Capital Adequacy (E) Task Force

RBC Proposal Form

☐ Capital Adequacy (E) Task Force
☐ Health RBC (E) Working Group
☐ Life RBC (E) Working Group
☒ Catastrophe Risk (E) Subgroup
☐ Investment RBC (E) Working Group
☐ Longevity Risk (A/E) Subgroup
☐ Variable Annuities Capital. & Reserve (E/A) Subgroup
☐ P/C RBC (E) Working Group
☐ RBC Investment Risk & Evaluation (E) Working Group

		FOR NAIC USE ONLY
	DATE: 12/02/23	Agenda Item # 2023-15-CR Year 2024
CONTACT PERSON:	**Eva Yeung**	**DISPOSITION**
TELEPHONE:	**816-783-8407**	**ADOPTED:** ☒ TASK FORCE (TF) 03/17/24 ☒ WORKING GROUP (WF) 03/17/24 ☒ SUBGROUP (SG) 03/17/24
EMAIL ADDRESS:	**eyeung@naic.org**	**EXPOSED:** ☐ TASK FORCE (TF) ☐ WORKING GROUP (WG) ☒ SUBGROUP (SG) 12/02/23
ON BEHALF OF:	**P/C RBC (E) Working Group**	**REJECTED:** ☐ TF ☐ WG ☐ SG
NAME:	**Tom Botsko**	**OTHER:** ☐ DEFERRED TO ☐ REFERRED TO OTHER NAIC GROUP ☐ (SPECIFY)
TITLE:	**Chair**	
AFFILIATION:	**Ohio Department of Insurance**	
ADDRESS:	**50 West Town Street, Suite 300** **Columbus, OH 43215**	

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

☐ Health RBC Blanks
☒ Property/Casualty RBC Blanks
☐ Life and Fraternal RBC Blanks
☐ Health RBC Instructions
☐ Property/Casualty RBC Instructions
☐ Life and Fraternal RBC Instructions
☐ Health RBC Formula
☒ Property/Casualty RBC Formula
☐ Life and Fraternal RBC Formula
☐ OTHER ______

DESCRIPTION/REASON OR JUSTIFICATION OF CHANGE(S)

The proposed change may add severe convective storm as one of the catastrophe perils for informational purposes only in the Rcat component. While the Catastrophe Risk (E) Subgroup reviewed the possibility of expanding the current catastrophe framework to include other perils that may experience a greater tail risk under projected climate-related trends, the severe convective storm has been identified as a catastrophe peril in the Rcat component.

Additional Staff Comments:

** **This section must be completed on all forms.** **Revised 2-2023**

CALCULATION OF CATASTROPHE RISK CHARGE RCAT
PR027A, PR027B, PR027C, PR027D, PR027, AND PR027INT

The catastrophe risk charge for earthquake (PR027A), hurricane (PR027B), ~~and~~ wildfire and convective storms for informational purposes only (PR027C and PR027D) risks is calculated by multiplying the RBC factors by the corresponding modeled losses and reinsurance recoverables. The risk applies on a net basis with a corresponding contingent credit risk charge for certain categories of reinsurers. Data must be provided for the worst year in 50, 100, 250, and 500; however, only the worst year in 100 will be used in the calculation of the catastrophe risk charge. While projected losses modeled on an Aggregate Exceedance Probability basis is preferred, companies are permitted to report on an Occurrence Exceedance Probability basis if that is consistent with the company's internal risk management process.

The projected losses can be modeled using the following NAIC approved third party commercial vendor catastrophe models: AIR, CoreLogic for earthquake and hurricane only, RMS, KCC, the ARA HurLoss Model (hurricane only), or the Florida Public Model for hurricane, as well as catastrophe models that are internally developed by the insurer or that are the result of adjustments made by the insurer to vendor models to represent the own view of catastrophe risk (hereinafter "own models").

However, an insurer seeking to use an own model must first obtain written permission to do so by the domestic or lead state insurance regulator. In the situation where the model output is used to determine the catastrophe risk capital requirement for a single entity, the regulator granting permission to use the own model is the domestic state. In the situation where the model output is used to determine the catastrophe risk capital requirement for a group, the grantor is the lead state regulator. In the situation where the insurer seeking permission is a non-U.S. insurer, the grantor shall be the lead state regulator. Under all scenarios, the regulator that is granting permission should inform other domestic states that have a catastrophe risk exposure and share the results of the review.

To obtain permission to use the own model, the insurer must provide the domestic or lead state insurance regulator with written evidence of each of the following:

1. The nature, scale, and complexity of the insurer's catastrophe risk make it reasonable for the insurer to use its own model.
2. The own model is used for catastrophe risk management, capital assessment, and the capital allocation process.
3. The insurer has validated the own model(s) for each of the perils included in the RBC catastrophe risk charge. The insurer is including both U.S. and non-U.S. exposures in the calculation of the RBC charge.
4. The insurer has individuals with experience in developing, testing and validating internal models or engages third parties with such experience.
5. The own model was developed using reasonable data and assumptions.
6. The insurer must provide supporting model documentation and/or the differences from the vendor models if modified from the vendor models, supporting that the model was developed using reasonable data and assumptions. The insurer must provide a copy of the latest validation report and the insurer is solely responsible for the relevant cost. The validation report must provide a description of the scope, content, results and limitations of the validation, the individual qualifications of validation team and the date of the validation. Both the model documentation and the model validation report must be provided at a minimum once every five years, or whenever the lead or domestic state calls an examination; whenever there is a material change in the model; or whenever there is a material change in the insurer's exposure to catastrophe exposure.
7. The results of the own model for each relevant peril should be compared with the results produced by at least one of the following models: AIR, CoreLogic for earthquake and hurricane only, RMS, KCC, ARA HurLoss (hurricane only), or the Florida Public Model for hurricane. The insurer must provide the comparison and an explanation of the drivers of differences between the results produced by the internal model vs. results produced by the selected prescribed model. Evidence that the own model produces reasonable results must be provided at a minimum once every five years, or whenever the lead or domestic state calls an examination; whenever there is a material change in the model; or whenever there is a material change in the insurer's exposure to catastrophe exposure.
8. If the own model has been approved or accepted by the non-U.S. lead supervisor for use in the determination of regulatory capital, the insurer must submit evidence, if available, from the non-US lead supervisor of the most recent approval/acceptance including the description of scope, content, results and limitations of the approval/acceptance process and dates of any planned future approval/acceptance, if known. The name and the contact information of a contact person at the non-US lead supervisor should also be provided for questions on the approval/acceptance process.

If the lead or domestic state determines that permission to use the own model cannot be granted, the insurer shall be required to determine the RBC Catastrophe Risk Charge through the use of one of the third-party commercial vendor models (AIR, CoreLogic for earthquake and hurricane only, RMS, KCC, ARA HurLoss (hurricane only)), or the Florida Public Model for hurricane, as advised by the lead state or domestic state.

If the lead or domestic state determines that permission to use the own model can be granted to determine the RBC Catastrophe Risk Charge, the model will be subject to additional review through the ongoing examination process. If, as a result of the examination, the lead or domestic state determines that permission to use the own model should be revoked, the insurer may be required to resubmit the risk-based capital filing and any past filings so impacted where own model was used, as directed by the lead state or domestic state.
If the insurer obtains permission to use the own model, it cannot revert back to using third party commercial vendor models to determine the RBC Catastrophe Risk Charge in subsequent reporting periods, unless this is agreed with the lead or domestic state that granted permission.

The contingent credit risk charge should be calculated in a manner consistent with the way the company internally evaluates and manages its modeled net catastrophe risk.

Note that no tax effect offsets or reinstatement premiums should be included in the modeled losses. Further note that the catastrophe risk charge is for earthquake and hurricane risks only.

As per the footnote on this page, modeled losses to be entered PR027A, PR027B ~~and~~ PR027C and PR027D in Lines (1) through (4) are to be calculated using one of the **third party** commercial **vendor** models – AIR, CoreLogic for earthquake and hurricane only, RMS, KCC, ARA HurLoss (hurricane only); or the Florida Public Model (hurricane only)**or the insurer's own catastrophe model**; and using the insurance company's own insured property exposure information as inputs to the model. The insurance company may elect to use the modeled results from any one of the models, or any combination of results of two or more of the models. Each insurer will not be required to utilize any prescribed set of modeling assumptions but will be expected to use the same exposure data, modeling, and assumptions that the insurer uses in its own internal catastrophe risk management process. Any exceptions must be explained in the required *Attestation Re: Catastrophe Modeling Used in RBC Catastrophe Risk Charges* within this RBC Report.

The Interrogatory on page (PR027INT) supports an exemption from filing the catastrophe risk charge.

Any company qualifying for exemption from the earthquake risk charge must identify the particular criteria from among (1a), (1b), (2) and (3) that provides its qualification for exemption, and may leave the other three items from this group of four possible qualifications for exemption blank; except identification of criteria (3) as the basis for the exemption requires a further answer to (3a) and (3b).). If an insurer does not write or assume earthquake risks leaving no gross exposure, enter an "X" in PR027INT interrogatory 3, with no need to fill in (3a) and (3b). If the company qualifies for exemption from the earthquake risk charge, page PR027A and line (1) on PR027 may be left blank.

Any company qualifying for exemption from the hurricane risk charge must identify the particular criteria from among (4a), (4b), (5) and (6) that provides its qualification for exemption, and may leave the other three items from this second group of four possible qualifications for exemption blank. If an insurer does not write or assume hurricane risks leaving no gross exposure, enter an "X" in PR027INT interrogatory 6. If the company qualifies for exemption from the hurricane risk charge, page PR027B and line (2) on PR027 may be left blank.

Any company qualifying for exemption from the wildfire risk charge must identify the particular criteria from among (7a), (7b), (8), ~~and~~ (9) and (10) that provides its qualification for exemption and may leave the other ~~three~~ four items from this third group of ~~four~~ five possible qualifications for exemption blank. If an insurer does not write or assume ~~hurricane~~ wildfire risks leaving no gross exposure, enter an "X" in PR027INT interrogatory 9. If the company qualifies for exemption from the wildfire risk charge, page PR027C and line (3) on PR027 may be left blank.

Any company qualifying for exemption from the convective storms risk charge must identify the particular criteria from among (11a), (11b), (12), (13) and (14) that provides its qualification for exemption and may leave the other four items from this fourth group of five possible qualifications for exemption blank. If an insurer does not write or assume convective storms risks leaving no gross exposure, enter an "X" in PR027INT interrogatory 13. If the company qualifies for exemption from the convective storms risk charge, page PR027D and line (4) on PR027 may be left blank.

In general, the following conditions will qualify a company for exemption: if it uses an intercompany pooling arrangement or quota share arrangement with U.S. affiliates covering 100% of its earthquake, hurricane ~~and~~ , wildfire and convective storms risks such that there is no exposure for these risks; if it has a ratio of Insured Value – Property to surplus as regards policyholders of less than 50%; or if it writes Insured Value – Property that includes hurricane, earthquake and/or wildfire coverage in catastrophe-prone areas representing less than 10% of its surplus as regards policyholders.

"Insured Value – Property" includes aggregate policy limits for structures and contents for policies written and assumed in the following annual statement lines – Fire, Allied Lines, Earthquake, Farmowners, Homeowners, and Commercial Multi-Peril.

"Catastrophe-Prone Areas in the U.S." include:

i. For hurricane risks, Hawaii, District of Columbia and states and commonwealths bordering on the Atlantic Ocean and/or the Gulf of Mexico including Puerto Rico.
ii. For earthquake risk or for fire following earthquake, any of the following commonwealth or states: Alaska, Hawaii, Washington, Oregon, California, Idaho, Nevada, Utah, Arizona, Montana, Wyoming, Colorado, New Mexico, Puerto Rico, and geographic areas in the following states that are in the New Madrid Seismic Zone - Missouri, Arkansas, Mississippi, Tennessee, Illinois and Kentucky.
iii. For wildfire risk, California, Idaho, Montana, Oregon, Nevada, Wyoming, Colorado, New Mexico, Washington, Arizona, and Utah.

Specific Instructions for Application of the Formula

<u>Column (1) – Direct and Assumed Modeled Losses</u>
These are the direct and assumed modeled losses per the first footnote. Include losses only; no loss adjustment expenses. For companies that are part of an inter-company pooling arrangement, the losses in this column should be consistent with those reported in Schedule P, i.e. losses reported in this column should be the gross losses for the pool multiplied by the company's share of the pool.

<u>Column (2) – Net Modeled Losses</u>
These are the net modeled losses per the footnote. Include losses only; no loss adjustment expenses.

<u>Column (3) - Ceded Amounts Recoverable</u>
These are the modeled losses ceded under any reinsurance contract. Include losses only, no loss adjustment expenses, and should be associated with the Net Modeled Losses.

<u>Column (4) - Ceded Amounts with Zero Credit Risk Charge</u>
Per the footnote, modeled catastrophe losses that would be ceded to the categories of reinsurers that are not subject to the RBC credit risk charge (i.e., U.S. affiliates and mandatory pools, whether authorized, unauthorized, or certified).

<u>Column (6) – Amount</u>
These are automatically calculated based on the previous columns.

<u>Column (7) - RBC Requirement</u>
A factor of 1.000 is applied to the reported modeled catastrophe losses calculated on both AEP and OEP basis, and a factor of 0.018 is applied to the reinsurance recoverables. The RBC Requirement is based on either AEP reported results <u>or</u> OEP reported results (not both), consistent with the way the company internally evaluates and manages its modeled net catastrophe risk.

<u>Column (5) – Y/N</u>

Please indicate “Y” for OEP basis and “N” for AEP basis. This column should not be blank.

CALCULATION OF CATASTROPHE RISK CHARGE FOR CONVECTIVE STORMS PR027D
(For Informational Purposes Only)

	Convective Storms	Reference	Modeled Losses (1) Direct and Assumed	(2) Net	3† Ceded Amounts Recoverable	(4)†† Ceded Amounts Recoverable with zero Credit Risk Charge
(1)	Worst Year in 50	Company Records	0	0	0	0
(2)	Worst Year in 100	Company Records	0	0	0	0
(3)	Worst Year in 250	Company Records	0	0	0	0
(4)	Worst Year in 500	Company Records	0	0	0	0

		(5) Y/N
(5)	Has the company reported above, its modeled convective storms losses using an occurrence exceedance probability (OEP) basis?	

		Reference	(6) Amount	Factor	(7) RBC Requirement (C(6) * Factor)
(6)	Net Convective Storms Risk	L(2) C(2)	0	1.000	0
(7)	Contingent Credit Risk for Convective Storms Risk	L(2) C(3) - C(4)	0	0.018	0
(8)	Total Convective Storms Catastrophe Risk (AEP Basis)	If L(5) C(5) = "N", L(8) C(6) = L(6) C(7)+ L(7) C(7), otherwise "0"	0	1.000	0
(9)	Total Convective Storms Catastrophe Risk (OEP Basis)	If L(5) C(5) = "Y", L(9) C(6) = L(6) C(7)+ L(7) C(7), otherwise "0"	0	1.000	0
(10)	Total Convective Storms Catastrophe Risk	L(8) C(7) + L(9) C(7)			0

Disclosure in lieu of model-based reporting:

		(8) Direct and Assumed	(9) Net
(11)	For a company qualifying for the exemption under PR027INT D (14), complete 11a through 11c below:		
	a. Provide the company's gross and net 1-in-100-year Convective Storms losses on a best estimate basis in lieu of model-based reporting.		

b. Provide details on how the company estimated the amounts shown in 11a.

c. Provide a narrative disclosure about how the company manages its Convective Storms risk.

Lines (1)-(4): Modeled losses to be entered on these lines are to be calculated using one of the following NAIC approved third party commercial vendor catastrophe models - AIR, RMS, or KCC, Corelogic or a catastrophe model that is internally developed by the insurer and has received permission of use by the lead or domestic state. The insurance company's own insured property exposure information should be used as inputs to the model(s). The insurance company may elect to use the modeled results from any one of the models, or any combination of the results of two or more of the models. Each insurer will not be required to utilize any prescribed set of modeling assumptions, but will be expected to use the same data, modeling, and assumptions that the insurer uses in its own internal catastrophe risk management process. An attestation to this effect and an explanation of the company's key assumptions and model selection may be required, and the company's catastrophe data, assumptions, model and results may be subject to examination.

† Column (3) is modeled catastrophe losses that would be ceded under reinsurance contracts. This should be associated with the Net Modeled Losses shown in Column (2).

††Column (4) is modeled catastrophe losses that would be ceded to the categories of reinsurers that are not subject to the RBC credit risk charge (i.e., U.S. affiliates and mandatory pools, whether authorized, unauthorized, or certified).

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

CALCULATION OF CATASTROPHE RISK CHARGE PR027

		Reference	(1) RBC Amount
(1)	Total Earthquake Catastrophe Risk	PR027A L(10) C(7)	0
(2)	Total Hurricane Catastrophe Risk	PR027B L(10) C(7)	0
(3)	Total Wildfire Catastrophe Risk	PR027C L(10)C(7)	0
(4)	**Total Convective Storms Risk**	**PR027D L(10)C(7)**	**0**
(5)	Total Catastrophe Risk (R_{cat})	SQRT(L(1)^2 + L(2)^2)	0
(5a)	Total Catastrophe Risk (R_{cat} For Informational Purposes Only)	SQRT(L(1)^2 + L(2)^2 +L(3)^2**+L(4)^2**)	**0**

Lines 3**. 4,** and **5**a are for informational purposes only

INTERROGATORY TO SUPPORT EXEMPTION FROM COMPLETING PR027 (To be completed by companies reporting no RBC charge in either Lines 1 through 3) **PR027INT**

Place an "X" in the appropriate cell for the criteria under which the company is claiming an exemption

A Earthquake Exemption (To be completed by companies reporting no RBC charge in PR027 Line 1) -

(1) The company has not entered into a reinsurance agreement covering earthquake exposure with a non-affiliate or a non-US affiliate and, either

(1a) the company participates in an inter-company pooling arrangement with 0% participation, leaving no net exposure for earthquake risks; Or

(1b) the company cedes 100% of its earthquake exposures to its US affiliate(s), leaving no net exposure for earthquake risks

(2) The Company's Ratio of Insured Value - Property to surplus as regards policyholders is less than 50%

(3) The company has written Insured Value - Property that includes earthquake coverage in the Earthquake-Prone areas representing less than 10% of its surplus as regards policyholders

For any company qualifying for the exemption under 3 provide details about how the "geographic areas in the New Madrid Seismic Zone" were determined.

(3a) What resource was used to define the New Madrid Seismic Zone?

(3b) Was exposure determined based on zip codes or counties in the zone, was it based on all of the earthquake exposure in the identified states or was another methodology used? Describe any other methodology used.

Note: "Earthquake-Prone areas" include any of the following states or commonwealths: Alaska, Hawaii, Washington, Oregon, California, Idaho, Nevada, Utah, Arizona, Montana, Wyoming, Colorado, New Mexico, Puerto Rico, and geographic areas in the following states that are in the New Madrid Seismic Zone - Missouri, Arkansas, Mississippi, Tennessee, Illinois and Kentucky.

B Hurricane Exemption (To be completed by companies reporting no RBC charge in PR027 Line 2) -

(4) The company has not entered into a reinsurance agreement covering hurricane exposure with a non-affiliate or a non-US affiliate and, either

(4a) the company participates in an inter-company pooling arrangement with 0% participation, leaving no net exposure for hurricane risks; Or

(4b) the company cedes 100% of its hurricane exposures to its US affiliate(s), leaving no net exposure for hurricane risks

(5) The Company's Ratio of Insured Value - Property to surplus as regards policyholders is less than 50%

(6) The company has written Insured Value - Property that includes hurricane coverage in the Hurricane-Prone areas representing less than 10% of its surplus as regards policyholders

Note: "Hurricane-Prone areas" include Hawaii, District of Columbia and states and commonwealths bordering on the Atlantic Ocean, and/or Gulf of Mexico including Puerto Rico.

C Wildfire Exemption (To be completed by companies reporting no RBC charge in PR027 Line 3) -

(7) The company has not entered into a reinsurance agreement covering wildfire exposure with a non-affiliate or a non-US affiliate and, either

(7a) the company participates in an inter-company pooling arrangement with 0% participation, leaving no net exposure for wildfire risks; Or

(7b) the company cedes 100% of its wildfire exposures to its US affiliate(s), leaving no net exposure for wildfire risks

(8) The Company's Ratio of Insured Value - Property to surplus as regards policyholders is less than 50%

(9) The company has written Insured Value - Property that includes wildfire coverage in the wildfire-Prone areas representing less than 10% of its surplus as regards policyholders

(10) The sum of the direct and assumed premium written in wildfire-prone areas across the following Annual Statement lines is less than $50 million: Fire, Allied Lines, Earthquake, Farmowners, Homeowners, and Commercial Multi-Peril; and the company does not currently utilize NAIC approved third party commercial vendor wildfire catastrophe models.

Note: "Wildfire-Prone areas" include any of the following states: California, Idaho, Montana, Oregon, Nevada, Wyoming, Colorado, New Mexico, Washington, Arizona, and Utah.

D Convective Storms Exemption (To be completed by companies reporting no RBC charge in PR027 Line 3) -

(11) The company has not entered into a reinsurance agreement covering Convective Storms exposure with a non-affiliate or a non-US affiliate and, either

(11a) the company participates in an inter-company pooling arrangement with 0% participation, leaving no net exposure for Convective Storms risks; Or

(11b) the company cedes 100% of its convective storms exposures to its US affiliate(s), leaving no net exposure for Convective Storms risks

(12) The Company's Ratio of Insured Value - Property to surplus as regards policyholders is less than 50%

(13) The company has written Insured Value - Property that includes Convective Storms coverage in the Convective Storms-Prone areas representing less than 10% of its surplus as regards policyholders

(14) The sum of the direct and assumed premium written in Convective Storms-prone areas across the following Annual Statement lines is less than $50 million: Fire, Allied Lines, Earthquake, Farmowners, Homeowners, and Commercial Multi-Peril; and the company does not currently utilize NAIC approved third party commercial vendor wildfire catastrophe models.

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

* Item C is for informational purposes only.

SCHEDULE P PART 1 SUMMARY PR100

						Earthquake and Hurricane Experience*				
	(3) Premiums Earned, Net	(24) Total Net Losses and Expenses Unpaid	(28) Total Losses and Expenses Incurred, Net	(32) Non Tabular Discount Loss	(33) Non Tabular Discount Loss Expense	(24A) Total U.S. Net Losses Unpaid	(28A) Total U.S. Losses Incurred, Net	(24B) Total Non-U.S. Net Losses Unpaid	(28B) Total Non-U.S. Losses Incurred, Net	(28C) Total Losses and Expenses Incurred, Net excluding Earthquake and Hurricane Losses
(2) **2015**	0		0				0		0	0
(3) **2016**	0		0				0		0	0
(4) **2017**	0		0				0		0	0
(5) **2018**	0		0				0		0	0
(6) **2019**	0		0				0		0	0
(7) **2020**	0		0				0		0	0
(8) **2021**	0		0				0		0	0
(9) **2022**	0		0				0		0	0
(10) **2023**	0		0				0		0	0
(11) **2024**	0		0				0		0	0
(12) Totals		0		0	0	0		0		

	Wildfire Catastrophe Experience*				**Convective Storms Catastrophe Experience***				
	(24I) Total U.S. Net Losses Unpaid	(28I) Total U.S. Losses Incurred, Net	(24II) Total Non-U.S. Net Losses Unpaid	(28II) Total Non-U.S. Losses Incurred, Net	**(24III) Total U.S. Net Losses Unpaid**	**(28III) Total U.S. Losses Incurred, Net**	**(24IV) Total Non-U.S. Net Losses Unpaid**	**(28IV) Total Non-U.S. Losses Incurred, Net**	**(28V) Total Losses and Expenses Incurred, Net excluding Earthquake, Hurricane, Wildfire and Convective Storms Losses**
(2) **2015**		0		0		**0**		**0**	**0**
(3) **2016**		0		0		**0**		**0**	**0**
(4) **2017**		0		0		**0**		**0**	**0**
(5) **2018**		0		0		**0**		**0**	**0**
(6) **2019**		0		0		**0**		**0**	**0**
(7) **2020**		0		0		**0**		**0**	**0**
(8) **2021**		0		0		**0**		**0**	**0**
(9) **2022**		0		0		**0**		**0**	**0**
(10) **2023**		0		0		**0**		**0**	**0**
(11) **2024**		0		0		**0**		**0**	**0**
(12) Totals	0		0		**0**		**0**		

vendor link items

Data elements calculated automatically by the spreadsheet

* Please provide comments on any data issues or estimations used to derive the catastrophe experience data

******Columns 24I through 28V are for informational purposes only.**

SCHEDULE P PART 1A THRU 1U PR101 - PR123

	(3) Premiums Earned, Net	(24) Total Net Losses and Expenses Unpaid	(28) Total Losses and Expenses Incurred, Net	Earthquake and Hurricane Experience* (24A) Total U.S. Net Losses Unpaid	(28A) Total U.S. Losses Incurred, Net	(24B) Total Non-U.S. Net Losses Unpaid	(28B) Total Non-U.S. Losses Incurred, Net	(28C) Total Losses and Expenses Incurred, Net excluding Earthquake and Hurricane Losses
(2) 2014	0		0		0		0	0
(3) 2016	0		0		0		0	0
(4) 2017	0		0		0		0	0
(5) 2018	0		0		0		0	0
(6) 2019	0		0		0		0	0
(7) 2020	0		0		0		0	0
(8) 2021	0		0		0		0	0
(9) 2022	0		0		0		0	0
(10) 2023	0		0		0		0	0
(11) 2024	0		0		0		0	0
(12) Totals		0		0		0		

	Wildfire Catastrophe Experience* (24I) Total U.S. Net Losses Unpaid	(28I) Total U.S. Losses Incurred, Net	(24II) Total Non-U.S. Net Losses Unpaid	(28II) Total Non-U.S. Losses Incurred, Net	**Convective Storms Catastrophe Experience*** **(24III) Total U.S. Net Losses Unpaid**	**(28III) Total U.S. Losses Incurred, Net**	**(24IV) Total Non-U.S. Net Losses Unpaid**	**(28IV) Total Non-U.S. Losses Incurred, Net**	**(28V) Total Losses and Expenses Incurred, Net excluding Earthquake, Hurricane, Wildfire and Convective Storms Losses**
(2) 2014		0		0		0		0	0
(3) 2016		0		0		0		0	0
(4) 2017		0		0		0		0	0
(5) 2018		0		0		0		0	0
(6) 2019		0		0		0		0	0
(7) 2020		0		0		0		0	0
(8) 2021		0		0		0		0	0
(9) 2022		0		0		0		0	0
(10) 2023		0		0		0		0	0
(11) 2024		0		0		0		0	0
(12) Totals	0		0		0		0		

vendor link items

manual data entry items

*Please provide losses only; no expenses. Catastrophe losses should 1.) be the net losses incurred for the reporting entity, not net losses incurred for the group; 2.) be a subset of, and therefore, less than, total net losses reported in Column (28); 3.) be reported in 000s to be consistent with all values reported in this exhibit; and 4.) not be reported as negative amounts.

**If this line of business has incurred U.S. catastrophe losses arising from events either included on the list of U.S. catastrophe events approved by the Catastrophe Risk Subgroup as available on the NAIC's website or numbered and labeled by PCS as a hurricane, tropical storm, or earthquake, provide only the amount of those catastrophe losses in Catastrophe Experience columns (24A) and (28A).

***If this line of business has incurred non-U.S. catastrophe losses arising from a hurricane, tropical storm, or earthquake from an event included on the list of non-U.S. catastrophe events approved by the Catastrophe Risk Subgroup as available on the NAIC's website, provide only the amount of those catastrophe losses in Catastrophe Experience Columns (24B) and (28B).

******Columns 24I through 28V are for informational purposes only.**