

Draft date: 11/10/22

2022 Fall National Meeting

Tampa, Florida

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

Tuesday, December 13, 2022 12:00 – 1:00 p.m.

JW Marriott—HP Plant Ballroom A - D—Level 2

ROLL CALL

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

NAIC Support Staff: Eva Yeung

AGENDA

Consider Adoption of its Nov. 15, and Summer National Meeting
 Minutes—Tom Botsko (OH)

 Consider Adoption of its Subgroup Reports and Minutes
 —Wanchin Chou (CT)

 Consider Adoption of Proposal 2022-07-P (PR035 Line of Business)
 —Tom Botsko (OH)

- 4. Discuss its Working Agenda—*Tom Botsko (OH)*Attachment D
- Hear Updates on Current Property/Casualty (P/C) Risk-Based Capital (RBC) Projects from the American Academy of Actuaries (Academy) —Tom Botsko (OH)
- Discuss Any Other Matters Brought Before the Working Group
 —Tom Botsko (OH)
- 7. Adjournment

Draft: 11/22/22

Property and Casualty Risk-Based Capital (E) Working Group and the Catastrophe Risk (E) Subgroup E-Vote November 15, 2022

The Property and Casualty Risk-Based Capital (E) Working Group of the Capital Adequacy (E) Task Force conducted an e-vote with the Catastrophe Risk (E) Subgroup of the Property and Casualty Risk-Based Capital (E) Working Group of the Capital Adequacy (E) Task Force that concluded Nov. 15, 2022. The following Working Group members participated: Tom Botsko, Chair (OH); Wanchin Chou, Vice Chair (CT); and Judy Mottar (IL). The following Subgroup members participated: Wanchin Chou, Chair (CT); Laura Clements (CA); Travis Grassel (IA); Judy Mottar (IL); Anna Krylova (NM); Tom Botsko (OH); and Andrew Schallhorn (OK).

1. Adopted the 2022 U.S. and Non-U.S. Catastrophe Risk Event Lists

The Working Group and the Subgroup conducted an e-vote to consider adoption of the Jan. 1 through Sept. 30 U.S. and non-U.S. catastrophe risk event lists.

Grassel made a motion, seconded by Mottar, to adopt the Jan. 1 and Sept. 30 U.S. and non-U.S. catastrophe risk event lists (Attachment XX). The motion passed unanimously.

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

SharePoint/NAIC Support Staff Hub/Member Meetings/Fall 2022 National Meeting/Task Forces/CapAdequacy/PCRBC WG/Cat Risk Email Vote 111522.docx

Draft: 8/17/22

Property and Casualty Risk-Based Capital (E) Working Group and the Catastrophe Risk (E) Subgroup Portland, Oregon August 9, 2022

The Property and Casualty Risk-Based Capital (E) Working Group of the Capital Adequacy (E) Task Force met in Portland, OR, Aug. 10, 2022, in joint session with the Catastrophe Risk (E) Subgroup of the Property and Casualty Risk-Based Capital (E) Working Group of the Capital Adequacy (E) Task Force. The following Working Group members participated: Tom Botsko, Chair (OH); Wanchin Chou, Vice Chair (CT); Robert Ridenour (FL); Judy Mottar (IL); Anna Krylova (NM); Miriam Fisk (TX); and Amy Malm (WI). The following Subgroup members participated: Wanchin Chou, Chair (CT); Robert Ridenour, Vice Chair (FL); Laura Clements (CA); Judy Mottar (IL); Anna Krylova (NM); Tom Botsko (OH); Andrew Schallhorn (OK); and Miriam Fisk (TX). Also participating were: Travis Grassel (IA); and John Rehagen (MO).

1. Adopted the Subgroup's June 14 and April 19 Minutes

Mr. Chou said the Subgroup met June 14 and April 19. During these meetings, the Subgroup took the following action: 1) adopted its Spring National Meeting minutes; 2) exposed proposal 2022-04-CR, which is the U.S. and non-U.S. lists of wildfire events for a 30-day public comment period ending July 13; 3) adopted proposal 2021-17-CR MOD, which provides an exemption to those companies where the modeling requirements would impose a cost and compliance burden that represent an outsized cost relative to the incremental benefit of providing the modeled data during the for informational purposes period; 4) discussed the independent model review instructions in the Rcat; 5) evaluated other catastrophe risk for possible inclusion in the Rcat component; and 6) heard a presentation from the International Society of Catastrophe Managers (ISCM) regarding different programs to elevate the catastrophe risk profession that the ISCM offers.

Mr. Ridenour made a motion, seconded by Ms. Clements, to adopt the Subgroup's June 14 (Attachment Five-A) and April 19 (Attachment Five-B) minutes. The motion passed unanimously.

2. Adopted the Working Group's June 24, June 7, and April 26 Minutes

Mr. Botsko said the Working Group met June 24, June 7, and April 26. During these meetings, the Working Group took the following action: 1) adopted its Spring National Meeting minutes; 2) adopted proposal 2021-17-CR MOD, which provides an exemption to those companies where the modeling requirements would impose a cost and compliance burden that represent an outsized cost relative to the incremental benefit of providing the modeled data during the for informational purposes period; 3) adopted proposal 2022-01-P, which removes the trend test for information-only wordings in the PR033 footnote; 4) adopted proposal 2022-02-P, which provides 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; 5) exposed affiliated investments instructions and structures for a 60-day public comment period ending June 25; 6) forwarded the referral regarding the reinsurer designation equivalent rating factors to the Blanks (E) Working Group; and 7) heard updates on current P/C RBC projects from the American Academy of Actuaries (Academy).

Ms. Mottar made a motion, seconded by Mr. Ridenour, to adopt the Working Group's June 24 (Attachment Five-C), June 7 (Attachment Five-D), and April 26 (Attachment Five-E) minutes. The motion passed unanimously.

3. Adopted Proposal 2022-04-CR (2013-2021 Wildfire Event Lists)

Mr. Chou said the U.S. and non-U.S. lists of wildfire events were exposed for a 30-day public comment period ending July 13. He stated that the Subgroup received one comment letter from the Swiss Re America Holding Corporation (Swiss Re) during the exposure period. He said Swiss Re believed that the insurance direct incurred losses for the Southern California Woolsey Wildfires in 2018 should be \$2.9 billion based on the reports from the California Department of Insurance (DOI). Without objection from the Subgroup, Mr. Chou said the incurred losses amount for this event is updated to \$2.9 billion.

Mr. Schallhorn made a motion, seconded by Ms. Clements, to adopt proposal 2022-04-CR (Attachment Seven). The motion passed unanimously.

4. Adopted the 2022 P/C RBC Newsletter

Mr. Botsko said the 2022 P/C RBC newsletter reflects the adopted proposals and editorial changes for year-end 2022. He said the newsletter appears different from past years; the purpose of the adoption is to consider the content of the newsletter, as the format will later be revised. He said when the formatting of the newsletter is complete, it will be posted to the Working Group's web page.

Mr. Ridenour made a motion, seconded by Ms. Krylova, to adopt the 2022 P/C RBC newsletter (Attachment Five-F). The motion passed unanimously.

5. Referred the Affiliated Investment Instructions and the RBC Structure to the Capital Adequacy (E) Task Force

Mr. Botsko said during its April 26 meeting, the Working Group exposed the affiliated investment instructions and blanks changes for a 60-day public comment period. There were no comments received. He also commented that the Life Risk-Based Capital (E) Working Group received one comment letter from American Council of Life Insurers (ACLI) regarding the issue of non-admission. He said this issue will be discussed at the Capital Adequacy (E) Task Force meeting.

Mr. Chou made a motion, seconded by Mr. Ridenour, to refer the P/C affiliated instructions and blanks to the Capital Adequacy (E) Task Force for discussion. The motion passed unanimously.

6. Exposed Proposal 2022-07-P (PR035 Line of Business)

Mr. Botsko said proposal 2022-07-P provides consistency of the lines of business categories used in the Annual Statement, Underwriting and Investment Exhibit, Part 1B and RBC Report, PR035.

The Working Group and the Subgroup agreed to expose proposal 2022-07-P for a 30-day public comment period ending Sept. 8.

7. Exposed Proposal 2022-08-CR (Independent Model Review Instructions)

Mr. Chou said during the April 19 meeting, the Subgroup determined that a further clarification to the instructions is necessary, as better instructions will not only lighten the burdens but also provide a more consistent modeling review process among the states. He also stated that the instructions were revised with assistance from the Independent Model Review Ad Hoc Group, which was established by the Subgroup earlier. He also indicated that the proposed revised instructions are to capture the spirit of the own model permission review and clarify the requirements expected from the company who submits its own model for permission.

The Working Group and the Subgroup agreed to expose proposal 2022-08-CR for a 30-day public comment period ending Sept. 8.

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

David Traugott (Academy) said this presentation (Attachment Five-G) provides a brief update on the Academy report, which expects to be released in September. He also stated that this update describes the methodology and presents sample results that will be finalized in the report. He said this report focuses on: 1) the Investment Income Adjustment (IIA) factor; 2) updated adjustment of indicated premium risk factors for catastrophes; 3) alternative safety margins for consideration by the Working Group; and 4) the combined impact of these changes, including updated risk factors provided in the Academy April 2021 report.

9. Discussed 2021 RBC Statistics

Mr. Botsko said the 2021 P/C RBC statistics were run on July 1. He said there were 2,511 P/C RBC filings loaded onto the NAIC database, up from 2,477 in 2020. He stated that there were 35 companies that triggered an action level in 2021: 1) eight were in a company action level; 2) three were in a regulatory action level; 3) six were in an authorized control level (ACL); and 4) 18 were in a mandatory control level. Also, there were 17 companies that triggered the trend test, and the ACL and total adjusted capital (TAC) amounts increased from 2020 to 2021. Mr. Botsko indicated that there were a few categories that were highlighted in boldface, representing new categories in the statistical report (Attachment Five-H) to create consistency across life, P/C, and health statistical reports.

10. Discussed the Working Group and Subgroup's Working Agenda

Mr. Chou summarized the changes of the Subgroup's 2022 working agenda, which included the following substantial changes: 1) changing the expected completion date to the item of "evaluate other catastrophe risks for possible inclusion in the charge" to 2023 or later; and 2) eliminating the following items: a) "implement wildfire peril in the Rcat component"; and b) "evaluate the possibility of modifying exemption criteria for different cat perils in the PR027 interrogatories." Mr. Botsko said the Working Group: 1) added a new item of "changing the RBC PR035 Line of Business categories"; and 2) eliminated the "remove the trend test footnote in PR033" item from the 2022 working agenda.

11. Evaluated Other Catastrophe Risks for Possible Inclusion in the Rcat Component

Mr. Chou said as was recalled in the last Subgroup meeting, the flood peril may not be warranted due to the materiality aspect based on the industry inputs. The Subgroup agreed that it is worth it to review the possibility of including the severe convective storms as the next peril for the Rcat component. Mr. Chou also anticipated that the Subgroup would follow a development approach like the wildfire peril. Lastly, he said he expects that the new peril will be implemented in the Rcat component for informational purposes only in 2024 RBC reporting. He also encouraged all the subject matter experts (SMEs) and volunteers to join the new ad hoc group so this project will be completed in time.

12. Heard a Presentation from the NOAA Regarding Forecasting and Resilience: Severe Thunderstorms

Harold E. Brooks (National Oceanic and Atmospheric Administration—NOAA) provided a brief overview on Forecasting and Resilience: Severe Thunderstorms (Attachment Five-I). He said the severe thunderstorms in the U.S. include: 1) tornados; 2) hails greater than one inch; and 3) winds greater than 50 mph. He also stated that it could happen anywhere but particularly between the Rockies and Appalachians. In addition, he presented some useful information on tornado resilience and hail protection.

Attachment A
Attachment Five
Capital Adequacy (E) Task Force
8/11/22

13. <u>Discussed Other Matters</u>

Mr. Chou said the Subgroup will schedule several closed calls between the Subgroup members and the individual modeling vendors in the future to discuss the wildfire impact analysis that the vendors performed last year. He stated that a summary of the calls will be provided in the Subgroup meeting afterwards.

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

SharePoint/NAIC Support Staff Hub/ Member Meetings/E Cmte/CADTF/2022-2-Summer/PCRBCWG

Attachment B – Catastrophe Risk (E) Subgroup Meeting Summary

Capital Adequacy (E) Task Force

RBC Proposal Form

Capital Adequacy (E) Catastrophe Risk (E) S C3 Phase II/ AG43 (E)	Subgroup [] Investment RBC (E) Working	g Group [] Operational Risk (E) Subgroup		
	DATE: 7/8/22	FOR NAIC USE ONLY		
CONTACT PERSON:	Eva Yeung	Agenda Item # 2022-07-P		
TELEPHONE:	816-783-8407	Year <u>2023</u>		
EMAIL ADDRESS:	eyeung@naic.org	DISPOSITION		
ON BEHALF OF:	P/C RBC (E) Working Group	[] ADOPTED		
NAME:	Tom Botsko	[] REJECTED		
TITLE:	Chair	[] DEFERRED TO		
AFFILIATION:	Ohio Department of Insurance	[] REFERRED TO OTHER NAIC GROUP		
ADDRESS:	50 West Town Street, Suite 300	[x] EXPOSED <u>8/9/22</u>		
	Columbus, OH 43215	[] OTHER (SPECIFY)		
] Life and Fraternal RBC Instructions		
	DESCRIPTION OF CHANGE	(S)		
The proposed change would	d modify the lines of business categories in PR035.			
	REASON OR JUSTIFICATION FOR C	HANGE **		
The proposed PR035 chang Underwriting and Investme	ges would provide consistency of the lines of busines on Exhibit, Part 1B.	ess categories used in the Annual Statement,		
	Additional Staff Comments:			
8/9/22 - The Working Grou	up agreed to expose this proposal for a 30-public co	mment period ending Sept. 8.		
** This section must be o	completed on all forms.	Revised 2-2019		

UNDERWRITING AND INVESTMENT EXHIBIT - PREMIUMS WRITTEN PR035

(1) Did your company write Accident and Health Insurance in 2022?	
If answer is yes, please complete Column 2, 2022 Net Premiums Written.	
(2) Did your company write Accident and Health Insurance in 2021?	
If answer is yes, please complete Column 3, 2021 Net Premiums Written.	
(3) Were the total net Premiums written zero in 2022?	
(4) Were the total net Premiums written zero in 2021?	

For all companies, enter net premiums written in all Columns, Line 1 through Line 34.

For all companies, enter net premiums written in all Columns, Line 1 through Line 34.			
	(1)	(2)	(3)
	2023	2022	2021
	Net Premiums	Net Premiums	Net Premiums
Line of Business	Written	Written	Written
1. Fire	0	XXX	XXX
2.1 Allied Lines	0	xxx	xxx
2.2 Multiple Peril Crop	0	xxx	XXX
2.3 Federal Flood	0	xxx	XXX
2.4 Private Crop	0	xxx	XXX
2.5 Private Flood	0	xxx	XXX
3. Farmowners Multiple Peril	0	xxx	xxx
4. Homeowners Multiple Peril	0	xxx	xxx
5.1 Commercial Multiple Peril (Non-Liability Portion)	0	XXX	XXX
5.2 Commercial Multiple Peril (Liability Portion)			
6. Mortgage Guaranty	0	xxx	XXX
8. Ocean Marine	0	xxx	xxx
9. Inland Marine	0	xxx	xxx
10. Financial Guaranty	0	xxx	XXX
11.1 Medical Professional Liability - Occurrence	0	xxx	xxx
11.2 Medical Professional Liability - Claims-Made	0	xxx	XXX
12. Earthquake	0	xxx	XXX
13.1 Comprehensive (Hospital and Medical) Individual	Ů		
13.2 Comprehensive (Hospital and Medical) Group Accident and Health	0	0	0
14. Credit Accident and Health (group and individual)	0	0	0
15.1 Vision Only Other Accident and Health	0	0	0
15.2 Dental Only	Ů	•	•
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 Premium			
15.9 Other Health			
16. Workers' Compensation	0	VVV	VVV
-	0	XXX	XXX
17.1 Other Liability - Occurrence	0	XXX	XXX
17.2 Other Liability - Claims-Made	0	XXX	XXX
17.3 Excess Workers' Compensation	0	XXX	XXX
18.1 Products Liability - Occurrence		XXX	XXX
18.2 Products Liability - Claims-Made	0	XXX	XXX
19.1, 19.2 Private Passenger Auto Liability No-Fault (Personal Injury Protection)	0	XXX	XXX
19.2 Other Private Passenger Auto Liability			
19.3, 19.4 Commercial Auto Liability-No-Fault (Personal Injury Protection)	0	XXX	XXX
19.4 Other Commercial Auto Liability			
21.1 Private Passenger Auto Physical Damage	0	XXX	XXX
21.2 Commercial Auto Physical Damage			
22. Aircraft (all perils)	0	XXX	XXX
23. Fidelity	0	XXX	XXX
24. Surety	0	XXX	XXX
26. Burglary and Theft	0	XXX	XXX
27. Boiler and Machinery	0	XXX	XXX
28. Credit	0	XXX	XXX
29. International	0	XXX	XXX
30. Warranty	0	xxx	XXX
31. Reinsurance Property	0	XXX	XXX
32. Reinsurance Liability	0	xxx	XXX
33. Reinsurance Financial Lines	0	xxx	XXX
34. Aggregate Write-Ins for Other Lines of Business	0	xxx	XXX
35. TOTALS	0	0	0

Denotes items that must be manually entered on the filing software.

Priority 1 – High Priority Priority 2 – Medium Priority Priority 3 – Low Priority

CAPITAL ADEQUACY (E) TASK FORCE WORKING AGENDA ITEMS FOR CALENDAR YEAR 2023

2023#	Owner	2023 Priority	Expected Completion Date	Working Agenda Item	Source	Comments	Date Added to Agenda
Ongoing	Items – P&C	RBC	1		T		1
			Addressed – Pa		1		T
15	Cat Risk SG	k 1		Continue development of RBC formula revisions to include a risk charge based on catastrophe model output:			
			Year-end 2023 or later	a) Evaluate other catastrophe risks for possible inclusion in the charge - determine whether to recommend developing charges for any additional perils, and which perils or perils those should be.	Referral from the Climate and Resiliency Task Force. March 2021	4/26/21 - The SG exposed the referral for a 30-day period. 6/1/21 - The SG forwarded the response to the Climate and Resiliency Task Force. 2/22/22 - The SG adopted proposal 2021-17-CR (adding the wildfire peril for informational purposes only). The SG continues reviewing other perils for possible inclusion in the Rcat. 8/11/22 - The TF adopted Proposal 2022-04-CR (2013-2021 Wildfire Event Lists) 9/26/22 - The SG formed an ad hoc group to conduct review on different convective storm models.	4/26/2021
16	P&C RBC WG	1	Year-end 2020 or later	Evaluate a) the current growth risk methodology whether it is adequately reflects both operational risk and underwriting risk; b) the premium and reserve based growth risk factors either as a stand-alone task or in conjunction with the ongoing underwriting risk factor review with consideration of the operational risk component of excessive growth; c) whether the application of the growth factors to NET proxies adequately accounts for growth risk that is ceded to reinsures that do not trigger growth risk in their own right.	Refer from Operational Risk Subgroup	1) Sent a referral to the Academy on 6/14/18 conference call.	1/25/2018
17	P&C RBC WG	1	2020 Summer Meeting or later	Continue development of RBC formula revisions based on the Covered Agreement: consider whether the factor for uncollateralized, unrated reinsurers, runoff and captive companies should be adjusted	-	12/5/19 - The WG exposed Proposal 2018-19 P (Vulnerable 6 or unrated risk charge) for a 30- day exposure period. 2/3/20 - The WG adopted Proposal 2018-19 P. However, the WG intended to evaluate the data	8/4/2018

		1	1		ı		
						annually until reaching any agreed	
						upon change to the factor and the	
						structure.	
						3/15/21 - The WG exposed	
						Proposal 2021-03-P (Credit Risk	
						Instruction Modification) for a 30-	
						day exposure period.	
						4/27/21 The WG adopted	
						proposal 2021-03-P.	
						6/30/21- The CADTF adopted this	
						proposal.	
						10/25/21 - The WG exposed	
						Proposal 2021-14-P (R3 Factor	
						Adjustment) for a 30-day	
						exposure period.	
						3/23/22 – The WG adopted	
						proposal 2021-14-P.	
						3/28/22 — The CADTF adopted this	
						proposal.	
18	P&C RBC	4	Year-end	Evaluate the proposed changes from the Affiliated Investment Ad Hoc Group related to P/C	-	8/9/22 – The WG referred the	6/10/2019
	₩G		2022 or	RBC Affiliated Investments		instructions and blanks to the	
			later			CADTF.	
17	P&C RBC	1	2023	Continue working with the Academy to review the methodology and revise the			6/10/2019
	WG		Summer	underwriting (Investment Income Adjustment, Loss Concentration, LOB UW risk) charges in			
			Meeting or	the PRBC formula as appropriate.			
			later				
18	Cat Risk	1	Year-end	Evaluate the possibility of allowing additional third party models or adjustments to the		7/15/21 - The SG is continue	12/6/2019
	SG		2023 or	vendor models to calculate the cat model losses		evaluating this item.	
			later			10/27/21 - The SG exposed the	
						proposal 2021-15-CR (adding KCC	
						model).	
						12/16/21 - The SG adopted the	
						proposal 2021-15-CR.	
						3/23/22 - The WG adopted this	
						proposal.	
21	P&C RBC	1	2023 Spring	Evaluate if changes should be made to the P/C formula to better assess companies in	-	1/29/20 - received a referral from	2/3/2020
	₩G		Meeting	runoff.		the Restructuring Mechanisms (E)	
						WG	
						4/27/21 - The WG forwarded a	
						response to the Restructuring	
						Mechanism (E) WG.	
						8/9/22 – The WG referred this	
						issue to the CADTF.	

19	P&C RBC	1	2023	Evaluate the Underwriting Risk Line 1 Factors in the P/C formula.			7/30/2020	
	WG		Summer					
			Meeting or					
			later					
20	Cat Risk	2	2023 Spring	Evaluate the possibility of enhancing the Independent Model Instructions.		8/9/22 – The SG and WG exposed	3/22/2022	
	SG		Meeting or			proposal 2022-07-P for a 30-day		
			later			public comment period.		
						9/26/22 – The SG adopted		
						proposal 2022-08-CR.		
21	PCRBCWG	1	2023 Spring	Changing the RBC PR035 Line of Business categories to match the Lines of Business		8/9/22 - The WG exposed	7/7/2022	
			Meeting	categories in the Annual Statement, Underwriting and Investment Exhibit, Part 1B.		proposal 2022-07-P for a 30-day		
						comment period.		
New Ite	New Items – P&C RBC							