

# STATE OF CONNECTICUT INSURANCE DEPARTMENT



## Property Casualty Insurance Rate Reviews For Calendar Year 2021

Andrew N. Mais
Insurance Commissioner

## January 15, 2022

To: Sen. Matthew Lesser, Co-Chair, Insurance and Real Estate Committee Rep. Kerry Wood, Co-Chair, Insurance and Real Estate Committee Sen. Tony Hwang, 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 2021, 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 and casualty industry continues to be among the nation's leaders. Our P&C industry ranks 5<sup>th</sup> 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 2021 include:

- A decrease in workers' compensation insurance rates for the 8<sup>th</sup> straight year.
- Continued efforts to hold down homeowner's rate increases have saved policyholders \$9.5 million in 2021 and \$77.1 million since 2012.
- Private Passenger automobile savings resulted in \$47.7 million in 2021.

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 2021

#### **Table of Contents**

## Page

4-8		Summary of Rate Reviews
9-10	Exhibit A	Private Passenger Auto Rate Filings
11-13	Exhibit B	Homeowners Rate Filings
14-18	Exhibit C	Workers' Compensation Filing Decision and Orders
19-27	Exhibit C-1	Workers' Compensation Filings – 2021
28-33	Exhibit C-2	Workers' Compensation Filings – 2022
34-36	Exhibit D	Commercial Automobile Filings
37-39	Exhibit E-1 Exhibit E-2	Commercial General Liability & Medical Malpractice Filings
40-41	Exhibit F	Commercial Fire and Allied Filings
42-44	Exhibit G	Commercial Multi-Peril and Business owners
45	Exhibit H	All Other Commercial

## **Summary of 2021Rate 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 2021, the P&C Division reviewed **5,261** rate, rule, form, and guideline filings, of these 670 filings were Service Contracts/extended warranty filings.

#### Lines of business reviewed

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

#### A. Personal Automobile (Exhibit A)

There was an average overall rate increase of 1.5 percent, up from -0.1 percent in 2020.

**One** (1) **company** introduced new auto rating programs in Connecticut in 2021: Motor Club Insurance Co. which is a AAA affiliate.

**Rate filings reviewed:** This year we saw more rate filings as companies began seeing deteriorating results as more drivers returned to the roads. This year there were 63 filings versus 55 in 2020. This is still down from 2019 when 89 filings were submitted.

The department continues to review automobile rate filings closely to ensure the rates are actuarially justified based on actual experience, since industry started

seeing deterioration in frequency coming out of 2020. As a result of our scrutiny, we were able to modify **20 rate filing** increase request and saved consumers \$47,780,909.

Also contributing to the smaller number of formal rate filings, we had discussions with other companies about the uncertainties of projecting rates in this Covid pandemic environment, (3) companies withdrew their increase filings as a result.

Flex rate filings: Of the 63 filings, there were 20 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 14 filings were for rate increases, 4 filings were for decreases, and 2 with a 0% overall change.

**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 2021

- Liability = +2.2 percent (1.8 percentage points higher than 2020)
- Physical Damage = 0.0 percent
- Combined Total = +1.5 percent

#### **B.** Homeowners (Exhibit B)

Based on our reviews we were able to save consumers **\$9,514,066** million in 2021. Overall, we have saved consumers \$77.1 million since 2012 as a result of the Department's increased scrutiny of rate requests.

#### **Rate Filings Reviewed in 2021**

- Homeowners rate filings recorded 79
- Average increase requested **4.2 percent** (5.3 percent in 2020)
- Average increase Department allowed **3.4 percent**
- Number of flex rate filings 12

#### **Market Growth**

There were three (4) new homeowner market entries, Farmers Fire Ins. Exchange, TypTap Insurance Co., Homeowners Choice Property and Casualty Ins. Co., and Motor Club Ins. Co.

## C. Workers' Compensation (Exhibit C)

On Oct. 28, 2021, Commissioner Mais approved a reduction in overall workers' compensation Loss Costs and Assigned Risk rates for Connecticut. This marked the

eighth 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:

- **-14.1 percent overall decrease to loss costs** (actual losses and claim adjustment expenses)
- -8.2 percent overall decrease in assigned risk rates

**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 2021 filing we have reviewed 345 filings and three (3) independent filings for CBIA Comp Services (CBIA), the Workers' Comp Trust (WCT), and CT Interlocal Risk Management Agency (CIRMA). CIRMA makes their filing later in the year for a 7/1 effective date, while CBIA and WCT have a 1/1 effective date.

#### **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 2021, **69 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.

2 companies withdrew their filing after the department reviewed and advised the rates were not actuarially supported.

## E. Commercial General Liability (Exhibit E)

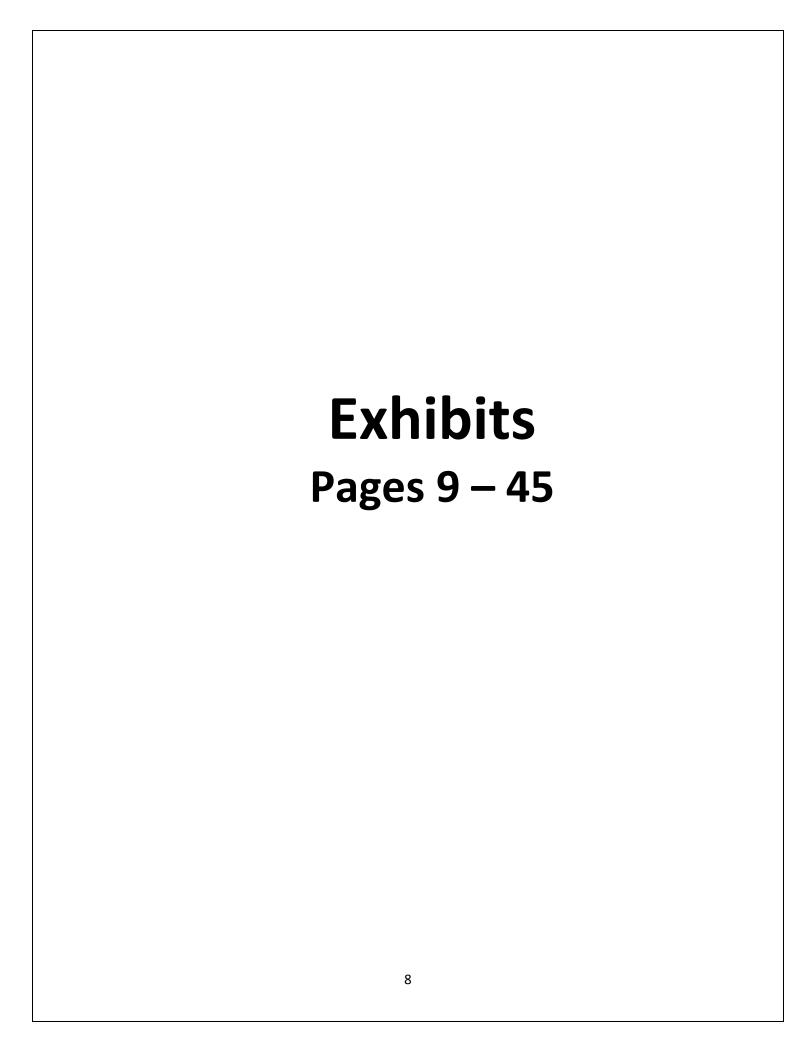
In 2021, **55 companies or groups** filed commercial general liability rates based on various industry loss costs documents to implement revised loss costs modifiers or independent effective dates.

Additionally, there were (3) rate request in 2021 for rate change in Medical Malpractice for physicians and surgeons and (1) rate request for APRN's. There were (2) 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).

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

During 2021, the Department reviewed **98 company or group filings** to adopt various industry loss costs documents. The breakdown of those filings are:

- 32 Fire and Allied Lines
- 57 Commercial Multi-peril/Businessowners
- 9 Inland Marine
- 0 Burglary & Theft
- 0 Fidelity & Surety



## EXHIBIT – A

## Status of Private Passenger Auto Rate Filings (2021 Effective Dates)

		Flex Filing	*****	Approved	*****	
Company Name	Effective Date New	Y/N	Liability	Phys Dam	Total	Premium Written
Utica Mutual Insurance Company - EDGE2	01/10/2021	Υ	0.0%	0.0%	0.0%	\$ 2,279,991
Encompass Indemnity Company	01/28/2021	N	0.0%	0.0%	0.0%	\$ 3,725,459
Foremost Insurance Company	02/11/2021	N	-0.4%	-2.2%	0.0%	\$ 19,480,000
Metropolitan Property and Casualty Ins. Co	01/31/2021	N	-2.4%	-2.4%	-2.4%	\$ 52,325,526
CSAA Affinity Insurance Company	02/01/2021	N	3.8%	3.0%	3.5%	\$ 76,671,294
Quincy Mutual Fire Insurance Company	02/01/2021	N	2.9%	2.5%	2.8%	\$ 14,619,175
Amica Mutual Insurance Company	02/01/2021	Υ	0.0%	-7.1%	-2.6%	\$ 111,314,568
Amica Mutual Insurance Company	07/01/2021	Υ	-2.4%	-4.7%	-3.2%	\$ 111,314,568
Amica Mutual Insurance Company	08/01/2021	N	-1.2%	-1.2%	-1.2%	\$ 78,392,775
Amica Property and Casualty Insurance Co	02/01/2021	Υ	0.0%	-7.0%	-2.4%	\$ 2,440,531
Amica Property and Casualty Insurance Co	07/01/2021	Υ	-2.4%	-4.7%	-3.2%	\$ 2,440,531
Amica Property and Casualty Insurance Co	08/01/2021	N	-0.9%	-0.9%	-0.9%	\$ 1,587,989
Farmers_Mid-Century Insurance Company	02/01/2021	N	8.4%	2.9%	6.5%	\$ 25,078,206
United Ohio Insurance Company	02/15/2021	N	-0.2%	-6.8%	-2.8%	\$ 14,349,056
State Farm Fire and Casualty Company	02/15/2021	N	3.7%	3.8%	3.7%	\$ 44,479,514
State Farm Mutual Automobile Ins. Co	02/15/2021	N	3.7%	3.9%	3.8%	\$ 181,768,648
Plymouth Rock Assurance Corporation	04/01/2021	Υ	8.9%	0.7%	6.0%	\$ 32,883,295
Plymouth Rock - Palisades - Direct	04/01/2021	Υ	5.0%	5.0%	5.0%	\$ 7,170,916
Allstate Insurance Company	03/04/2021	N	-5.0%	-4.9%	-4.9%	\$ 47,157,030
Allstate Property and Casualty Insurance Co	03/04/2021	N	-5.0%	-5.0%	-5.0%	\$ 13,829,150
Allstate Fire and Casualty Insurance Co	03/04/2021	N	-5.0%	-5.0%	-5.0%	\$ 207,659,630
Central Mutual Insurance Company	05/01/2021	N	1.0%	-1.7%	0.0%	\$ 11,612,793
Nationwide Insurance Company of America	05/30/2021	N	0.0%	0.0%	0.0%	\$ 30,024,031
Providence Mutual Ins. Co.	05/01/2021	N	19.1%	17.1%	18.0%	\$ 8,120,297
Century-National Insurance Company	07/02/2021	N	-0.4%	-0.4%	-0.4%	\$ 35,639,248
Covenant Insurance Company	04/01/2021	N	0.0%	0.0%	0.0%	\$ 19,189,237
Travelers - Standard Fire Insurance Co	04/30/2021	N	-2.8%	-3.5%	-3.0%	\$ 131,014,241
Travelers Home and Marine Insurance Co	06/24/6021	N	-4.7%	-5.4%	-5.0%	\$ 32,628,976
Travelers Personal Security Insurance Co	06/24/2021	N	-4.7%	-5.4%	-5.0%	\$ 7,659,656
Integon National Insurance Company	07/02/2021	N	0.0%	0.0%	0.0%	\$ 8,468,653
Utica Mutual Ins. Company - Millennium	06/07/2021	N	0.0%	0.0%	0.0%	\$ 24,500,469
USAA_United Services Automobile Assoc	09/20/2021	N	0.0%	-1.1%	-0.5%	\$ 40,099,634
USAA Casualty Insurance Company	09/20/2021	N	0.0%	-2.3%	-1.0%	\$ 54,427,976
USAA General Indemnity Company	09/20/2021	N	0.0%	-8.1%	-3.5%	\$ 36,926,183
USAA_Garrison Property & Casualty Ins. Co	09/20/2021	N	0.0%	-2.3%	-1.0%	\$ 20,900,364

State Total	63	20	2.2%	0.0%	1.5%	\$ 3,099,708,760
Companies with 0% filed rate changes	11	2	0.0%	0.0%	0.0%	\$ 125,513,706
Companies with non-0% rate changes	52	18	2.3%	0.0%	1.5%	\$ 2,974,195,054
Totals:	# Total Filings	# Flex Filings	Liability	Phys Dam	Total	Premium Writter
2021 weighted Averages						
Motor Club Insurance Company	10/07/2021	NEW CO	IVIPAINY			
<del>-</del> ·				4.0%	4.0%	\$ 12,044,89
ROOT Insurance Company MET Economy Preferred Ins. Co.	09/28/2021 11/12/2021	Y	6.1% 4.0%	5.6% 4.0%	6.0% 4.0%	\$ 3,667,50 \$ 12,044,89
State Automobile Mutual Insurance Co	09/24/2021	Y	5.8%	5.0%	5.5%	\$ 8,695,10
Dairyland Insurance Company	10/25/2021	N	8.8%	-20.8%	7.4%	\$ 4,626,04
American Commerce Insurance Company	11/01/2021	N	3.4%	1.0%	2.5%	\$ 35,589,33
Berkley Insurance Company	12/17/2021	N	0.0%	0.1%	0.0%	\$ 2,102,59
Liberty Mutual Personal Insurance Co	10/17/2021	Y	7.0%	0.0%	4.9%	\$ 46,846,12
Liberty Mutual Insurance Company	10/17/2021	Y	7.0%	0.0%	6.1%	\$ 3,446,00
LM Insurance Corporation	10/17/2021	Y	7.2%	-2.1%	5.8%	\$ 2,346,28
LM General Insurance Company	10/17/2021	Y	7.0%	-1.7%	5.0%	\$ 107,563,10
Plymouth Rock_Palisades Ins. Company	09/01/2021	Y	0.0%	0.0%	0.0%	\$ 12,101,67
Progressive Direct Insurance Company	06/30/2021	Υ	1.3%	12.4%	5.7%	\$ 106,836,95
Progressive Casualty Insurance Company	06/30/2021	Υ	3.8%	12.4%	5.8%	\$ 87,894,03
Midvale Indemnity Company	08/10/2021	N	-15.5%	-10.9%	-14.1%	\$ 145,22
Stillwater Insurance Company	07/09/2021	N	1.3%	7.1%	3.5%	\$ 1,864,96
Old Dominion Insurance Company	10/30/2021	N	6.0%	16.4%	7.0%	\$ 33,088,63
NJM - New Jersey Manufacturers Ins. Co	10/16/2021	N	-5.4%	-7.2%	-6.0%	\$ 456,14
Kemper Independence Ins. Co_Prime	12/30/2021	N	18.8%	6.9%	14.4%	\$ 23,504,37
Kemper Independence Ins. Co_Prime	06/15/2021	Y	3.9%	7.4%	5.6%	\$ 18,786,49
Government Employees Insurance Co	09/30/2021	Υ	8.6%	1.5%	6.0%	\$ 56,494,53
Government Employees Insurance Co	11/11/2021	N	-0.3%	-0.2%	-0.3%	\$ 56,494,53
GEICO General Insurance Company	09/30/2021	Y	8.6%	1.5%	6.0%	\$ 280,902,42
GEICO General Insurance Company	11/11/2021	N	-0.3%	-0.2%	-0.3%	\$ 280,902,42
GEICO Indemnity Company	09/30/2021	Υ	10.1%	-2.6%	6.0%	\$ 194,414,32
GEICO Indemnity Company	11/11/2021	N	-0.1%	-0.1%	-0.1%	\$ 194,414,32
Electric Insurance Company	06/15/2021	N	0.1%	-0.1%	0.0%	\$ 5,780,63
New South Insurance Company	06/10/2021	N	-0.8%	-10.2%	-3.1%	\$ 6,520,45

2020 Totals	0.4%	-1.0%	-0.1%
-------------	------	-------	-------

## EXHIBIT – B

## Status of CT Homeowners Rate Filings (2021 Effective dates)

(1)		(2)	(3)	(4)	(5)	
COMPANY	Flex Filing Y/N	EFFECTIVE DATE	WRITTEN PREMIUM	MARKET SHARE	2021 FILED OVERALL CHANGE	2021 FINAL RATE REC.
Utica First Insurance Company	N	01/01/2021	\$26,523,132	2.3%	5.8%	5.8%
Farmers_Fire Insurance Exchange	N	01/16/2021	\$0	0.0%		
Chubb National Insurance Company	N	04/19/2021	\$11,687,828	1.0%	9.5%	9.5%
Chubb_Great Northern Insurance Co	N	04/19/2021	\$58,813,004	5.0%	7.0%	7.0%
Chubb_Pacific Indemnity Company	N	04/19/2021	\$4,258,210	0.4%	-4.1%	-4.1%
Chubb_Vigilant Insurance Company	N	04/19/2021	\$38,753,648	3.3%	0.7%	0.7%
Chubb_Federal Insurance Company	N	04/19/2021	\$19,096,247	1.6%	-0.1%	-0.1%
CSAA General Insurance Company	N	02/01/2021	\$26,675,601	2.3%	5.3%	5.3%
Stillwater P&C ins Co.	N	02/05/2021	\$3,619,580	0.3%	-1.7%	-1.7%
The Hanover Insurance Co	N	04/12/2021	\$7,630,443	0.7%	0.0%	0.0%
The Hanover Insurance Co	N	06/04/2021	\$18,585,163	1.6%	4.1%	4.1%
Utica Mutual Insurance Company	N	02/22/2021	\$1,082,661	0.1%	6.0%	6.0%
Covenant Insurance Company	N	03/01/2021	\$14,648,280	1.3%	-0.7%	-0.7%
United Services Automobile Association	N	06/07/2021	\$618,250	0.1%	3.7%	3.7%
USAA Casualty Insurance Company	N	06/07/2021	\$933,695	0.1%	3.8%	3.8%
USAA General Indemnity Company	N	06/07/2021	\$702,886	0.1%	3.5%	3.5%
Garrison Property & Casualty Ins. Co	N	06/07/2021	\$439,015	0.0%	3.6%	3.6%
Utica National_Republic-Franklin Ins Co	N	03/20/2021	\$4,847,850	0.4%	9.8%	9.8%
Allstate Insurance Company	Υ	04/10/2021	\$65,134,868	5.6%	5.9%	5.9%
Allstate Indemnity Company	Υ	04/10/2021	\$1,945,641	0.2%	5.9%	5.9%
Armed Forces Insurance Exchange	N	03/29/2021	\$375,447	0.0%	0.1%	0.1%
The Travelers Home & Marine Ins Co (renewal only)	N	03/30/2021	\$61,879,429	5.3%	3.1%	3.1%
Travelers Personal Security Ins Co (renewal only)	N	03/30/2021	\$6,290,234	0.5%	3.3%	3.3%
State Farm Fire and Casualty Company	N	04/01/2021	\$88,172,639	7.6%	0.0%	0.0%
Central Mutual Insurance Company	N	04/01/2021	\$9,132,711	0.8%	3.5%	3.5%
Plymouth Rock Home Assurance Corp	Υ	04/15/2021	\$22,834,843	2.0%	5.4%	5.4%
Farm Family Casualty Insurance C	Y	04/15/2021	\$2,124,146	0.2%	9.7%	9.7%
Farmers_Truck Insurance Exchange	N	06/10/2021	\$16,526,000	1.4%	4.8%	4.8%
Integon National Ins Co/National General	N	04/18/2021	\$6,278,335	0.5%	10.0%	10.0%
Integon National Ins Co/One Choice	N	07/02/2021	\$18,790,870	1.6%	6.9%	6.9%
Narragansett Bay Insurance Company	N	05/15/2021	\$13,493,977	1.2%	5.0%	5.0%

Narragansett Bay Insurance Company	N	11/01/2021	\$20,655,448	1.8%	6.0%	6.0%
United Services Automobile Association	N	08/23/2021	\$31,307,496	2.7%	0.0%	0.0%
USAA Casualty Insurance Company	N	08/23/2021	\$30,055,150	2.6%	0.0%	0.0%
USAA General Indemnity Company	N	08/23/2021	\$12,297,333	1.1%	0.0%	0.0%
Garrison Property & Casualty Ins Co	N	08/23/2021	\$3,477,194	0.3%	0.0%	0.0%
Bankers Standard Insurance Co	N	06/17/2021	\$2,814,300	0.2%	9.9%	9.9%
Universal North America Insurance Co	N	08/01/2021	\$6,927,744	0.6%	10.0%	10.0%
Covenant Insurance Company	N	06/01/2021	\$14,531,837	1.2%	-0.1%	-0.1%
United Property Casualty Insurance	N	05/01/2021	\$11,675,027	1.0%	18.7%	0.0%
Nationwide_Crestbrook	Υ	05/01/2021	\$1,576,093	0.1%	3.9%	3.9%
Encompass Indemnity Co - HO3/DF	Υ	04/29/2021	\$2,759,617	0.2%	0.0%	0.0%
Encompass Indemnity Co -HO4/HO6	Υ	04/29/2021	\$116,551	0.0%	4.3%	4.3%
Graphic Arts Mutual Insurance Co	N	07/03/2021	\$740,256	0.1%	2.0%	0.0%
AmGUARD Insurance Company	N	06/01/2021	\$13,040,666	1.1%	12.0%	12.0%
Harco National Insurance Company	N	04/16/2021	\$3,901,249	0.3%	7.5%	7.5%
TypTap Insurance Company	N	05/17/2021	\$0	0.0%	NEW	NEW
Homeowners Choice Property & Casualty Ins Co, Inc.	N	06/01/2021	\$0	0.0%	NEW	NEW
Quincy Mutual Fire Insurance Company	N	06/01/2021	\$8,607,962	0.7%	0.0%	0.0%
New England Mutual Insurance Co	N	06/01/2021	\$2,566,613	0.2%	0.0%	0.0%
LM Insurance Corporation	Υ	07/22/2021	\$2,266,569	0.2%	6.3%	6.3%
Liberty Mutual Personal Insurance Co	Υ	07/22/2021	\$59,518,291	5.1%	5.7%	5.7%
Property and Casualty Ins Co of Hartford	Υ	05/20/2021	\$13,593,232	1.2%	3.5%	0.0%
Hartford Insurance Co of the Midwest	N	05/20/2021	\$7,781,575	0.7%	3.9%	0.0%
Hartford Casualty Insurance Co	N	05/20/2021	\$796,948	0.1%	5.9%	0.0%
Hartford Insurance Co of the Southeast	N	05/20/2021	\$5,984,747	0.5%	8.4%	0.0%
Hartford Trumbull Ins Co	N	05/20/2021	\$18,874,678	1.6%	7.4%	0.0%
Hartford Accident and Indemnity Co	N	05/20/2021	\$6,160,029	0.5%	8.6%	0.0%
AIG Property Casualty Co	Υ	12/15/2021	\$43,057,495	3.7%	3.9%	3.9%
Homesite Insurance Company	N	10/21/2021	\$31,304,920	2.7%	9.9%	3.3%
Amica Mutual Ins Co.	Υ	09/01/2021	\$79,435,384	6.8%	2.0%	0.0%
Vault Reciprocal Exchange	N	09/01/2021	\$1,756,394	0.2%	2.9%	2.9%
Pharmacists Mutual Insurance Company	N	08/15/2021	\$6,989	0.0%	10.7%	10.7%
Nationwide General Insurance Company	N	08/15/2021	\$26,575,210	2.3%	6.3%	6.3%
Nationwide Property & Casualty Ins Co	N	08/15/2021	\$18,816,576	1.6%	5.8%	5.8%
Nationwide Mutual Fire Insurance Co	N	08/15/2021	\$13,333,155	1.1%	5.3%	5.3%
Travelers Personal Ins Co Quantum 2.0	N	06/25/2021	\$38,291,439	3.3%	3.3%	3.29
Hanover-Massachusetts Bay Ins Co	N	10/15/2021	\$22,204,034	1.9%	4.9%	5.5%
Hanover-Citizens Insurance Co	N	10/15/2021	\$2,432,297	0.2%	5.5%	1.4%
The Hanover Insurance Co	N	10/15/2021	\$378,905	0.0%	5.3%	2.3%

Patrons Mutual Ins Co of Connecticut	N	11/17/2021	\$8,183,292	0.7%	3.2%	3.2%
Main Street America Assurance Co - MSA New	N	10/01/2021	\$2,147,243	0.2%	4.0%	3.7%
NGM Insurance Company - MSA Legacy	N	11/14/2021	\$12,358,926	1.1%	6.9%	3.8%
Cincinnati Insurance Company	N	10/01/2021	\$19,164,959	1.6%	5.8%	5.8%
Berkley Insurance Company	N	12/17/2021	\$4,663,723	0.4%	3.9%	3.9%
Motor Club Insurance Company	N	10/08/2021		0.0%		
American Commerce Insurance Co	N	12/21/2021	\$2,980,698	0.3%	4.0%	4.0%
State Automobile Mutual Insurance Co	N	11/27/2021	\$2,354,882	0.2%	4.5%	4.5%
Kemper Independence Ins Co_Prime	N	12/16/2021	\$4,431,520	0.4%	3.0%	3.0%

Total Filings 79
Total Flex Filings 12

2021 Totals		2020* WRITTEN PREMIUM	MARKET SHARE	FILED OVERALL CHANGE	FINAL RATE RECORDED
Total 2021 – All Companies with non-zero Rate Change		\$ 835,882,956	71.6%	5.9%	4.7%
Company with no Rate Changes		\$ 331,916,323	28.4%	0.0%	0.0%
Total 2021 – All Companies		\$1,167,799,279	100.0%	4.2%	3.4%
				4.2%	3.4%
Compare to 2020					
Total 2020 – All Companies with non-zero Rate Change	As of 12/17/2020	\$938,609,149	98.1%	5.40%	5.23%
Companies with no Rate Changes	Range Valued	\$18,371,592	1.9%	0.00%	0.00%
Total 2020 – All Companies		\$953,980,741	100.0%	5.3%	5.1%
Number of 2020 filings	65			5.3%	5.1%
Number of 2019 filings	78				

#### 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, 2022

\_\_\_\_\_\_

#### MEMORANDUM AND ORDER

#### I. INTRODUCTION

On September 16, 2021 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 Loss Costs and a change in Assigned Risk Rates for Workers' Compensation Insurance pursuant to Conn. Gen. Stat. §38a-665(a) proposed to be effective January 1, 2022.

The filing requests revisions of the current loss costs and assigned risk rates that the Department approved effective January 1, 2021. NCCI proposes an overall -14.1% change for pure premium loss costs and an overall -8.2% 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 24, 2021 at: <a href="https://portal.ct.gov/CID/Public-Notices/2022-NCCI-Notice-Rate-and-Loss-Cost-Filing">https://portal.ct.gov/CID/Public-Notices/2022-NCCI-Notice-Rate-and-Loss-Cost-Filing</a> 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	-13.2%
Contracting	-13.7%
Office & Clerical	-16.6%
Goods & Services	-14.3%
Miscellaneous	-13.4%
<b>Overall Change Requested</b>	-14.1%

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

Industry Group	Assigned Risk Plan Rate Average Change (%)
Manufacturing	-7.2%
Contracting	-7.7%
Office & Clerical	-10.8%
Goods & Services	-8.4%
Miscellaneous	-7.4%
<b>Overall Change Requested</b>	-8.2%

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	-13.3%	-13.3%
Trend	-1.7%	-1.7%
Benefits	+0.6%	+0.6%
Loss-based Expenses/Expenses	+0.2%	+7.1%
Overall Change Requested	-14.1%	-8.2%

- 4. The assessments due from employers for funding the cost of the Workers' Compensation Commission are 2.70% of losses. Insurance carriers pass through these assessments to employers. For the Voluntary Market and the Assigned Risk Market, the assessment rate converted to a percentage of premium is 1.9% 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 decreasing to 6.1% of total losses, with a proposed assessment on assigned risk standard premium and voluntary market standard premium of 3.8%.
- 5. The filing proposes to increase the maximum payroll for Executive Officers or Members of Limited Liability Companies from \$2,700 to \$2,900.
- 6. The filing proposes to increase the maximum payroll for Athletic Teams from \$1,350 to \$1,450.
- 7. NCCI estimates that the changes to the Connecticut's medical fee schedule, effective April 1, 2021, will result in an impact of +0.6% on overall workers compensation system costs.
- 8. The filing proposes to increase the Permissible Loss Ratio for the Assigned Risk Rate filing from 70.9% to 71.3%.
- 9. The filing proposes no change to the currently approved expense constants.
- 10. The filing proposes no change to the currently approved Uncollectible Premium Provision.
- 11. The filing proposes no change to the minimum premium multiplier.
- 12. 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.
- 13. The filing proposes to increase the annual payroll for Partners and Sole Proprietors from \$71,400 to \$75,200.
- 14. The filing proposes to increase the current voluntary loss adjustment expense (LAE) provision from 19.7% to 19.9%.
- 15. The filing proposes a 0.6% decrease to the current assigned risk expense provision.
- 16. The filing proposes no change to the United States Longshore and Harbor Workers' Compensation Coverage Percentage.

#### 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 2018 and 2019. 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 an increase to the Assigned Risk Loss Cost Differential from 1.3 to 1.439 (including the impact of the reduction in assigned risk premium discounts). The increase reflects a deterioration in the assigned risk market loss cost experience relative to the voluntary market loss cost experience.

#### C. COVID-19

NCCI recently reviewed its actuarial catastrophe methodology as a result of the COVID-19 pandemic. Currently, NCCI's Catastrophe (other than Certified Acts of Terrorism) Provision accounts for single-event losses resulting only from earthquakes, noncertified acts of terrorism, or catastrophic industrial accidents that exceed \$50 million in aggregate workers compensation losses. However, the COVID-19 pandemic has shown that there are other perils that can result in catastrophic losses.

In the calculation of loss costs, NCCI is proposing to use data that excludes the impact of the catastrophic COVID-19 event. NCCI is proposing for the Catastrophe (other than Certified Acts of Terrorism) Provision to contemplate the exposure to all events or perils that could result in aggregate workers compensation losses in excess of \$50 million (which may include pandemics). At this time, NCCI is proposing no change to the currently approved advisory Miscellaneous Value for Catastrophe (other than Certified Acts of Terrorism).

Due to the uncertainty surrounding quantifying the impact future pandemics could have on the workers compensation system, it is appropriate to contemplate all catastrophic perils, including pandemics, within the Catastrophe (other than Certified Acts of Terrorism) definition without a change in the advisory value. This handling recognizes that there are additional catastrophic exposures (which may include pandemics) on workers compensation system costs that should be considered in the calculation of loss costs in adherence with the Actuarial Standards of Practice (ASOPs).

#### 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 1.9% of standard premium and "F" classification assessment fund rate will be changed to 3.8% of standard premium for voluntary market and assigned risk insurers for policies effective on or after January 1, 2022.
- C. The proposed increase to the maximum payroll for Executive Officers or Members of Limited Liability Companies from \$2,700 to \$2,900 is approved.
- D. The proposed increase to the maximum payroll for Athletic Teams from \$1,350 to \$1,450 is approved.
- E. The proposed increase to the Permissible Loss Ratio for the Assigned Risk Rate filing from 70.9% to 71.3% is approved.
- F. The proposed increase to the annual payroll for Partners and Sole Proprietors from \$71,400 to \$75,200 is approved.
- G. The proposed increase to the current voluntary loss adjustment expense (LAE) provision from 19.7% to 19.9% is approved.
- H. The proposed -0.6% decrease to the current assigned risk expense provision is approved.
- I. The proposed increase in the Assigned Risk Loss Cost Differential to 1.439 (including the impact of the reduction in the assigned risk premium discounts) is approved.
- J. The thirty (30) day advance filing requirement set forth in Conn. Gen. Stat. §38a-676(b) for filings received prior to January 1, 2022 be waived in order to allow for the adoption of the change in advisory pure premium loss costs effective January 1, 2022.

Dated at Hartford, Connecticut this 28th day of October, 2021.

Signature on file with original Order	
Andrew N. Mais	
Insurance Commissioner	

## EXHIBIT-C-1

ORGANIZATION	COMPANY NAME	YEAR 2021	RATE CHANGE
INDEPENDENT	CBIA COMP. SERVICES, INC.		-5.0
INDEPENDENT	WORKERS COMP TRUST		0.0
INDEPENDENT	CT INTERLOCAL RISK MANAGEMENT AGENCY		-5.6
NCCI			
	BROTHERHOOD MUTUAL INS CO		-3.7
	NEW JERSEY MANUFACTURERS INS CO		-0.2
	PENNSYLVANIA MFG ASSOC INS CO		-1.7
	MANUFACTURERS ALLIANCE INS CO		-1.7
	PENNSYLVANIA MFG INDEMNITY CO		-2.0
	AMERICAN STATES INS CO		-2.6
	AMERICAN ECONOMY INS CO		2.0
	FIRST NATIONAL INS CO OF AMERICA		
	GENERAL INS CO OF AMERICA		
	FEDERATED MUTUAL INSURANCE COMPANY		0.1
	FEDERATED SERVICE INSURANCE COMPANY		-0.9
	FEDERATED RESERVE INS CO		-0.17
	GREAT AMERICAN INS CO		0.1
	GREAT AMERICAN ASSURANCE CO		0.6
	GREAT AMERICAN INS CO OF NY		-0.4
	GREAT AMERICAN ALLIANCE INS CO		-3.5
	GREAT AMERICAN SPIRIT INS CO		-1.6
	GUIDEONE MUTUAL INS CO		-3.7
	PRAETORIAN INSURANCE COMPANY		-1.8
	STONINGTON INS CO		-1.8
	GENERAL CASUALTY CO OF WISCONSIN		-1.8
	REGENT INSURANCE COMPANY		-1.8
	QBE INS CORP		-1.8
	NORTH POINTE INS CO		1.2
	LIBERTY MUTUAL INS CO		3.0
	LIBERTY MUTUAL FIRE INS CO		0.1
	LM INSURANCE CORP		-3.0
	FIRST LIBERTY INSURANCE CORP		1.2
	LIBERTY INSURANCE CORP		-1.5
	EMPLOYERS INS CO OF WAUSAU		3.0

GREENWICH INSURANCE COMPANY	-1.8
XL INSURANCE AMERICA, INC.	-1.8
XL SPECIALTY INSURANCE CO.	-1.8
T.H.E. INSURANCE COMPANY	-1.8
PHARMACISTS MUTUAL INSURANCE CO.	-2.2
CHIRON INSURANCE COMPANY	0
NATIONAL INTERSTATE INSURANCE CO.	-2.7
TRIUMPHE CASUALTY COMPANY	3.4
VANLINER INSURANCE COMPANY	-2.7
TRANSGUARD INS. CO. OF AMERICA	-4.8
FARM FAMILY CASUALTY INSURANCE COMPANY	-1.9
WORK FIRST CASUALTY COMPANY	4.8
ASSOC. INDUSTRIES OF MA MUTUAL INSURANCE COMPANY	-1.8
ASSOC. EMPLOYERS INSURANCE COMPANY	-1.8
ACE AMERICAN INS CO	-0.1
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	
FEDERAL INS CO	
CHUBB INDEMNITY INS CO	
GREAT NORTHERN INS CO	
PACIFIC INDEMNITY CO	
VIGILANT INS CO	
CHUBB NATIONAL INS CO	
AMOUADD INC CO	2.2
AMGUARD INS CO	-2.6
NORGUARD INC. CO	-2.1
NORGUARD INS CO	-5.5
EASTGUARD INS CO	-2.7
MITCH CHMITCHO INC CO OF AMERICA	10
MITSUI SUMITOMO INS CO OF AMERICA	-1.8
MITSUI SUMITOMO INS USA INC	-1.8

TOKIO MARINE AMERICA INS CO	-1.8
TRANS PACIFIC INS CO	-1.8
ATLANTIC CHARTER INS CO	-6.2
NOVA CASUALTY CO SUPERIOR TIER	-2.1
PREFERRED TIER	
STANDARD TIER	
SUBSTANDARD TIER	
FEDERATED MUTUAL INSURANCE COMPANY	2.5
FEDERATED SERVICE INSURANCE COMPANY	3.2
FEDERATED RESERVE INS CO	2.3
INS CO OF THE WEST	-1.8
 SELECTIVE INSURANCE CO OF THE SOUTHEAST	-1.4
SELECTIVE INSURANCE CO OF SOUTH CAROLINA	-1.2
SELECTIVE INSURANCE CO OF AMERICA	-1.2
CALIFORNIA INS CO	-1.8
FRANK WINSTON CRUM INS CO	-1.0
HDI GLOBAL INS CO	10.0
 EMPLOYERS COMPENSATION INS CO	-9.5
EMPLOYERS ASSURANCE CO	-5.1
EMPLOYERS PREFERRED INS CO	-2.3
HANOVER INSURANCE COMPANY	-1.7
MASSACHUSETTS BAY INSURANCE CO	-2.1
CITIZENS INSURANCE CO OF AMERICA	-0.8
ALLMERICA FINANCIAL BENEFIT INS CO	-0.9
HANOVER AMERICAN INS CO	-0.5
ALLMERICA FINANCIAL ALLIANCE INS CO	-3.8
FIREMAN'S FUND INSURANCE CO	-7.2
NATIONAL SURETY CORPORATION	-8.8
AMERICAN AUTOMOBILE INSURANCE CO	-7.2
FRANKENMUTH MUTUAL INS CO	0.0
ANSUR AMERICA INS CO	
HARTEORD FIRE INS CO	1 2
HARTFORD FIRE INS CO HARTFORD CASUALTY INS CO	1.2

	HARTFORD UNDERWRITERS INS CO	1.3
	TWIN CITY FIRE INS CO	1.2
	SENTINEL INS CO, LTD	1.3
	HARTFORD INS CO OF THE MIDWEST	1.2
	PACIFIC INSURANCE COMPANY	1.2
	TRUMBULL INS CO	1.2
	PROPERTY & CASUALTY INS CO OF HARTFORD	1.1
	HARTFORD INS CO OF THE SOUTHEAST	1.2
	NUTMEG INS CO	1.2
	THE TIME OF THE OFFI	112
	AMERICAN ALTERNATIVE INS CORP	-1.8
	AMERICAN FAMILY HOME INS CO	
	AMERICAN MODERN HOME INS CO	
	7 WENG AN WESSERIA FISHE INC GO	
,	SENTRY CASUALTY CO	0.0
	SENTICI GAGGAETT GO	0.0
	ACIG INS CO	-1.8
	7.010 1140 00	-1.0
	SERVICE AMERICAN IDEMNITY CO	-1.8
	SERVICE AMERICAN IDEMINITY CO	-1.0
	SENTRY INS A MUTUAL CO	-1.4
	MIDDLESEX INS CO	-2.7
	PATRIOT GENERAL INS CO	-1.1
	SENTRY SELECT INS CO	-0.1
	SENTIAL SELECTING CO	-0.1
	AMERICAN HOME ASSURANCE CO	-1.8
	AIG ASSURANCE CO	-1.0
	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	
	AID INS CO	
	GREAT WEST CASUALTY COMPANY	1.4
	SILLAT WEST SASSALTT SOWII ANT	1.4
	NEW YORK MARINE AND GENERAL INS CO	0.0
	INC. I ON INTIMINE AND GENERAL ING. CO	0.0
	PENNSYLVANIA INS CO	0.0
	I LINIO LEVANIA INO OO	0.0
	NATIONAL SPECIALTY INS CO	-1.8
	TATTOTAL OF LOIALTT 1140 00	-1.0
	CHURCH MUTUAL INS CO	5.05
	CHOICH WOLD TO LE HAD DO	0.00

AMERICAN CASUALTY COMPANY OF READING PA	-3.79
CONTINENTAL CASUALTY COMPANY	1.22
NATIONAL FIRE INS CO	-3.94
CONTINENTAL INS CO	-2.72
TRANSPORTATION INS CO	-1.69
VALLEY FORGE INSURANCE CO	-3.18
STATE NATIONAL INS CO	-3.4
STARR INDEMNITY & LIABILITY COMPANY	-1.8
STARR SPECIALTY INS CO	
ZURICH AMERICAN INS CO	-2.5
AMERICAN GUARANTEE & LIABILITY INS CO	-2.6
AMERICAN ZURICH INS CO	-5.8
ZURICH AMERICAN INS CO OF IL	-2.5
FIDELITY AND DEPOSIT CO OF MD	-2.7
COLONIAL AMERICAN CASUALTY & SURETY CO	-2.7
AMERICAN COMPENSATION INS CO	3.6
STATE AUTOMOBILE MUTUAL INS CO	-1.1
STATE AUTO P&C INSURANCE CO	-2.9
PLAZA INSURANCE COMPANY	-12.3
PATRONS MUTUAL INS CO OF CT	-6.7
INTREPID INSURANCE COMPANY	0.0
TECHNOLOGY INSURANCE CO., INC	-2.874
WESCO INSURANCE COMPANY	-4.843
SECURITY NATIONAL INSURANCE CO	-3.445
BERKLEY NATIONAL INSURANCE CO	-2.874
BERKLEY REGIONAL INSURANCE CO	-1.561
RIVERPORT INSURANCE CO.	-4.965
TRI-STATE INS CO. OF MINNESOTA	1.491
EVEREST NATIONAL INSURANCE CO	-1.200
EVEREST REINSURANCE COMPANY	0.000
EVEREST PREMIER INSURANCE COMPANY	-2.800
EVEREST DENALI INSURANCE COMPANY	-0.800
ATLANTIC SPECIALTY INSURANCE COMPANY	-1.725

OBI AMERICA INSURANCE COMPANY	2.780
OBI NATIONAL INSURANCE COMPANY	-0.798
ARBELLA INDEMNITY INS CO	-1.87
ADDELLA DEGETECTION NO CO	
ARBELLA PROTECTION INS CO	-1.14
CLEAR SPRING PROPERTY & CASUALTY CO	9.0
CLEAR SPRING PROPERTY & CASUALTY CO	9.0
NORMANDY INS CO	-1.8
NORWAND I INS CO	-1.0
NATIONAL AMERICAN INS CO	-1.8
SFM MUTUAL INS CO	0.0
ARCH INS CO	-2.43
ARCH INDEMNITY INS CO	0.0
ARCH PROPERTY CASUALTY INS CO	0.0
BERKSHIRE HATHAWAY HOMESTATE INS CO	-1.8
OAK RIVER INS CO	
REDWOOD FIRE AND CASUALTY INS CO	
SAFETY NATIONAL CASUALTY CORP	-12.1
SAFETY FIRST INS CO	-3.9
CRESTBROOK INS CO	0.0
NATIONWIDE AGRIBUSINESS INS CO - PREFERRED	0.7
NATIONWIDE AGRIBUSINESS INS CO - STANDARD	
NATIONAL CASUALTY CO. PREFERRED	2.2
NATIONAL CASUALTY CO - PREFERRED  NATIONAL CASUALTY CO - STANDARD	-2.2
NATIONAL CASUALTY CO - STANDARD  NATIONAL CASUALTY CO - NON-STANDARD	
INATIONAL CASUALTT CO - NON-STANDARD	
MARKEL INS CO	-0.9
WARREL ING GO	0.5
FIRSTCOMP INS CO	-1.5
	1.0
EMPLOYERS MUTUAL CASUALTY CO	-0.3

EMCASCO INS CO	0.6
EMC PROPERTY & CASUALTY CO	-2.4
UNION INS CO OF PROVIDENCE	3.8
MEMIC INDEMNITY COMPANY	-4.2
MEMIC INDEMNITY COMPANY	
MEMIC INDEMNITY COMPANY	
MEMIC INDEMNITY COMPANY	
MAINE EMPLOYERS' MUTUAL INS CO	-3.1
MAINE EMPLOYERS' MUTUAL INS CO	
MAINE EMPLOYERS' MUTUAL INS CO	
MEMIC CASUALTY COMPANY	-2.6
MEMIC CASUALTY COMPANY	
MEMIC CASUALTY COMPANY	
FLORISTS MUTUAL INS CO	4.1
GREAT DIVIDE INS CO	-6.2
CILLIN DIVIDE INC CO	0.2
BENCHMARK INS CO	-3.6
BEITOT IIII II	
STARNET INS CO	2.3
CAROLINA CASUALTY INS CO	2.0
MIDWEST EMPLOYERS CASUALTY CO	
KEY RISK INS CO	
BERKLEY CASUALTY CO	
PREFERRED EMPLOYERS INS CO	
FREFERRED EMIFEOTERS INS CO	
OLD REPUBLIC INS CO	5.2
OLD REPUBLIC INS CO	5.2
OLD DEDUCE CENEDALING CODD	1.0
OLD REPUBLIC GENERAL INS CORP	-1.8
ACCIDENT FUND OFNEDAL INC CO	
ACCIDENT FUND GENERAL INS CO	4.4
ACCIDENT FUND NATIONAL INS CO	0.4
ACCIDENT FUND INS CO OF AMERICA	0
UNITED WISCONSIN INS CO	4.3
UNITED STATES FIRE INS CO	-0.2
NORTH RIVER INS CO	-2.2
CRUM AND FORSTER INDEMNITY COMPANY	-0.8
TRUCK INSURANCE EXCHANGE	-1.3
FARMERS INSURANCE EXCHANGE	0.0
MID-CENTURY INS CO	0.0
FOREMOST INS CO GRAND RAPIDS MICHIGAN	-4.4
FOREMOST PROPERTY & CASUALTY INS CO	-28.2
FOREMOST SIGNATURE INS CO	0.7

ZENITH INS CO	-1.8
WESTPORT INS CORPORATION	-1.8
NORTH AMERICAN SPECIALTY INS CO	
NORTH AMERICAN ELITE INS CO	
SOMPO AMERICA INS CO	1.5
SOMPO AMERICA FIRE & MARINE INS CO	-32.3
AMERICAN LIBERTY INS CO	0.0
NATIONAL LIABILITY & FIRE INS CO	-0.7
BERKSHIRE HATHAWAY DIRECT INS CO	-2.9
WELLFLEET NEW YORK INS CO	-1.8
WELLFLEET INS CO	-1.8
STATE FARM FIRE AND CASUALTY CO	-2.6
SERVICE LLOYDS INS CO	INITIAL
ACCREDITED CASUALTY & SURETY CO INC	-1.8
WCF NATIONAL INS CO	-2.6
ALLIED PROPERTY & CASUALTY INS CO	-1.3
DEPOSITORS INS CO	-2.9
AMCO INS CO	0.0
NATIONWIDE MUTUAL INS CO	0.2
NATIONWIDE PROPERTY & CASUALTY INS CO	2.1
NATIONWIDE MUTUAL FIRE INS CO	0.0
NATIONWIDE GENERAL INS CO	0.0
NATIONWIDE ASSURANCE INS CO	0.0
NATIONWIDE INS CO OF AMERICA	0.0
HARLEYSVILLE WORCESTER INS CO	-1.3
HARLEYSVILLE PREFERRED INS CO	-1.6
HARLEYSVILLE INS CO	0.4
PLAZA INSURANCE COMPANY	0.0
NGM INS CO	-0.1
MAIN STREET AMERICA ASSURANCE CO	-0.4
OLD DOMINION INS CO	-0.4
STAR INSURANCE COMPANY	-32.1

MIDVALE INDEMNITY COMPANY	-1.5
FIRE INSURANCE EXCHANGE	INITIAL
ALL AMERICA INS CO - ALL OTHER	-8.9
CENTRAL MUTUAL INS CO - ALL OTHER	-0.9
CINCINNATI INSURANCE COMPANY	-4.4
CINCINNATI CASUALTY COMPANY	3.9
CINCINNATI INDEMNITY COMPANY	4.2
PENN MILLERS INSURANCE COMPANY	-2.8
TRAVELERS CASUALTY INS CO OF AMERICA	INITIAL
SUNZ INS CO	INITIAL
EXECUTIVE RISK INDEMNITY INC	INITIAL
BERKLEY CASUALTY CO	9.1
CAROLINA CASUALTY INS CO	5.1
KEY RISK INS CO	13.4

## EXHIBIT-C-2

ORGANIZATION	COMPANY NAME	YEAR 2022	RATE CHANGE
INDEPENDENT	CBIA COMP. SERVICES, INC.		-5.6
INDEPENDENT	WORKERS COMP TRUST		-3.0
INDEPENDENT	CT INTERLOCAL RISK MANAGEMENT AGENCY		
NCCI	NOTE: For reference NCCI filing 202105045 for loss costs overall change was -14.1% for voluntary loss costs; -8.2% for assigned risk rates.		
	WEST BEND MUTUAL INS CO		-13.9
	VANLINER INS CO		-17.6
	NATIONAL INTERSTATE INSURANCE CO		-14.3
	TRIUMPHE CASUALTY COMPANY		-17.1
	INS CO OF THE WEST		-14.1
	TRAVELERS INDEMNITY COMPANY		-13.8
	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		
	TRAVELERS CASUALTY INS CO OF AMERICA		
	WCF NATIONAL INS CO		-18.7
	PREFERRED PROFESSIONAL INSURANCE COMPANY		-14.1
	PROTECTIVE INSURANCE COMPANY		-13.9
	SAGAMORE INSURANCE COMPANY		-13.4
	PENNSYLVANIA MFG ASSOC INS CO		-14.5
	MANUFACTURERS ALLIANCE INS CO		-15.4
	PENNSYLVANIA MFG INDEMNITY CO		-15.7
	TENIOTE VINIA INI GINDENINI TI CO		13.7
	EVEREST NATIONAL INSURANCE CO		-14.2

EVEREST REINSURANCE COMPANY	0.0
EVEREST PREMIER INSURANCE COMPANY	-13.5
EVEREST DENALI INSURANCE COMPANY	-14.8
AMERICAN ALTERNATIVE INS CORP	-11.8
AMERICAN FAMILY HOME INS CO	-14.1
AMERICAN MODERN HOME INS CO	-14.1
PHARMACISTS MUTUAL INS CO	-14.3
CHIRON INS CO	-10.1
OLD REPUBLIC INS CO	-14.1
OLD REPUBLIC GENERAL INS CORP	-25.7
ARBELLA INDEMNITY INS CO	-16.1
ARBELLA PROTECTION INS CO	-15.6
ACCIDENT FUND GENERAL INS CO	-15.6
ACCIDENT FUND NATIONAL INS CO	-17.2
ACCIDENT FUND INS CO OF AMERICA	-16.3
UNITED WISCONSIN INS CO	-17.9
ATLANTIC SPECIALTY INSURANCE COMPANY	-17.3
OBI AMERICA INSURANCE COMPANY	0.0
OBI NATIONAL INSURANCE COMPANY	-17.0
GREENWICH INSURANCE COMPANY	-14.1
XL INSURANCE AMERICA, INC.	-14.1
XL SPECIALTY INSURANCE CO.	-14.1
T.H.E. INSURANCE COMPANY	-14.1
EMPLOYERS COMPENSATION INS CO	-17.0
EMPLOYERS ASSURANCE CO	-13.0
EMPLOYERS PREFERRED INS CO	-11.6
NATIONAL LIABILITY & FIRE INS CO	-12.0
BERKSHIRE HATHAWAY DIRECT INS CO	-13.4
WELLFLEET NEW YORK INS CO	-14.0
WELLFLEET INS CO	-11.4
20	

EMPLOYERS INS CO OF NEVADA	-14.1
STARNET INS CO	-13.2
CAROLINA CASUALTY INS CO	
MIDWEST EMPLOYERS CASUALTY CO	
KEY RISK INS CO	
BERKLEY CASUALTY CO	
PREFERRED EMPLOYERS INS CO	
ASSOC. INDUSTRIES OF MA MUTUAL INSURANCE COMPANY	-14.1
ASSOC. EMPLOYERS INSURANCE COMPANY	-14.1
MIDVALE INDEMNITY COMPANY	-14.3
FLORISTS MUTUAL INS CO	0.3
UTICA MUTUAL INS COMPANY - STANDARD	-12.6
UTICA MUTUAL INS COMPANY - PREFERRED	
GRAPHIC ARTS MUTUAL INS COMPANY	-12.8
REPUBLIC-FRANKLIN INS COMPANY - SUPERIOR	-13.4
REPUBLIC-FRANKLIN INS COMPANY - PREMIER	
UTICA NATIONAL ASSURANCE COMPANY - TIER A	-14.1
UTICA NATIONAL ASSURANCE COMPANY - TIER B	
UTICA NATIONAL INS CO OF TEXAS	-13.8
UTICA NATIONAL INS CO OF OHIO	-12.0
SENTRY INS A MUTUAL CO	-7.3
MIDDLESEX INS CO	-7.1
PATRIOT GENERAL INS CO	-6.4
SENTRY SELECT INS CO	-9.4
SENTRY CASUALTY CO	0.0
ACE AMERICAN INS CO	-15.5
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	
FEDERAL INS CO	
CHUBB INDEMNITY INS CO	
20	· · · · · · · · · · · · · · · · · · ·

GREAT NORTHERN INS CO	
PACIFIC INDEMNITY CO	
VIGILANT INS CO	
CHUBB NATIONAL INS CO	
EXECUTIVE RISK INDEMNITY INC	
ATLANTIC CHARTER INSURANCE COMPANY	-8.10%
AMERISURE MUTUAL INSURANCE COMPANY	-14.1
AMEISURE INSURANCE COMPANY	-14.1
AMERICAN HOME ASSURANCE CO	-12.6
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	
NOVA CASUALTY CO SUPERIOR TIER	-14.2
PREFERRED TIER	
STANDARD TIER	
SUBSTANDARD TIER	
THE OHIO CASUALTY INS CO	-5.5
OHIO SECURITY INSURANCE COMPANY	-5.5
WEST AMERICAN INSURANCE COMPANY	
AMERICAN FIRE & CASUALTY COMPANY	
AWIERICAN FIRE & CASUALIT COMPANY	
LIBERTY MUTUAL INS CO	-12.5
LIBERTY MUTUAL FIRE INS CO	12.5
LM INSURANCE CORP	
FIRST LIBERTY INSURANCE CORP	
LIBERTY INSURANCE CORP	
EMPLOYERS INS CO OF WAUSAU	
ACADIA INS CO - STANDARD	-11.6
ACADIA INS CO - PREFERRED	
CONTINTENTAL WESTERN INS CO - STANDARD	
CONTINTENTAL 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	
STATE NATIONAL INS CO	-15.7
SERVICE LLOYDS INS CO	0.0
SERVICE AMERICAN IDEMNITY CO	-17.1
STARR INDEMNITY & LIABILITY COMPANY	-14.1
STARR SPECIALTY INS CO	
SFM MUTUAL INS CO	0.0
FIREMAN'S FUND INSURANCE CO	-10.0
NATIONAL SURETY CORPORATION	-14.4
AMERICAN AUTOMOBILE INSURANCE CO	-10.3
AMERICAN COMPENSATION INS CO	-11.9
STATE AUTOMOBILE MUTUAL INS CO	-16.5
STATE AUTO P&C INSURANCE CO	-15.3
PLAZA INSURANCE COMPANY	-10.8
PATRONS MUTUAL INS CO OF CT	-12.1
FRANKENMUTH MUTUAL INS CO	0.0
ANSUR AMERICA INS CO	
SAFETY NATIONAL CASUALTY CORP	-6.8
SAFETY FIRST INS CO	-1.8
TRANSGUARD INS CO OF AMERICA	-17.3
NORMANDY INS CO	-19.0
NATIONAL AMERICAN INS CO	-14.1
NEW JERSEY MANUFACTURERS INS CO	-12.8
22	

BITCO GENERAL INS CORP	-15.60
BROTHERHOOD MUTUAL INS CO	-8.2
CALIFORNIA INS CO	-14.1
PENNSYLVANIA INS CO	-14.1
UNITED STATES FIRE INS CO	-12.6
NORTH RIVER INS CO	-18.8
CRUM AND FORSTER INDEMNITY COMPANY	-12.9
FRANK WINSTON CRUM INS CO	-12.5
GREAT AMERICAN INS CO	-11.7
GREAT AMERICAN ASSURANCE CO	-2.4
GREAT AMERICAN INS CO OF NY	0.0
GREAT AMERICAN ALLIANCE INS CO	-10.6
GREAT AMERICAN SPIRIT INS CO	-12.6
MAG MUTUAL INS CO	-30.0
HANOVER INSURANCE COMPANY	-14.3
MASSACHUSETTS BAY INSURANCE CO	-14.3
CITIZENS INSURANCE CO OF AMERICA	-14.1
ALLMERICA FINANCIAL BENEFIT INS CO	-11.8
HANOVER AMERICAN INS CO	-9.4
ALLMERICA FINANCIAL ALLIANCE INS CO	-13.5

## EXHIBIT-D

LINE OF BUSINESS: COMMERCIAL AUTOMOBILE			
ORGANIZATION	COMPANY NAME	YEAR 2021	RATE CHANGE
ISO	Liberty Mutual Fire Insurance Company		15.4%
	Berkley National Insurance Compan		7.0%
ISO	Continental Western Insurance Company		9.1%
	Union Insurance Company		8.3%
	Firemen's Insurance Company of Washington, D.C.		8.8%
	Tri-State Insurance Company of Minnesota		5.2%
	Acadia Insurance Company		9.0%
	National Casualty Company		-1.0%
	Plymouth Rock Assurance Corporation		5.0%
	All America		-10.3%
	Central Mutual		3.8%
Independent	American Home Assurance Commerce and Industry Insurance Co		11.9%
	Granite State Insurance Co  National Union Fire Insurance Co of Pittsburgh, PA		
	New Hampshire Insurance Co		
	The Insurance Company of the State of PA		
	AIG Assurance Co		
ISO	Insurance Service Organization		5.4%
Non Adopt ISO	Carolina Casualty Insurance Co		
	NOVA Casualty Co		
	Philadelphia Indemnity Insurance Co		
ISO	Falls Lake National Insurance Company		0.0%
Non Adopt ISO	Florists' Mutual Insurance		
ISO	Allied World Ins. Co		0.0%
Non Adopt ISO	Amica Property and Casualty		
	Graphic Arts Mutual Insurance		

	Atlantic Specialty Insurance		
ISO	Manufacturers Alliance Insurance		3.3%
	Pennsylvania Manufacturers' Association Insurance Co.		1.5%
	Pennsylvania Manufacturers Indemnity Company		17.8%
Non Adopt ISO	Quincy Mutual Fire Insurance		0.0%
ISO	Hartford Casualty Insurance Company		8.0%
	Hartford Insurance Company of the Midwest		8.0%
	Hartford Underwriters Insurance Company		8.0%
	Twin City Fire Insurance Company		8.0%
	Property and Casualty Insurance Company of Hartford		8.0%
	Hartford Fire Insurance Company		8.0%
ISO	Hartford Accident and Indemnity Company		6.5%
ISO	Sentinel Insurance Company		5.0%
	State Farm Fire and Casualty Company		13.7%
	State Farm Mutual Automobile Insurance Company		5.8%
	Patrons Mutual Insurance Company of Connecticut		5.0%
ISO; independent Tiering	Nationwide General Insurance Company		7.8%
	Nationwide Assurance Company		12.9%
	Nationwide Affinity Insurance Company of America		12.9%
	Nationwide Insurance Company of Florida		12.9%
ISO	Great Northern Insurance Company		4.2%
	Pacific Indemnity Company		4.2%
	Vigilant Insurance Company		4.2%
	Federal Insurance Company		4.2%
ISO	Brotherhood Mutual Insurance Company		8.5%
Non Adopt ISO	New Jersey Manufacturers Insurance		
	·		
ISO	The Charter Oak Fire	9/1/2021	4.3%
	The Phoenix Insurance	9/1/2021	4.0%
	The Travelers Indemnity	9/1/2021	4.1%
	The Travelers Indemnity of America	9/1/2021	3.2%
	The Travelers Indemnity Company Of Connecticut	9/1/2021	3.1%
	Travelers Casualty Insurance Company of America	9/1/2021	0.0%
	Travelers Property Casualty Company of America	9/1/2021	3.0%
Independent	GEICO General Insurance Company	NEW	
	I		

ISO	Trumbull Insurance Company	10/16/2021	5.4%
(The Hartford)			
Non Adopt ISO	Providence Mutual Fire Insurance Company		
	Farmers Insurance Exchange	12/1/2021	4.3%
	Mid-Century Insurance Company		4.6%
	Truck Insurance Exchange		4.2%
	Great West Casualty Company	12/1/2021	0.0%
WITHDRAWN 2021			
Independent			
	National Indemnity Company	WITHDRAWN	19.9%
Independent			
	National Liability & Fire Insurance Company	WITHDRAWN	7.6%

## EXHIBIT – E-1

LINE OF BUSINESS: GENERAL LIABILITY				
ORGANIZATION	COMPANY NAME	YEAR 2021	RATE CHANGE	
ISO/Independent	Utica National Insurance Group		-8.00%	
ISO/Independent	The Hanover Insurance Group		3.90%	
ISO/Independent	All America Insurance Company		-0.90%	
	Central Mutual Insurance Company		0.00%	
ISO/Independent	Old Republic Insurance Company		9.80%	
Independent	Housing Enterprise Insurance Company, Inc.		15.40%	
ISO/Independent	Regent Ins Co.		-1.70%	
ISO/Independent	General Casualty Co of WI		-3.10%	
Independent	U.S. Specialty Insurance Company		3.70%	
ISO/Independent	Harleysville Insurance Group		0.50%	
Independent	Arbella Protection Insurance Company, Inc.		-0.10%	
Independent	National Liability & Fire Insurance Company		14.50%	
Independent	The Cincinnati Group		0.39%	
Independent	Lyndon Southern Insurance Company		15.00%	
Independent	CT Interlocal Risk Management Agency		2.40%	
Independent	Nationwide Agribusiness Insurance Company		15.50%	
Independent/ISO	AmTrust Group		14.90%	
Independent	Great American Insurance Group		5.80%	
Independent	United States Liability Insurance Company		4.80%	
Independent	AmGuard Insurance Company		7.77%	
Independent	Selective Insurance Company of America		4.60%	
	Selective Insurance Company of South Carolina			
	Selective Insurance Company of Southeast			
Independent	Continental Casualty Company		-4.30%	

Independent	Berkley Group		19.30%
ISO	Florists' Mutual Insurance Company		7.90%
Independent	Falls Lake National Insurance Company		-19.00%
ISO	American Guarantee and Liability Insurance Company	7.10%	
	American Zurich Insurance Company		6.20%
	Empire Fire and Marine Insurance Company		2.90%
	Fidelity and Deposit Company of Maryland		2.00%
	Zurich American Insurance Company		5.20%
	Zurich American Insurance Co. of Illinois.		4.10%
ISO/Independent	Acadia Insurance Company		3.90%
	Continental Western Insurance Company		3.20%
	Firemen's Insurance Co. of Washington D.C.		3.70%
	Union Insurance Company		4.30%
ISO/Independent	Tri-State Insurance Company of Minnesota		3.20%
ISO/Independent	BITCO General Insurance Corporation		-0.20%
ISO	Mitsui Sumitomo Insurance Company of America		4.90%
	Mitsui Sumitomo Insurance USA Inc.		5.60%
Independent	Travelers Casualty and Surety Company of America		19.00%
ISO/Independent	EMC Property & Casualty Company		-0.70%
	EMCASCO Insurance Company		3.10%
	Employers Mutual Casualty Company		1.50%
	Union Insurance Company of Providence		4.60%
ISO/Independent	Liberty Mutual Group		15.00%
Independent	Selective Insurance Company of America		0.00%
•	Selective Insurance Company of South Carolina		0.00%
	Selective Insurance Company of the Southeast		0.00%
Independent	The Hanover American Insurance Company		0.00%
	Massachusetts Bay Insurance Company		0.10%
	The Hanover Insurance Company		0.30%
	Citizens Insurance Company of America		0.20%
ISO	Regent Insurance Company		13.10%
ISO/Independent	State National Insurance Company	12/7/2021	Initial

### EXHIBIT – E-2

LINE OF BUSINESS: GENERAL LIABILITY  MEDICAL MALPRACTICE					
ORGANIZATION	COMPANY NAME	YEAR 2021	RATE CHANGE		
Independent	Integris Group		2.9%		
Independent	The Doctors Company, an Interinsurance Exchange		5.0%		
Independent	Medical Protective		0.0%		
Independent	ProSelect Insurance Company		7.0%		
Independent	Liberty Insurance Underwriters Inc.		7.4%		
Independent	Philadelphia Indemnity Insurance Company		0.0%		

## EXHIBIT-F

	LINE OF BUSINESS: FIRE AND ALLIED	YEAR	
ORGANIZATION	COMPANY NAME	2021	RATE CHANGE
Independent	American Home Assurance Co.		5.50%
	Granite State Insurance Co		
	Illinois National Insurance Co.		
	New Hampshire Insurance Co		
	Tri-State Insurance Company of Minnesota		5.00%
ISO	Insurance Service Organization		3.20%
ISO Non Adopt	Philadelphia Indemnity Insurance Co		0.00%
Independent	State Auto Property & Casualty Insurance Co		11.00%
	State Automobile Mutual Insurance Co		
	Patrons Mutual Insurance Company of CT		
Ind/ISO	Seneca Insurance Co		8.00%
	Imperium Insurance Co		24.00%
Independent/ISO	Tri-State Insurance Company of Minnesota		6.80%
ISO	American Fire and Casualty Company		8.00%
ISO	Federated Mutual Insurance Company		2.90%
ISO/Ind	United Ohio Insurance Company		8.60%
ISO	The Hanover American Insurance Company		-5.53%
ISO	NOVA Casualty Company		12.10%
ISO	Graphic Arts Mutual Insurance Company		0.00%
	Republic-Franklin Insurance Company		
	Utica National Assurance Company		
	Utica National Insurance Company of Texas		
	Utica Mutual Insurance Company		
ISO / Independent	Wesco Insurance Company		30.70%
	Security National Insurance Company		30.70%

	Technology Insurance Company, Inc.	30.70%
	CorePointe Insurance Company	0.00%
	Milford Casualty Insurance Company	0.00%
	Southern Insurance Company	0.00%
	AmTrust Insurance Company	0.00%
ISO/Independent	State Automobile Mutual Insurance Co	0.00%
ISO/Independent	Berkshire Hathaway Specialty Ins Co	0.00%

## EXHIBIT – G

LINE	LINE OF BUSINESS: COMMERCIAL MULTI-PERIL & BUSINESS OWNERS				
ORGANIZATION	COMPANY NAME	YEAR 2021	RATE CHANGE		
Independent	Star Indemnity & Liab Co.		-2.50%		
100	Loo		4.500/		
ISO	ISO		-1.50%		
Independent	Berkshire Hathaway Direct Co. (3 pager)		48.00%		
ISO	Star Indemnity & Liability Co,		-7.80%		
Independent	Quincy Mutual Fire Insurance Company		1.30%		
Part ISO; Part	State Automobile Mutual Insurance Company		11.70%		
Independent/ Tiering					
Independent	Regent Insurance Company		0.00%		
	General Casualty Company of Wisconsin				
Independent	State Farm Fire And Casualty Company		-9.50%		
Independent	Patrons Mutual Insurance Company of Connecticut		4.20%		
Independent	Main Street America Assurance Company		4.40%		
Independent	Twin City Fire Insurance Company		8.10%		
Independent	Sentinel Insurance Company, Ltd.		3.50%		
Independent	Hartford Underwriters Insurance Company		7.70%		
Independent	Aspen American Insurance Company		6.40%		
Independent	Massachusetts Bay Insurance Company		5.40%		
	The Hanover Insurance Company		5.00%		

	Citizens Insurance Company of America	5.30%
Independent	The Charter Oak Fire Insurance Company	3.26%
	Phoenix Insurance Company	2.14%
	The Travelers Indemnity Company	2.91%
	Travelers Indemnity Company of America	2.74%
	Travelers Indemnity Company of Connecticut	2.99%
	Travelers Property Casualty Company of America	2.76%
Independent	Employers Mutual Casualty Company	0.10%
	EmCasco Insurance Company	
	Union Insurance Company of Providence	
	EMC Property & Casualty Company	
Independent	American Fire and Casualty Company	10.80%
	Ohio Casualty Insurance Company	9.50%
	Ohio Security Insurance Company	10.10%
	West American Insurance Company	9.50%
ISO / Independent	State National Insurance Company, Inc.	
ISO / Independent	Stillwater Insurance Company	1.60%
ISO / Independent	Berkshire Hathaway Direct Insurance Company	10.00%
ISO / Independent	Midvale Indemnity Company	
ISO / Independent	CUMIS Insurance Society, Inc.	-2.70%
ISO / Independent	Church Mutual Insurance Company, S.I.	9.84%
ISO / Independent	Middlesex Insurance Company	-0.30%
	Patriot General Insurance Company	-0.30%
	Sentry Insurance Company	-0.30%
Independent	Wesco Insurance Company	0.09%
ISO	Strathmore Insurance Company	0.00%
ISO	Hospitality Insurance Company	
ISO / Independent	Progressive Casualty Insurance Company	
ISO	Midvale Indemnity Company	

Independent	Farmers Insurance Exchange	3.07%
	Truck Insurance Exchange	7.16%
	Mid-Century Insurance Company	6.31%
ISO/Ind	Arbella Protection Insurance Company, Inc.	3.50%
ISO/Ind	Graphic Arts Mutual Insurance Company	8.00%
Independent	United States Liability Insurance Company	1.02%
Independent	Brotherhood Mutual Insurance Company	9.88%
ISO	Selective Insurance Company of America	2.50%
ISO/Independent	Washington International Insurance Company	Initial
Independent	Nationwide General Ins. Co	3.0%
ISO/Independent	Argonaut Insurance Company	Initial

## EXHIBIT – H

LINE OF BUSINESS: INLAND MARINE			
ORGANIZATION	COMPANY NAME	YEAR 2021	RATE CHANGE
Independent	Jewelers Mutual Insurance Company, SI		4.30%
Independent	Federated Mutual Insurance Company		2.20%
	Federated Reserve Insurance Company		3.00%
	Federated Service Insurance Company		2.50%
Independent	State Farm Fire and Casualty Company		-8.60%
Independent	National Casualty Company		9.1%
Independent	Independence American Insurance Company		5.80%
Independent	Independence American Insurance Company		18.00%
Independent	Independence American Insurance Company		-1.70%

LINE OF BUSINESS: BURGLARY AND THEFT			
ORGANIZATION	COMPANY NAME	YEAR 2021	RATE CHANGE
	NONE		

LINE OF BUSINESS: BOILER AND MACHINERY			
ORGANIZATION	COMPANY NAME	YEAR 2021	RATE CHANGE
	NONE		

LINE OF BUSINESS: FILDELITY & SURETY			
ORGANIZATION	COMPANY NAME	YEAR 2021	RATE CHANGE
	NONE		