

NAIC BLANKS (E) WORKING GROUP

Blanks Agenda Item Submission Form

		DATE: <u>11/4/2022</u>	FOR NAIC USE ONLY
CONTACT PERSON:	<u>Debbie Doggett (MO DCI) & Gavin Friedman (American Pet Ins Co; ZPIC Ins Co)</u>		Agenda Item # <u>2023-01BWG</u> Year <u>2024</u> Changes to Existing Reporting <input type="checkbox"/> [X] New Reporting Requirement <input type="checkbox"/> []
TELEPHONE:	<u>Debbie (573) 526-2944 / Gavin (310) 254-5256</u>		REVIEWED FOR ACCOUNTING PRACTICES AND PROCEDURES IMPACT
EMAIL ADDRESS:	<u>debbie.doggett@insurance.mo.gov / gavin.friedman@trupanion.com</u>		No Impact <input checked="" type="checkbox"/> [X] Modifies Required Disclosure <input type="checkbox"/> []
ON BEHALF OF:	<u>Joint submission by (i) the MO Dept of Commerce and Insurance and (ii) American Pet Ins Co and ZPIC Ins Co</u>		Is there data being requested in this proposal which is available elsewhere in the Annual/Quarterly Statement? <input type="checkbox"/> [No] <i>***If Yes, complete question below***</i>
NAME:	<u>Debbie Doggett</u>		DISPOSITION
TITLE:	<u>Chief Financial Analyst</u>		<input type="checkbox"/> [] Rejected For Public Comment <input type="checkbox"/> [] Referred To Another NAIC Group <input checked="" type="checkbox"/> [X] Received For Public Comment <input type="checkbox"/> [] Adopted Date _____ <input type="checkbox"/> [] Rejected Date _____ <input type="checkbox"/> [] Deferred Date _____ <input type="checkbox"/> [] Other (Specify) _____
AFFILIATION:	<u>Missouri DCI</u>		
ADDRESS:	<u>301 W Hight St. #530, Jefferson City, MO 65101</u>		

BLANK(S) TO WHICH PROPOSAL APPLIES

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> [X] ANNUAL STATEMENT | <input type="checkbox"/> [] INSTRUCTIONS | <input checked="" type="checkbox"/> [X] CROSSCHECKS |
| <input checked="" type="checkbox"/> [X] QUARTERLY STATEMENT | <input checked="" type="checkbox"/> [X] BLANK | |
| <input type="checkbox"/> [] Life, Accident & Health/Fraternal | <input type="checkbox"/> [] Separate Accounts | <input type="checkbox"/> [] Title |
| <input checked="" type="checkbox"/> [X] Property/Casualty | <input type="checkbox"/> [] Protected Cell | <input type="checkbox"/> [] Other _____ |
| <input type="checkbox"/> [] Health | <input type="checkbox"/> [] Health (Life Supplement) | |

Anticipated Effective Date: January 1, 2024

IDENTIFICATION OF ITEM(S) TO CHANGE

Remove Pet Insurance from Inland Marine line of business and add a new line of business to Appendix – P/C Lines of Business. Add Pet Insurance line within the existing P/C Blank for the Underwriting and Investment Exhibits, Exhibit of Premiums and Losses (State Page), and Insurance Expense Exhibit. Add new Schedule P Parts 1 through 4 specific to Pet Insurance.

REASON, JUSTIFICATION FOR AND/OR BENEFIT OF CHANGE**

See Page 2 for detailed reason and justification for change.

*****IF THE DATA IS AVAILABLE ELSEWHERE IN THE ANNUAL/QUARTERLY STATEMENT, PLEASE NOTE WHY IT IS REQUIRED FOR THIS PROPOSAL*****

NAIC STAFF COMMENTS

Comment on Effective Reporting Date: _____

Other Comments:

** This section must be completed 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.

Line 9.2 – 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.

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 =====** ↓

Non-proportional assumed reinsurance –Property Reinsurance

Includes all the following lines: Fire, Allied Lines, Ocean Marine, Inland Marine, Pet Insurance Plans, Earthquake, Group Accident and Health, Credit Accident and Health, Other Accident and Health, Auto Physical Damage, Boiler and Machinery, Burglary and Theft and International (of the foregoing).

↓ **===== Detail Eliminated to Conserve Space =====** ↓

SCHEDULE P – PARTS 1A THROUGH 4F1U

Reporting entities should complete Schedule P in thousands only but must report all claim counts in whole numbers.

↓ **===== Detail Eliminated to Conserve Space =====** ↓

ANNUAL STATEMENT BLANKS – PROPERTY/CASUALTY

UNDERWRITING AND INVESTMENT EXHIBIT
PART 1 – PREMIUMS EARNED

Line of Business	1 Net Premiums Written per Column 6, Part 1B	2 Unearned 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	4 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 Commercial multiple peril (liability portion)
6. Mortgage guaranty
8. Ocean marine
9.1 Inland marine
9.2. <u>Pet Insurance Plans</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) 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 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
32. Reinsurance-nonproportional assumed liability
33. Reinsurance-nonproportional assumed financial lines
34. Aggregate write-ins for other lines of business
35. TOTALS
DETAILS OF WRITE-INS				
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)

**UNDERWRITING AND INVESTMENT EXHIBIT
PART 1A – RECAPITULATION OF ALL PREMIUMS**

Line of Business	1 Amount Unearned (Running One Year or Less from Date of Policy) (a)	2 Amount Unearned (Running More Than One Year from Date of Policy) (a)	3 Earned but Unbilled Premium	4 Reserve for Rate Credits and Retrospective Adjustments Based on Experience	5 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 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					
9.1 Inland marine					
9.2 <u>Pet Insurance Plans</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) individual					
13.2 Comprehensive (hospital and medical) group.....					
14. Credit accident and health					
individual)					
15.1 Vision only.....					
15.2 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					
32. Reinsurance-nonproportional assumed liability					
33. Reinsurance-nonproportional assumed financial lines					
34. Aggregate write-ins for other lines of business					
35. TOTALS					
36. Accrued retrospective premiums based on experience.....					
37. Earned but unbilled premiums.....					
38. Balance (Sum of Lines 35 through 37)					
DETAILS OF WRITE-INS					
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)					

(a) State here basis of computation used in each case

UNDERWRITING AND INVESTMENT EXHIBIT
PART 1B – PREMIUMS WRITTEN

Line of Business	1 Direct Business (a)	Reinsurance Assumed		Reinsurance Ceded		6 Net Premiums Written Cols. 1+2+3- 4-5
		2 From Affiliates	3 From Non- Affiliates	4 To Affiliates	5 To Non- Affiliates	
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
9.1 Inland marine
9.2 <u>Pet Insurance Plans</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) 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 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 assumed liability	XXX
33. Reinsurance-nonproportional assumed financial lines	XXX
34. Aggregate write-ins for other lines of business
35. TOTALS
DETAILS OF WRITE-INS						
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)

(a) Does the company's direct premiums written include premiums recorded on an installment basis? Yes [] No []
 If yes: 1. The amount of such installment premiums \$.....
 2. Amount at which such installment premiums would have been reported had they been recorded on an annualized basis \$.....

UNDERWRITING AND INVESTMENT EXHIBIT
PART 2 – LOSSES PAID AND INCURRED

Line of Business	Losses Paid Less Salvage				5 Net Losses Unpaid Current Year (Part 2A, Col. 8)	6 Net Losses Unpaid Prior Year	7 Losses Incurred Current Year (Cols. 4 + 5 - 6)	8 Percentage of Losses Incurred (Col. 7, Part 2) to Premiums Earned (Col. 4, Part 1)
	1 Direct Business	2 Reinsurance Assumed	3 Reinsurance Recovered	4 Net Payments (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 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) 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 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 assumed liability	XXX							
33. Reinsurance-nonproportional assumed financial lines	XXX							
34. Aggregate write-ins for other lines of business								
35. TOTALS								
DETAILS OF WRITE-INS								
3401.								
3402.								
3403.								
3498. Sum. of remaining write-ins for Line 34 from overflow page								
3499. Totals (Lines 3401 through 3403 + 3498) (Line 34 above)								

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

Line of Business	Reported Losses				Incurred But Not Reported			8 Net Losses Unpaid (Cols. 4 + 5 + 6 - 7)	9 Net Unpaid Loss Adjustment Expenses
	1 Direct	2 Reinsurance Assumed	3 Deduct Reinsurance Recoverable	4 Net Losses Excl. Incurred But Not Reported (Cols. 1+2-3)	5 Direct	6 Reinsurance Assumed	7 Reinsurance Ceded		
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									
9.1 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) individual								(a)	
13.2 Comprehensive (hospital and medical) group								(a)	
14. Credit accident and health (group and individual)									
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 Federal employees health benefits plan								(a)	
15.9 Other health								(a)	
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				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									
35. TOTALS									
DETAILS OF WRITE-INS									
3401.									
3402.									
3403.									
3498. Sum. of remaining write-ins for Line 34 from overflow page									
3499. Totals (Lines 3401 through 3403 + 3498) (Line 34 above)									

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

EXHIBIT OF PREMIUMS AND LOSSES (Statutory Page 14)

NAIC Group Code _____

BUSINESS IN THE STATE OF

DURING THE YEAR

NAIC Company Code _____

Line of Business	Gross Premiums, Including Policy and Membership Fees, Less Return Premiums and Premiums on Policies not Taken		3 Dividends Paid or Credited to Policyholders on Direct Business	4 Direct Unearned Premium Reserves	5 Direct Losses Paid (deducting salvage)	6 Direct Losses Incurred	7 Direct Losses Unpaid	8 Direct Defense and Cost Containment Expense Paid	9 Direct Defense and Cost Containment Expense Incurred	10 Direct Defense and Cost Containment Expense Unpaid	11 Commissions and Brokerage Expenses	12 Taxes, Licenses and Fees
	1 Direct Premiums Written	2 Direct Premiums Earned										
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.....												
9.1 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) ind (b).....												
13.2 Comprehensive (hospital and medical) group (b).....												
14. Credit A&H (Group and Individual).....												
15.1 Vision Only (b).....												
15.2 Dental Only (b).....												
15.3 Disability Income (b).....												
15.4 Medicare Supplement (b).....												
15.5 Medicaid Title XIX (b).....												
15.6 Medicare Title XVIII (b).....												
15.7 Long-Term Care (b).....												
15.8 Federal Employees Health Benefits Plan (b).....												
15.9 Other Health (b).....												
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. 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).....												
DETAILS OF WRITE-INS												
3401.....												
3402.....												
3403.....												
3498.Sum of remaining write-ins for Line 34 from overflow page.....												
3499.TOTAL (Lines 3401 through 3403 plus 3498) (Line 34 above).....												

(a) Finance and service charges not included in Lines 1 to 35 \$
 (b) For health business on indicated lines report: Number of persons insured under PPO managed care products and number of persons insured under indemnity only products

INSURANCE EXPENSE EXHIBIT
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)

	Premiums Written (Pg. 8, Pt. 1B, Col. 6)		Premiums Earned (Pg. 6, Pt. 1, Col. 4)		Dividends to Policyholders (Pg. 4, Line 17)		Incurred Loss (Pg. 9, Pt. 2, Col. 7)		Loss Adjustment Expense				Unpaid Losses (Pg. 10, Pt. 2A, Col. 8)		Loss Adjustment Expense				Unearned Premium Reserves (Pg. 7, Pt. 1A, Col. 5)		Agents' Balances		
	1 Amount	2 %	3 Amount	4 %	5 Amount	6 %	7 Amount	8 %	Defense and Cost Containment Expenses Incurred		Adjusting and Other Expenses Incurred		13 Amount	14 %	Defense and Cost Containment Expenses Unpaid		Adjusting and Other Expenses Unpaid		19 Amount	20 %	21 Amount	22 %	
									9 Amount	10 %	11 Amount	12 %			15 Amount	16 %	17 Amount	18 %					
1. Fire		XXX		100.0																			
2.1 Allied Lines		XXX		100.0																			
2.2 Multiple Peril Crop.....		XXX		100.0																			
2.3 Federal Flood.....		XXX		100.0																			
2.4 Private Crop.....		XXX		100.0																			
2.5 Private Flood		XXX		100.0																			
3. Farmowners Multiple Peril		XXX		100.0																			
4. Homeowners Multiple Peril		XXX		100.0																			
5.1 Comm Mult Peril (Non-Liab).....		XXX		100.0																			
5.2 Comm Mult Peril (Liab).....		XXX		100.0																			
6. Mortgage Guaranty.....		XXX		100.0																			
8. Ocean Marine		XXX		100.0																			
9.1 Inland Marine		XXX		100.0																			
9.2 Pet Insurance Plans.....		XXX		100.0																			
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																			
12. Earthquake.....		XXX		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		100.0																			
15.4 Medicare Supplement.....		XXX		100.0																			
15.5 Medicaid Title XIX		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		100.0																			
17.2 Other Liability—Claims-Made.....		XXX		100.0																			
17.3 Excess Workers' Compensation.....		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		100.0																			
19.4. Other Commercial Auto Liability.....		XXX		100.0																			
21.1 Priv Passenger Auto Phys Damage.....		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		100.0																			
27. Boiler and Machinery		XXX		100.0																			
28. Credit		XXX		100.0																			
29. International.....		XXX		100.0																			
30. Warranty.....		XXX		100.0																			
31. Reins-Nonproportional Assumed Property.....		XXX		100.0																			
32. Reins-Nonproportional Assumed Liab.....		XXX		100.0																			
33. Reins-Nonproportional Assumed Fin Lines..		XXX		100.0																			
34. 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																			
3402.		XXX		100.0																			
3403.		XXX		100.0																			
3498. Summary of remaining write-ins for Line 34 from overflow page		XXX		100.0																			
3499. TOTAL (Lines 3401 through 3403 plus 3498 (Line 34 above))		XXX		100.0																			

INSURANCE EXPENSE EXHIBIT
PART II—ALLOCATION TO LINES OF BUSINESS NET OF REINSURANCE (Continued)
PREMIUMS, LOSSES, EXPENSES, RESERVES AND PROFITS AND PERCENTAGES TO PREMIUMS EARNED FOR BUSINESS NET OF REINSURANCE
(\$000 OMITTED)

	Other Underwriting Expenses								Other Income Less Other Expenses (Pg. 4, Line 15 minus Line 5)		Pre-Tax Profit or Loss Excluding All Investment Gain		Investment Gain on Funds Attributable to Insurance Transactions		Profit or Loss Excluding Investment Gain Attributable to Capital and Surplus		Investment Gain Attributable to Capital and Surplus		Total Profit or Loss	
	Commission and Brokerage Expenses Incurred (IEE Pt. 1, Line 2.8, Col. 2)		Taxes, Licenses & Fees Incurred (IEE Pt. 1, Line 20.5, Col. 4)		Other Acquisitions, Field Supervision, and Collection Expenses Incurred (IEE Pt. 1, Line 25 minus 2.8 Col. 2)		General Expenses Incurred (IEE Pt. 1, Line 25, Col. 3)													
	23 Amount	24 %	25 Amount	26 %	27 Amount	28 %	29 Amount	30 %	31 Amount	32 %	33 Amount	34 %	35 Amount	36 %	37 Amount	38 %	39 Amount	40 %	41 Amount	42 %
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 Comm Mult Peril (Non-Liab)																				
5.2 Comm Mult Peril (Liab)																				
6. Mortgage Guaranty																				
8. Ocean Marine																				
9.1 Inland Marine																				
9.2 Pet Insurance Plans																				
10. Financial Guaranty																				
11.1 Med Prof Liab—Occurrence																				
11.2 Med Prof Liab—Claims-Made																				
12. Earthquake																				
13.1 Comprehensive Individual																				
13.2 Comprehensive Group																				
14. Credit A&H																				
15.1 Vision Only																				
15.2 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 FEHBP																				
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 Liab—Occurrence																				
18.2 Products Liab—Claims-Made																				
19.1 Priv Passenger Auto No-Fault																				
19.2 Other Priv Passenger Auto Liab																				
19.3 Commercial Auto No-Fault																				
19.4 Other Commercial Auto Liab																				
21.1 Priv Passenger Auto Phys Damage																				
21.2 Commercial Auto Phys Damage																				
22. Aircraft (all perils)																				
23. Fidelity																				
24. Surety																				
26. Burglary and Theft																				
27. Boiler and Machinery																				
28. Credit																				
29. International																				
30. Warranty																				
31. Reins-Nonproportional Assumed Property																				
32. Reins-Nonproportional Assumed Liab																				
33. Reins-Nonproportional Assumed Fin Lines																				
34. Aggr Write-Ins for Other Lines of Bus.																				
35. TOTAL (Lines 1 through 34)																				
DETAILS OF WRITE-INS																				
3401.																				
3402.																				
3403.																				
3498. Summary of remaining write-ins for Line 34 from overflow page																				
3499. TOTAL (Lines 3401 through 3403 plus 3498) (Line 34 above)																				

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.

INSURANCE EXPENSE EXHIBIT
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)

	Premiums Written (Pg. 8, Pt. 1B, Col. 1)		Premiums Earned (Sch. T, Line 59, Col. 3)		Dividends to Policyholders		Incurred Loss (Sch. T, Line 59, Col. 6)		Loss Adjustment Expense				Unpaid Losses (Sch. T, Line 59, Col. 7)		Loss Adjustment Expense				Unearned Premium Reserves		Agents' Balances	
	1	2	3	4	5	6	7	8	Defense and Cost Containment Expenses Incurred		Adjusting and Other Expenses Incurred		13	14	Defense and Cost Containment Expenses Unpaid		Adjusting and Other Expenses Unpaid		19	20	21	22
									9	10	11	12			15	16	17	18				
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		100.0																		
2.3 Federal Flood		XXX		100.0																		
2.4 Private Crop		XXX		100.0																		
2.5 Private Flood		XXX		100.0																		
3. Farmowners Multiple Peril		XXX		100.0																		
4. Homeowners Multiple Peril		XXX		100.0																		
5.1 Comm Mult Peril (Non-Liab)		XXX		100.0																		
5.2 Comm Mult Peril (Liab)		XXX		100.0																		
6. Mortgage Guaranty		XXX		100.0																		
8. Ocean Marine		XXX		100.0																		
9.1 Inland Marine		XXX		100.0																		
9.2 Pet Insurance Plans		XXX		100.0																		
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																		
12. Earthquake		XXX		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		100.0																		
15.4 Medicare Supplement		XXX		100.0																		
15.5 Medicaid Title XIX		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		100.0																		
17.2 Other Liability—Claims-Made		XXX		100.0																		
17.3 Excess Workers' Compensation		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		100.0																		
19.4. Other Commercial Auto Liability		XXX		100.0																		
21.1 Priv Passenger Auto Phys Damage		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		100.0																		
27. Boiler and Machinery		XXX		100.0																		
28. Credit		XXX		100.0																		
29. International		XXX		100.0																		
30. Warranty		XXX		100.0																		
31. 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	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
34. 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																		
3402.		XXX		100.0																		
3403.		XXX		100.0																		
3498. Summary of remaining write-ins for Line																						
34 from overflow page		XXX		100.0																		
3499. TOTAL (Lines 3401 through 3403 plus																						
3498) (Line 34 above)		XXX		100.0																		

INSURANCE EXPENSE EXHIBIT
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)

	Other Underwriting Expenses								Other Income Less Other Expenses		Pre-Tax Profit or Loss Excluding All Investment	
	Commission and Brokerage Expenses Incurred		Taxes, Licenses & Fees Incurred		Other Acquisitions, Field Supervision, and Collection Expenses Incurred		General Expenses Incurred					
	23	24	25	26	27	28	29	30	31	32	33	34
	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
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 Comm Mult Peril (Non-Liab)												
5.2 Comm Mult Peril (Liab)												
6. Mortgage Guaranty												
8. Ocean Marine												
9.1 Inland Marine												
9.2 Pet Insurance Plans												
10. Financial Guaranty												
11.1 Med Prof Liability—Occurrence												
11.2 Med Prof Liability—Claims-Made												
12. Earthquake												
13.1 Comprehensive Individual												
13.2 Comprehensive Group												
14. Credit A&H												
15.1 Vision Only												
15.2 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 FEHBP												
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 Liab—Occurrence												
18.2 Products Liab—Claims-Made												
19.1 Priv Passenger Auto No-Fault												
19.2 Other Priv Passenger Auto Liab												
19.3 Commercial Auto No-Fault												
19.4 Other Commercial Auto Liability												
21.1 Priv Passenger Auto Phys Damage												
21.2 Commercial Auto Phys Damage												
22. Aircraft (all perils)												
23. Fidelity												
24. Surety												
26. Burglary and Theft												
27. Boiler and Machinery												
28. Credit												
29. International												
30. Warranty												
31. Reins-Nonproportional Assumed Property	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
33. Reins-Nonproportional Assumed Fin Lines	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
34. Aggr Write-Ins for Other Lines of Bus												
35. TOTAL (Lines 1 through 34)												
DETAILS OF WRITE-INS												
3401.												
3402.												
3403.												
3498. Summary of remaining write-ins for Line 34 from overflow page												
3499. TOTAL (Lines 3401 through 3403 plus 3498) (Line 34 above)												

SCHEDULE P – PART 1U – PET INSURANCE PLANS
(\$000 OMITTED)

Years in Which Premiums Were Earned and Losses Were Incurred	Premiums Earned			Loss and Loss Expense Payments						12 Number of Claims Reported Direct and Assumed		
	1 Direct and Assumed	2 Ceded	3 Net (Cols. 1-2)	Loss Payments		Defense and Cost Containment Payments		Adjusting and Other Payments			10 Salvage and Subrogation Received	11 Total Net Paid (Cols. 4 - 5 + 6 - 7 + 8 - 9)
				4 Direct and Assumed	5 Ceded	6 Direct and Assumed	7 Ceded	8 Direct and Assumed	9 Ceded			
1. Prior.....	XXX	XXX	XXX	XXX
2. 2023.....	XXX
3. 2024.....	XXX
4. Totals	XXX	XXX	XXX									XXX

	Losses Unpaid				Defense and Cost Containment Unpaid				Adjusting and Other Unpaid		23 Salvage and Subrogation Anticipated	24 Total Net Losses and Expenses Unpaid	25 Number of Claims Outstanding Direct and Assumed
	Case Basis		Bulk + IBNR		Case Basis		Bulk + IBNR		21 Direct and Assumed	22 Ceded			
	13 Direct and Assumed	14 Ceded	15 Direct and Assumed	16 Ceded	17 Direct and Assumed	18 Ceded	19 Direct and Assumed	20 Ceded					
1.
2.
3.
4.													

	Total Losses and Loss Expenses Incurred			Loss and Loss Expense Percentage (Incurred/Premiums Earned)			Nontabular Discount		34 Inter-Company Pooling Participation Percentage	Net Balance Sheet Reserves After Discount	
	26 Direct and Assumed	27 Ceded	28 Net	29 Direct and Assumed	30 Ceded	31 Net	32 Loss	33 Loss Expense		35 Losses Unpaid	36 Loss Expenses Unpaid
1.	XXX	XXX	XXX	XXX	XXX	XXX	XXX
2.
3.
4.	XXX	XXX	XXX	XXX	XXX	XXX			XXX		


|||
Detail Eliminated to Conserve Space
|||


SCHEDULE P – PART 2U – PET INSURANCE PLANS

Years in Which Losses Were Incurred	INCURRED NET LOSSES AND DEFENSE AND COST CONTAINMENT EXPENSES REPORTED AT YEAR-END (\$000 OMITTED)										DEVELOPMENT	
	1 2015	2 2016	3 2017	4 2018	5 2019	6 2020	7 2021	8 2022	9 2023	10 2024	11 One Year	12 Two Year
1. Prior.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX
2. 2023.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
3. 2024.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
										4.Totals		

SCHEDULE P – PART 3U – PET INSURANCE PLANS

Years in Which Losses Were Incurred	CUMULATIVE PAID NET LOSSES AND DEFENSE AND COST CONTAINMENT EXPENSES REPORTED AT YEAR-END (\$000 OMITTED)										11 Number of Claims Closed With Loss Payment	12 Number of Claims Closed Without Loss Payment
	1 2015	2 2016	3 2017	4 2018	5 2019	6 2020	7 2021	8 2022	9 2023	10 2024		
1. Prior.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	000	XXX	XXX
2. 2023.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX
3. 2024.....	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX	XXX


=
Detail Eliminated to Conserve Space
=


SCHEDULE P – PART 4U – PET INSURANCE PLANS

Years in Which Losses Were Incurred	BULK AND IBNR RESERVES ON NET LOSSES AND DEFENSE AND COST CONTAINMENT EXPENSES REPORTED AT YEAR-END (\$000 OMITTED)									
	1 2015	2 2016	3 2017	4 2018	5 2019	6 2020	7 2021	8 2022	9 2023	10 2024
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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