4, Part 1)
1.	Fire								
2.1	Allied lines								
2.2	Multiple peril crop								
2.3	Federal flood								
2.4	Private crop								
2.5	Private flood								
3.	Farmowners multiple peril								
4.	Homeowners multiple peril								
5.1 5.2	Commercial multiple peril (non-liability portion)								
6.	Mortgage guaranty								
8.	Ocean marine								
9. <u>1</u>	Inland marine								
9.2	Pet Insurance Plans								
10.	Financial guaranty								
11.1	Medical professional liability—occurrence								
11.2	Medical professional liability—claims-made								
12.	Earthquake								
13.1	Comprehensive (hospital and medical) individual								
13.2	Comprehensive (hospital and medical) group								
14.	Credit accident and health (group and individual)								
15.1	Vision only								
15.2	Dental only								
15.3	Disability income								
15.4	Medicare supplement								
15.5 15.6	Medicaid Title XIX								
15.6	Medicare Title XVIII								
15.7	Federal employees health benefits plan								
15.8	Other health								
16.	Workers' compensation								
17.1	Other liability—occurrence								
17.2	Other liability—claims-made								
17.3	Excess workers' compensation								
18.1	Products liability—occurrence								
18.2	Products liability—claims-made								
19.1	Private passenger auto no-fault (personal injury								
	protection)								
19.2	Other private passenger auto liability								
19.3	Commercial auto no-fault (personal injury protection)								
19.4	Other commercial auto liability								
21.1	Private passenger auto physical damage								
21.2 22.	Commercial auto physical damage								
22.	Fidelity								
24.	Surety								
26.	Burglary and theft								
27.	Boiler and machinery								
28.	Credit								
29.	International								
30.	Warranty								
31.	Reinsurance-nonproportional assumed property	XXX							
32.	Reinsurance-nonproportional assumed liability	XXX							
33.	Reinsurance-nonproportional assumed financial lines	XXX							
34.	Aggregate write-ins for other lines of business								
35.	TOTALS								
DETAIL	S OF WRITE-INS								
3401.									
3402									
3403									
	m. of remaining write-ins for Line 34 from overflow page								
3499. Tot	tals (Lines 3401 through 3403 + 3498) (Line 34 above)								

UNDERWRITING AND INVESTMENT EXHIBIT PART 2A – UNPAID LOSSES AND LOSS ADJUSTMENT EXPENSES

PART 2A – UNPAID LOSSES AND LOSS ADJUSTMENT EXPENSES Reported Losses Incurred But Not Reported								8	0	
		1	2 Rep	orted Losses	4	5	6	ed 7	8	9
	Line of Business	Direct	Reinsurance Assumed	Deduct Reinsurance Recoverable	Net Losses Excl. Incurred But Not Reported (Cols. 1+2-3)	5 Direct	Reinsurance Assumed	Reinsurance Ceded	Net Losses Unpaid (Cols. 4 + 5 + 6 - 7)	Net Unpaid Loss Adjustment Expenses
1.	Fire									
2.1	Allied lines									
2.2 2.3	Multiple peril crop									
2.3	Federal flood									
2.5	Private flood									
3.	Farmowners multiple peril									
4.	Homeowners multiple peril									
5.1	Commercial multiple peril (non-liability portion)									
5.2	Commercial multiple peril (liability portion)									
6.	Mortgage guaranty									
8. 9.1	Ocean marine Inland marine									
9. <u>1</u> 9.2	Pet Insurance Plans									
10.	Financial guaranty									
11.1	Medical professional liability—occurrence									
11.2	Medical professional liability—claims-made									
12.	Earthquake									
13.1	Comprehensive (hospital and medical) individual								(a)	
13.2 14.	Comprehensive (hospital and medical) group Credit accident and health (group and individual)								(a)	
15.1	Vision only								(a)	
15.2	Dental only								(a)	
15.3	Disability income								(a)	
15.4	Medicare supplement								(a)	
15.5	Medicaid Title XIX								(a)	
15.6	Medicare Title XVIII								(a)	
15.7	Long-term care								(a)	
15.8 15.9	Federal employees health benefits plan Other health								(a)	
16.	Workers' compensation								(a)	
17.1	Other liability—occurrence									
17.2	Other liability—claims-made									
17.3	Excess workers' compensation									
18.1	Products liability—occurrence									
18.2	Products liability—claims-made									
19.1	Private passenger auto no-fault (personal injury protection)									
19.2 19.3	Other private passenger auto liability Commercial auto no-fault (personal injury protection)									
19.3	Other commercial auto liability									
21.1	Private passenger auto physical damage									
21.2	Commercial auto physical damage									
22.	Aircraft (all perils)									
23.	Fidelity									
24.	Surety									
26. 27.	Burglary and theft									
28.	Credit									
29.	International									
30.	Warranty									
31.	Reinsurance-nonproportional assumed property	XXX				XXX				
32.	Reinsurance-nonproportional assumed liability	XXX				XXX				
33.	Reinsurance-nonproportional assumed financial lines	XXX				XXX				
34.	Aggregate write-ins for other lines of business	ļ						1	1	
35.	TOTALS									
	S OF WRITE-INS									
3401. 3402.										
3402. 3403.										
	n. of remaining write-ins for Line 34 from overflow page									
	als (Lines 3401 through 3403 + 3498) (Line 34 above)									
()	ding \$ for present value of life inde									

⁽a) Including \$......for present value of life indemnity claims reported in Lines 13 and 15.

EXHIBIT OF PREMIUMS AND LOSSES (Statutory Page 14)

BUSINESS IN THE STATE OF **DURING THE YEAR** NAIC Company Code _____ NAIC Group Code _____

		Policy and M Less Return	iums, Including Iembership Fees, Premiums and	3 Dividends Paid	4	5	6	7	8	9	10	11	12
		1 Direct Premiums	Policies not Taken 2 Direct Premiums	or Credited to Policyholders on Direct	Direct Unearned Premium	Direct Losses Paid (deducting	Direct Losses	Direct Losses	Direct Defense and Cost Containment	Direct Defense and Cost Containment	Direct Defense and Cost Containment	Commissions and Brokerage	Taxes, Licenses
<u></u>	Line of Business	Written	Earned	Business	Reserves	salvage)	Incurred	Unpaid	Expense Paid	Expense Incurred	Expense Unpaid	Expenses	and Fees
	Fire												
	Multiple Peril Crop												
2.3	Federal Flood												
	Private Crop												
2.5	Private Flood												
3.	Farmowners Multiple Peril												
5.1	Commercial Multiple Peril (Non-Liability			***************************************		***************************************		***************************************					
	Commercial Multiple Peril (Liability Portion)												
	Mortgage Guaranty												
8.	Ocean Marine												
	Inland Marine												
	Pet Insurance Plans	<u></u>	<u></u>										
	Financial Guaranty												
11.1	Medical Professional Liability—Occurrence Medical Professional Liability—Claims-Made												
12.	Earthquake												
13.1	Comprehensive (hospital and medical) ind (b)												
13.2	Comprehensive (hospital and medical) group (b).												
14.	Credit A&H (Group and Individual)												
15.1	Vision Only (b) Dental Only (b)												
15.3	Disability Income (b)												
15.4	Medicare Supplement (b)												
15.5	Medicaid Title XIX (b)												
	Medicare Title XVIII (b)												
	Long-Term Care (b) Federal Employees Health Benefits Plan (b)												
	Other Health (b)												
16.	Workers' Compensation												
17.1	Other Liability—Occurrence												
17.2	Other Liability—Claims-Made												
17.3	Excess Workers' Compensation												
18.2	Products Liability—Claims-Made												
19.1	Private Passenger Auto No-Fault (Personal Injury												
	Protection)												
	Other Private Passenger Auto Liability												
19.3	Commercial Auto No-Fault (Personal Injury Protection)]
19.4	Other Commercial Auto Liability												
21.1	Private Passenger Auto Physical Damage												
	Commercial Auto Physical Damage												
22.													
23. 24.	Fidelity												
26.	Burglary and Theft												
27.	Boiler and Machinery												
28.	Credit												
29.	International												
30. 31	Warranty Reins nonproportional assumed property	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
32	Reins nonproportional assumed liability	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
33	Reins nonproportional assumed financial lines	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
34.	Aggregate Write-Ins for Other Lines of Business.												
35.	TOTAL (a)					1		1	1				
DET 3401	AILS OF WRITE-INS												
3402													
3403													
	.Sum of remaining write-ins for Line 34 from												
2.404	Overflow page												
3499	(Line 34 above)												

PART II – ALLOCATION TO LINES OF BUSINESS NET OF REINSURANCE

PREMIUMS, LOSSES, EXPENSES, RESERVES AND PROFITS AND PERCENTAGES TO PREMIUMS EARNED FOR BUSINESS NET OF REINSURANCE (\$000 OMITTED)

									L	oss Adjustn	nent Expense				Los	s Adjustn	nent Expense	:	Unearn			
	Premium	s Written			Divide	nds to	Incurre	d Loss	Defense a	and Cost	Adjustir	ng and	Unpaid	Losses	Defense a	nd Cost	Adjustin	o and	Premiu Reserve			
	(Pg. 8,		Premium	s Earned	Policyh		(Pg. 9,		Contair		Other Ex			Pt. 2A,	Contain		Other Ex		(Pg. 7, Pt.			
	Col			1, Col. 4)	(Pg. 4, L		Col.	- /	Expenses		Incur			. 8)	Expenses		Unpa		Col. 5		Agents' Bal	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
1. Fire	Amount	% XXX	Amount	% 100.0	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
2.1 Allied Lines		XXX		100.0																		
2.2 Multiple Peril Crop		XXX		100.0																		
2.3 Federal Flood 2.4 Private Crop		XXX XXX		100.0 100.0																		
2.5 Private Flood		XXX		100.0																		
Farmowners Multiple Peril Homeowners Multiple Peril		XXX XXX		100.0 100.0																		
5.1 Comm Mult Peril (Non-Liab)		XXX		100.0																		
5.2 Comm Mult Peril (Liab)		XXX		100.0																		
Mortgage Guaranty Ocean Marine		XXX XXX		100.0 100.0																		
9.1 Inland Marine		XXX		100.0																		
9.2 Pet Insurance Plans		XXX	<u></u>	100.0	<u></u>	<u></u>	<u></u>	<u></u>	<u></u>	<u></u>	<u></u>	<u></u>		<u></u>	<u></u>		<u></u>	<u></u>			<u></u>	<u></u>
Financial Guaranty 11.1 Med Prof Liab—Occurence		XXX XXX		100.0 100.0																		
11.2 Med Prof Liab—Claims-Made		XXX		100.0																		
12. Earthquake		XXX		100.0 100.0																		
13.2 Comprehensive Group		XXX		100.0																		
14. Credit A&H		XXX		100.0																		
15.1 Vision Only		XXX XXX		100.0 100.0																		
15.3 Disability Income		XXX		100.0																		
15.4 Medicare Supplement		XXX XXX		100.0 100.0																		
15.5 Medicaid Title XIX		XXX		100.0																		
15.7 Long-Term Care		XXX		100.0																		
15.8 FEHBP		XXX		100.0 100.0																		
16. Workers' Compensation		XXX		100.0																		
17.1 Other Liability—Occurrence		XXX		100.0																		
17.2 Other Liability—Claims-Made		XXX XXX		100.0 100.0																		
18.1 Products Liab—Occurrence		XXX		100.0																		
18.2 Products Liab— Claims-Made		XXX		100.0																		
19.1 Priv Passenger Auto No-Fault		XXX XXX		100.0 100.0																		
19.3 Commercial Auto No-Fault		XXX		100.0																		
Other Commercial Auto Liability Priv Passenger Auto Phys Damage		XXX XXX		100.0 100.0																		
21.1 Priv Passenger Auto Phys Damage		XXX		100.0																		
22. Aircraft (all perils)		XXX		100.0																		
23. Fidelity		XXX		100.0 100.0																		
24. Surety		XXX		100.0																		
27. Boiler and Machinery		XXX		100.0																		
28. Credit		XXX XXX		100.0 100.0																		
30 Warranty		XXX		100.0																		
31 Reins-Nonproportional Assumed Property		XXX		100.0																		
Reins-Nonproportional Assumed Liab Reins-Nonproportional Assumed Fin Lines		XXX		100.0 100.0																		
 Aggr Write-Ins for Other Lines of Bus 		XXX		100.0																		
35. TOTAL (Lines 1 through 34)		XXX		100.0																		
DETAILS OF WRITE-INS 3401.		XXX]	100.0]			1								1	1			1		1 1
3402.		XXX		100.0																		
3403.		XXX		100.0																		
3498. Summary of remaining write-ins for Line 34 from overflow page		XXX		100.0																		l
3499. TOTAL (Lines 3401 through 3403 plus																				1		
3498 (Line 34 above)	ļ	XXX	ļ	100.0	ļ		L						ļ		L		ļ					لـــــا

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PART II—ALLOCATION TO LINES OF BUSINESS NET OF REINSURANCE (Continued)

PREMIUMS, LOSSES, EXPENSES, RESERVES AND PROFITS AND PERCENTAGES TO PREMIUMS EARNED FOR BUSINESS NÉT OF REINSURANCE (\$000 OMITTED)

				Othe	er Underwi	riting Expenses	S														\neg
						Other Acqu										Profit or	Loss				ļ
		Commission	n and			Field Supe	rvision,	General E	Expenses					Investmen	t Gain	Exclud	ing	Investm	ent		ļ
		Brokerage Ex	penses	Taxes, Lic	enses &	and Colle	ection	Incu	rred	Other Inco	ome Less	Pre-Tax Pr	ofit or	on Fun	ıds	Investmen	t Gain	Gain	1		
		Incurred (IEE	Pt. 1,	Fees Inc		Expenses I		(IEE Pt.	1, Line	Other Ex		Loss Exclu	ading	Attributal	ble to	Attributal		Attributal			
		Line 2.8		(IEE Pt.		(IEE Pt. 1,		25		(Pg. 4, I		All Invest		Insurar		Capital		Capital		Total Profi	it or
		Col. 2)		20.5, C		minus 2.8		Col.	- /	minus I		Gain		Transact		Surplu		Surplu		Loss	
		23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42
		Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1.	Fire																				
	Allied Lines Multiple Peril Crop.																				
	Federal Flood.																				
	Private Crop.																				
2.5	Private Flood																				
3.	Farmowners Multiple Peril																				
4.	Homeowners Multiple Peril																				
5.1 5.2																					
6.	Mortgage Guaranty																				
8.	Ocean Marine																				
9. <u>1</u>	Inland Marine																				
9.2	Pet Insurance Plans																				
10. 11.1	Med Prof Liab—Occurrence																				
11.2	Med Prof Liab—Occurrence Med Prof Liab—Claims-Made																				
12.	Earthquake																				
13.1	Comprehensive Individual.																				
13.2																					
14. 15.1	Credit A&H Vision Only																				
15.1	Dental Only																				
15.3	Disability Income																				
	Medicare Supplement																				
15.5	Medicaid Title XIX																				
15.6 15.7																					
15.7																					
15.9	Other Health																				
16.	Workers' Compensation																				
17.1	Other Liability—Occurrence																				
17.2 17.3	Other Liability—Claims-Made Excess Workers' Compensation																				
18.1	Products Liab—Occurrence																				
18.2	Products Liab —Claims-Made																				
19.1	Priv Passenger Auto No-Fault																				
19.2.	Other Priv Passenger Auto Liab																				
19.3 19.4.																					
21.1																					
21.2	Commercial Auto Phys Damage																				
22.	Aircraft (all perils)																				
23. 24.	Fidelity																				
24.	Burglary and Theft																				
27.	Boiler and Machinery																				
28.	Credit																				
29.	International																				
30. 31.	Warranty Reins-Nonproportional Assumed Property																				
31.	Reins-Nonproportional Assumed Property																				
33.	Reins-Nonproportional Assumed Fin Lines																				
34.	Aggr Write-Ins for Other Lines of Bus														<u> </u>						
35.	TOTAL (Lines 1 through 34)																				
	AILS OF WRITE-INS																				
3401.																					
3402. 3403.																					
3403. 3498.	Summary of remaining write-ins for Line 34 from overflow page																				
	TOTAL (Lines 3401 through 3403 plus 3498) (Line 34 above)																				
3499.	1017L (Line 3401 tillough 3403 plus 3430) (Line 34 800Ve)	1				I.								1	1		1		1		

NOTE: THE ALLOCATION OF INVESTMENT INCOME FROM CAPITAL AND SURPLUS BY LINE OF BUSINESS MAY NOT ACCURATELY REFLECT THE PROFITABILITY OF A PARTICULAR LINE FOR USE IN THE RATE MAKING PROCESS.

PART III – ALLOCATION TO LINES OF DIRECT BUSINESS WRITTEN

PREMIUMS, LOSSES, EXPENSES, RESERVES AND PROFITS AND PERCENTAGES TO PREMIUMS EARNED FOR DIRECT BUSINESS WRITTEN (\$000 OMITTED)

					1				L	oss Adiustr	nent Expense	;			L	oss Adiustr	ment Expense	;				
	Premiums	Written	Premiums	Earned	Divide	ends	Incurre	d Loss	Defense a	-	Adjustii		Unpaid	Losses	Defense a		Adjustir					
	(Pg. 8, 1	Pt. 1B,	(Sch. T, I	ine 59,	to		(Sch. T, l	Line 59,	Contair	ment	Other Ex		(Sch. T, I		Contair		Other Ex		Unearned	Premium		
	Col.	1)	Col.	3)	Policyho	olders	Col.	6)	Expenses	Incurred	Incur	red	Col.	7)	Expenses	Unpaid	Unpa	aid	Rese	rves	Agents' Ba	lances
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
1. Fire		XXX		100.0																		
2.1 Allied Lines		XXX		100.0																		
2.2 Multiple Peril Crop		XXX XXX		100.0 100.0																		
2.4 Private Crop		XXX		100.0																		
2.5 Private Flood		XXX		100.0																		
Farmowners Multiple Peril		XXX		100.0																		
Homeowners Multiple Peril		XXX		100.0																		
5.1 Comm Mult Peril (Non-Liab)		XXX		100.0 100.0																		
5.2 Comm Mult Peril (Liab) 6. Mortgage Guaranty		XXX XXX		100.0																		
8. Ocean Marine		XXX		100.0																		
9.1 Inland Marine		XXX		100.0																		
9.2 Pet Insurance Plans		XXX		100.0	<u></u>					<u></u>												
10. Financial Guaranty		XXX		100.0																		
11.1 Med Prof Liab—Occurrence		XXX		100.0																		
11.2 Med Prof Liab—Claims-Made		XXX		100.0 100.0																		
13.1 Comprehensive Individual		XXX		100.0																		
13.2 Comprehensive Group		XXX		100.0																		
14. Credit A&H		XXX		100.0																		
15.1 Vision Only		XXX		100.0																		
15.2 Dental Only		XXX		100.0																		
15.3 Disability Income		XXX XXX		100.0 100.0																		
15.4 Medicare Supplement		XXX		100.0																		
15.6 Medicare Title XVIII		XXX		100.0																		
15.7 Long-Term Care		XXX		100.0																		
15.8 FEHBP		XXX		100.0																		
15.9 Other Health		XXX		100.0																		
16. Workers' Compensation		XXX		100.0																		
17.1 Other Liability—Occurrence		XXX XXX		100.0 100.0																		
17.2 Other Liability—Claims-Made		XXX		100.0																		
18.1 Products Liab—Occurrence		XXX		100.0																		
18.2 Products Liab—Claims-Made		XXX		100.0																		
19.1 Priv Passenger Auto No-Fault		XXX		100.0																		
19.2. Other Priv Passenger Auto Liab		XXX		100.0																		
19.3 Commercial Auto No-Fault		XXX XXX		100.0 100.0																		
19.4. Other Commercial Auto Liability		XXX		100.0																		
21.2 Commercial Auto Phys Damage		XXX		100.0																		
22. Aircraft (all perils)		XXX		100.0																		
23. Fidelity		XXX		100.0																		
24. Surety		XXX		100.0																		
26. Burglary and Theft		XXX XXX		100.0 100.0																		
28. Credit		XXX		100.0																		
29. International		XXX		100.0																		
30. Warranty		XXX		100.0																		
 Reins-Nonproportional Assumed Property 	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
32. Reins-Nonproportional Assumed Liab	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
33. Reins-Nonproportional Assumed Fin Lines.	XXX	XXX	XXX	XXX 100.0	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
 Aggr Write-Ins for Other Lines of Bus TOTAL (Lines 1 through 34) 	-	XXX	H	100.0	-		-										1				-	\vdash
DETAILS OF WRITE-INS		АЛЛ		100.0																		
3401		XXX		100.0																		
3402.		XXX		100.0																		
3403		XXX		100.0																		
3498. Summary of remaining write-ins for Line													l						l		1	
34 from overflow page		XXX		100.0																		
3499. TOTAL (Lines 3401 through 3403 plus 3498) (Line 34 above)		XXX		100.0			1						l						l		ĺ	
5496) (Line 54 above)	1	ΛΛΛ		100.0			1	l					l			1	1	l				

PART III – ALLOCATION TO LINES OF DIRECT BUSINESS WRITTEN (Continued) PREMIUMS, LOSSES, EXPENSES, RESERVES AND PROFITS AND PERCENTAGES TO PREMIUMS EARNED FOR DIRECT BUSINESS WRITTEN (\$000 OMITTED)

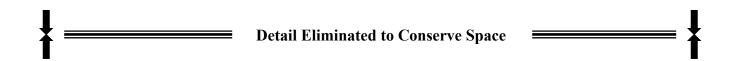
						iting Expenses							Į.
				04.	er onderm	Other Acquisition	ns Field						
		Commission	and			Supervision						Pre-Tax Profit	or Loss
		Brokerage Ex		Taxes, Licenses	& Fees	Collection Ex		General Exp	enses	Other Income	e I ess	Excluding	
		Incurred		Incurred		Incurred		Incurred		Other Expe		Investme	
		23	24	25		27	28	29	30	31	32	33	34
		Amount	24 %	25 Amount	26 %	27 Amount	28 %	Amount	30 %	Amount	32 %	Amount	34 %
-	Fire	Amount	/0	Amount	/0	Amount	/0	Amount	/0	Amount	/0	Amount	/0
	Allied Lines												
	Multiple Peril Crop												
2.3	Federal Flood												
	Private Crop												
	Private Flood												
3. 4.	Homeowners Multiple Peril												
	Comm Mult Peril (Non-Liab)							***************************************					
5.2	Comm Mult Peril (Liab)												
	Mortgage Guaranty												
8.	Ocean Marine												
	Inland Marine												
9.2	Pet Insurance Plans										<u></u>	<u></u>	<u></u>
10.	Financial Guaranty												
	Med Prof Liability—Occurrence Med Prof Liability—Claims-Made												
12	Earthquake												
	Comprehensive Individual.												
	Comprehensive Group												
14.	Credit A&H												
	Vision Only												
	Dental Only												
	Disability Income												
	Medicare Supplement												
	Medicare Title XVIII												
	Long-Term Care												
	FEHBP												
	Other Health												
	Workers' Compensation												
	Other Liability—Occurrence												
17.2	Other Liability—Claims-Made												
	Excess Workers' Compensation												
18.1	Products Liab—Occurrence Products Liab—Claims-Made												
	Priv Passenger Auto No-Fault												
	Other Priv Passenger Auto Liab												
19.3	Commercial Auto No-Fault												
	Other Commercial Auto Liability												
	Priv Passenger Auto Phys Damage												
21.2	Commercial Auto Phys Damage												
	Aircraft (all perils)												
	Surety												
26.	Burglary and Theft												
27.	Boiler and Machinery												
28.	Credit												
29.	International												
30.	Warranty	373737		373737		373737		373737					
31.	Reins-Nonproportional Assumed Property	XXX	XXX	XXX XXX	XXX	XXX XXX	XXX XXX	XXX XXX	XXX	XXX	XXX XXX	XXX XXX	XXX XXX
32. 33.	Reins-Nonproportional Assumed Liab	XXX XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX XXX	XXX	XXX	XXX
34.	Aggr Write-Ins for Other Lines of Bus.	AAA	777	ллл	ллл	ллл	ллл	۸۸۸	АЛА	AAA	АЛА	АЛА	AAA
35.	TOTAL (Lines 1 through 34)												
	LS OF WRITE-INS	l						l		I			
3401.	LS OF WRITE-INS									1			
3401.													
3403.													
3498.	Summary of remaining write-ins for Line 34 from overflow page												
3499.	TOTAL (Lines 3401 through 3403 plus 3498) (Line 34 above)												

$\frac{\textbf{SCHEDULE P-PART 1U-PET INSURANCE PLANS}}{\textbf{(\$000 OMITTED)}}$

	<u>P</u>	remiums E	arned				Loss and Lo	ss Expense Pay	ments/			12
	<u>1</u>	2	<u>3</u>			Defense a	ınd Cost	Adjusting a	and Other	<u>10</u>	<u>11</u>	_
				Loss Pay	ments	Containmen	t Payments	Paym	<u>ents</u>			Number of
Years in Which				<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	9	Salvage	Total Net	Claims Reported
Premiums Were	Direct			Direct		Direct		Direct		and	Paid	Direct
Earned and Losses	<u>and</u>		<u>Net</u>	<u>and</u>		<u>and</u>		<u>and</u>		Subrogation	(Cols. 4 - 5 +	<u>and</u>
Were Incurred	Assumed	Ceded	(Cols. $1-2$)	Assumed	Ceded	Assumed	Ceded	Assumed	Ceded	Received	6 - 7 + 8 - 9	Assumed
1. Prior	XXX	XXX	XXX									XXX
2. 2023												XXX
3. 2024												XXX
4. Totals	XXX	XXX	XXX									XXX

		Lossos	Unpaid		Dofono	a and Cost C	ontainment Un	anid.	Adjusting a		<u>23</u>	<u>24</u>	<u>25</u>
	Case Ba		Bulk +	IBNR	Case I		Bulk + I		2 <u>1</u>	<u>22</u>		Total Net	Number of Claims
	13 Direct	<u>14</u>	15 Direct	<u>16</u>	17 Direct	<u>18</u>	19 Direct	<u>20</u>	Direct		Salvage	Losses and	Outstanding Direct
	and		and		and		and		and		and Subrogation	Expenses	and
	Assumed	Ceded	Assumed	Ceded	Assumed	Ceded	Assumed	Ceded	Assumed	Ceded	Anticipated	<u>Unpaid</u>	Assumed
1 2 3.								<u></u>					
<u>4.</u>													

	Losses and	Total Loss Expens	es Incurred		oss Expense Pod/Premiums E		Nontabular 1	Discount Discount	<u>34</u>		lance Sheet After Discount
	26 Direct	<u>27</u>	<u>28</u>	29 Direct	<u>30</u>	<u>31</u>	<u>32</u>	<u>33</u>	Inter-Company Pooling	<u>35</u>	36 Loss
	and Assumed	Ceded	Net	and Assumed	Ceded	Net	Loss	Loss	Participation Percentage	Losses Unpaid	Expenses Unpaid
_1	XXX	XXX	XXX	XXX	XXX	XXX	Loss	Expense	XXX		Olipaid
<u>2</u>											
4.	XXX	XXX	XXX	XXX	XXX	XXX			XXX		

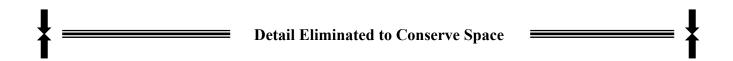


<u>SCHEDULE P – PART 2U – PET INSURANCE PLANS</u>

	INC	URRED NET LO	OSSES AND DE	FENSE AND C	OST CONTAIN	MENT EXPEN	SES REPORTE	D AT YEAR-EN	D (\$000 OMIT	ΓED)	DEVELO	<u>OPMENT</u>
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	8	9	<u>10</u>	<u>11</u>	<u>12</u>
Years in Which											One	Two
Losses Were Incurred	2015	<u>2016</u>	<u>2017</u>	2018	2019	<u>2020</u>	<u>2021</u>	<u>2022</u>	2023	<u>2024</u>	Year	Year
1. Prior	XXX	XXX	XXX	XXX	XXX	XXX	XXX					
2. 2023	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX				XXX
<u>3. 2024</u>	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX		XXX	XXX
										4.Totals		

<u>SCHEDULE P – PART 3U – PET INSURANCE PLANS</u>

	CUMULA	TIVE PAID NE	Γ LOSSES ANI	DEFENSE AN	ID COST CON	TAINMENT EX	PENSES REPO	ORTED AT YEA	AR-END (\$000)	OMITTED)	<u>11</u>	<u>12</u>
	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	9	<u>10</u>	Number of	Number of
											Claims Closed	Claims Closed
Years in Which											With Loss	Without Loss
Losses Were Incurred	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>Payment</u>	<u>Payment</u>
1. Prior	XXX	XXX	XXX	XXX	XXX	XXX	XXX	000			XXX	XXX
2. 2023	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX		<u></u>	XXX	XXX
3. 2024	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX		XXX	XXX



SCHEDULE P – PART 4U – PET INSURANCE PLANS

	BU	LK AND IBNR RE	SERVES ON NET	LOSSES AND DEI	FENSE AND COST	CONTAINMENT	EXPENSES REPO	ORTED AT YEAR-	END (\$000 OMITT	ED)
Years in Which	1	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	9	<u>10</u>
Losses Were Incurred	2015	<u>2016</u>	<u>2017</u>	2018	2019	2020	2021	2022	2023	<u>2024</u>
1. Prior	XXX	XXX	XXX	XXX	XXX	XXX	XXX			
2. 2023	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX		
3. 2024	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	

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From: connie.cjwassociates@gmail.com <connie.cjwassociates@gmail.com>

Sent: Wednesday, March 22, 2023 2:52 PM

To: Yeung, Eva K. <EYeung@naic.org> **Cc:** connie.cjwassociates@gmail.com

Subject: PRBC meeting today

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Eva,

During the meeting today, the discussion turned to the Blanks Working Group item 2022-15 which has already been adopted. That adoption removed an instruction from the Property/Casualty Annual Statements Instructions indicating that entities whose A&H business is less than 5% did not need to complete Schedule H – Part 5. Tom made the comment that perhaps the PRBC Working Group should consider removing the 5% instruction for A&H business from the PRBC.

I would like to submit that the two items are not related at all. It is just coincidence that 5% is mentioned in both circumstances.

Previously, P&C companies with LESS THAN 5% A&H premium did not have to complete Schedule H – Part 5. They still had to complete the other four parts of Schedule H. Part 5 is a recap of health claims and is not used for the "5% premium test" in the PRBC.

The PRBC uses equal to or greater than 5% of PREMIUMS as a benchmark for determining if the reporting entity should include A&H premium in the P&C Underwriting Risk (PR017 & PR018) or if, instead, they need to include the A&H business in the health section of the formula. This threshold for premiums is not related to the completion (or not) of Schedule H – Part 5.

Therefore, I personally think it would be a mistake to delete the 5% A&H premium threshold from the PRBC. That would result in the loss of valuable information in the Health section.

Please feel free to share this with Tom. I didn't have his email address handy to be able to include him on this email.

Thanks.

Connie

Connie Jasper Woodroof
CJW Associates
connie.cjwassociates@gmail.com
913-709-4192

NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

		TOD MAIG LISE ONLY
	DATE: 08/19/2022	FOR NAIC USE ONLY Agenda Item # 2022-15BWG
CONTACT PERSON:		Year
CONTACT PERSON.		Changes to Existing Reporting [X]
TELEPHONE:		New Reporting Requirement []
EMAIL ADDRESS:		REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT
ON BEHALF OF:		No Impact [X]
NAME:		Modifies Required Disclosure [] DISPOSITION
TITLE:		[] Rejected For Public Comment
AFFILIATION:	Missouri Department of Insurance	[] Referred To Another NAIC Group [X] Received For Public Comment
ADDRESS:	301 W High St #630	[] Adopted Date
	Jefferson City, MO 65101	[] Deferred Date
	Jenerson erty, mo obiot	[] Other (Specify)
•	BLANK(S) TO WHICH PROPOSAL API	PLIES
[X] ANNUAL STATEM [] QUARTERLY STAT		[X] CROSSCHECKS
[X] Life, Accident & H [X] Property/Casualty [] Health	lealth/Fraternal [] Separate Accounts / [] Protected Cell [] Health (Life Supplement)	[] Title [] Other
Anticipated Effective Date:	Annual 2023	
	IDENTIFICATION OF ITEM(S) TO CHA	NGE
Revise the language of the	Schedule H, Part 5 to remove the 5% of premiums	filing exemption (FE).
	REASON, JUSTIFICATION FOR AND/OR BENEFIT	F OF CHANGE**
was updated for Annual 2 nstructions for Schedule H	al is to remove the 5% of premium filing exemption 2022 to bring uniformity in the accident and he , Part 5 had the less than 5% filing exemption and temoval of the 5% exemption would require both Pr	alth lines of business, the Property/Casualty the Life/Fraternal instructions did not have the
	NAIC STAFF COMMENTS	
Comment on Effective Rep	orting Date:	
Other Comments:		

^{**} This section must be completed on all forms.

SCHEDULE H

ACCIDENT AND HEALTH EXHIBIT



PART 5 – HEALTH CLAIMS

Companies with less than 5% of premiums in Accident and Health business should not complete this schedule.

A. <u>DIRECT</u>

Line 1 - Incurred Claims

Should agree with Line 3 plus Line 4 minus Line 2.



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