

MIKE CAUSEY INSURANCE COMMISSIONER

December 4, 2023

Honorable Jake Johnson Representative 300 North Salisbury Street, Room 306B1 Raleigh, North Carolina 27603-5925

Honorable Harry Warren Representative 300 North Salisbury Street, Room 611 Raleigh, North Carolina 27603-5925

Re: October 18, 2023, Request by the NC House of Representatives House Oversight and Reform Committee

Dear Representative Johnson and Representative Warren:

On behalf of the North Carolina Department of Insurance ("DOI"), I appreciate the opportunity the Committee has provided for me to submit both my previous November 8, 2023 response to the *Report Prepared for the North Carolina House Oversight and Reform Committee* by Dr. Jonathan Murphy ("Murphy Report") and this written testimony addressing the topics the Committee identified in its October 18, 2023 request. This written testimony has been prepared in consultation with DOI professionals, including DOI actuaries.

I. Introduction

The Murphy Report suggests that the General Assembly: (1) restrict the number of auto "drivers" that auto insurers may cede to the North Carolina Motor Vehicle Reinsurance Facility ("Facility"); (2) allow the insurers to increase all drivers' auto rates annually by a statutorily set, flexible rate without "prior approval" by the Commissioner; and then (3) dissolve the Facility and create an "assigned-risk plan" that would require North Carolina auto insurers to write and bear the losses from auto policies for all eligible "drivers" but permit the insurers to charge higher rates to those "drivers" they deem to be "high risk."

In my November 8th response, I addressed many reasons why the DOI considers the Murphy Report to be unsupported or misleading and why North Carolina should not enact the

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regulatory changes Dr. Murphy suggests.¹ Among those reasons were that, if enacted, Dr. Murphy's proposed changes would radically undercut the ability of the Commissioner to review, approve, or effectively contest those auto rate increases requested by the North Carolina Rate Bureau ("Rate Bureau") and would eliminate the ability of North Carolina consumers to choose their own auto insurers. My responses below to the topics the Committee has posed only further demonstrate why the current operations of the Facility are preferable to Dr. Murphy's recommendations for legislative reform of the Facility.

<u>Topic 1 -- History of Rate Regulation and Reinsurance Facility</u> <u>for Commercial and Private Vehicles</u>

A. Evolution of the Facility

In 1958, North Carolina first adopted compulsory auto insurance. Prior to 1973, North Carolina had in effect an assigned-risk statutory framework that assigned policies for high-risk drivers to the state's auto insurers on a pro rata basis based on their participation in the auto insurance market.

In its 1973 session, the General Assembly repealed the state's assigned-risk law and replaced it with the Facility. The Facility law requires all PPA and commercial auto insurers in North Carolina to write auto policies for all insureds who qualify as eligible risks. When an auto insurer writes or renews a policy for an insured, however, the insurer may choose to "cede" most of the coverage under that policy to the Facility.

The one type of auto coverage that auto insurers cannot cede to the Facility is for physical damage to a vehicle. Upon ceding an auto policy to the Facility—i.e., upon "cession"—the insurer retains coverage for physical damage to a vehicle. Additionally, the insurer may obtain the insured's consent to charge a rate for such physical damage coverage that is higher than the maximum rate allowed by the Rate Bureau.

If it cedes a policy to the Facility, the insurer is compensated for continuing to service the policy but gives up any profit on the policy in return for relieving itself of any liability for claims under the policy. Policies that have been ceded to the Facility move into in the "residual market," while policies that auto insurers opt to retain remain in the "voluntary market."

The Facility law originally provided that no auto insurer could cede more than 50% of all of its automobile liability insurance business in the State. Later, the law was amended to remove any limitation on the number of policies an insurer may cede to the Facility.

¹ My November 8th response contains detailed descriptions of the functions of the Facility, as well as the Commissioner's role with regard to auto insurance rates generally. So that I do not provide repetitive information, this written testimony will cross-reference terms and concepts which are addressed in greater detail in the November 8th response.

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Since 1977, the Facility law has required that, when an insurer cedes a PPA policy to the Facility, the policy be characterized as either a "clean-risk" policy or an "other-than-clean-risk" ("OTC") policy, depending on various factors. By statute, the rates for a clean-risk PPA policy do not change upon the policy being ceded, but the rates on an OTC PPA policy may increase upon cession.

The Facility develops and proposes its own rates for ceded OTC PPA policies and ceded commercial auto policies. The Facility must calculate its proposed rates so far as possible to produce neither a profit nor a loss for the Facility. The Commissioner may challenge the Facility's proposed higher rates in a hearing.

The Facility may assess North Carolina auto insurers on a pro rata basis if necessary to defray its annual losses and expenses. Such losses and expenses may be caused by risks on both ceded PPA and commercial policies. In turn, the insurers pass on any such assessments to their policyholders via "recoupment" surcharges.

For PPA policies particularly, assessments and consequently recoupments are based both: (a) on losses caused by the requirement that rates for clean risk policies remain the same upon cession (the "clean-risk surcharge"); and (b) on losses under all ceded PPA policies—clean and OTC—from liability and medical payments and uninsured and underinsured drivers (the "lossrecoupment surcharge"). The Facility's Task Force on Recoupment, which is made up of industry representatives from the Facility's Board of Governors, reviews and approves such clean-risk and loss-recoupment surcharges.

B. The Legislature's 2023 Changes Positively Affecting the Facility

The Murphy Report argues that, unless the General Assembly reforms the Facility and permits North Carolina auto insurers to impose annual flexible rates on insureds for any reason and without prior approval by the Commissioner, auto insurers will be unable to charge sufficient premiums to cover the increased risk for certain policies and to lower the amount of policies they cede to the Facility.

Dr. Murphy neglects to mention, however, that the General Assembly acted this very year to improve the ability of auto insurers to charge sufficient premium to cover the increased risk for certain policies so that they will not need to cede as many policies to the Facility. *See* 2023 N.C. Sess. Laws secs. 16(e)-16(g) (2023) ("2023 Changes") p 26, <u>www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S452v6.pdf</u>. A task force established by the Commissioner and his staff to improve the state's auto insurance system recommended the 2023 Changes. The task force consisted of insurance industry representatives, as well as DOI representatives.

New drivers may present a higher risk than experienced drivers for numerous years after they first receive their driver's licenses. Under former GS 58-36-65(k), auto insurers could impose surcharges on new drivers for only three (3) years after they became licensed in North Carolina. Three years of surcharges are not always sufficient to cover the risks posed by new December 4, 2023 Page 4 of 11

drivers, and this fact is understood as having caused insurers to cede many such policies to the Facility.

The 2023 Changes, however, amended the statute to permit auto insurers to impose a surcharge for eight (8) years on those newly licensed North Carolina drivers who receive their licenses on or after January 1, 2025.² See 2023 Changes p 26, <u>www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S452v6.pdf</u>. By being enabled to collect the inexperienced-driver surcharge for eight years instead of three years, auto insurers should be less likely to cede the policies for such drivers to the Facility. This, in turn, should lead to fewer assessments by the Facility against the state's auto insurers, with a resulting drop in the amount of any recoupments charged to consumers. Additionally, the extended surcharge for new drivers should allow insurers to charge sufficient premiums to cover the risks for certain clean policies they would otherwise have ceded, leading to lower requests for auto rate increases by the Rate Bureau.

Additionally, North Carolina auto insurers are more likely to cede to the Facility policies for those drivers who are at fault for accidents or who receive convictions for moving violations. Under former GS 58-36-65(b), auto insurers were permitted to impose surcharges on those drivers who accumulated Safe Driver Incentive Plan ("SDIP") points due to at-fault accidents or moving violations. These SDIP surcharges, however, only lasted three (3) years.

The 2023 Changes amended GS 58-36-65(j) to permit insurers to impose a surcharge for five (5) years on those drivers who are convicted of a broad range of traffic violations that result in more than four SDIP points. *See* 2023 Changes p 26, <u>www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S452v6.pdf</u>. By being enabled to collect a surcharge on these riskiest of drivers for five years instead of three years, auto insurers should be less likely to cede the policies for such drivers to the Facility. This, in turn, should lead to fewer assessments by the Facility against the state's auto insurers, with a resulting drop in the amount of any recoupments the insurers charge to consumers. Additionally, the extended surcharges for convicted drivers should allow insurers to charge sufficient premiums to cover the risks for certain clean policies they would otherwise have ceded, leading to lower requests for auto rate increases by the Rate Bureau.

It will take time before the effects of the 2023 Changes become apparent, especially because the extended inexperienced-driver surcharges will not take effect until January 1, 2025. The General Assembly should not consider reforming the Facility or the rate statutes in any way until a sufficient number of years have passed to learn whether the 2023 Changes are successful.

² Under the 2023 Changes, new drivers may qualify for an inexperienced-driver insurance discount after three years if they have not experienced an at-fault accident or received a driving conviction. Additionally, DOI anticipates that the Rate Bureau will recommend inexperienced-driver surcharges that *decrease* over the eight-year period, based on the drivers' records.

<u>Topic 2 – Premium Impact of Reinsurance Facility on Total Insurance Cost,</u> <u>Including Surcharges and Other Fees</u>

In response to Topic 1 above, I have described in detail what additional premiums may be charged to certain drivers when their policies are ceded to the Facility, as well as what Facility losses can be assessed against insurers and in turn passed on to all North Carolina drivers via recoupment surcharges. It is unclear to the DOI what additional data the Committee may be requesting under this Topic 2, but if the Committee wants me to provide any additional data in response to Topic 2, I will gladly do so in supplemental written testimony.

That said, the Murphy Report may suggest that the additional premiums chargeable upon cession and the Facility's loss-recoupment surcharges are insufficient to fund the Facility. Also, the Murphy Report may suggest that the loss-recoupment surcharges are excessive for those North Carolina drivers whose policies the auto insurers elect *not* to cede to the Facility. I dispute any such suggestions because the best evidence that the Facility's operations are working well in their current form is the fact that North Carolina's auto insurance rates are within the top 11 least expensive state rates in the nation.

However, if the Committee is concerned that the Facility is not currently funded sufficiently, then I again urge it to not consider reforming the Facility or the rate statutes until a sufficient number of years have passed to learn whether the 2023 Changes are successful in lowering the number of policies auto insurers cede to the Facility and lowering assessments and resulting surcharges to consumers.

<u>Topic 3 – Anomalies in North Carolina's Insurance Market, Such as Companies that Only</u> Serve the Reinsurance Facility and the Large Share of Drivers in the Reinsurance Facility

A. The Companies that Cede a Great Deal of Premiums to the Facility Are Not a Negative Anomaly.

As I explained in response to Topic 1, there is no limit on the number of policies that an auto insurer may cede to the Facility. But the Facility does not report the number of policies ceded to it, and so the DOI does not know the breakdown of how many policies individual insurers have ceded to the Facility.

The DOI *does* have information about the overall premium amounts that individual auto insurers have foregone by ceding policies to the Facility, and I have attached an Excel spreadsheet demonstrating these amounts for year 2021.³ *See* Ceded Premiums, Attachment C

³ Ceded premium does not necessarily correspond with the number of ceded policies because: (a) the premium for a particular policy may vary greatly according to how many vehicles and drivers are insured under that policy; and (b) when an insurer cedes a policy, all of the vehicles and drivers under that policy are effectively ceded to the Facility.

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hereto. Attachment C, which consists of data published by the Facility, lists 61 auto insurance companies that sold PPA or commercial auto insurance in North Carolina in 2021.

Overall, Attachment C demonstrates two important points. First, there are relatively few insurance companies ceding large amounts of annual premium to the Facility. For example, 32 out of the 61 companies that wrote auto insurance in the state in 2021 ceded less than 20% of their premiums to the Facility. Additionally, 11 out of these 61 insurance companies wrote in excess of \$100 million in premiums in 2021. Seven (7) out of these 11 companies ceding over \$100 million in premiums, however, ceded less than 20% of their premiums to the Facility.

Second, Attachment C demonstrates that those insurance companies that cede a great percentage of their annual premium to the Facility in fact write relatively low amounts of annual premium. For example, 12 companies out of 61 ceded more than 80% of their premium to the Facility in 2021. Out of these 12 companies, however, 10 companies wrote less than \$25 million in annual premiums. In sum, I do not believe that Attachment C demonstrates any anomalous number of companies that are writing policies only to "service" the Facility.

I also want to observe that those companies that cede great amounts of their written premium to the Facility do not prejudice those companies that cede far lesser amounts. Under the Rate Bureau system, which submits rate increases based on a hypothetical conglomeration of all auto insurers in North Carolina (known as the "hypothetical one" company), the lost premium suffered by the companies ceding the most premium to the Facility inures to the benefit of the companies ceding less premium. This is because those companies ceding less premium can benefit from a higher overall requested rate increase based on the losses of those companies ceding more premium.

Finally, even those auto insurers that cede 100% of their written premiums to the Facility do not necessarily lose money on such policies. As noted in my November 8th response, the Facility permits the insurers to charge for their costs in servicing the policies, including claims-appraisal costs. Additionally, as noted above, the insurers still retain any physical damage coverage they wrote for the policy and are able to charge higher rates on such coverage if they obtain consent from the policyholders.

B. The Murphy Report Does Not Cite Evidence of an Anomalous Number of Drivers Being Ceded to the Facility.

I rebutted at great length in my November 8th response the argument in the Murphy Report that there is an anomalous number of drivers ceded to the Facility. It is entirely unclear from any reported data of which the DOI is aware exactly where Dr. Murphy would have obtained data to support his apparent claim that 25% of North Carolina auto policies or vehicles have been ceded to the Facility and that this represents the largest percentage of auto policies or drivers in the residual market of any state in the country.

As I explained in my November 8th response, auto insurers do not cede "drivers" to the Facility, as Dr. Murphy claims, but rather policies, and the Facility does not report the number of

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ceded policies. And, although Attachment C to this testimony demonstrates that from 2015 to 2021 between 24.91% and 27.74% of written premium was ceded to the Facility annually, this does not correlate to the number of ceded policies.

Likewise, it is currently unclear to the DOI where Dr. Murphy would have obtained data to support his seeming claim that *all* consumers whose policies or vehicles are in the Facility tend to pay up to "35 percent higher" premiums than drivers in the voluntary market. The Report itself has no citation for this conclusion, and the only known data demonstrates that: (a) the premiums for 73% of the vehicles covered by ceded PPA policies remained the same upon being ceded; and (b) only the 27% of consumers whose ceded policies are OTC pay approximately 35% more in premium than they paid before their policies were ceded.

C. There Are Many Positive Anomalies Resulting from the Facility's Operations.

Regardless of any negative anomalies that the Murphy Report claims there are with regard to the Facility, there are numerous advantages of North Carolina's unique Facility system that constitute *positive* anomalies when compared to other states' systems.

First and most importantly, the current formulation of the Facility—even with the number of cessions, assessments, and recoupment surcharges—still results in North Carolina having the 11th best, least expensive auto insurance rates in the nation. Meanwhile, the counter-example Dr. Murphy uses, South Carolina, has the 14th worst, most expensive auto insurance rates in the nation. North Carolina's low auto rates are a positive anomaly of the Facility's current organization.

Second, although 1.57 million vehicles have been ceded to the Facility under PPA policies, 1.15 million of these vehicles were ceded as clean risks, while only 420,000 vehicles were ceded as OTC. This results in the positive anomaly that policyholders for 73% of the ceded vehicles were not charged additional premium upon their vehicles being ceded.

Third, as of 2019, only 7.4% of drivers were uninsured in North Carolina, making it tied with South Dakota at tenth among the states with the least percentage of uninsured drivers. *See* "Facts and Statistics, Uninsured Motorists," Insurance Information Institute, at <u>https://www.iii.org/fact-statistic/facts-statistics-uninsured-motorists</u>. This too is a positive anomaly resulting from the current operation of the Facility. Meanwhile, for the same year, 10.9% of South Carolina drivers had no insurance, making South Carolina 28th among the 50 states with the highest percentage of uninsured drivers, which is a negative anomaly in South Carolina's assigned-risk system. *Id*.

Fourth, as noted in my November 8th response, in assigned-risk systems such as that Dr. Murphy advocates, auto policies are assigned based on the number of participating auto insurers, meaning that the consumer has no choice whatsoever in which auto insurer will write the consumer's policy. For example, a consumer in an assigned-risk state can be compelled to December 4, 2023 Page 8 of 11

obtain a policy from an auto insurer with a poor history of handling legitimate claims. Consumers in South Carolina would have suffered this loss of choice since that state eliminated its facility, as would consumers in the other states Dr. Murphy asserts employ assigned-risk systems. Meanwhile, under North Carolina's current system, consumers can elect the auto insurer of their choice, and that insurer will continue to service the policy even where it is ceded to the Facility.

D. Negative Anomalies that Could Result from an Assigned-Risk System

In addition to North Carolina consumers losing their ability to select their own insurers, if the General Assembly were to eliminate the Facility in favor of an assigned-risk system, as Dr. Murphy suggests, it is highly likely that North Carolina auto insurance rates would rise quickly and extensively. First, there is every reason to believe that the number of policies ceded to the Facility would generally equal the number of policyholders whose risks would be assigned to the state's auto insurers in an assigned-risk system. Second, North Carolina auto insurers could no longer recover recoupment fees from such policyholders if the Facility were eliminated. Instead, the insurers would have to bear the losses from the assigned-risk policies.

These significant new losses to the insurance industry as the result of adopting an assigned-risk system would almost invariably result in much higher auto rates, such as those in South Carolina. Indeed, the Murphy Report itself anticipates such rate increases from an assigned-risk plan by specifically requesting that the industry be allowed a "flexible rate" such as that in South Carolina, where auto insurers can increase their rates by 7% annually for any reason and without any need for prior regulatory approval.⁴ A process for North Carolina auto insurers to raise their rates unilaterally without the Commissioner's approval would deprive the North Carolina public of the extensive data that the Rate Bureau is currently required to submit to justify any auto insurance increase.

There are other significant risks from an assigned-risk system. For example, the Murphy Report suggests that, under a flexible rate system, one auto insurer could elect to raise its annual rate by only 5%, while another could elect to raise its rate by 7%, all without prior approval. Under an assigned-risk system, one insured's policy might be assigned to the first company, while another insured's policy might be assigned to the second insurer, resulting in two similarly situated drivers having to pay different rates.

⁴ The Murphy Report characterizes South Carolina's flexible rate as not requiring prior regulatory approval before it can be used. Report p 7, fn 3. In my November 8th response, I also referred to the South Carolina model as not requiring prior approval for a rate increase of up to 7%. To be clear, South Carolina *does* provide its insurance authority the ability to challenge an auto rate increase within the flexible rate range but *only after* that increase has already gone into effect without prior approval. S.C. Code sec. 38-73-220(c).

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Further, it is unclear how an assigned-risk plan could be designed to ensure that risky insureds would be assigned only to those insurers with the lower rates without prejudicing those insurers with higher rates. In other words, an assigned-risk law combined with a flexible rate law could result in the assigned-risk plan picking "favorites" among insurers, although ironically those insurers with higher rates might be the "favorites" in that they will not have to cover the losses from as many assigned policies as a company with lower rates.

Finally, under an assigned-risk system, insurers may be assigned policies that they are unable to administer, either financially or in practice. For example, commercial auto insurers commonly specialize in the types of commercial policies they write. One small insurer may write only commercial policies for fleet taxis, while another larger insurer may write commercial policies for big rigs. If all commercial auto insurers were assigned policies for vehicles of all types under an assigned-risk system, it is unclear how the smaller company that previously wrote coverage for taxis suddenly would obtain the reserves to cover the risks posed by big rigs. Similarly, it is unclear that how smaller companies previously serving only taxis would suddenly obtain the claims expertise to service big rig policies.

Topic 4 - Factors that Lead to Variation in Insurance Premiums Across States

As addressed above and in my November 8th response, under North Carolina's unique system, the Commissioner reviews and either approves or challenges the auto rate increases proposed by the Rate Bureau on behalf of all North Carolina auto insurers. The Commissioner approves a maximum rate that auto insurers may charge eligible risks for the minimum required coverages.

Certainly, not all North Carolina insurers charge their customers this maximum rate, and there are numerous factors based on which they may charge consumers less. Further, such factors are similar to those used in other states that utilize prior-approval methods for auto rates, as well as those states that permit auto insurers to file and immediately use higher rates, subject to a later challenge by the insurance authorities.

Some of the main rating factors for auto insurance are:

- Location, including the location's population density, accident rates, vehicle theft rates, auto repair costs, medical and legal costs, auto safety claims, disposable income per capita, and number of uninsured drivers
- Age so long as it is not unfairly discriminatory
- Gender so long as it is not unfairly discriminatory
- Marital status so long as it is not unfairly discriminatory
- Driving experience
- Driving record

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- Claims history
- Credit history
- Previous insurance coverage
- Vehicle type
- Vehicle use
- Miles driven per number of highway miles
- Relative amounts of coverages selected by consumers
- Relative amounts of deductibles selected by consumers

See <u>https://content.naic.org/cipr-topics/auto-insurance;</u> *see also* <u>https://content.naic.org/sites/default/files/publication-aut-pb-auto-insurance-database.pdf</u>

The above factors may affect North Carolina auto insurance rates as well as those of other states. However, another factor that may influence our state's low auto insurance rates is the fact that North Carolina is a contributory negligence state. This means that in a lawsuit for damages based on negligence, a claimant's own negligence is a complete bar to recovery if it contributed to the claimant's injuries. As a result, a claimant's negligence is considered a factor in settlement negotiations with an insurer before a lawsuit is filed. Lower settlement amounts, as well as verdicts that result in no recovery because of the claimant's negligence, can be seen as contributing to North Carolina's low auto insurance rates.

Topic 5 – Other Regulatory Needs for the Department of Insurance

The current functions of the Facility and North Carolina's current regulation of auto insurance rates have resulted in significantly low auto insurance rates in our state. Consequently, the DOI does not believe there is any need to reform the law regarding the Facility or auto rates.

However, if the Committee is concerned about the Facility or auto rates in North Carolina, then I again urge it to not consider reforming the Facility or the rate laws until we can see whether the 2023 Changes are successful in lowering the number of policies auto insurers cede to the Facility.

If, after a sufficient period of time, the 2023 Changes have not been successful, then the DOI requests that the General Assembly permit it to work with insurance industry representatives to explore together other possible changes to the current laws. If the 2023 Changes do not achieve their aims, then one potential change that DOI and industry representatives could discuss would be whether a moderate increase in fees for clean policies that are ceded to the Facility would inject new funds into the Facility. Such a possible change should

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not prejudice clean ceded policyholders, who could always seek lesser rates from different insurers.

Conclusion

The combination of the Facility and the Commissioner's authority to approve or reject the Rate Bureau's proposed auto-insurance increases results in a clear benefit to North Carolina consumers in the form of low auto rates. The 2023 Changes will further improve these results, and the General Assembly should not entertain the suggestions of the Murphy Report or any other attempts at reform unless the 2023 Changes are unsuccessful. Even then, the General Assembly should permit the DOI and the state's auto insurers to work together to propose any further auto insurance reform.

Sincerely,

Mike Causey Insurance Commissioner

ATTACHMENT C

NC AUTOMOBILE LIABILITY WRITTEN PREMIUMS 2021 CALENDAR YEAR BY NCRF CEDING MEMBER COMPANY OR GROUP EXCLUDING DESIGNATED AGENT BUSINESS

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0.8866 American Millemium Inc Co 2,197,206 1,429,066 65,04% 0.8067 American States Ins Co 13,827,697 33,801,432 75,51% 0.8161 Amica Miller To Co 18,827,697 33,801,432 75,51% 0.9994 Atlantic Cas Ins Co 10,482,81,91 14,155,696 91,12% 0.9385 Central Mult Ins Co 12,348,544 56,33 0,16% 0.9385 Central Mult Ins Co 12,348,544 56,33 0,16% 0.9035 Electric Ins Co 13,451,656,634 72,33 1,44% 0.9011 Employers Mut Cas Co 14,41,644 125,059 0,87% 0.9035 Estarance Ins Co 10,771,662 6,216,748 13,80% 0.9236 Firemens Ins Co of Wash DC 1,076,738 143,866 6,57% 0.9237 Firemens Ins Co of Wash DC 1,076,748 144,868 1,00% 0.9237 General Cas Co Grand Rapids MD 61,47,84 40,866 6,57% 0.9330 General Cas Co Grand Rapids MD 61,478 10,90%							
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05697 Anguard Ins Co 18.277.97 13.801.432 75.31% 05994 Attactic Cas Ins Co 14.281.191 14.155.696 91.22% 07030 Auto Owners Ins Co 10.0465.001 61.61.12 0.61% 02128 BITCO General Ins Corp 2.284.544 3.63 0.65% 05992 Central Mult Ins Co 1.390.616 50.66.07 2.22% 05919 Electric Ins Co 1.345.674 2.7.333 1.44% 06119 Employers Mult Cas Co 1.44.11.644 125.095 0.37% 09935 Esurance Ins Co 1.077.1.642 6.216.133 3.77% 09235 Fermers Ins Co of Grand Asput C 1.078.179 1.54.29 1.43% 07237 Foremast Ins Co of Wash DC 1.078.173 1.54.29 1.56% 07307 Government Employees Ins Co 3.40.08.645 1.0 0.00% 22778 Sereewill Co of Wisconsin 1.57.764 3.28.708 0.03% 07307 Government Employees Ins Co 2.475.151 1.28.27.18 0.30%							
03314 Anic Mut ins Co 18,442,88 84,705 4037 020703 Auto Owners ins Co 100,465,501 61,112 06,114 02128 BITCO General Ins Cop 2,284,544 3,633 0.16% 03383 Central Mut Ins Co 19,360,316 506,807 2,62% 27944 Discovery ins Co 19,360,316 506,807 2,62% 03592 Electric ins Co 1,481,664 27,323 1,44% 04073 Enel price NML Cas Co 184,103,635 6,069,381 3,30% 08233 Farmers P&C Ins Co 12,747 1,438 19,00% 07275 Foremost Ins Co Grand Rapids MI 614,748 403,686 65,67% 07301 Genermite Temployters Ins Co 4,220,238 4,250,052 100,71% 07303 Genermite Temployters Ins Co 4,220,238 4,250,052 100,71% 07314 Genermite Temployters Ins Co 4,247,51,52 1,826,728 4,30% 07328 Hartor Ca Ins Co 4,247,51,52 1,826,728 4,30%							
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• 03583 Central Mut Ins Co 19.360.216 506.807 2.024 05592 Electric Ins Co 1.286.624 27.333 1.444 05192 Electric Ins Co 1.286.624 27.333 1.444 09073 Ene Indivers MuC as Co 1.286.634 27.333 1.444 09073 Ene Inc Co 1.241.1364 1.50.05 0.37% 09073 Ene Inc Co 1.241.1364 1.50.95 0.37% 07259 Foremost Ins Co Grand Mapids MI 6.43.748 1.269 1.243 07307 General Cas Co d Visconsin 1.157.643 2.3463 1.50% 07307 Government Employees Ins Co 4.20.03645 170 0.00% 07418 Hanoreer Ins Co 4.247.552 1.267.73 4.36.66 07428 Hanoreer Ins Co 4.247.552 1.267.73 4.30% 07418 Hanoreer Ins Co 1.577.543 4.260.0024 4.30% 07610 Horace Mann Ins Co 1.273.748 1.62.004.14 27.750 9.51.270	*	07093	Auto Owners Ins Co		100,466,501		
27984 Discovery ins Co 2024,055 20,217,271 10000% 06119 Employers Mut Cas Co 1441,1664 125,055 0.87% 06035 Etric Ins Co 124,106,365 0.09336 50,09331 30% 06336 Furance Ins Co 10,771,662 6,261,513 57,71% 06329 Farmers P&C Ins Co 32,844,576 6,436,748 10,806 07135 Geromati Las Co Grand Rapids MI 61,474,44 403,865 6,67% 07301 General Cas Co of Wash DC 149,121,337 144,103,079 6,836 07303 General Cas Co of Wisconsin 1,567,643 24,463 1,50% 07301 General Cas Co of Misconsin 1,577,544 4,280,052 100,71% 07611 Hardow Inn SCo 1,377,543 1,842,618 100 4,36% 11099 Incline Cas Co 1,377,748 16,120,411 9,275,55 80,19% 07611 Infrago General Ins Cop 443,149,668 26,160,032,44 30% 11099 Incline Cor 2,760		02128	BITCO General Ins Corp		2,284,544	3,633	0.16%
0592 Electric Ins Co 1,89,624 27,32 1,444 0613 Employers ML Cas Co 184,11,664 125,095 0.87% 09073 Erie Ins Co 194,110,635 6,093,981 3.39% 0233 Farmers P&C Ins Co 10,771,652 6,436,748 19,60% 04729 Firemens Ins Co Grand Rapids MI 6,14,744 403,866 6,567% 07159 GELCO Indeminity Co 149,121,337 144,103,073 96,63% 07307 General Los Co of Mixconsin 1,567,643 2,463 1.00% 07307 Government Employees Ins Co 34,4006,465 170 0.00% 07307 Government Employees Ins Co 34,4275,152 4.30% 07101 Horace Mann Ins Co 157,75,844 688,001 4.36% 11099 Incline, Ca Co 1,737,748 681,001 4.39% 11091 Incline Ca Co 1,737,748 681,000 12,75% 07610 Horace Mann Ins Co 1,837,728 16,022 25,893 07104 Int	*	03583	Central Mut Ins Co		19,360,816	506,807	2.62%
• 06119 Etric Ins Co 14.11.664 125.095 0.87% • 06936 Esurance Ins Co 10.771.662 6.263.13 3.30% • 06233 Farmers P&C Ins Co 32.844.376 6.456.748 19.90% • 07275 Foremost Ins Co of Wash DC 1.076.173 14.133.05 6.637% • 07301 General Cas Co of Wisconsin 1.367.643 23.463 1.50% • 07301 Government Employees Ins Co 44.003.665 170 0.00% • 07301 Government Employees Ins Co 42.402.038 1.30% 0.07% • 07314 Hanover Ins Co 6.330.044 284 0.00% • 07134 Hanover Ins Co 1.377.543 688.001 4.30% • 07611 Infeigo General Ins Cop 43.149.668 216.00.924 59.03% • 07611 Infeigo General Ins Cop 2.76.075 915.270 31.5% • 07621 Infeigo General Ins Cop 7.56.077		27984	Discovery Ins Co		20,216,959	20,217,271	100.00%
• 09073 Etriance ins Co 194,106,635 6,069,381 3.30% • 05393 Farmes P&C Ins Co 32,844,576 6,436,748 19,60% • 07275 Foremost Ins Co Grand Rapids MI 6,14,748 403,868 6,67% • 07159 GEICO Indeminty Co 149,21,337 144,103,073 96,63% • 07307 Government Employees Ins Co 344,008,645 170 0.00% • 07307 Government Employees Ins Co 344,008,645 170 0.00% • 07307 Government Employees Ins Co 4,220,238 4,250,052 100,71% • 01238 Handrover Ins Co 137,77,544 688,001 4,36% • 01109 Hardrof Ca Sin Sc O 2,777,874 688,001 4,36% • 07510 Horace Mann Ins Co 15,775,544 688,001 4,36% • 07611 Integon General Ins Corp 4,314,06,68 61,60,024 9,03% • 04144 Inferity Ins Co 18,387,728 1,60,622 2,53% • 07524 Mibrak Ins Co 9,565,47 4,73,51,51		05092	Electric Ins Co		1,896,624	27,323	1.44%
09836 Esurance ins Co 10.771,662 6,216,163 97.1% 0723 Firemens ins Co of Makh DC 1,076,179 15,429 1.43% 0725 Foremost ins Co Grand Rapids MI 614,748 403,886 65,67% 07301 General Cas Co of Wisconsin 1,367,678 23,443 1.50% 07301 General Cas Co of Wisconsin 1,367,678 23,463 1.50% 07303 General Cas Co of Wisconsin 1,367,643 23,463 1.50% 07010 Government Employees ins Co 4,4008,645 170 0.00% 07131 Hardrord Cas Ins Co 4,247,5125 1,826,728 4.30% 07134 Hardrord Cas Ins Co 17,379,748 16,120,411 9.275% 07141 Infinity ns Co 17,379,748 16,120,411 9.275% 07141 Infinity ns Co 13,31,35% 0.0824 10,327,728 10,334 11034 Kemper Indegendence Ins Co 2,761,073 49,348% 0.0335 07544 Midaki Ins Co 18,387,728 10,050,227,359	*	06119	Employers Mut Cas Co		14,411,664	125,095	0.87%
• 05293 Farmers P&C Ins Co 32,244,575 6,385,748 19,605,75 • 07275 Foremost Ins Co Grand Rapids MI 614,748 403,665 65,67%, • 07303 General Cas Co of Wisconsin 15,67,434 23,463 1,50%,432 • 07307 Government Employees Ins Co 344,008,645 170 0.00%, • 07307 Government Employees Ins Co 344,008,645 170 0.00%, • 01238 Hanover Ins Co 6,350,084 284 0.00%, • 01238 Hanover Ins Co 13,57,76,48 68,001 42,75,152 1,262,728 4,30% • 07610 Horace Mann Ins Co 17,379,748 16,100,411 92,75% 00744 107611 107807 43,149,668 20,160,924 50,303% • 07611 Integen General Ins Co 2,761,075 515,270 33,15% 09824 Liberty Mutual Ins Co 18,4105 102,733 64,39% • 07614 Integen General Ins Co 7,600,244 21,556,555 21,414 • 07524 Midawind General Ins Co 158,105 </td <td>*</td> <td></td> <td>Erie Ins Co</td> <td></td> <td></td> <td>6,069,381</td> <td>3.30%</td>	*		Erie Ins Co			6,069,381	3.30%
04729 Firemens ins Co of Wash DC 1.076,179 15,429 1.43% 07030 General Cas Co Grand Rapids MI 614,748 403,666 65,67% 07301 General Cas Co of Wisconsin 1.567,643 23,463 1.50% 07303 General Cas Co of Wisconsin 1.567,643 23,463 1.007% 07804 General Cas ins Co 4,220,238 4,250,052 100,71% 07811 Hardore Cas ins Co 4,2475,152 1.282,728 4.30% 10794 Horace Mann ins Co 15,775,643 688,001 4.36% 10199 Incline Cas Co 17,775,644 688,001 4.36% 10199 Incline Cas Co 17,775,644 4.398,255 80,13% 11034 Hardford Cas ins Co 2,761,073 915,270 31,51% 10824 Uberty Mutual ins Co 15,875,650 21,642,073 50,94% 02543 Milbank ins Co 15,875,651 55,30,301 24,48% 07564 Nationwide General ins Co 16,44,364,030 16,33,4947 13,329		09836				6,216,163	57.71%
• 07275 Foremost ins Co Grand Rapids MI 614, 748 403,866 65.67% • 07301 General Cas Co of Wisconsin 1.557,643 23,463 1.50% • 07307 Government Employees ins Co 344,000,645 17.0 0.000% • 07307 Government Employees ins Co 344,000,645 17.0 0.007% • 01338 Hanover ins Co 6,350,084 4,250,052 100.71% • 01338 Hanover ins Co 1,737,744 168,001 4,275,152 1,282,728 4,30% • 07610 Horace Mann ins Co 17,379,744 165,716 15,570 33,15% • 07614 Infinity ins Co 17,379,7424 4598,295 50,03% • 07614 Infinity ins Co 13,817,78 110,69,262 25,89% • 07814 Infinity ins Co 158,105 102,733 64,39% • 07824 Midovial findermity Co 158,105 102,733 64,39% • 07844 Midovial findermity Co 158,105 102,733 64,39% • 07844 Midovial findermity	*						
07159 GECO Indemnity Co 149,121,337 14,103,073 96,63% 07301 General Cas Co of Wisconin 1,567,643 23,463 1.50% 07301 Government Employees Ins Co 344,006,465 170 0.00% 9918 Hanover Ins Co 42,20,238 4,250,052 100,71% 90181 Hanover Ins Co 6,350,048 284 0.00% 10138 Hartford Cas Ins Co 42,475,152 1,286,728 4.30% 10199 Incline Cas Co 17,776,644 688,001 4.36% 10199 Incline Cas Co 17,776,44 688,001 4.36% 10199 Incline Cas Co 17,776,44 689,001 4.36% 10181 Integro General Ins Co 5,764,24 4,598,205 80,19% 11824 Infinity Ins Co 15,876,613 10,773,30 64,98% 07544 Mibank Ins Co 27,640,75 91,57,70 50,94% 07544 Ntaionwide General Ins Co 76,600,244 21,556,656 23,14% 07542 Nationwide Ins Co 14,364,030 16,343,497 11,32%							
• 07301 General Cas Conf Wisconsin 1,567,643 23,463 1,50% • 07307 Government Employees Ins Co 344,008,645 170 0.00% 27777 Greenwille Cas Ins Co 6,350,084 2420,233 4,250,032 100.71% • 0133 Hartford Cas Ins Co 6,350,084 284 0.00% • 01761 Horace Mann Ins Co 17,757,644 68,001 42,475,152 1,266,743 23,443 • 07611 Incine Cas Co 17,379,748 16,100,924 90,3% • 07611 Integen General Ins Cop 43,149,668 261,600,924 90,3% • 09824 Liberty Mutual Ins Co 81,87,728 21,069,62 28,8% • 06124 Nationwide General Ins Co 76,600,244 21,556,556 28,14% • 07524 Nc Farm Bureau Mut Ins Co 18,105 16,34,9477 13,25% • 06124 Nationwide General Ins Co 76,800,244 21,556,556 28,14% • <td>*</td> <td></td> <td>-</td> <td></td> <td></td> <td></td> <td></td>	*		-				
07307 Government Employes ins Co 344,008,645 170 0.00% 07818 Hanover Ins Co 4,220,052 100,71% 09818 Hanover Ins Co 6,350,084 284 0.00% 07133 Hartford Cas Ins Co 4,2475,152 1,226,728 4,30% 07144 Horace Mann Ins Co 1,7379,748 16,120,441 92,75% 07141 Integon General Ins Co 5,734,224 4,582,295 80,019% 11034 Kemper Independence Ins Co 2,751,075 915,270 33,15% 09824 Liberty Mutual Ins Co 158,105 102,733 64,98% 07504 Nationwide General Ins Co 76,600,244 21,556,556 28,14% 07504 Nationwide Ins Co 39,955,103 1,334,473 11,32% 06124 Nationwide Ins Co 38,97,787 48,873,392 90,68% 07504 Nationwide Ins Co 39,955,103 1,344,413,10 9,04% 07514 Nationwide Ins Co 38,973,871,48,873,392 90,68% 06124 NG							
2778 Greenville Cas ins Co 4,220,238 4,250,052 100,71% 01238 Hantover ins Co 6,350,084 284 0.00% 01238 Hantford Cas ins Co 42,475,152 1,826,728 4,30% 07610 Horace Mann Ins Co 15,775,634 688,001 4,36% 11099 Incline Cas Co 17,377,748 16,120,411 92,775% 07611 Integon General Ins Corp 443,149,668 26,160,924 25,85% 07624 Liberty Mutual Ins Co 183,87,728 21,069,262 28,89% 07524 Nationwide General Ins Co 76,60,24 21,555,656 28,14% 07524 Nationwide General Ins Co 76,60,24 21,555,656 28,14% 07524 Nc Farm Bureau Mut Ins Co 143,364,303 15,31,4947 11,32% 06124 Nationwide General Ins Co 75,364,303 16,31,4947 11,32% 07524 NC Farm Bureau Mut Ins Co 38,963,283 57,3730 15,1% 06124 Nationwide Mut Ins Co 38,063,283 57,37,392							
• 09818 Hardvor Ins Co 6,350,084 284 0.00% • 01238 Hardvor Cas Ins Co 4,2475,152 1,826,728 4,30% • 07610 Horace Mann Ins Co 15,775,634 68,001 4,36% 07144 Infinity ins Co 17,379,748 16,120,441 92,75% 07141 Integon General Ins Cop 443,149,668 261,600,924 59,03% 1034 Kemper Independence Ins Co 2,761,075 915,270 33,15% 10282 Liberty Mutual Ins Co 158,105 102,733 64,98% 02543 Milbank Ins Co 158,105 102,733 64,98% 07504 Nationwide Ens Co America 58,716,196 15,550,301 26,488 06124 Nationwide Ins Co 144,364,030 16,334,947 11,32% 07524 NC Farm Bureau Mut Ins Co 38,993,387 48,873,703 1,51% * 06142 NSM Ins Co 48,873,9292 90,68% * 10511 Peak P&C Ins Corp 53,887,377.370	•						
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• 06098 Penn National Mut Cas Ins Co 38,063,283 573,730 1.51% • 27676 Perm Gen Assurance Corp of O'hio 14,780,999 14,580,409 98,64% • 10545 Progressive Premier Ins Co of Illinois 494,874,513 168,108,367 33.97% • 10546 Progressive Universal Ins Co 5.219,474 2,448,448 46.91% • 7960 SAFECO Ins Co of America 29,7527 17,887 6.01% • 7967 Selective Ins Co of the Southeast 29,230,794 1.829 0.04% • 7352 Southern General Ins Co 8,371,125 8,390,213 100.23% 7633 State Automobile P&C Ins Co 8,180,927 682,740 8.35% 7665 State Farm Mut Auto Ins Co 20,996,727 19,744,386 94,04% • 11366 Stonewood Ins Co 20,996,727 19,744,386 94,04% • 7838 The Cincinnati Ins Co 17,868,756 10,934,547 6.19% • 7020 Trian		06142	NGM Ins Co		4,859,246	193,750	3.99%
27676 Perm Gen Assurance Corp of Ohio 14,780,999 14,580,409 98,64% 10545 Progressive Premier Ins Co of Illinois 494,874,513 168,108,367 33.97% 10546 Progressive Universal Ins Co 5,219,474 2,448,448 46.91% 7067 Selective Ins Co of America 29,7527 17,887 6.01% 6127 Sentry Ins Co 16,373,966 321,654 1.96% 7633 State Automobile P&C Ins Co 8,180,927 682,740 8.35% 7667 State Farm Mut Auto Ins Co 529,115,075 150,664,450 28,47% 11366 Stonewood Ins Co 20,996,727 19,744,386 94.04% * 7838 The Cincinnati Ins Co 17,868,756 10,934,547 61.19% * 11371 The Members Ins Co 17,868,756 10,934,547 61.19% * 2034 The Travelers Indemnity Co 9,357,783 341,739 3.65% 5163 Unitrin Auto & Home Ins Co 5,644,549 79,13% 6.25% 5163 Unitrin Soguard Ins Co 9,357,783 341,739 3.65%	*	10511	Peak P&C Ins Corp		53,897,387	48,873,992	90.68%
10545 Progressive Premier Ins Co of Illinois 494,874,513 168,108,367 33.97% 10546 Progressive Universal Ins Co 5,219,474 2,448,448 46.91% 7960 SAFECO Ins Co of America 297,527 17,887 6.01% 7967 Selective Ins Co of the Southeast 297,220,794 11,829 0.04% 6127 Sentry Ins Co 16,373,966 321,654 1.96% 7633 State Automobile P&C Ins Co 8,371,125 8,300,213 100.23% 7663 State Farm Mut Auto Ins Co 529,115,075 150,664,450 28,47% 11366 Stonewood Ins Co 20,996,727 19,744,386 94.04% * 7838 The Cincinnati Ins Co 40,741,224 1,482,736 3.64% 11371 The Members Ins Co 5,246 4,447 84.77% 6500 Truck Ins Exchange 179,665 85,662 47.68% 5131 Triangle Ins Co 13,022,313 12,648,669 97.13% * 3542 USAA Cas Ins Co 268,996,158 17,623,613 6,55% * 35899 Uti	*	06098	Penn National Mut Cas Ins Co		38,063,283	573,730	1.51%
10546 Progressive Universal Ins Co 5,219,474 2,448,448 46.91% 7960 SAFECO Ins Co of America 297,527 17,887 6.01% 7967 Selective Ins Co of the Southeast 29,230,794 11,829 0.04% * 7967 Selective Ins Co of the Southeast 29,230,796 321,654 1.96% 7352 Southern General Ins Co 8,371,125 8,390,213 100.23% 7633 State Automobile P&C Ins Co 8,180,927 682,740 8.35% 7667 State Farm Mut Auto Ins Co 29,915,075 19,744,386 9.404% * 7838 The Cincinnati Ins Co 40,741,224 1,482,736 3.64% * 7838 The Cincinnati Ins Co 17,868,756 10,934,547 61.19% * 7034 The Members Ins Co 5,246 4,447 84.77% 6550 Truck Ins Exchange 179,665 85,662 47.68% 5163 Unitrin Auto & Home Ins Co 5,645,759 384,644 681% 7202 Unitrin Safeguard Ins Co 13,022,313 12,648,669 9.737 <	*	27676	Perm Gen Assurance Corp of Ohio		14,780,999	14,580,409	98.64%
* 7960 SAFECO Ins Co of America 297,527 17,887 6.01% * 7967 Selective Ins Co of the Southeast 29,230,794 11,829 0.04% * 6127 Sentry Ins Co 16,373,966 321,054 1.96% 7633 State Automobile P&C Ins Co 8,371,125 8,390,213 100.23% 7667 State Farm Mut Auto Ins Co 529,115,075 150,664,450 28,47% 11366 Stonewood Ins Co 20,996,772 19,744,386 94.04% * 7838 The Cincinnati Ins Co 40,741,224 1,482,736 3,64% 11371 The Members Ins Co 17,868,756 10,934,547 61.19% * 2034 The Travelers Indemnity Co 91,539,256 6,239,487 6.82% 2513 Triangle Ins Co 5,246 4,447 84.77% 6505 Truck Ins Exchange 179,665 85,662 47.68% 5163 Unitrin Auto & Home Ins Co 5,645,759 384,644 6.81% 7202 Unitrin Safeguard Ins Co 13,022,313 12,648,669 97.13% * 5899	*		-				
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* 2034 The Travelers Indemnity Co 91,539,256 6,239,487 6.82% 2513 Triangle Ins Co 5,246 4,447 84.77% 6550 Truck Ins Exchange 179,665 85,662 47.68% 5163 Unitrin Auto & Home Ins Co 5,645,759 384,644 6.81% 7202 Unitrin Safeguard Ins Co 9,357,783 341,739 3.65% 5394 Universal Ins Co 13,022,313 12,648,669 97.13% * 3542 USAA Cas Ins Co 268,996,158 17,623,613 6.55% * 5899 Utica Mut Ins Co 7,446,429 779,919 10.47% * 5899 Utica Companies in a group Comparison of Previous Years: 346,953,140 24.91% * includes all companies in a group Comparison of Previous Years: 2020 4,296,939,511 1,078,531,753 25.10% 2019 4,190,335,683 1,071,003,907 25.56% 2016 3,478,927,909 967,165,027 27.80% 2016 3,478,927,909 967,165,027 27.80% 2016 3,478,927,909 967,165,027 27.80% </td <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>							
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2015 3,320,038,093 921,031,565 27.74%							
	NOTES:			2015	5,520,030,035		27.74/0

NOTES:

NOTES:
1. Written Premiums are from Company annual statements (as writtten).
2. Ceded Premiums are from amounts reported to NCRF (as reported) and may include adjustments for prior periods, thus ceded could exceed written on this exhibit.
3. NCRF company groups may not be the same as NAIC company groups.