



STATE OF CONNECTICUT INSURANCE DEPARTMENT



Property Casualty Insurance Rate Reviews For Calendar Year 2019

Andrew N. Mais
Insurance Commissioner

January 15, 2020

To: Sen. Mathew Lesser, Co-Chair, Insurance and Real Estate Committee
Rep. Sean Scanlon, Co-Chair, Insurance and Real Estate Committee
Sen. Kevin Kelly, Ranking Member, Insurance and Real Estate Committee
Rep. Cara Pavalock-D'Amato, Ranking Member, Insurance and Real Estate Committee

I am pleased to provide you with the Department's annual report of our review of property casualty rates in the state for calendar year 2019, pursuant to Connecticut General Statutes Section 38a-9(c).

Maintaining a competitive market is essential to the Department's mission of consumer protection and Department reviews help ensure that products are priced fairly and are adequate for the coverage provided.

Connecticut's property casualty industry continues to be among the nation's leaders. Our P&C industry ranks 5th in the nation for direct written premium. There are hundreds of carriers licensed to write P&C business in Connecticut, including some of the nation's largest carriers, which are headquartered here.

Some highlights of 2019 include:

- A decrease in workers' compensation insurance rates for the 6th straight year.
- Continued efforts to hold down homeowner's rate increases have saved policyholders \$4.6 million in 2019 and \$66 million since 2012.

If you should have any questions or would like to discuss any items in the report, please do not hesitate to contact me.

Respectfully,



Andrew Mais, Commissioner

Cc: Office of Legislative Research

**CONNECTICUT INSURANCE DEPARTMENT
PROPERTY & CASUALTY DIVISION
SUMMARY OF RATE REVIEWS FOR CALENDAR YEAR 2019**

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Summary of 2019 Rate Reviews

Connecticut Insurance Department
Property & Casualty Division

How the rates were reviewed

The Department's Property & Casualty (P&C) Division conducts actuarial reviews pursuant to competitive rating laws, which establish standards for regulation of personal risk insurance. The statutes rely on a competitive marketplace to establish and maintain reasonable rate levels. Rates may not be inadequate or unfairly discriminatory, e.g. charging different premiums for policyholders with similar exposures.

Overall reviews

In 2019, the P&C Division reviewed **5,724** rate, rule, form and guideline filings, of these 586 filings were extended warranty filings.

Lines of business reviewed

- Personal Automobile
- Homeowners
- Workers' Compensation
- Commercial Automobile
- Commercial General Liability
- Commercial Fire and Allied
- Commercial Multi-Peril/Business owners
- Miscellaneous

A. Personal Automobile (Exhibit A)

There was an average overall rate increase of 1.0 percent, down from 3.4 percent in 2018.

Three (3) companies introduced new auto rating programs in Connecticut in 2019: Plymouth Rock (Palisades), Root (A telematics only program) and Vault.

Rate filings reviewed: The Department received and reviewed **84 rate filings** from companies' actively writing private passenger automobile coverage in

Connecticut. These companies varied in their distribution of drivers, policy limits, coverage types, prior rate filing dates, loss cost levels and cost trends.

Flex rate filings: Of the 84 filings, there were **17 flex rate filings** submitted under the flex rating statutes 38a-688a in which prior approval is not required if the overall aggregate change is -6% to +6 %. Of the flex filings 9 filings were for rate increases and 8 filings were for decreases.

File and Use: Property damage liability and automobile physical damage coverages are “file and use,” which means prior approval from the Department is not required.

Statewide rate level change for 2019

- Liability = +2.9 percent (2.5 percentage points lower than 2018)
- Physical Damage = -1.7 percent
- Combined Total = +1.0 percent

B. Homeowners (Exhibit B)

Based on our reviews we were able to save consumers \$4,623,303 million in 2019. Overall we have saved consumers \$66 million since 2012 are the result of the Department’s increased scrutiny of rate requests.

Rate Filings Reviewed in 2019

- Homeowners rate filings recorded – 78
- Average increase requested – **4.0 percent** (3.1 percent in 2018)
- Average increase Department allowed – **3.5 percent**
- Number of flex rate filings – 25

Market Growth

In 2019 four (5) companies introduced new homeowner rating tiers/programs: Liberty Mutual (rental program), Metropolitan Direct P&C, Bunker Hill, Main Street America, and Liberty Mutual/Safeco.

There were five (5) new homeowner market entries, Kingstone, Markel (renters program), Vault (high value homes) and Spinnaker (renters program).

C. Workers’ Compensation (Exhibit C)

On Oct. 28, 2019, [Commissioner Mais approved a reduction](#) in overall workers’ compensation Loss Costs and Assigned Risk rates for Connecticut. This marked the sixth straight year that rates have decreased. The Commissioner’s order

followed a 30-day public comment period on the filing and recommendations proposed by the National Council on Compensation Insurance (NCCI) for workers' compensation Insurance. The order resulted in:

- **-2.9 percent overall decrease to loss costs** (actual losses and claim adjustment expenses)
- **-4.5 percent overall decrease in assigned risk**

Exhibit C-2 identifies each company adopting the rate changes. Companies adjust the industry loss cost for expenses, investment income and competitive deviations to the loss costs as permitted by state law – C.G.S. 38a-676. Since approving the NCCI 2019 filing we have reviewed 201 filings and two (2) independent filings for CBIA Comp Services and CT Interlocal Risk Management Agency (CIRMA).

D. Commercial Automobile (Exhibit D)

Commercial Automobile, filings from the Insurance Services Office (ISO), are primary industry loss costs filings for both liability and physical damage coverage. These are loss costs only, no expenses are included.

In 2019, **78 companies or groups** filed commercial automobile rates based on loss cost filings or independent rates. Companies adjust the industry loss cost for expenses, investment income and competitive deviations to the loss costs as permitted by state law – C.G.S. 38a-676.

E. Commercial General Liability (Exhibit E)

In 2019, **56 companies** filed commercial general liability rates based on various industry loss costs documents to implement revised loss costs modifiers or independent effective dates.

Additionally, there was **one (1) rate request** and **one (1) ISO Loss Costs** filing in 2019 for rate change in Medical Malpractice for physicians and surgeons. (Medical Protective) increase of 7.4% and ISO Loss Costs 2.6%. There were **Three (3) miscellaneous rate requests** for other medical malpractice professional liability practices. None of the rate requests met the States Prior rate approval requirements as outlined under C.G.S 38a-676 (2) (A).

There were **Three (3)** new companies that entered the market to write medical malpractice insurance, two are writing Physicians and Surgeons, and the other is writing “other” medical professionals. Medical Malpractice insurance is a sub-line of Professional Liability.

F. Other Commercial Lines (Exhibits F, G and H)

During 2019, the Department reviewed **87 company or group filings** to adopt various industry loss costs documents. The breakdown of those filings are:

- 40 – Fire and Allied Lines
- 38 – Commercial Multi-peril/Businessowners
- 7 – Inland Marine
- 1 – Burglary & Theft
- 1 – Fidelity & Surety

Exhibits

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**Status of Private Passenger Auto Rate Filings
(2019 Effective Dates)**

		Flex Filing	***** Liability	Approved Phys Dam	***** Total	Premium Written
Company Name	Effective Date New	Y/N	Liability	Phys Dam	Total	Premium Written
AMtrust_Integon National Insurance Company	1/3/2019	N	3.0%	3.0%	3.0%	16,936,630
Plymouth Rock_Palisades Insurance Company	1/14/2019	N - New	0.0%	0.0%	0.0%	0
Plymouth Rock_Palisades Insurance Company	12/16/2019	Y	-4.3%	-3.0%	-3.8%	1,933,324
Omni Ins Co	2/14/2019	N	7.3%	-3.8%	5.8%	3,246,978
Utica Mutual Insurance Company	1/23/2019	N	2.6%	3.7%	3.0%	6,007,444
Mapfre_American Commerce Insurance Company	1/24/2019	N	6.7%	5.2%	6.2%	68,554,254
Progressive Casualty Insurance Company	1/25/2019	N	3.7%	-0.8%	2.5%	73,276,766
Progressive Casualty Insurance Company	8/6/2019	Y	-0.5%	-7.5%	-2.1%	76,608,762
Progressive Direct Insurance Company	1/25/2019	N	2.6%	-3.4%	2.3%	79,057,190
Progressive Direct Insurance Company	8/6/2019	Y	0.5%	-1.6%	-0.2%	90,723,635
United Ohio Insurance Company	2/1/2019	N	9.9	9.8	9.9%	10,117,245
United Ohio Insurance Company	8/1/2019	N	10.0%	10.0%	10.0%	14,504,461
Old Dominion Insurance Company	3/1/2019	N	7.6%	3.8%	6.3%	25,409,774
Providence Mutual Fire Insurance Company	3/1/2019	N	13.5%	15.4%	14.1%	8,557,856
Kemper Independence Insurance Company	5/2/2019	N	2.9%	6.7%	4.0%	10,301,893
Kemper_Unitrin Insurance Company	5/2/2019	N	2.0%	4.8%	2.9%	1,493,914
Kemper Independence Insurance Company	6/30/2019	Y	3.8%	11.2%	6.0%	13,298,044
Horace Mann Insurance Company	3/1/2019	N	-8.0%	17.0%	-20.2%	147,954
Horace Mann Property & Casualty Insurance Company	3/2/2019	N	17.0%	-2.7%	9.0%	4,235,839
Horace Mann Teachers Insurance Company	3/3/2019	N	15.8%	-3.5%	8.0%	3,348,428
Farmers_Mid-Century Insurance Company	3/11/2019	N	5.4%	0.0%	3.5%	24,716,051
Farmers_Mid-Century Insurance Company	10/16/2019	N	4.2%	2.5%	3.6%	25,965,829
The Cincinnati Insurance Company	3/1/2019	N	2.5%	10.4%	5.7%	12,839,621
Berkley Insurance Company	2/1/2019	N	-21.7%	-17.1%	-19.7%	17,533

ROOT Insurance Company	4/10/2019	N - NEW	0.0%	0.0%	0.0%	0
ROOT Insurance Company	11/8/2019	N	-9.6%	-11.0%	-10.0%	134,462
LM General Insurance Company	2/3/2019	N	-2.4%	-4.0%	-2.9%	126,489,287
LM Insurance Corporation	2/3/2019	N	-2.4%	-4.0%	-2.5%	6,526,334
Homesite_Midvale Ins Co.	6/15/2019	N	16.6%	33.9%	20.9%	57,968
Hanover_Massachusetts Bay Insurance Company	5/25/2019	N	4.0%	0.0%	2.8%	467,063
The Hanover Insurance Company	5/2/2019	N	5.1%	0.0%	3.5%	79,104
Hanover_Citizens Insurance Company of America	5/2/2019	N	4.5%	0.0%	3.1%	1,310,607
Privilege Underwriters Reciprocal Exchange	3/9/2019	N	1.0%	5.0%	3.0%	10,213,313
Metropolitan Group P& C Insurance Company	3/31/2019	Y	4.5%	1.8%	3.5%	52,903,063
Metropolitan Property and Casualty Insurance Company	3/31/2019	y	4.5%	7.8%	3.5%	34,587,141
Metropolitan Casualty Insurance Company	3/31/2019	y	4.5%	1.8%	3.5%	17,347,034
State Automobile Mutual Insurance Company	4/12/2019	Y	-3.4%	-2.2%	-3.0%	2,943,625
State Farm Mutual Automobile Insurance Company	5/6/2019	N	-4.0%	-3.5%	-3.7%	161,438,936
GEICO Indemnity Company	4/1/2019	Y	-0.4%	-7.6%	-2.6%	199,342,789
GEICO General Insurance Company	4/1/2019	Y	-1.0%	-8.0%	-3.5%	308,779,240
Government Employees Insurance Company	4/1/2019	Y	-1.0%	-8.0%	-3.5%	60,778,001
MAPFRE- American Commerce Insurance Company	6/25/2019	N	15.3%	8.0%	12.5%	65,390,143
MAPFRE- American Commerce Insurance Company	10/14/2019	N	0.3%	0.0%	0.2%	59,636,556
Amica Mutual Insurance Company	8/1/2019	N	2.4%	-0.1%	1.5%	111,151,571
Amica Property and Casualty Insurance Company	8/1/2019	N	11.7%	8.3%	10.5%	1,583,421
New South Insurance Company	4/25/2019	Y	4.4%	10.9%	6.0%	4,857,906
New South Insurance Company	9/13/2019	Y	3.7%	11.9%	5.8%	5,671,025
CSAA Affinity Insurance Company	11/1/2019	N	24.4%	-18.8%	10.6%	62,669,708
Metropolitan Direct Property and Casualty Insurance Company	7/19/2019	N	7.7%	2.2%	6.0%	1,054,604
Economy Fire & Casualty Company	7/19/2019	N	7.7%	2.2%	6.0%	174,132
Allstate Fire and Casualty Insurance Company	8/15/2019	N	4.6%	0.0%	3.0%	200,127,338
New London County Mutual Insurance Co	8/1/2019	Y	11.7%	-4.2%	5.1%	4,098,489
Old Dominion Insurance Company	6/6/2019	Y	-1.9%	-2.6%	-2.1%	26,454,230
Utica Mutual Insurance Company	7/29/2019	N	2.6%	6.6%	4.0%	11,364,247
The Hanover American Insurance Company	7/12/2019	N	6.3%	-3.1%	3.0%	56,002,144

(2019 Effective dates)

(1)		(2)	(3)	(4)	(5)	
COMPANY	Flex Filing Y/N	EFFECTIVE DATE	2018* WRITTEN PREMIUM	MARKET SHARE	2019 FILED OVERALL CHANGE	2019 FINAL RATE RECORDED
Liberty Mutual Insurance Company_Renters program	N	01/21/19	\$0	0.0%	0.0%	0.0%
State Farm Fire and Casualty Company	N	01/01/19	\$73,099,983	6.7%	1.0%	1.0%
Metropolitan Direct Property and Casualty Insurance Co.	N	01/31/19	\$0	0.0%	0.0%	0.0%
Vermont Mutual Insurance Company	N	02/01/19	\$14,453,260	1.3%	3.8%	3.8%
Farmers_Truck Insurance Exchange	N	04/27/19	\$13,929,000	1.3%	4.1%	4.1%
Kemper Independence Insurance Company	N	05/02/19	\$5,689,978	0.5%	0.3%	0.3%
Kemper_Unitrin Insurance Company	N	05/02/19	\$1,557,992	0.1%	3.3%	3.3%
Kingstone Ins. Company	N	03/01/19	\$0	0.0%	0.0%	0.0%
The Travelers Home and Marine Insurance Co	N	02/01/19	\$75,311,675	6.9%	3.1%	3.1%
Travelers Personal Security Insurance Company	N	02/01/19	\$9,931,439	0.9%	3.0%	3.0%
Narragansett Bay Insurance Company	N	02/01/19	\$3,128,026	0.3%	2.1%	2.1%
Utica National_Republic-Franklin Insurance Company	N	03/20/19	\$6,581,310	0.6%	7.9%	7.9%
Utica National_Graphic Arts Mutual Insurance Company	N	03/20/19	\$875,244	0.1%	3.9%	3.9%
Central Mutual Insurance Company	N	04/01/19	\$9,544,850	0.9%	2.9%	2.9%
National General_Integon National Insurance Co	N	01/22/19	\$25,095,428	2.3%	5.5%	5.5%
Bunker Hill	N	02/15/19	\$0	0.0%	0.0%	0.0%
Hartford Casualty Insurance Company	N	01/19/19	\$839,936	0.1%	-0.4%	-0.4%
Hartford Insurance Company of the Southeast	N	01/19/19	\$6,640,844	0.6%	-0.2%	-0.2%
Trumbull Insurance Company	N	01/19/19	\$14,231,010	1.3%	-0.1%	-0.1%
Hartford Accident and Indemnity Company	N	01/19/19	\$3,016,209	0.3%	0.0%	0.0%
Markel_State National Insurance Company	N	12/15/18	\$0	0.0%	0.0%	0.0%
Stillwater P&C ins Co.	N	01/28/19	\$3,433,411	0.3%	4.4%	4.4%
Travelers Standard Fire	N	03/01/19	\$1,583,412	0.1%	11.2%	11.2%
The Travelers Indemnity Company of America	N	03/01/19	\$285,497	0.0%	10.3%	10.3%
Travelers_Automobile Insurance Co of Hartford, Ct	N	03/01/19	\$23,634	0.0%	12.9%	12.9%
Berkley Insurance Company	N	01/01/19	\$37,934	0.0%	-6.5%	-6.5%
Amica Mutual Insurance Company	N	05/01/19	\$72,434,620	6.6%	3.9%	3.9%
American Strategic Insurance Corp	Y	02/05/19	\$19,575,869	1.8%	5.1%	5.1%
Vault Reciprocal Exchange	N	04/03/19	\$0	0.0%	0.0%	0.0%
Covenant Insurance Company	N	06/01/19	\$15,015,554	1.4%	4.2%	4.2%
State Automobile Mutual Insurance Company	N	04/27/19	\$477,092	0.0%	2.9%	2.9%
Bunker Hill Insurance Company	Y	05/15/19	\$11,982,039	1.1%	5.0%	2.7%

Integon National Insurance Company	N	04/01/19	\$8,835,653	0.8%	7.5%	5.5%
Massachusetts Bay Ins. Co	N	07/15/19	\$30,878,776	2.8%	4.0%	4.0%
The Hanover Insurance Company	N	07/15/19	\$565,065	0.1%	3.6%	3.6%
Citizens Ins Co. of America	N	07/15/19	\$3,695,105	0.3%	3.8%	3.8%
Liberty Mutual Insurance Company_Fire Insurance Co	Y	06/23/19	\$34,744,541	3.2%	3.0%	3.0%
The First Liberty Insurance Corporation	Y	06/23/19	\$0	0.0%	0.0%	0.0%
Liberty Insurance Corporation	Y	05/09/19	\$64,249,200	5.8%	2.9%	2.9%
LM Insurance Corporation	Y	05/09/19	\$3,593,067	0.3%	2.4%	2.4%
Utica First Insurance Company	N	05/01/19	\$23,940,011	2.2%	3.8%	3.8%
CSAA General Insurance Company	N	11/01/19	\$10,094,511	0.9%	2.9%	2.9%
Allstate Indemnity Company	Y	07/20/19	\$2,205,646	0.2%	6.0%	6.0%
Allstate Insurance Company Condo	Y	07/04/19	\$4,236,304	0.4%	6.0%	6.0%
Allstate Insurance Company	Y	07/20/19	\$69,850,086	6.4%	6.0%	0.0%
Homesite Insurance Co.	N	08/01/19	\$28,545,253	2.6%	11.8%	11.8%
Stillwater Property and Casualty Insurance Co	N	05/31/19	\$1,627,311	0.1%	5.7%	5.7%
Main Street America Assurance Company	N	10/10/19	\$0	0.0%	0.0%	0.0%
Chubb National Insurance Company	Y	07/15/19	\$10,143,720	0.9%	6.3%	6.3%
Great Northern Insurance Company	Y	07/15/19	\$57,871,971	5.3%	3.8%	3.8%
Pacific Indemnity Company	Y	07/15/19	\$4,431,975	0.4%	-0.5%	-0.5%
Vigilant Insurance Company	Y	07/15/19	\$39,406,733	3.6%	2.2%	2.2%
Federal Insurance Company	Y	07/15/19	\$18,827,005	1.7%	1.6%	1.6%
CSAA Fire & Casualty Insurance Company Legacy Book	N	10/01/19	\$20,307,521	1.8%	2.8%	2.8%
Kemper Independence Insurance Company	Y	05/16/19	\$2,005,239	0.2%	2.5%	2.5%
AIG Property Casualty Company	N	09/15/19	\$41,604,939	3.8%	5.9%	5.9%
NGM Insurance Company	N	10/10/19	\$15,802,634	1.4%	6.5%	6.5%
AmGUARD Insurance Company	N	09/15/19	\$858,330	0.1%	14.6%	15.0%
Patrons Mutual Insurance Company of Connecticut	N	09/20/19	\$11,884,058	1.1%	9.4%	9.4%
Nationwide General Insurance Company	Y	8/11/2019	\$16,260,925	1.5%	3.0%	3.0%
Nationwide Property and Casualty Insurance Co	Y	8/11/2019	\$22,020,864	2.0%	3.0%	3.0%
Nationwide Mutual Fire Insurance Company	Y	8/11/2019	\$14,803,762	1.3%	2.1%	2.1%
Liberty Mutual_Safeco Insurance Company of America	Y	12/14/2019	\$12,627,548	1.1%	3.0%	3.0%
Liberty_Safeco_General Insurance Company of America	Y	12/14/2019	\$40,721,871	3.7%	2.9%	2.9%
Century-National Insurance Company	N	9/2/2019	\$23,430,995	2.1%	8.0%	8.0%
Utica Mutual Insurance Company	N	7/29/2019	\$1,939,951	0.2%	5.0%	5.0%
Travelers Personal Insurance Company - Quantum 2	N	9/13/2019	\$7,910,748	0.7%	0.1%	0.1%
The Cincinnati Insurance Company	N	10/1/2019	\$12,624,807	1.1%	5.0%	5.0%
United Property & Casualty Insurance Company	N	11/1/2019	\$6,551,375	0.6%	5.7%	5.7%
Liberty_Safeco_American Economy Insurance Co	N	9/21/2019	\$0	0.0%	0.0%	0.0%

Spinnaker Insurance Company	N	8/15/2019	\$0	0.0%	0.0%	0.0%
HARCO National Insurance Company	N	8/12/2019	\$453,783	0.0%	0.0%	0.0%
American Commerce Insurance Company	N	11/29/2019	\$4,236,230	0.4%	9.0%	9.0%
Privilege Underwriters Reciprocal Exchange (PURE)	Y	12/7/2019	\$26,121,438	2.4%	4.9%	4.9%
Electric Insurance Company	N	11/23/2019	\$5,038,452	0.5%	-2.7%	-2.7%
Encompass Insurance Company of America	Y	9/22/2019	\$1,947,571	0.2%	5.5%	5.5%
Encompass Indemnity Company	Y	9/22/2019	\$2,808,755	0.3%	5.0%	5.5%
Vault Reciprocal Exchange	Y	11/11/2019	\$91,749	0.0%	4.7%	4.7%
Total Filings	78					
Total Flex Filings	24					
Total 2019 - All Companies with non-zero rate Change			\$ 1,025,250,646	93.3%	4.252%	3.801%
Companies with no Rate Changes			<u>\$ 73,320,078</u>	<u>6.7%</u>	<u>0.0%</u>	<u>0.0%</u>
Total 2019 - All Companies			\$ 1,098,570,724	100.0%	3.969%	3.548%
					4.0%	3.5%
<u>Compare to 2018</u>						
Total			\$ 1,244,698,159	84.4%	3.7%	3.5%
companies with no rate change			<u>\$ 229,587,841</u>	<u>15.6%</u>	<u>0.0%</u>	<u>0.0%</u>
Total			\$ 1,474,286,000	100.0%	3.1%	2.9%

In the Matter of:

The National Council on Compensation Insurance, Inc.’s Workers’ Compensation Voluntary Advisory Loss Costs, Assigned Risk Rates, and Rating Values Filing, Effective January 1, 2020

MEMORANDUM AND ORDER

I. INTRODUCTION

On September 18, 2019 the National Council on Compensation Insurance, Inc. (“NCCI”) filed a workers’ compensation insurance application with the Connecticut Insurance Department (the “Department”) for a change in Voluntary Market Advisory Pure Premium Loss Costs and a change in Assigned Risk Plan Rates for Workers’ Compensation Insurance pursuant to Conn. Gen. Stat. §38a-665(a) proposed to be effective January 1, 2020.

The filing requests revisions of the current loss costs and assigned risk rates that the Department approved effective January 1, 2019. NCCI proposes an overall -2.9% change for pure premium loss costs and an overall -4.5% change in assigned risk plan rates. Changes to individual classification costs have been limited to 20% of the industry group change.

In order to give the public an opportunity to comment on NCCI’s filing, the Department published the filing and Executive Summary on its webpage on September 23, 2019 at: <https://portal.ct.gov/CID/Public-Notices/Notice-of-Public-Comment-For-NCCI-Rate-and-Loss-Cost-Filing-Effective-2020> and provided a thirty (30) day period for the public and interested parties to review and comment on the filing. The Department did not receive any public comments and did not hold a public hearing.

The following sections are a review of the NCCI filing requests; Insurance Department Staff's recommendations; and my determination regarding approval of the filing.

II. NCCI FILING REQUESTS

1. NCCI's proposed changes in Voluntary Market Advisory Loss Costs reflects the following pure premium level changes:

Industry Group	Voluntary Market Pure Premium Advisory Loss Cost Average Change (%)
Manufacturing	-1.5%
Contracting	-5.9%
Office & Clerical	-2.5%
Goods & Services	-1.9%
Miscellaneous	-2.9%
Overall Change Requested	-2.9%

2. The proposed change in Assigned Risk Plan Rates reflects the following rate level changes:

Industry Group	Assigned Risk Plan Rate Average Change (%)
Manufacturing	-3.2%
Contracting	-7.5%
Office & Clerical	-4.1%
Goods & Services	-3.5%
Miscellaneous	-4.5%
Overall Change Requested	-4.5%

3. The components of the Advisory Loss Costs and Assigned Risk Plan Rate changes are comprised of the following elements:

Component	Voluntary Market Pure Premium Change (%)	Assigned Risk Plan Premium Level Change (%)
Experience and Development	-5.3%	-5.3%
Trend	+1.0%	+1.0%
Benefits	+0.4%	+0.4%
Loss-based Expenses/Expenses	+1.1%	-0.6%
Overall Change Requested	-2.9%	-4.5%

4. The assessments due from employers for funding the cost of the Workers' Compensation Commission are 3.20% of losses. Insurance carriers pass through these assessments to employers. For the Voluntary Market and the Assigned Risk Plan, the assessment rate converted to a percentage of premium is 2.3% of standard premium. The assessment rate for "F" classifications, which provides coverage under the United States Longshore and Harbor Workers' Compensation Act and its extensions, is increasing to 6.8% of total losses, with a proposed assessment on assigned risk standard premium and voluntary market standard premium of 4.1%.
5. The filing proposes a \$100 increase to the maximum payroll for Executive Officers or Members of Limited Liability Companies.
6. The filing proposes a \$50 increase to the maximum payroll for Athletic Teams.
7. NCCI estimates that the changes to the Hospital and Ambulatory Surgical Center (ASC) Fee Schedule, effective April 1, 2019, will result in an impact of +0.4% on overall workers compensation system costs in Connecticut.
8. NCCI estimates that the changes to the Practitioner Fee Schedule, effective July 15, 2019, will result in a negligible increase (smaller than +/-0.1%) on overall workers compensation system costs in Connecticut.
9. The filing proposes to increase the Permissible Loss Ratio for the Assigned Risk Rate filing from 70.9% to 71.3%.
10. The filing proposes no change to the currently approved expense constants.
11. The filing proposes no change to the Uncollectible Premium Provision.

12. The filing proposes no change to the minimum premium multiplier.
13. The filing proposes no change to the currently approved Terrorism voluntary loss cost. The filing proposes no change to the currently approved assigned risk Terrorism rate.
14. The filing proposes to increase the annual payroll for Partners and Sole Proprietors from \$67,500 to \$69,100.
15. The filing proposes to increase the current voluntary loss adjustment expense (LAE) provision from 17.6% to 18.9%.
16. The filing proposes a 0.6% decrease to the current assigned risk expense provision.
17. The filing proposes to increase the United States Longshore and Harbor Workers' Compensation Coverage Percentage from to 25% to 50%.

III. DISCUSSION AND RECOMMENDATIONS

A. Overall Advisory Loss Costs and Assigned Risk Plan Rates

Conn. Gen. Stat. §38a-665 establishes the standards, methods and criteria for the making and use of workers' compensation insurance rates in Connecticut. Conn. Gen. Stat. §38a-665 provides that no rates shall be excessive or inadequate, nor shall they be unfairly discriminatory. Conn. Gen. Stat. §38a-665(b) provides that consideration shall be given, to the extent possible, to: past and prospective loss experience; reasonable margin for profit and contingencies; past and prospective expenses both countrywide and those specially applicable to this state; investment income earned or realized both from unearned premium and loss reserve funds; and other relevant factors, including judgment factors.

The Department's staff determined that overall cost levels are decreasing for the assigned risk rates and for the voluntary market advisory loss costs. The cost levels for this filing are based on Connecticut loss experience for policy years 2016 and 2017. NCCI adjusts past losses to current conditions using adjustment methods, which make the magnitude of the change very sensitive to their assumptions. Critical assumptions include those for trend, loss development and experience period. Department staff reviewed the assumptions included in these filings for reasonableness including the changes below and concluded the proposed voluntary loss cost and assigned risk rate changes in this filing are appropriate.

B. Assigned Risk Differential

The filing proposes no change to the Assigned Risk Differential.

C. Changes in NCCI Actuarial Methodology

NCCI made changes to the actuarial methodology which resulted in an immaterial overall impact to the rate filing. Regarding loss adjustment expenses, CT specific paid defense and cost containment expense data derived from an NCCI Call for Policy Year data will be used replacing countrywide data allocated to CT.

Regarding the US Longshore & Harbor Workers' benefit percentage factor, after a full study was conducted this year, NCCI has set factors for each state with the expectation that these factors will not be changed unless there is a significant change to the state's benefit system. Regarding the indemnity trend, NCCI has conducted research concluding that an explicit adjustment for change in State Average Weekly Wage (SAWW) for maximum/minimum weekly benefits can be replaced by a simpler approach as the changes in wages will sufficiently capture the changes for workers at maximum/minimum weekly benefit levels just as it captures changes for all other workers. NCCI will be making this change in indemnity trend countrywide.

IV. ORDER

On the basis of the foregoing recommendations and analysis by Department staff and my review of the filing, I hereby order that:

- A. NCCI's Assigned Risk Plan rates and voluntary market advisory loss costs are **accepted** as filed.
- B. The proposed Workers' Compensation Commission industrial classification assessment fund rate will be changed to 2.3% of standard premium and "F" classification assessment fund rate will be changed to 4.1% of standard premium for voluntary market and assigned risk plan insurers for policies effective on or after January 1, 2020.

- C. The proposed increase to the Permissible Loss Ratio for the Assigned Risk Rate filing from 70.9% to 71.3% is approved.
- D. The proposed increase to the annual payroll for Partners and Sole Proprietors from \$67,500 to \$69,100 is approved.
- E. The proposed increase to the current voluntary loss adjustment expense (LAE) provision from 17.6% to 18.9% is approved.
- F. The proposed 0.6% decrease to the current assigned risk expense provision is approved.
- G. The proposed increase to the United States Longshore and Harbor Workers' Compensation Coverage Percentage from 25% to 50% is approved.
- H. The thirty (30) day advance filing requirement set forth in Conn. Gen. Stat. §38a-676(b) for filings received prior to January 1, 2020 be waived in order to allow for the adoption of the change in advisory pure premium loss costs effective January 1, 2020.

Dated at Hartford, Connecticut this 28th day of October, 2019

See Signature on file

Andrew N. Mais
Insurance Commissioner

EXHIBIT – C – 1

ORGANIZATION	COMPANY NAME	YEAR 2019	RATE CHANGE
INDEPENDENT	CBIA COMP. SERVICES, INC.		-16.3
INDEPENDENT	WORKERS COMP TRUST		-7.4
INDEPENDENT	CT Interlocal Risk Management Agency		-1.1
NCCI			
	UTICA NATIONAL INS OF TEXAS		INITIAL
	UTICA NATIONAL INS OF OHIO		INITIAL
	PREFERRED PROFESSIONAL INS CO		-16.8
	PEERLESS INSURANCE COMPANY		-3.0
	EXCELSIOR INSURANCE COMPANY		-3.8
	NETHERLANDS INSURANCE COMPANY		-4.8
	PEERLESS INDEMNITY INSURANCE COMPANY		-3.3
	TRANSGUARD INS CO OF AMERICA INC		-9.8
	FEDERATED MUTUAL INSURANCE COMPANY		-19.0
	FEDERATED SERVICE INSURANCE COMPANY		-18.2
	FEDERATED RESERVE INS CO		-16.8
	VANLINER INS CO		-11.2
	NATIONAL INTERSTATE INSURANCE CO		-14.2
	TRIUMPHE CASUALTY COMPANY		-26.9
	TRAVELERS INDEMNITY COMPANY		-11.7
	TRAVELERS PROPERTY CASUALTY CO OF AMERICA		
	CHARTER OAK FIRE INSURANCE CO		
	TRAVELERS INDEMNITY CO OF AMERICA		
	TRAVELERS INDEMNITY CO OF CT		
	PHOENIX INSURANCE COMPANY		
	TRAVELERS CASUALTY AND SURETY CO		
	FARMINGTON CASUALTY COMPANY		
	STANDARD FIRE INSURANCE COMPANY		
	LIBERTY MUTUAL INS CO		-16.8
	LIBERTY MUTUAL FIRE INS CO		
	LM INSURANCE CORP		
	FIRST LIBERTY INSURANCE CORP		
	LIBERTY INSURANCE CORP		
	EMPLOYERS INS CO OF WAUSAU		
	AMERICAN HOME ASSURANCE CO		-16.8
	AIG ASSURANCE CO		
	AIG PROPERTY CASUALTY CO		
	COMMERCE AND INDUSTRY INS CO		
	GRANITE STATE INSURANCE CO		

ILLINOIS NATIONAL INSURANCE		
NATIONAL UNION FIRE INS CO OF PITTSBURGH, PA		
NEW HAMPSHIRE INS CO		
INSURANCE COMPANY OF THE STATE OF PA		
AIU INS CO		
THE OHIO CASUALTY INS CO		-2.6
OHIO SECURITY INSURANCE COMPANY		-14.7
WEST AMERICAN INSURANCE COMPANY		-4.4
AMERICAN FIRE & CASUALTY COMPANY		-4.1
BERKLEY NATIONAL INS CO		-13.01
BERKLEY REGIONAL INS CO		
TRI-STATE INS CO OF MINNESOTA		
RIVERPORT INS CO		
PHARMACISTS MUTUAL INS CO		-8.0
INS CO OF THE WEST		-16.8
CAROLINA CASUALTY INS CO		-17.2
MIDWEST EMPLOYERS CASUALTY CO		-11.3
STARNET INS CO		-13.5
FALLS LAKE NATIONAL INS CO		-16.8
SENTRY INS A MUTUAL CO		-17.7
MIDDLESEX INS CO		
PATRIOT GENERAL INS CO		
SENTRY SELECT INS CO		
GREAT AMERICAN INS CO		-21.5
GREAT AMERICAN ASSURANCE CO		
GREAT AMERICAN INS CO OF NY		
GREAT AMERICAN ALLIANCE INS CO		
GREAT AMERICAN SPIRIT INS CO		
STARSTONE NATIONAL INS CO		-8.6
HANOVER INSURANCE COMPANY		-16.70
MASSACHUSETTS BAY INSURANCE CO		-17.80
CITIZENS INSURANCE CO OF AMERICA		-21.20
ALLMERICA FINANCIAL BENEFIT INS CO		-21.10
HANOVER AMERICAN INS CO		-22.40
ALLMERICA FINANCIAL ALLIANCE INS CO		-17.60
AMERICAN STATES INS CO		-3.8
AMERICAN ECONOMY INS CO		
FIRST NATIONAL INS CO OF AMERICA		

GENERAL INS CO OF AMERICA		
ATLANTIC CHARTER INS CO		INITIAL
BERKSHIRE HATHAWAY HOMESTATE INS CO		-16.8
OAK RIVER INS CO		
REDWOOD FIRE AND CASUALTY INS CO		
MITSUI SUMITOMO INS CO OF AMERICA		-16.5
MITSUI SUMITOMO INS USA INC		-10.5
GUIDEONE MUTUAL INS CO		-14.0
AMERICAN ALTERNATIVE INS CORP		-16.8
AMERICAN FAMILY HOME INS CO		
AMERICAN MODERN HOME INS CO		
NEW JERSEY MANUFACTURERS INS CO		-23.7
SENTRY CASUALTY CO		0.0
WORK FIRST CASUALTY CO		-8.4
AMERICAN COMPENSATION INS CO		-10.3
STATE AUTO MUTUAL INS CO		-17.5
STATE AUTO PROPERTY & CASUALTY INS CO		-15.9
PATRONS MUTUAL INS CO OF CT		-14.5
PLAZA INSURANCE CO		-21.3
CALIFORNIA INS CO		-16.8
CLEAR SPRING PROPERTY & CASUALTY CO		-28.5
WESTPORT INS CORPORATION		-16.8
NORTH AMERICAN SPECIALTY INS CO		
NORTH AMERICAN ELITE INS CO		
FRANK WINSTON CRUM INS CO		-19.8
WESCO INS CO		-16.8
TECHNOLOGY INS CO		
SECURITY NATIONAL INS CO		
MARKEL INS CO		-6.4
FIRSTCOMP INS CO		-14.8
NATIONAL AMERICAN INS CO		-16.8
BROTHERHOOD MUTUAL INS CO		-12.9

	SELECTIVE INSURANCE CO OF THE SOUTHEAST		-13.6
	SELECTIVE INSURANCE CO OF SOUTH CAROLINA		-25.6
	SELECTIVE INSURANCE CO OF AMERICA		-18.8
	OLD REPUBLIC INS CO		-16.8
	OLD REPUBLIC GENERAL INS CORP		-16.8
	STARR INDEMNITY & LIABILITY COMPANY		-16.8
	STARR SPECIALTY INS CO		
	FIREMAN'S FUND INSURANCE CO		-14.1
	NATIONAL SURETY CORPORATION		-18.4
	AMERICAN AUTOMOBILE INSURANCE CO		-12.1
	FLORISTS MUTUAL INS CO		-13.3
	AMERICAN CASUALTY COMPANY OF READING PA		-9.9
	CONTINENTAL CASUALTY COMPANY		
	NATIONAL FIRE INS CO		
	CONTINENTAL INS CO		
	TRANSPORTATION INS CO		
	VALLEY FORGE INSURANCE CO		
	SAFETY NATIONAL CASUALTY CORP		-22.0
	SAFETY FIRST INS CO		
	EASTERN ADVANTAGE ASSURANCE CO		-16.8
	EASTERN ALLIANCE INS CO		
	ALLIED EASTERN INDEMNITY CO		
	ELECTRIC INSURANCE CO		-47.5
	NEW YORK MARINE AND GENERAL INS CO		0.0
	EMPLOYERS COMPENSATION INS CO		-15.8
	EMPLOYERS ASSURANCE CO		
	EMPLOYERS PREFERRED INS CO		
	ROCKWOOD CASUALTY INS CO		-16.8
	STATE NATIONAL INS CO		-16.8
	FRANKENMUTH MUTUAL INS CO		0.0
	ANSUR AMERICA INS CO		
	AMGUARD INS CO		-15.4
	NORGUARD INS CO		-14.7
	NORGUARD INS CO		-16.7
	EASTGUARD INS CO		-13.3

IMPERIUM INS CO	-16.8
GREAT MIDWEST INS CO	-16.8
ACADIA INS CO - STANDARD	-11.5
ACADIA INS CO - PREFERRED	
CONTINENTAL WESTERN INS CO - STANDARD	
CONTINENTAL WESTERN INS CO - PREFERRED	
FIREMEN'S INS CO OF WASHINGTON, D.C. - STANDARD	
FIREMEN'S INS CO OF WASHINGTON, D.C. - PREFERRED	
UNION INS CO - STANDARD	
UNION INS CO - PREFERRED	
ADMIRAL INDEMNITY CO - STANDARD	
CLERMONT INS CO - STANDARD	
CLERMONT INS CO - PREFERRED	
SAGAMORE INS CO	-14.8
PROTECTIVE INSURANCE COMPANY	-8.7
ZENITH INS CO	-16.8
XL SPECIALTY INSURANCE COMPANY	-14.5
XL INS AMERICA	
GREENWICH INSURANCE COMPANY	
T.H.E. INS CO	
FEDERAL INS CO	-2.5
CHUBB INDEMNITY INS CO	-3.4
GREAT NORTHERN INS CO	-1.1
PACIFIC INDEMNITY CO	-4.2
VIGILANT INS CO	-7.4
CHUBB NATIONAL INS CO	-14.0
FEDERATED MUTUAL INSURANCE COMPANY	12.6
FEDERATED SERVICE INSURANCE COMPANY	
FEDERATED RESERVE INS CO	
GREAT WEST CASUALTY COMPANY	-8.2
BITCO GENERAL INS CORP	-16.8
UNITED STATES FIRE INS CO	-17.8
NORTH RIVER INS CO	-14.6
CRUM AND FORSTER INDEMNITY COMPANY	-15.9
SAMSUNG FIRE & MARINE INS CO, LTD, USB	-16.8

	ACCIDENT FUND GENERAL INS CO		-16.7
	ACCIDENT FUND NATIONAL INS CO		
	ACCIDENT FUND INS CO OF AMERICA		
	UNITED WISCONSIN INS CO		
	BENCHMARK INS CO		-16.8
	ALL AMERICA INS CO - All Other		-31.8
	Central Mutual INS CO - All Other		
	ACE AMERICAN INS CO		-6.4
	INDEMNITY INS CO OF NORTH AMERICA		
	INSURANCE COMPANY OF NORTH AMERICA		
	WESTCHESTER FIRE INS CO		
	ACE FIRE UNDERWRITERS INS CO		
	ACE PROPERTY & CASUALTY INS CO		
	BANKERS STANDARD INS CO		
	PACIFIC EMPLOYERS INS CO		
	TRUCK INSURANCE EXCHANGE		-7.49
	FOREMOST INS CO GRAND RAPIDS MICHIGAN		-12.7
	FOREMOST PROPERTY & CASUALTY INS CO		
	FOREMOST SIGNATURE INS CO		
	MEMIC INDEMNITY COMPANY		-21.97
	MEMIC INDEMNITY COMPANY		
	MEMIC INDEMNITY COMPANY		
	MEMIC INDEMNITY COMPANY		
	MAINE EMPLOYERS' MUTUAL INS CO		-21.08
	MAINE EMPLOYERS' MUTUAL INS CO		
	MAINE EMPLOYERS' MUTUAL INS CO		
	MEMIC CASUALTY COMPANY		-35.53
	CHURCH MUTUAL INS CO		1.01
	MAIN STREET AMERICA ASSURANCE CO		-13.6
	OLD DOMINION INS CO		-14.7
	NGM INS CO		-15.0
	NATIONAL LIABILITY & FIRE INS CO		-14.1
	BERKSHIRE HATHAWAY DIRECT INS CO		
	ATLANTA INTERNATIONAL INS CO		
	ASSOCIATED INDUSTRIES OF MA MUTUAL INS CO		-16.8

	ASSOCIATED EMPLOYERS INS CO		-16.8
	ACIG INS CO		-18.72
	ZURICH AMERICAN INS CO		-17.5
	AMERICAN GUARANTEE & LIABILITY INS CO		
	AMERICAN ZURICH INS CO		
	ZURICH AMERICAN INS CO OF IL		
	FIDELITY AND DEPOSIT CO OF MD		
	COLONIAL AMERICAN CASUALTY & SURETY CO		
	INTREPID INS CO		0.0
	KEY RISK INS CO		-16.8
	PENNSYLVANIA MFG ASSOC INS CO		-14.2
	MANUFACTURERS ALLIANCE INS CO		
	PENNSYLVANIA MFG INDEMNITY CO		
	MAG MUTUAL INS CO		INITIAL
	ADVANTAGE WORKERS COMPENSATION INS CO		-13.8
	ARBELLA INDEMNITY INS CO		-14.68
	RLI INS CO Tier I		-18.6
	Tier II		
	Tier III		
	GREAT DIVIDE INS CO		-16.6
	UTICA MUTUAL INS COMPANY - STANDARD		-17.7
	UTICA MUTUAL INS COMPANY - PREFERRED		
	GRAPHIC ARTS MUTUAL INS COMPANY		-17.6
	REPUBLIC-FRANKLIN INS COMPANY - SUPERIOR		-18.8
	REPUBLIC-FRANKLIN INS COMPANY - PREMIER		
	UTICA NATIONAL ASSURANCE COMPANY - TIER A		-16.2
	UTICA NATIONAL ASSURANCE COMPANY - TIER B		
	UTICA NATIONAL INS CO OF TEXAS		0.0
	UTICA NATIONAL INS CO OF OHIO		0.0
	OBI NATIONAL INSURANCE CO - Standard Tier		-26.7
	OBI NATIONAL INSURANCE CO - Preferred Tier		
	OBI NATIONAL INSURANCE CO - Super Preferred Tier		
	ATLANTIC SPECIALTY INS CO - Standard Tier		-31.9
	ATLANTIC SPECIALTY INS CO - Preferred Tier		
	ATLANTIC SPECIALTY INS CO - Super Preferred Tier		
	OBI AMERICA INS CO		-19.9

	TOKIO MARINE AMERICA INS CO		-14.8
	TRANS PACIFIC INS CO		-14.7
	HDI GLOBAL INS CO		-16.8
	ALLIED PROPERTY & CASUALTY INS CO		-16.1
	DEPOSITORS INS CO		-12.2
	AMCO INS CO		-9.2
	NATIONWIDE MUTUAL INS CO		-13.4
	NATIONWIDE PROPERTY & CASUALTY INS CO		-9.2
	NATIONWIDE MUTUAL FIRE INS CO		-13.9
	NATIONWIDE GENERAL INS CO		0.0
	NATIONWIDE ASSURANCE INS CO		0.0
	NATIONWIDE INS CO OF AMERICA		0.0
	SERVICE AMERICAN IDEMNITY CO		INITIAL
	EVEREST NATIONAL INS CO		-15.8
	EVEREST REINSURANCE CO		
	EVEREST PREMIER INS CO		
	EVEREST DENALI INS CO		
	HARLEYSVILLE WORCESTER INS CO		-16.6
	HARLEYSVILLE PREFERRED INS CO		-8.8
	HARLEYSVILLE INS CO		-3.2
	NATIONWIDE AGRIBUSINESS INS CO - Preferred		0.8
	NATIONWIDE AGRIBUSINESS INS CO - Standard		
	NATIONWIDE AGRIBUSINESS INS CO - NonStandard		
	NATIONAL CASUALTY CO - Preferred		-5.0
	NATIONAL CASUALTY CO - Standard		
	NATIONAL CASUALTY CO - Non-Standard		
	ARCH INS CO		-16.8
	AMERICAN MINING INSURANCE COMPANY		-17.4
	STATE FARM FIRE AND CASUALTY CO		-14.9
	PRAETORIAN INSURANCE COMPANY		-12.2
	STONINGTON INS CO		-16.8
	GENERAL CASUALTY CO OF WISCONSIN		-12.1
	REGENT INSURANCE COMPANY		-13.7
	FARM FAMILY CASUALTY INS CO		-13.1
	AMERISURE MUTUAL INS CO		-16.8
	AMERISURE INS CO		-16.8

	ARGONAUT INS CO		-8.6
	HARTFORD FIRE INS CO		-0.4
	HARTFORD CASUALTY INS CO		-0.5
	HARTFORD ACCIDENT & INDEMNITY CO		-0.4
	HARTFORD UNDERWRITERS INS CO		-0.4
	TWIN CITY FIRE INS CO		-0.4
	SENTINEL INS CO, LTD		-0.4
	HARTFORD INS CO OF THE MIDWEST		-0.4
	PACIFIC INSURANCE COMPANY		-0.4
	TRUMBULL INS CO		-3.3
	HARTFORD INS CO OF THE SOUTHEAST		-0.4
	NUTMEG INS CO		-16.6
	NORMANDY INS CO		INITIAL
	NATIONAL SPECIALTY INS CO		INITIAL
	EMPLOYERS INS CO OF NEVADA		INITIAL
	OBI NATIONAL INSURANCE CO - Standard Tier		16.9
	OBI NATIONAL INSURANCE CO - Preferred Tier		
	OBI NATIONAL INSURANCE CO - Super Preferred Tier		
	ATLANTIC SPECIALTY INS CO - Standard Tier		30.5
	ATLANTIC SPECIALTY INS CO - Preferred Tier		
	ATLANTIC SPECIALTY INS CO - Super Preferred Tier		
	OBI AMERICA INS CO		13.4
	CINCINNATI INSURANCE COMPANY		-15.3
	CINCINNATI CASUALTY COMPANY		-16.2
	CINCINNATI INDEMNITY COMPANY		-15.4
	MIDVALE INDEMNITY COMPANY		-7.70
	STARNET INS CO		2.1
	CAROLINA CASUALTY INS CO		1.2
	MIDWEST EMPLOYERS CASUALTY CO		-2.0
	KEY RISK INS CO		-2.5
	BERKLEY CASUALTY CO		2.0
	PREFERRED EMPLOYERS INS CO		0.0
	SOMPO AMERICA INS CO		-8.5
	SOMPO AMERICA FIRE & MARINE INS CO		
	CHIRON INS CO		INITIAL

	PROPERTY & CASUALTY INS CO OF HARTFORD		INITIAL
	EMPLOYERS MUTUAL CASUALTY CO		-6.0
	EMCASCO INS CO		-3.3
	EMC PROPERTY & CASUALTY CO		0.0
	UNION INS CO OF PROVIDENCE		0.0
	ARCH INDEMNITY INS CO		INITIAL
	PENN MILLERS INSURANCE COMPANY		-5.1
	WEST BEND MUTUAL INS CO		INITIAL

EXHIBIT – C – 2

ORGANIZATION	COMPANY NAME	YEAR 2020	RATE CHANGE
INDEPENDENT	CBIA COMP. SERVICES, INC.		-2.9
INDEPENDENT	WORKERS COMP TRUST		-3.2
NCCI			
	SFM MUTUAL INS CO		INITIAL
	VANLINER INS CO		-2.5
	NATIONAL INTERSTATE INSURANCE CO		-0.4
	TRIUMPHE CASUALTY COMPANY		-3.1
	THE OHIO CASUALTY INS CO		-4.4
	OHIO SECURITY INSURANCE COMPANY		-4.1
	WEST AMERICAN INSURANCE COMPANY		-4.2
	AMERICAN FIRE & CASUALTY COMPANY		-5.0
	AMERICAN STATES INS CO		-0.9
	AMERICAN ECONOMY INS CO		-0.2
	FIRST NATIONAL INS CO OF AMERICA		0.0
	GENERAL INS CO OF AMERICA		0.0
	PEERLESS INSURANCE COMPANY		-6.0
	EXCELSIOR INSURANCE COMPANY		-6.1
	NETHERLANDS INSURANCE COMPANY		-1.7
	PEERLESS INDEMNITY INSURANCE COMPANY		-1.9
	LIBERTY MUTUAL INS CO		-2.9
	LIBERTY MUTUAL FIRE INS CO		
	LM INSURANCE CORP		
	FIRST LIBERTY INSURANCE CORP		
	LIBERTY INSURANCE CORP		
	EMPLOYERS INS CO OF WAUSAU		
	STATE NATIONAL INS CO		-3.5
	FEDERATED MUTUAL INSURANCE COMPANY		-2.6
	FEDERATED SERVICE INSURANCE COMPANY		-0.8
	FEDERATED RESERVE INS CO		-2.5
	ARBELLA INDEMNITY INS CO		-2.24
	ARBELLA PROTECTION INS CO		-2.87
	WEST BEND MUTUAL INS CO		INITIAL
	STARR INDEMNITY & LIABILITY COMPANY		-2.9

STARR SPECIALTY INS CO		
NATIONAL AMERICAN INS CO		-2.9
FRANK WINSTON CRUM INS CO		-4.8
BERKSHIRE HATHAWAY HOMESTATE INS CO		-2.9
OAK RIVER INS CO		
REDWOOD FIRE AND CASUALTY INS CO		
FALLS LAKE NATIONAL INS CO		-2.9
STATE AUTO MUTUAL INS CO		-1.9
STATE AUTO PROPERTY & CASUALTY INS CO		-2.8
PATRONS MUTUAL INS CO OF CT		-4.9
PLAZA INSURANCE CO		-2.1
AMERICAN COMPENSATION INS CO		7.9
INS CO OF THE WEST		-2.9
BROTHERHOOD MUTUAL INS CO		3.9
OBI NATIONAL INSURANCE CO - Standard Tier		-1.6
OBI NATIONAL INSURANCE CO - Preferred Tier		
OBI NATIONAL INSURANCE CO - Super Preferred Tier		
ATLANTIC SPECIALTY INS CO - Standard Tier		-4.1
ATLANTIC SPECIALTY INS CO - Preferred Tier		
ATLANTIC SPECIALTY INS CO - Super Preferred Tier		
OBI AMERICA INS CO		0.93
DAKOTA TRUCK UNDERWRITERS		INITIAL
GREAT AMERICAN INS CO		3.8
GREAT AMERICAN ASSURANCE CO		4.4
GREAT AMERICAN INS CO OF NY		-2.7
GREAT AMERICAN ALLIANCE INS CO		-3.5
GREAT AMERICAN SPIRIT INS CO		0.0
INTREPID INS CO		0.0
GREAT DIVIDE INS CO		-6.3
BITCO GENERAL INS CORP		1.00
CALIFORNIA INS CO		-2.9
STARNET INS CO		-2.9
CAROLINA CASUALTY INS CO		
MIDWEST EMPLOYERS CASUALTY CO		
KEY RISK INS CO		

BERKLEY CASUALTY CO		
PREFERRED EMPLOYERS INS CO		
PENNSYLVANIA MFG ASSOC INS CO		-2.9
MANUFACTURERS ALLIANCE INS CO		
PENNSYLVANIA MFG INDEMNITY CO		
FEDERATED MUTUAL INSURANCE COMPANY		2.9
FEDERATED SERVICE INSURANCE COMPANY		2.2
FEDERATED RESERVE INS CO		2.9
AMERICAN HOME ASSURANCE CO		-10.1
AIG ASSURANCE CO		
AIG PROPERTY CASUALTY CO		
COMMERCE AND INDUSTRY INS CO		
GRANITE STATE INSURANCE CO		
ILLINOIS NATIONAL INSURANCE		
NATIONAL UNION FIRE INS CO OF PITTSBURGH, PA		
NEW HAMPSHIRE INS CO		
INSURANCE COMPANY OF THE STATE OF PA		
AIU INS CO		
UTICA MUTUAL INS COMPANY - STANDARD		-4.6
UTICA MUTUAL INS COMPANY - PREFERRED		
GRAPHIC ARTS MUTUAL INS COMPANY		-2.2
REPUBLIC-FRANKLIN INS COMPANY - SUPERIOR		
REPUBLIC-FRANKLIN INS COMPANY - PREMIER		
UTICA NATIONAL ASSURANCE COMPANY - TIER A		-3.8
UTICA NATIONAL ASSURANCE COMPANY - TIER B		
UTICA NATIONAL INS CO OF TEXAS		0.0
UTICA NATIONAL INS CO OF OHIO		0.0
ZURICH AMERICAN INS CO		-3.1
AMERICAN GUARANTEE & LIABILITY INS CO		
AMERICAN ZURICH INS CO		
ZURICH AMERICAN INS CO OF IL		
FIDELITY AND DEPOSIT CO OF MD		
COLONIAL AMERICAN CASUALTY & SURETY CO		
EMPLOYERS COMPENSATION INS CO		-3.8
EMPLOYERS ASSURANCE CO		
EMPLOYERS PREFERRED INS CO		
EMPLOYERS INS CO OF NEVADA		-2.9
GREAT WEST CASUALTY COMPANY		-4.2
MEMIC INDEMNITY COMPANY		-2.26
MEMIC INDEMNITY COMPANY		
MEMIC INDEMNITY COMPANY		
MEMIC INDEMNITY COMPANY		

MAINE EMPLOYERS' MUTUAL INS CO	-3.15
MAINE EMPLOYERS' MUTUAL INS CO	
MAINE EMPLOYERS' MUTUAL INS CO	
MEMIC CASUALTY COMPANY	-2.25
MEMIC CASUALTY COMPANY	
MEMIC CASUALTY COMPANY	
SAGAMORE INS CO	-1.3
PROTECTIVE INSURANCE COMPANY	-0.6
WORK FIRST CASUALTY CO	-2.4
CLEAR SPRING PROPERTY & CASUALTY CO	-2.9
BERKLEY NATIONAL INS CO	4.47
BERKLEY REGIONAL INS CO	
TRI-STATE INS CO OF MINNESOTA	
RIVERPORT INS CO	
PHARMACISTS MUTUAL INS CO	-0.5
CHIRON INS CO	0.0
ACE AMERICAN INS CO	-1.1
INDEMNITY INS CO OF NORTH AMERICA	-0.4
INSURANCE COMPANY OF NORTH AMERICA	0.0
WESTCHESTER FIRE INS CO	0.0
ACE FIRE UNDERWRITERS INS CO	0.0
ACE PROPERTY & CASUALTY INS CO	0.0
BANKERS STANDARD INS CO	29.5
PACIFIC EMPLOYERS INS CO	-5.5
ACADIA INS CO - STANDARD	-6.7
ACADIA INS CO - PREFERRED	
CONTINENTAL WESTERN INS CO - STANDARD	
CONTINENTAL WESTERN INS CO - PREFERRED	
FIREMEN'S INS CO OF WASHINGTON, D.C. - STANDARD	
FIREMEN'S INS CO OF WASHINGTON, D.C. - PREFERRED	
UNION INS CO - STANDARD	
UNION INS CO - PREFERRED	
ADMIRAL INDEMNITY CO - STANDARD	
CLERMONT INS CO - STANDARD	
CLERMONT INS CO - PREFERRED	
CHURCH MUTUAL INS CO	-4.64
AMERICAN ALTERNATIVE INS CORP	-2.9
AMERICAN FAMILY HOME INS CO	-2.9
AMERICAN MODERN HOME INS CO	-4.1
FIREMAN'S FUND INSURANCE CO	-3.5
NATIONAL SURETY CORPORATION	-0.9

	AMERICAN AUTOMOBILE INSURANCE CO		-3.1
	BENCHMARK INS CO		-2.9
	FARM FAMILY CASUALTY INS CO		1.5
	TRAVELERS INDEMNITY COMPANY		-2.9
	TRAVELERS PROPERTY CASUALTY CO OF AMERICA		
	CHARTER OAK FIRE INSURANCE CO		
	TRAVELERS INDEMNITY CO OF AMERICA		
	TRAVELERS INDEMNITY CO OF CT		
	PHOENIX INSURANCE COMPANY		
	TRAVELERS CASUALTY AND SURETY CO		
	FARMINGTON CASUALTY COMPANY		
	STANDARD FIRE INSURANCE COMPANY		
	FLORISTS MUTUAL INS CO		3.8
	XL SPECIALTY INSURANCE COMPANY		-2.9
	XL INS AMERICA		
	GREENWICH INSURANCE COMPANY		
	T.H.E. INS CO		
	MAG MUTUAL INS CO		-2.9
	NEW JERSEY MANUFACTURERS INS CO		-2.3
	OLD REPUBLIC INS CO		-4.7
	ZENITH INS CO		-2.9
	HDI GLOBAL INS CO		-2.9
	ATLANTIC CHARTER INS CO		-10.5
	GUIDEONE MUTUAL INS CO		-0.7
	NORMANDY INS CO		0.0
	PRAETORIAN INSURANCE COMPANY		-2.9
	STONINGTON INS CO		
	GENERAL CASUALTY CO OF WISCONSIN		
	REGENT INSURANCE COMPANY		
	RLI INS CO Tier I		-3.9
	Tier II		
	Tier III		
	SELECTIVE INSURANCE CO OF THE SOUTHEAST		-3.2

	SELECTIVE INSURANCE CO OF SOUTH CAROLINA		-5.0
	SELECTIVE INSURANCE CO OF AMERICA		-3.8
	SENTRY CASUALTY CO		0.0
	SENTRY INS A MUTUAL CO		-4.4
	MIDDLESEX INS CO		
	PATRIOT GENERAL INS CO		
	SENTRY SELECT INS CO		
	SERVICE AMERICAN IDEMNITY CO		-2.9
	STARSTONE NATIONAL INS CO		-19.5
	ACCIDENT FUND GENERAL INS CO		-1.9
	ACCIDENT FUND NATIONAL INS CO		-0.7
	ACCIDENT FUND INS CO OF AMERICA		0.1
	UNITED WISCONSIN INS CO		3.6
	WESCO INS CO		-2.9
	TECHNOLOGY INS CO		
	SECURITY NATIONAL INS CO		
	MITSUI SUMITOMO INS CO OF AMERICA		-2.9
	MITSUI SUMITOMO INS USA INC		-2.9
	ASSOCIATED INDUSTRIES OF MA MUTUAL INS CO		-2.9
	ASSOCIATED EMPLOYERS INS CO		-2.9
	SAFETY NATIONAL CASUALTY CORP		-11.1
	SAFETY FIRST INS CO		

EXHIBIT – D

LINE OF BUSINESS: COMMERCIAL AUTOMOBILE			
ORGANIZATION	COMPANY NAME	YEAR 2019	RATE CHANGE
ISO Loss Costs	Insurance Services Office, Inc	CA-2018-BRLA1	1.4 (LC)
Co's may Adopt or Non Adopt			
ISO	Occidental Fire & Casualty Company of North Carolina		
ISO	Government Employees Insurance Company		9.8
ISO	Nationwide Mutual Insurance Company		6.1
	Nationwide Property and Casualty Insurance Company		6.1
	Nationwide Mutual Fire Insurance Company		6.1
	Allied Insurance Company of America		7.8
ISO	NGM Insurance Company		6.2
ISO	Travelers Casualty Insurance Company of America		4.6
ISO	Nationwide Agribusiness Insurance Company		6.8
ISO	Everest National Insurance Compan		1.4
ISO	Florists' Mutual Insurance Company		12.6
ISO	Global Liberty Insurance Co. of New York		5.8
ISO	Quincy Mutual Fire Insurance Company		3.2
ISO	Nova Casualty Insurance Company		2.7
ISO	Allmerica Financial Benefit Insurance Company		5.7
ISO	Liberty Mutual Insurance Group		14.7
ISO	Wesco Insurance Company		1.4
	AmTrust Insurance Co. of Kansas, Inc.		1.4
	Milford Casualty Insurance Company		1.4
ISO	Massachusetts Bay Insurance Company		4.5
	Hanover Insurance Company		8.4
	Citizens Insurance Company of America		5.7
ISO	North River Insurance Company		-3.7
	United States Fire Insurance Company		-3.7

ISO	Selective Insurance Co. of America		5.9
	Selective Insurance Co. of South Carolina		7.4
	Selective Insurance Company of the Southeast		7.4
ISO	Acadia Insurance Company		6
	Continental Western Insurance Company		7.8
	Firemen's Insurance Company of Washington, D.C.		6.6
	Union Insurance Company		6.8
	Tri-State Insurance Company of Minnesota		5
ISO	Great American Insurance		14.5
	Great American Assurance		14
	Great American Insurance Company of New York		13.2
	Great American Alliance		12.3
	Plymouth Rock Assurance Corporation		3.7
ISO	Harleysville Preferred Insurance Company		13
	Harleysville Insurance Company		12.9
	Harleysville Worcester Insurance Compan		12.2
ISO	Markel American		1.3
ISO	Federated Mutual		11.2
ISO	Charter Oak Fire Ins. Co.		3.554
	Phoenix Ins. Co.		5.698
	Travelers Indemnity Co.		3.664
	Travelers Indemnity Co. of America		5.266
	Travelers Indemnity Co. of CT		6.352
	Travelers Casualty Ins. Co. of America		-0.021
	Travelers Property Casualty Co. of America		4.155
	Progressive Casualty Ins.Co.		-1.9
ISO	Trumbull Ins. Co.		10
ISO	Sentinel Ins. Co.		5
ISO	American Zurich Ins. Co.		19.1
	American Guarantee and Liability Ins. Co.		7.1
	Zurich American Ins. Co. of IL		7.7
	Zurich American Ins. Co.		8.2
ISO	Foremost Ins. Co. Grand Rapids MI		12
	Foremost Property & Casualty Ins. Co.		12.1
	Foremost Signature Ins. Co.		12.1
ISO	Hartford Casualty Ins. Co.		6.6
	Hartford Ins. Of the Midwest		6.6
	Hartford Underwriters Ins. Co.		6.6

	Property and Casualty Ins. Co. of Hartford		6.6
	Twin City Fire Ins. Co.		6.6
	Hartford Fire Ins. Co.		6.6
ISO	Nationwide Mutual Insurance Company		3.4
	Nationwide Property and Casualty Insurance Company		2.8
	Nationwide Mutual Fire Insurance Company		3.6
	Allied Insurance Company of America		11.5
	American Zurich Insurance Company		5.1
	American Guarantee and Liability Insurance Company		2.8
	Zurich American Insurance Company of Illinois		5.1
	Zurich American Insurance Company		3.6
ISO	Selective Insurance Company of America		5.3
	Selective Insurance Company of South Carolina		3.5
	Selective Insurance Company of the Southeast		2.5
ISO	Hartford Accident and Indemnity Co.		15.3

EXHIBIT – E-1

LINE OF BUSINESS: GENERAL LIABILITY			
ORGANIZATION	COMPANY NAME	YEAR 2019	RATE CHANGE
ISO	Insurance Services Office, Inc		
Independent	Continental Casualty Company		-2.50%
Independent	Continental Casualty Company		12.90%
Independent	Selective Insurance Company of America Selective Insurance Company of South Carolina Selective Insurance Company of Southeast		0.00%
Independent	Federated Mutual Insurance Company Federated Reserve Insurance Company Federated Service Insurance Company		0.04%
ISO/Independent	The Hanover America Insurance Company Massachusetts Bay Insurance Company The Hanover Insurance Company Citizens Insurance Company of America		-5.20% -2.40% -4.50% -0.90%
Independent	Seneca Insurance Company, Inc.		10.00%
Independent	Wesco Insurance Company		28.40%
ISO/Independent	Sentry Select Insurance Company		8.50%
ISO/Independent	Midvale Indemnity Company		4.90%
Independent	Zurich American Insurance Company		1.60%
ISO/Independent	Greater New York Mutual Insurance Company Insurance Company of Greater New York		8.00%
Independent	State Auto Property & Casualty Insurance Company State Automobile Mutual Insurance Company Patrons Mutual Insurance Co. of Connecticut		6.60%
Independent	Imperium Insurance Company		32.10%

Independent	Penn Millers Insurance Company		9.90%
Independent	AIG Group		-4.60%
Independent	Federated Mutual Insurance Company Federated Reserve Insurance Company Federated Service Insurance Company		10.00%
Independent	Imperium Insurance Company Great Midwest Insurance Company		17.20%
Independent	Cincinnati Casualty Company Cincinnati Indemnity Company Cincinnati Insurance Company		10.61%
ISO/Independent	Liberty Mutual Group		10.00%
ISO/Independent	Liberty Mutual Group		7.70%
ISO	Hartford Group		4.60%
ISO	Allstate Insurance Company		1.10%
ISO	Zurich Group		6.10%
ISO	Nationwide Agribusiness Insurance Company		-3.70%
Independent	United States Liability Insurance Company		-12.73%
ISO/Independent	Acadia Insurance Company Continental Western Insurance Company Firemen's Insurance Co. of Washington D.C. Union Insurance Company		0.80%
Independent	Travelers Casualty & Surety Co. Of America		6.2%
	Travelers Casualty and Surety Co of America		13.80%
ISO/Independent	Selective Insurance Company of America Selective Insurance Company of South Carolina Selective Insurance Company of Southeast		-1.10% -1.50% -2.00%

ISO/Independent	The Charter Oak Fire Insurance Company		1.24%
	The Phoenix Insurance Company		
	The Travelers Indemnity Company		
	The Travelers Indemnity Company of America		
	The Travelers Indemnity Company of Connecticut		
	Travelers Property Casualty Company of America		

**LINE OF BUSINESS: GENERAL LIABILITY
MEDICAL MALPRACTICE**

ORGANIZATION	COMPANY NAME	YEAR 2019	RATE CHANGE
Independent	Fortress Insurance Company		3.6%
Independent	Fair American Insurance and Rein. Co.		-0.5%
Independent	Campmed Casualty & Indemnity Co, Inc		New
Independent	MAG Mutual Insurance Company		New
Independent	Medical Mutual Insurance Company of NC		New
ISO	ISO Med Mal Loss Costs filing		2.6%
Independent	The Medical Protective Company		-8.0%
Independent	The Medical Protective Company		7.49%

EXHIBIT – F

LINE OF BUSINESS: FIRE AND ALLIED			
ORGANIZATION	COMPANY NAME	YEAR 2019	RATE CHANGE
ISO Loss Costs	Insurance Services Office, Inc	CF-2018-RLA1	-3.7
Co's May Adopt or Non Adopt			
ISO	Great Divide Insurance Company		-3.70%
ISO	Berkley National Insurance Company		-3.70%
ISO	Berkley Regional Insurance Company		-3.70%
ISO	Riverport Insurance Company		0.00%
ISO	StarNet Insurance Company		-3.70%
ISO	Intrepid Insurance Company		-3.70%
ISO	ACE American Insurance Company		-7.6
ISO	Federated Mutual		0.6
ISO	Selective Insurance Co. of America		1.9
	Selective Insurance Co. of South Carolina		1.9
ISO	Selective Insurance of the Southeast		4.2
ISO	Ameriican Fire & Casualty Company		0.9
	Ohio Casualty Insurance Compay		12
	Ohio Security Insurance Company		2.9
	West American Insurance Company		0.9
ISO	Florists Mutual Insurance Company		3.8
ISO	Markel American Insurance Company		-2.6
ISO	TransGuard Ins. Co. of America		-3.8
ISO	All America Insurance Company		1.8
	Central Mutual Insurance Company		2.2
ISO	Nationwide Mutual Insurannce Company		8.1
	Nationwide Mutual Property & Casualty Ins		8.2
	Nationwide Fire Insurance Company		7.5
ISO	Sentry a Mutual Co.		4.1
	Middlesex Ins. Co.		1.3
	Patriot General Ins. Co.		11.5
ISO	Hanover American Ins. Co.		-5

	Massachusetts Bay Ins. Co.		-5.3
	Hanover Ins. Co.		-5.2
	Citizens Ins. Co. of America		-2
ISO	Nova Casualty Ins. Co.		-3.7
ISO	American Fire and Casualty Co.		6
	Ohio Casualty Ins. Co.		8
	Ohio Security Ins. Co.		8
	West American Ins. Co.		8
ISO	Great American Ins. Co.		-18.41
	Great American Assurance Co.		8.47
	Great American Ins. Co. of NY		1.1
ISO	GuideOne Mutual Ins. Co.		11

LINE OF BUSINESS: COMMERCIAL MULTI PERIL & BUSINESS OWNERS

ORGANIZATION	COMPANY NAME	YEAR 2019	RATE CHANGE
ISO loss Costs Filing	Insurance Services Office, Inc	BP-2018-RLA1	0.80%
Co's may adopt or Non Adopt			
Independent	Philadelphia Indemnity Insurance Company		0.30%
Independent	Nationwide Agribusiness Insurance Company		4.90%
ISO	Midvale Indemnity Company		11.60%
ISO	Harleysville Insurance Company		0.50%
	Harleysville Preferred Insurance Company		0.20%
	Harleysville Worcester Insurance Company		0.70%
ISO	Selective Insurance Co. of America		-1.70%
	Selective Insurance Co. of South Carolina		-1.40%
	Selective Insurance Co. of the Southeast		-1.30%
ISO	Nationwide Mutual Insurance Company		9.30%
	Nationwide Property and Casualty Insurance Co.		8.90%
	Nationwide Mutual Fire Insurance Company		10.10%
	Allied Insurance Co. of America		8.00%
ISO	Transportation Insurance Company		1.00%
	Valley Forge Insurance Company		-1.50%
	Continental Casualty Company		-1.30%
ISO	American Fire and Casualty Company		1.70%
	Ohio Casualty Insurance Company		1.50%
	Ohio Security Insurance Company		3.90%
	West American Insurance Company		1.50%
ISO	AmGUARD Insurance Company		0.94%
ISO	Harleysville Insurance Company		6.40%
	Harleysville Preferred Insurance Company		7.80%
	Harleysville Worcester Insurance Company		7.70%
ISO	Selective Insurance Company of America		-2.20%
	Selective Insurance Company of South Carolina		-2.30%
	Selective Insurance Company of the Southeast		-2.30%
ISO/Independent	Strathmore Insurance Company		4.90%

ISO	Hartford Casualty Ins. Co.		2.00%
	Hartford Fire Ins. Co.		2.00%
ISO	Patrons Mutual Ins. Co. of Connecticut		0.10%
ISO	State Automobile Mutual Ins. Co.		-2.70%
ISO	Church Mutual Ins. Co.		5.75%
ISO	Harleysville Ins. Co.		4.00%
	Harleysville Preferred Ins. Co.		3.90%
	Harleysville Worcester Ins. Co.		4.00%
ISO	Travelers Casualty Ins. Co. of America		0.10%

EXHIBIT – H

LINE OF BUSINESS: INLAND MARINE			
ORGANIZATION	COMPANY NAME	YEAR 2019	RATE CHANGE
Independent	Selective Insurance Company of America		10.30%
	Selective Insurance Company of S. Carolina		9.10%
	Selective Insurance Company of Southeast		7.20%
Independent	American Fire and Casualty Company		1.80%
	The Ohio Casualty Insurance Company		
	Ohio Security Insurance Company		
	West American Insurance Company		

LINE OF BUSINESS: BURGLARY AND THEFT			
ORGANIZATION	COMPANY NAME	YEAR 2019	RATE CHANGE
	NONE		

LINE OF BUSINESS: BOILER AND MACHINERY			
ORGANIZATION	COMPANY NAME	YEAR 2019	RATE CHANGE
	NONE		

LINE OF BUSINESS: FILDELITY & SURETY			
ORGANIZATION	COMPANY NAME	YEAR 2019	RATE CHANGE
Independent	Federal Insurance Company		-14.90%