

Table of Contents

User Usage Agreement Attachments

Usage Agreement [Usage Agreement.pdf](#)

Form Attachments	(ex. Form Name	Form Number	Attachment Name)
Residence Held in Trust	H3-CW-C-0002		H3-CW-C-0002-202009.pdf
Home-Sharing or Occasional Rental Coverage	H3-CW-C-0008		H3-CW-C-0008-202009.pdf
Ordinance or Law Coverage	H3-CW-C-0010		H3-CW-C-0010-202010.pdf
Water Damage Coverage	H3-CW-C-0011		H3-CW-C-0011-202401.pdf
Scheduled Personal Property Endorsement	H3-CW-C-0013		H3-CW-C-0013-202104.pdf
Personal Liability Special Limit for Animal Liability	H3-CW-C-0020		H3-CW-C-0020-202101.pdf
Extended Replacement Cost Coverage	H3-CW-C-0031		H3-CW-C-0031-202004.pdf
Condemnation Exclusion	H3-CW-X-0022		H3-CW-X-0022-202010.pdf
Personal Liability Fungi, Wet or Dry Rot, or Bacteria Exclusion	H3-CW-X-0002		H3-CW-X-0002-202101.pdf
Animal Liability Exclusion	H3-CW-X-0004		H3-CW-X-0004-202101.pdf
Roof Exclusion	H3-CW-X-0006		H3-CW-X-0006-202307.pdf
Cosmetic Roof Damage Exclusion - Windstorm or Hail	H3-CW-X-0010		H3-CW-X-0010-202305.pdf
Criminal Acts Exclusion	H3-CW-X-0011		H3-CW-X-0011-202009.pdf
Controlled Substances Exclusion	H3-CW-X-0012		H3-CW-X-0012-202007.pdf
Sale of Home Exclusion	H3-CW-X-0013		H3-CW-X-0013-202003.pdf
Personal Liability Total Pollution Exclusion	H3-CW-X-0014		H3-CW-X-0014-202003.pdf
Personal Liability Assault and Battery Exclusion	H3-CW-X-0017		H3-CW-X-0017-202101.pdf
Personal Liability Punitive or Exemplary Damages Exclusion	H3-CW-X-0018		H3-CW-X-0018-202101.pdf

Personal Liability Lead Liability Exclusion	H3-CW-X-0019	H3-CW-X-0019-202101.pdf
Policy Declarations	H1-CW-D-0001	H1-CW-D-0001 05-22.pdf
Special Provisions - Ohio	H3-OH-A-0001	H3-OH-A-0001-202405.pdf
Actual Cash Value Loss Settlement With Roof Benefit Schedule - Reducing Benefit For Roof(s) Of All Ages	H3-CW-C-0052	H3-CW-C-0052-202401.pdf
Actual Cash Value Loss Settlement - Buildings	H3-CW-C-0022	H3-CW-C-0022-202009.pdf
Replacement Cost Settlement with Roof Benefit Schedule - Reducing Benefit For Roof(s) 16 years or Older	H3-CW-C-0055	H3-CW-C-0055-202402.pdf
Modified Functional Replacement Cost Settlement with Roof Benefit Schedule - Reducing Benefit For Roof(s) 16 Years Or Older	H3-CW-C-0054	H3-CW-C-0054-202402.pdf
Full Repair Cost Settlement with Roof Benefit Schedule - Reducing Benefit For Roof(s) 16 Years or Older	H3-CW-C-0056	H3-CW-C-0056-202402.pdf

Rate-Rule Attachments	(ex. Document Name	Attachment Name)
OH Homeowners Flex Program		OH071H3-C.pdf

<i>OH Homeowners Flex Program</i>	OH071H3-B.pdf
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<i>OH Homeowners Flex Program</i>	OH071H3-A.pdf
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Supporting Document Attachments	(ex. Supporting Document Name	Attachment Name)
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Filing Requirements Summary - P&C	Exhibit D & I - Additional Rate Support.pdf
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Filing Requirements Summary - P&C	Exhibit B - Rate Impacts.pdf
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Filing Requirements Summary - P&C	Property-Casualty Underwriting Profit Loss Statement -OH.pdf
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Filing Requirements Summary - P&C	Property-Casualty Underwriting Profit Loss Statement -CW.pdf
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Filing Requirements Summary - P&C	Exhibit C - Actuarial Indication Support.pdf
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Rate/Rule Side by Side Comparison - Current vs Proposed	Rule Comparison OH071H3-A Current vs. Proposed.pdf
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Rate/Rule Side by Side Comparison -
Current vs Proposed

[Rate Comparison OH071H3-A Current vs. Proposed \(Part 1\).pdf](#)

Rate/Rule Side by Side Comparison -
Current vs Proposed

[Rate Comparison OH071H3-A Current vs. Proposed \(Part 2\).pdf](#)

Rate/Rule Side by Side Comparison -
Current vs Proposed

[Rate Comparison OH071H3-A Current vs. Proposed \(Part 3\).pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-C-0002-201901 vs H3-IL-C-0002-202406.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-C-0008-201901 vs H3-IL-C-0008-202406.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-C-0010-201901 V. H3-CW-C-0010-202010.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-C-0011-201910 v H3-CW-C-0011-202401.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-C-0013-201901 V. H3-CW-C-0013-202104.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-C-0020-201901 v H3-CW-C-0020-202101.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-C-0031-201908 vs H3-CW-C-0031-202004.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-G-0002-201901 v. H3-CW-X-0022-202010.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-X-0012-201901 vs H3-CW-X-0012-202007.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-X-0013-202003 vs H3-CW-X-0013-201901.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-X-0014-201901 V. H3-CW-X-0014-202003.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-X-0017-201901 v. H3-CW-X-0017-202101.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-X-0018-201901 V. H3-CW-X-0018-202101.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-X-0010-201901 V. H3-CW-X-0010-202305.pdf](#)

Form Side by Side Comparisons -
Current vs Proposed

[H3-CW-X-0019-201901 V. H3-CW-X-0019-202101.pdf](#)

Form Side by Side Comparisons - Current vs Proposed	H1-CW-D-0001-201501 vs H3-CW-D-0001-202205.pdf
Form Side by Side Comparisons - Current vs Proposed	H3-CW-X-0002-201901 v. H3-CW-X-0002-202101.pdf
Form Side by Side Comparisons - Current vs Proposed	H3-CW-X-0004-201901 V. H3-CW-X-0004-202101.pdf
Form Side by Side Comparisons - Current vs Proposed	H3-CW-X-0006-201905 V. H3-CW-X-0006-202307.pdf
Form Side by Side Comparisons - Current vs Proposed	H3-CW-X-0011-201901 V. H3-CW-X-0011-202009.pdf
Form Side by Side Comparisons - Current vs Proposed	H3-OH-A-0001-201911 vs H3-OH-A-0001-202405.pdf
Explanatory Memorandum	Explanatory Memorandum.pdf
Support for the Objection of 09/17/2024	Data Dictionary.pdf
Support for the Objection of 09/17/2024	Lift Chart on Holdout Data.pdf
Support for the Objection of 09/17/2024	CAPE Analytics Roof Condition Rating Taxonomy - Version 30docx.pdf
Support for the Objection of 09/17/2024	CAPE Analytics Roof Covering Information for Filingdocx.pdf
Support for the Objection of 09/17/2024	CAPE Analytics Roof Geometry Information for Filingdocx.pdf
Support for the Objection of 09/17/2024	CAPE Analytics Tree Overhang Information for Filingdocx.pdf
Support for the Objection of 09/17/2024	Chi Square P-Values.pdf
Support for the Objection of 09/17/2024	Exhibit O-4 - Contingency Load Support Calculations.pdf
Support for the Objection of 09/17/2024	H3-CW-N-0042-202308.pdf
Support for the Objection of 09/17/2024	IP-CW-N-0012-202212.pdf
Support for the Objection of 09/17/2024	Premium and Exposure Exhibit.pdf
Support for the Objection of	Algorithm - Rule A07.pdf

Factual Statement & Redacted
Materials

[Factual Statement and Attestation - Request for Trade Secret
Protections - OH.pdf](#)

Factual Statement & Redacted
Materials

[OH HO Objection - AMIG - CAPE Responses 092024 -
Redacted - Trade Secret Status Requested.pdf](#)

Support for the Objection of
10/29/2024

[Exhibit O-1.pdf](#)

*Filing Requirements Summary -
P&C*

[Exhibit C - Actuarial Indication Support \(1\).pdf](#)

*Filing Requirements Summary -
P&C*

[Property-Casualty Underwriting Profit & Loss Statement -
OH.pdf](#)

*Filing Requirements Summary -
P&C*

[Property-Casualty Underwriting Profit & Loss Statement -
CW.pdf](#)

*Filing Requirements Summary -
P&C*

[Exhibit D & I - Additional Rate Support.pdf](#)

*Filing Requirements Summary -
P&C*

[Exhibit B - Rate Impacts \(1\).pdf](#)

*Filing Requirements Summary -
P&C*

[Exhibit B - Rate Impacts \(2\).pdf](#)

*Filing Requirements Summary -
P&C*

[Exhibit C - Actuarial Indication Support.pdf](#)

*Filing Requirements Summary -
P&C*

[Property-Casualty Underwriting Profit & Loss Statement -
OH.pdf](#)

*Filing Requirements Summary -
P&C*

[Property-Casualty Underwriting Profit & Loss Statement -
CW.pdf](#)

*Filing Requirements Summary -
P&C*

[Exhibit D & I - Additional Rate Support.pdf](#)

*Rate/Rule Side by Side
Comparison - Current vs Proposed*

[Rule Comparison OH071H3-A Current vs. Proposed \(1\).pdf](#)

*Rate/Rule Side by Side
Comparison - Current vs Proposed*

[Rate Comparison OH071H3-A Current vs. Proposed \(Part 1\)
\(1\).pdf](#)

<i>Rate/Rule Side by Side Comparison - Current vs Proposed</i>	<u>Rate Comparison OH071H3-A Current vs. Proposed (Part 2) (1).pdf</u>
<i>Rate/Rule Side by Side Comparison - Current vs Proposed</i>	<u>Rate Comparison OH071H3-A Current vs. Proposed (Part 3) (1).pdf</u>
<i>Explanatory Memorandum</i>	<u>Explanatory Memorandum (1).pdf</u>

Filing at a Glance

Company:	American Modern Property and Casualty Insurance Company
Product Name:	Homeowners Flex Program
State:	Ohio
TOI:	04.0 Homeowners
Sub-TOI:	04.0003 Owner Occupied Homeowners
Filing Type:	Form/Rate/Rule
Date Submitted:	07/26/2024
SERFF Tr Num:	AMMH-134183102
SERFF Status:	Closed-FILED
State Tr Num:	AMMH-134183102
State Status:	FILED
Co Tr Num:	HO-OH-2024MAR20-03
Effective Date	03/12/2025
Requested (New):	
Effective Date	04/05/2025
Requested (Renewal):	
Author(s):	Angie Bender
Reviewer(s):	Trent Emig (primary), Brad Wolfenbarger, Stewart Trego
Disposition Date:	11/12/2024
Disposition Status:	FILED
Effective Date (New):	03/12/2025
Effective Date (Renewal):	04/05/2025

General Information

Project Name: Rate/Rule/Form Revisions

Project Number: HO-OH-2024MAR20-03

Reference Organization:

Reference Title:

Filing Status Changed: 11/12/2024

State Status Changed: 11/12/2024

Created By: Angie Bender

Corresponding Filing Tracking Number:

State TOI: 04.0 Homeowners

Status of Filing in Domicile:

Domicile Status Comments:

Reference Number:

Advisory Org. Circular:

Deemer Date:

Submitted By: Angie Bender

State Sub-TOI: 04.0003 Owner Occupied Homeowners

Filing Description:

American Modern Property and Casualty Insurance Company would like to submit rate, rule, and form revisions to our Homeowners Flex Program. Please refer to the Explanatory Memorandum under the Supporting Documentation tab for further details.

Company and Contact

Filing Contact Information

Angie Bender,

7000 Midland Blvd.

Amelia, OH 45102

abender@amig.com

513-947-6798 [Phone]

Filing Company Information

American Modern Property and Casualty Insurance Company

7000 Midland Boulevard

Amelia, OH 45102

(800) 759-9008 ext. [Phone]

CoCode: 42722

Group Code: 361

Group Name: Munich Re

FEIN Number: 43-1262602

State of Domicile: Ohio

Company Type: Property and Casualty

State ID Number:



Filing Fees

State Fees

Fee Required? Yes
Fee Amount: \$50.00
Retaliatory? No
Fee Explanation: \$50 per filing per company.
Per Company: Yes

Company	Amount	Date Processed	Transaction #
American Modern Property and Casualty Insurance Company	\$50.00	07/26/2024 01:59 PM	291281638

EFT Total **\$50.00**

State Specific

Indicate Name of Statistical Reporting Agent (AAIS, ISO, ISSI, MSO, NCIS, NISS, OTIRB, SFAA, etc) Response REQUIRED on NEW Programs or NEW Lines of Business.: Not Applicable

PUBLIC RECORD ACKNOWLEDGEMENT (REQUIRED FIELD): Acknowledge (by entering "YES") that everything submitted in this filing, with the exception of pages or parts of documents appropriately marked as trade secret pursuant to Ohio law and the Department's "Trade Secrets Policy," will become public record in accordance with R.C. 149.43, R.C. 1751.52, R.C. 3935.04, and/or R.C. 3937.03. (See General Instructions for further information.): Yes

FILING FEES VIA EFT: Confirm that via EFT you have submitted Ohio's filing fees of \$50 per company.: Yes

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
FILED	Brad Wolfenbarger	11/12/2024	11/12/2024

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Pending Industry Response	Brad Wolfenbarger	10/29/2024	10/29/2024
Pending Industry Response	Maureen Motter	10/16/2024	10/16/2024
Pending Industry Response	Stewart Trego	09/17/2024	09/17/2024

Response Letters

Responded By	Created On	Date Submitted
Angie Bender	11/07/2024	11/07/2024
Kirstie Vilardo	10/17/2024	10/17/2024
Angie Bender	09/30/2024	10/15/2024

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Rate	OH Homeowners Flex Program	Angie Bender	08/14/2024	08/15/2024
Supporting Document	Rate/Rule Side by Side Comparison - Current vs Proposed	Angie Bender	08/14/2024	08/15/2024
Supporting Document	Explanatory Memorandum	Angie Bender	08/14/2024	08/15/2024
Supporting Document	Filing Requirements Summary - P&C	Angie Bender	08/14/2024	08/15/2024

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Request for Extension - Objection of 09/17/2024	Note To Reviewer	Angie Bender	09/30/2024	09/30/2024
Filing Status	Note To Filer	Trent Emig	09/13/2024	09/13/2024
Filing Status Request	Note To Reviewer	Angie Bender	09/12/2024	09/12/2024
AA Reviewed	Reviewer Note	Brad Wolfenbarger	11/12/2024	
AA Sent Letter	Reviewer Note	Brad Wolfenbarger	10/29/2024	

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
CA Review	Reviewer Note	Trent Emig	10/16/2024	
AA Sent Letter	Reviewer Note	Stewart Trego	09/17/2024	
CA Started Letter	Reviewer Note	Trent Emig	09/04/2024	

Disposition

Disposition Date: 11/12/2024
Effective Date (New): 03/12/2025
Effective Date (Renewal): 04/05/2025
- Effective Date (New) changed from 01/15/2025 to 03/12/2025 and Effective Date (Renewal) changed from 02/01/2025 to 04/05/2025 by Wolfenbarger, Brad on 11/15/2024.
Status: FILED

Comment: This filing, as submitted or as amended herein, is Approved under Chapter 3935, or Accepted under Chapter 3937, of the Ohio Revised Code.

EFFECTIVE DATES: Our records indicate you did/will implement this filing on the Effective Date(s) shown herein. If the effective dates are incorrect or you need to revise the effective date(s), submit a Post-Submission Update with the revised dates.

PUBLIC RECORD: Since filings become public record as of the effective date, changes of effective date(s) should be submitted PRIOR TO the effective date(s) originally requested.

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
American Modern Property and Casualty Insurance Company	5.700%	5.600%	\$441,678	3,669	\$7,855,837	223.200%	-22.200%

Schedule	Schedule Item	Schedule Item Status	Public Access
Form	Residence Held in Trust	Filed	Yes
Form	Home-Sharing or Occasional Rental Coverage	Filed	Yes
Form	Ordinance or Law Coverage	Filed	Yes
Form	Water Damage Coverage	Filed	Yes
Form	Scheduled Personal Property Endorsement	Filed	Yes
Form	Personal Liability Special Limit for Animal Liability	Filed	Yes
Form	Extended Replacement Cost Coverage	Filed	Yes
Form	Condemnation Exclusion	Filed	Yes
Form	Personal Liability Fungi, Wet or Dry Rot, or Bacteria Exclusion	Filed	Yes

Schedule	Schedule Item	Schedule Item Status	Public Access
Form	Animal Liability Exclusion	Filed	Yes
Form	Roof Exclusion	Filed	Yes
Form	Cosmetic Roof Damage Exclusion - Windstorm or Hail	Filed	Yes
Form	Criminal Acts Exclusion	Filed	Yes
Form	Controlled Substances Exclusion	Filed	Yes
Form	Sale of Home Exclusion	Filed	Yes
Form	Personal Liability Total Pollution Exclusion	Filed	Yes
Form	Personal Liability Assault and Battery Exclusion	Filed	Yes
Form	Personal Liability Punitive or Exemplary Damages Exclusion	Filed	Yes
Form	Personal Liability Lead Liability Exclusion	Filed	Yes
Form	Policy Declarations	Filed	Yes
Form	Special Provisions - Ohio	Filed	Yes
Form	Actual Cash Value Loss Settlement With Roof Benefit Schedule - Reducing Benefit For Roof(s) Of All Ages	Filed	Yes
Form	Actual Cash Value Loss Settlement - Buildings	Filed	Yes
Form	Replacement Cost Settlement with Roof Benefit Schedule - Reducing Benefit For Roof(s) 16 years or Older	Filed	Yes
Form	Modified Functional Replacement Cost Settlement with Roof Benefit Schedule - Reducing Benefit For Roof(s) 16 Years Or Older	Filed	Yes
Form	Full Repair Cost Settlement with Roof Benefit Schedule - Reducing Benefit For Roof(s) 16 Years or Older	Filed	Yes
Form	Personal Liability Limited Fungi, Wet or Dry Rot, or Bacteria Coverage	Filed	Yes
Form	Actual Cash Value Loss Settlement - Buildings	Filed	Yes
Form	Modified Functional Replacement Cost with Roof Covering Restriction 21 Years or Older	Filed	Yes
Form	Full Repair Cost with Actual Cash Value Roof	Filed	Yes
Form	Modified Functional Replacement Cost with Actual Cash Value Roof	Filed	Yes
Form	Replacement Cost with Actual Cash Value Roof	Filed	Yes
Form	Replacement Cost with Roof Covering Restriction 21 Years or Older	Filed	Yes
Form	Full Repair Cost with Roof Covering Restriction 21 Years	Filed	Yes

Schedule	Schedule Item	Schedule Item Status	Public Access
	or Older		
Rate (revised)	OH Homeowners Flex Program	Filed	Yes
Rate	OH Homeowners Flex Program	Filed	Yes
Rate	OH Homeowners Flex Program	Filed	Yes
Supporting Document (revised)	Filing Requirements Summary - P&C	Filed	Yes
Supporting Document (revised)	Rate/Rule Side by Side Comparison - Current vs Proposed	Filed	Yes
Supporting Document	Form Side by Side Comparisons - Current vs Proposed	Filed	Yes
Supporting Document (revised)	Explanatory Memorandum	Filed	Yes
Supporting Document	Support for the Objection of 09/17/2024	Filed	Yes
Supporting Document	Factual Statement & Redacted Materials	Filed	Yes
Supporting Document	Support for the Objection of 10/29/2024	Filed	Yes
Supporting Document	Filing Requirements Summary - P&C	Filed	Yes
Supporting Document	Filing Requirements Summary - P&C	Filed	Yes
Supporting Document	Rate/Rule Side by Side Comparison - Current vs Proposed	Filed	Yes
Supporting Document	Explanatory Memorandum	Filed	Yes

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	10/29/2024
Submitted Date	10/29/2024
Respond By Date	11/12/2024

Dear Angie Bender,

Introduction:

RESPOND BY: 11/12/2024

In order for us to continue our review, please submit a complete response by the date shown above.

Objection 1

Comments: Provide the distribution of water damage limits for each of the past 5 years.

Objection 2

Comments: Regarding the prospective loss trend of 8% for Other Wind & Hail, acknowledge that you will monitor loss performance and if the projected reversal in pure premiums does not materialize, that prospective loss trend picks in future filings will be more in line with the data unless new circumstances arise to support the high prospective trends.

Conclusion:

Sincerely,

Brad Wolfenbarger

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	10/16/2024
Submitted Date	10/16/2024
Respond By Date	10/23/2024

Dear Angie Bender,

Introduction:

RESPOND BY:

In order for us to continue our review, please submit a complete response by the date shown above.

Objection 1

Comments: The redacted materials & the factual statement should not have been submitted using the SERFF Confidential Functionality.

Resubmit both of these files without using the functionality.

Objection 2

Comments: Confirm you are aware that this objection letter was sent as part of the intake process and that additional questions may be submitted in a separate letter.

Conclusion:

*Sincerely,
Maureen Motter*

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	09/17/2024
Submitted Date	09/17/2024
Respond By Date	10/15/2024

Dear Angie Bender,

Introduction:

RESPOND BY: 10/01/2024

In order for us to continue our review, please submit a complete response by the date shown above.

Objection 1

Comments:

Rule R37 (1) states, Roof score is determined using property attributes provided by Cape Analytics which has been approved under separate cover.

It appears that Cape Analytics has not submitted any SERFF filings. Additionally, it appears that Cape Analytics is not registered as Rating Bureau or Advisory Organization. If this is inaccurate, provide clarification.

Since Cape Analytics has not submitted and is not registered as a Rating Bureau or Advisory Organization, amend Rule (1) to remove the reference to the Cape Analytics info/data/model being approved under separate cover.

Objection 2

Comments: Submit an updated version of 'Property-Casualty Underwriting Profit & Loss Statement - OH.pdf' and 'Property-Casualty Underwriting Profit & Loss Statement - CW.pdf' which includes 2023 data.

Objection 3

Comments: In Exhibit C-15 Complement of Credibility Calculation, (6) Assumed Effective Date of Current Rates is 6/18/2022. The Effective Date of Last Rate Revision in the SERFF Rate/Rule Schedule is 4/10/2024.

Revise Exhibit C-15 to use 4/10/2024 as the Assumed Effective Date of Current Rates. Revise and supersede as necessary.

Objection 4

Comments: Provide support for the 18% target return.

Objection 5

Comments: Provide support for the 3% contingency provision.

Objection 6

Comments: The prospective loss trends for Water Damage and Other Weather are 25.6% and 52.3%, respectively.

Provide an explanation for what is driving these trends, and why it is expected to continue during the prospective period.

Objection 7

Comments: The prospective loss trend for Other Wind & Hail is +8.0%. This is 15.5 percentage points above the retrospective pure premium trend of -7.5%, and a large positive value when all of the different point fits are negative.

Provide a narrative explaining why it is expected that the trend will reverse so dramatically on a prospective basis.

Objection 8

Comments: Clarify the total number of exposures (Ohio, countrywide, and non-US) and the premium volume (Ohio, countrywide, and non-US) included in the historical experience used in the derivation and testing of the GLM used to develop the rating plan. Discuss the credibility of the data.

Objection 9

Comments: Provide a complete, detailed list of all rating characteristics used as inputs into the rating plan GLM. Such should clearly illustrate that no prohibited characteristics were utilized.

Objection 10

Comments: Provide exhibits that include outputs on the accuracy and goodness of fit of the models utilized to derive the proposed rating plan.

Objection 11

Comments: Verify the GLM modeling methodology complies with ASOPs 23 and 56.

Objection 12

Comments: The minimum all other deductible is being raised to 1,000. Provide the following:

- a. The current number of insureds at each deductible below 1,000.*
- b. The current amount of premium at each deductible below 1,000.*
- c. The premium impact of moving to the 1,000 deductible.*
- d. Provide the rationale for removing the lower deductible options.*
- e. Explain how the insureds will be informed of this change.*

Objection 13

Comments: The minimum wind/hail deductible is being raised to 2,500. Provide the following:

- a. The current number of insureds at each deductible below 2,500.*
- b. The current amount of premium at each deductible below 2,500.*
- c. The premium impact of moving to the 2,500 deductible.*
- d. Provide the rationale for removing the lower deductible options.*
- e. Explain how the insureds will be informed of this change.*

Objection 14

Comments: According to rule R37, the Roof Score is determined using the subcomponents of Roof Condition Rating, Roof Geometry, Roof Covering Material, and Tree Overhang.

Provide the algorithm that is used to determine the roof score from the subcomponents.

Objection 15

Comments: According to rule R37, the Roof Score is determined using the subcomponents of Roof Condition Rating, Roof Geometry, Roof Covering Material, and Tree Overhang.

Provide objective definitions for each of the subcomponents.

Objection 16

Comments: According to rule R37, the Roof Score is determined using the subcomponents of Roof Condition Rating, Roof Geometry, Roof Covering Material, and Tree Overhang.

Provide the expected proportion of missing values for each of the subcomponents.

Objection 17

Comments: If you assert trade secret on any portion of your response, review Ohio's Trade Secret Policy (attached to the SERFF General Instructions).

PRIOR to submitting the response, confirm the following:

** The materials are marked properly per Item #1. A header or footer should indicate Trade Secret Status Claimed & should appear on unredacted & redacted versions of the files.*

**The factual statement is attached per Item #2.*

**The attestation is attached per Item #3. (Items #2 and #3 can be included in one document.)*

**The unredacted materials are attached per Item #4.*

**The redacted materials are attached per Item #5.*

NOTE: SERFF's Confidential Functionality should ONLY be applied to Item # 4's Unredacted Materials.

Conclusion:

*Sincerely,
Stewart Trego*

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	11/07/2024
Submitted Date	11/07/2024

Dear Trent Emig,

Introduction:

Thank you for your correspondence dated 10/29/2024.

Response 1

Comments:

Please see the attached Exhibit O-1, under the Supporting Documentation tab, for the requested limit data. This exhibit includes the requested distribution of water damage limits for each limit option available from 2019 to 2023 as well as the overall water damage severity for the accident year. We have provided these exhibits for our Ohio experience, for our Countrywide experience, and for the combination of states that the water damage severity trends were selected upon. These states all launched our Flex Product business transformation in 2020 and generally show similar shifts in business mix and claim severity. Our book of business in Ohio underwent business transformation to our Flex Product effective on 12/15/2020.

Prior to the Flex launch, coverage damage limit options were defaulted to 5%, and policyholders could either opt out (0%) or buy up, generally selecting 10%. With the launch of our Flex product, the default limit option was set to 10% and all policies that had 0% were increased to 5% at renewal. Since our initial launch of our Flex product, the default water damage limit has been increased from 10% to 100% and we are seeing consistent shifts in the average limit over the 5-year period requested with expected average limit to continue to rise into the prospective ratemaking period.

While Water Damage severity in Ohio is volatile, the upward pressure on water damage severity resulting from higher limits is evident. For the grouping of states the severity trends were selected upon, the upward pressure on severity is very consistent with the increase in water damage limits.

As the default water damage limit is 100% and as of the most recent year we have an average water damage limit of 36%, we expect the upward pressure on severity to continue well into the prospective pricing period.

Related Objection 1

Comments: Provide the distribution of water damage limits for each of the past 5 years.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Support for the Objection of 10/29/2024
Comments:	
Attachment(s):	Exhibit O-1.pdf

Response 2

Comments:

We acknowledge the statement above and confirm that we will monitor loss performance as requested and that prospective loss trends picks in future filings will be supported by the data.

Related Objection 2

Comments: Regarding the prospective loss trend of 8% for Other Wind & Hail, acknowledge that you will monitor loss performance and if the projected reversal in pure premiums does not materialize, that prospective loss trend picks in future filings will be more in line with the data unless new circumstances arise to support the high prospective trends.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

Thank you for your time and assistance.

Sincerely,

Angie Bender

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	10/17/2024
Submitted Date	10/17/2024

Dear Trent Emig,

Introduction:

Thank you for your time.

Response 1

Comments:

The materials have been moved to a separate component without the confidential function.

Related Objection 1

Comments: The redacted materials & the factual statement should not have been submitted using the SERFF Confidential Functionality.

Resubmit both of these files without using the functionality.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Factual Statement & Redacted Materials
Comments:	
Attachment(s):	Factual Statement and Attestation - Request for Trade Secret Protections - OH.pdf OH HO Objection - AMIG - CAPE Responses 092024 - Redacted - Trade Secret Status Requested.pdf

Response 2

Comments:

We confirm.

Related Objection 2

Comments: Confirm you are aware that this objection letter was sent as part of the intake process and that additional questions may be submitted in a separate letter.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

Thank you for your time.

Sincerely,

Kirstie Vilardo

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	09/30/2024
Submitted Date	10/15/2024

Dear Trent Emig,

Introduction:

Thank you for your correspondence dated on 09/17/2024.

Response 1

Comments:

Please see our revised filing rule reflecting the requested changes. Please also see the responses to objections 14, 15, and 16 to further elaborate upon the new roof score.

Related Objection 1

Comments:

Rule R37 (1) states, Roof score is determined using property attributes provided by Cape Analytics which has been approved under separate cover.

It appears that Cape Analytics has not submitted any SERFF filings. Additionally, it appears that Cape Analytics is not registered as Rating Bureau or Advisory Organization. If this is inaccurate, provide clarification.

Since Cape Analytics has not submitted and is not registered as a Rating Bureau or Advisory Organization, amend Rule (1) to remove the reference to the Cape Analytics info/data/model being approved under separate cover.

Changed Items:

No Form Schedule items changed.

Rate Schedule Item Changes					
Item No.	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Date Submitted
1	OH Homeowners Flex Program	1-61	Replacement	AMMH-133956698	10/15/2024 By: Kirstie Vilardo
<i>Previous Version</i>					
1	OH Homeowners Flex Program	1-60	Replacement	AMMH-133956698	08/15/2024 By: Angie Bender
<i>Previous Version</i>					
1	OH Homeowners Flex Program	1-60	Replacement	AMMH-133956698	07/26/2024 By: Angie Bender

No Supporting Documents changed.

Response 2

Comments:

Please see 'Property-Casualty Underwriting Profit & Loss Statement - OH.pdf' and 'Property & Casualty Underwriting Profit & Loss Statement - CW.pdf' submitted with this response, as they now include 2023 data.

Related Objection 2

Comments: Submit an updated version of 'Property-Casualty Underwriting Profit & Loss Statement - OH.pdf' and 'Property-Casualty Underwriting Profit & Loss Statement - CW.pdf' which includes 2023 data.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Filing Requirements Summary - P&C
Comments:	
Attachment(s):	Exhibit D & I - Additional Rate Support.pdf Exhibit B - Rate Impacts.pdf Property-Casualty Underwriting Profit Loss Statement -OH.pdf Property-Casualty Underwriting Profit Loss Statement -CW.pdf Exhibit C - Actuarial Indication Support.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Filing Requirements Summary - P&C</i>
Comments:	
Attachment(s):	<i>Exhibit C - Actuarial Indication Support.pdf Property-Casualty Underwriting Profit & Loss Statement - OH.pdf Property-Casualty Underwriting Profit & Loss Statement - CW.pdf Exhibit D & I - Additional Rate Support.pdf Exhibit B - Rate Impacts.pdf</i>
<i>Previous Version</i>	
Satisfied - Item:	<i>Filing Requirements Summary - P&C</i>
Comments:	
Attachment(s):	<i>Exhibit B - Rate Impacts.pdf Exhibit C - Actuarial Indication Support.pdf Property-Casualty Underwriting Profit & Loss Statement - OH.pdf Property-Casualty Underwriting Profit & Loss Statement - CW.pdf Exhibit D & I - Additional Rate Support.pdf</i>

Response 3

Comments:

Please see the updated Exhibit C. The last effective date has been updated and the indicated rates now reflect that change. The proposed indicated rates have been updated accordingly.

Related Objection 3

Comments: In Exhibit C-15 Complement of Credibility Calculation, (6) Assumed Effective Date of Current Rates is 6/18/2022. The Effective Date of Last Rate Revision in the SERFF Rate/Rule Schedule is 4/10/2024.

Revise Exhibit C-15 to use 4/10/2024 as the Assumed Effective Date of Current Rates. Revise and supersede as necessary.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Filing Requirements Summary - P&C
Comments:	
Attachment(s):	Exhibit D & I - Additional Rate Support.pdf Exhibit B - Rate Impacts.pdf Property-Casualty Underwriting Profit Loss Statement -OH.pdf Property-Casualty Underwriting Profit Loss Statement -CW.pdf Exhibit C - Actuarial Indication Support.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Filing Requirements Summary - P&C</i>
Comments:	
Attachment(s):	<i>Exhibit C - Actuarial Indication Support.pdf Property-Casualty Underwriting Profit & Loss Statement - OH.pdf Property-Casualty Underwriting Profit & Loss Statement - CW.pdf Exhibit D & I - Additional Rate Support.pdf Exhibit B - Rate Impacts.pdf</i>
<i>Previous Version</i>	
Satisfied - Item:	<i>Filing Requirements Summary - P&C</i>
Comments:	
Attachment(s):	<i>Exhibit B - Rate Impacts.pdf Exhibit C - Actuarial Indication Support.pdf Property-Casualty Underwriting Profit & Loss Statement - OH.pdf Property-Casualty Underwriting Profit & Loss Statement - CW.pdf Exhibit D & I - Additional Rate Support.pdf</i>

Response 4

Comments:

The increased profit provision is mostly due to the inclusion of a contingency load, explained above, and an increase from a 15% ROE to an 18% ROE.

When reviewing Company (see Exhibit O-4) and industry performance, it is apparent that the volatility of Property insurance is increasing over time. This can be seen in the volatility of the deltas displayed in Exhibit O-4 and in review of year-by-year performance. The increase in volatility does not appear to be stochastic in nature, but rather as the effect of sweeping or permanent changes such as climate change or social inflation. The increase in the Company ROE is based upon the principle that higher volatility requires higher return. An expected total return up to 18% becomes a reasonable target.

Related Objection 4

Comments: Provide support for the 18% target return.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Support for the Objection of 09/17/2024
Comments:	
Attachment(s):	Data Dictionary.pdf Lift Chart on Holdout Data.pdf CAPE Analytics Roof Condition Rating Taxonomy - Version 30docx.pdf CAPE Analytics Roof Covering Information for Filingdocx.pdf CAPE Analytics Roof Geometry Information for Filingdocx.pdf CAPE Analytics Tree Overhang Information for Filingdocx.pdf Chi Square P-Values.pdf Exhibit O-4 - Contingency Load Support Calculations.pdf H3-CW-N-0042-202308.pdf IP-CW-N-0012-202212.pdf Premium and Exposure Exhibit.pdf Algorithm - Rule A07.pdf

Response 5

Comments:

Property and Casualty insurance premiums traditionally include provisions for normally expected losses and expenses (including an estimate of expected catastrophe losses) and a combined provision for underwriting profit and contingencies. The contingency provision reflects an allowance in the rates for losses and expenses arising from events which cannot be reasonably foreseen or predicted. It thus represents an allowance for adverse fluctuations from the otherwise expected results. The underwriting profit provision reflects the expected difference between earned premiums and incurred losses, expenses, and contingencies. The need for a contingency element in the rates is generally accepted actuarially and recognized in nearly all rating laws. Over the long term, the contingency element will not be realized as an underwriting profit, but will be offset by unanticipated losses and expenses.

For 2020- 2023, American Moderns Homeowners Product Combined ratio excluding premium tax has ranged from 133.9% to 103.9%. These results were generated during a period when the countrywide profit and contingency ranged from 7.2% to 9.9% for Homeowners which contained no separate contingency load. Based on the difference between our filed profit and contingencies provisions and our actual results, the contingency element has recently been increased to 3% of earned premium.

It is thus reasonable to expect that a Countrywide average of 11% + 3.0% combined provision for underwriting profit and contingencies is appropriate.

Related Objection 5

Comments: Provide support for the 3% contingency provision.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 6

Comments:

The increase in Water Damage loss costs is due to significant enhancements in our homeowners product which has resulted in significant coverage expansions. This has resulted in material mix shifts in our book as a larger percentage of our customers have been electing for higher Water limits over time which has significantly increased the severity of water damage claims. As this shift is still occurring in the book, we expect the trends to continue into the prospective period and begin to flatten once the mix of business stabilizes.

Other Weather frequencies and severities have continued to rise across our countrywide portfolio. The enhancements in our homeowners product referenced above have resulted in more perils being covered without endorsements, and an examination of our data shows that the increase in loss costs for this peril is largely due to weight of ice and snow claims in unanticipated numbers. The shorter term fits especially have been climbing in recent years, far exceeding our selection. We are continuing to closely monitor this trend as it develops in order to prevent our rates from becoming excessive, but currently our experience suggests that we are Other Weather Rates are inadequate.

Related Objection 6

Comments: The prospective loss trends for Water Damage and Other Weather are 25.6% and 52.3%, respectively.

Provide an explanation for what is driving these trends, and why it is expected to continue during the prospective period.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 7

Comments:

The negative pure premium is largely due to the negative frequencies we are observing in our data. Evidence suggests that this negative frequency is not due to fewer Wind and Hail events, but rather more of such events being classified as a PCS CAT event. This is explainable since the dollar threshold for a CAT event has remained constant all through our experience period, meanwhile construction costs have increased drastically over the same time period. Given that the most significant portion of our Other Wind Hail losses are related to Roof Damage, it is not surprising that our experience demonstrates a strong negative trend. It is our expectation that inflationary pressures are slowing, and as such we expect to see a less drastic negative trend in the future. We expect in a more stable period a gradual positive trend is reasonable.

Related Objection 7

Comments: The prospective loss trend for Other Wind & Hail is +8.0%. This is 15.5 percentage points above the retrospective pure premium trend of -7.5%, and a large positive value when all of the different point fits are negative.

Provide a narrative explaining why it is expected that the trend will reverse so dramatically on a prospective basis.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 8

Comments:

The data that we used to model are Countrywide American Modern Homeowners pure premium data for six policy years . Since OH only data is a small percentage of our dataset, we believe that Ohio-only data is not credible to be modeled separately. We believe that the Countrywide data is credible for the intended use of our model. Please see Premium and Exposure exhibit, under the Supporting Documentation tab that shows the written and earn exposure distribution for train and test dataset for both Ohio and Countrywide and for each policy year.

Related Objection 8

Comments: Clarify the total number of exposures (Ohio, countrywide, and non-US) and the premium volume (Ohio, countrywide, and non-US) included in the historical experience used in the derivation and testing of the GLM used to develop the rating plan. Discuss the credibility of the data.

Changed Items:

- No Form Schedule items changed.
- No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Support for the Objection of 09/17/2024
Comments:	
Attachment(s):	Data Dictionary.pdf Lift Chart on Holdout Data.pdf CAPE Analytics Roof Condition Rating Taxonomy - Version 30docx.pdf CAPE Analytics Roof Covering Information for Filingdocx.pdf CAPE Analytics Roof Geometry Information for Filingdocx.pdf CAPE Analytics Tree Overhang Information for Filingdocx.pdf Chi Square P-Values.pdf Exhibit O-4 - Contingency Load Support Calculations.pdf H3-CW-N-0042-202308.pdf IP-CW-N-0012-202212.pdf Premium and Exposure Exhibit.pdf Algorithm - Rule A07.pdf

Response 9

Comments:

Please see Data Dictionary exhibit, under the Supporting Documentation tab that shows all rating variables used in each by peril GLM models.

Related Objection 9

Comments: Provide a complete, detailed list of all rating characteristics used as inputs into the rating plan GLM. Such should clearly illustrate that no prohibited characteristics were utilized.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Support for the Objection of 09/17/2024
Comments:	
Attachment(s):	Data Dictionary.pdf Lift Chart on Holdout Data.pdf CAPE Analytics Roof Condition Rating Taxonomy - Version 30docx.pdf CAPE Analytics Roof Covering Information for Filingdocx.pdf CAPE Analytics Roof Geometry Information for Filingdocx.pdf CAPE Analytics Tree Overhang Information for Filingdocx.pdf Chi Square P-Values.pdf Exhibit O-4 - Contingency Load Support Calculations.pdf H3-CW-N-0042-202308.pdf IP-CW-N-0012-202212.pdf Premium and Exposure Exhibit.pdf Algorithm - Rule A07.pdf

Response 10

Comments:

For each predictor variable in the model, nested chi square p-values were calculated to assess the significance of the variable as well as the overall improvement that each variable provides to the models goodness-of-fit. Please see Chi Square P-Values exhibits for a summary of these p-values, located under the Supporting Documentation tab.

Graphs comparing model predictions to actual experience are also visually inspected for each variable in the model. We evaluate the model lift on 20% holdout data by reviewing lift charts. The holdout data is scored using the model and all of the records are ranked according to the model prediction. The records are then binned into decile, i.e. quantiles in 10% increments. The average predicted and average actual pure premium are normalized to have mean 1.0 and plotted on the same axis. A lift chart for a successful model will show agreement between actual and predicted and a large separation between the highest and lowest deciles. Our models show excellent lift against countrywide data. Please see Lift Chart on Holdout Data exhibit under the Supporting documentation tab.

Related Objection 10

Comments: Provide exhibits that include outputs on the accuracy and goodness of fit of the models utilized to derive the proposed rating plan.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Support for the Objection of 09/17/2024
Comments:	
Attachment(s):	Data Dictionary.pdf Lift Chart on Holdout Data.pdf CAPE Analytics Roof Condition Rating Taxonomy - Version 30docx.pdf CAPE Analytics Roof Covering Information for Filingdocx.pdf CAPE Analytics Roof Geometry Information for Filingdocx.pdf CAPE Analytics Tree Overhang Information for Filingdocx.pdf Chi Square P-Values.pdf Exhibit O-4 - Contingency Load Support Calculations.pdf H3-CW-N-0042-202308.pdf IP-CW-N-0012-202212.pdf Premium and Exposure Exhibit.pdf Algorithm - Rule A07.pdf

Response 11

Comments:

ASOPs 23 and 56 were reviewed to ensure that the modeling work was performed in accordance with those actuarial standards of practice.

Related Objection 11

Comments: Verify the GLM modeling methodology complies with ASOPs 23 and 56.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 12

Comments:

A. 711 policies currently have a \$500 deductible, and 2195 policies have a \$1000 deductible.

B/C. At present, we have no policies with a wind/hail deductible. Our total current full term written premium per current deductible is shown below and is 7,855,837. The total proposed premium is 8,297,515 after the rate change of 5.6%. After moving the policies with the lower deductibles to the higher deductible, the proposed premium from rate & coverage change is 8,297,515, which from the 8,165,060 reflects a 1.6% premium reduction from the combined deductible coverage reduction.

D. Deductible rollups ensure that the minimum deductibles are appropriate given recent inflation.

E. Insureds will receive a notice H3-CW-N-0042 edition 8-23 that communicates the current vs new deductibles for All Other Peril. Insureds will receive a notice IP-CW-N-0012 edition 12-22 that communicated the Wind Hail Deductible. Please see a copy of these forms attached under the Supporting Documentation tab, labeled Support for the Objection of 09/17/2024.

Related Objection 12

Comments: The minimum all other deductible is being raised to 1,000. Provide the following:

- The current number of insureds at each deductible below 1,000.
- The current amount of premium at each deductible below 1,000.
- The premium impact of moving to the 1,000 deductible.
- Provide the rationale for removing the lower deductible options.
- Explain how the insureds will be informed of this change.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Support for the Objection of 09/17/2024
Comments:	
Attachment(s):	Data Dictionary.pdf Lift Chart on Holdout Data.pdf CAPE Analytics Roof Condition Rating Taxonomy - Version 30docx.pdf CAPE Analytics Roof Covering Information for Filingdocx.pdf CAPE Analytics Roof Geometry Information for Filingdocx.pdf CAPE Analytics Tree Overhang Information for Filingdocx.pdf Chi Square P-Values.pdf Exhibit O-4 - Contingency Load Support Calculations.pdf H3-CW-N-0042-202308.pdf IP-CW-N-0012-202212.pdf Premium and Exposure Exhibit.pdf Algorithm - Rule A07.pdf

Response 13

Comments:

A. 711 policies currently have a \$500 deductible, and 2195 policies have a \$1000 deductible.

B/C. At present, we have no policies with a wind/hail deductible. Our total current full term written premium per current deductible is shown below and is 7,855,837. The total proposed premium is 8,297,515 after the rate change of 5.6%. After moving the policies with the lower deductibles to the higher deductible, the proposed premium from rate & coverage change is 8,297,515, which from the 8,165,060 reflects a 1.6% premium reduction from the combined deductible coverage reduction.

D. Deductible rollups ensure that the minimum deductibles are appropriate given recent inflation.

E. Insureds will receive a notice H3-CW-N-0042 edition 8-23 that communicates the current vs new deductibles for All Other Peril. Insureds will receive a notice IP-CW-N-0012 edition 12-22 that communicated the Wind Hail Deductible. Please see a copy of these forms attached under the Supporting Documentation tab, labeled Support for the Objection of 09/17/2024.

Related Objection 13

Comments: The minimum wind/hail deductible is being raised to 2,500. Provide the following:

- a. The current number of insureds at each deductible below 2,500.
- b. The current amount of premium at each deductible below 2,500.
- c. The premium impact of moving to the 2,500 deductible.
- d. Provide the rationale for removing the lower deductible options.
- e. Explain how the insureds will be informed of this change.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Support for the Objection of 09/17/2024
Comments:	
Attachment(s):	Data Dictionary.pdf Lift Chart on Holdout Data.pdf CAPE Analytics Roof Condition Rating Taxonomy - Version 30docx.pdf CAPE Analytics Roof Covering Information for Filingdocx.pdf CAPE Analytics Roof Geometry Information for Filingdocx.pdf CAPE Analytics Tree Overhang Information for Filingdocx.pdf Chi Square P-Values.pdf Exhibit O-4 - Contingency Load Support Calculations.pdf H3-CW-N-0042-202308.pdf IP-CW-N-0012-202212.pdf Premium and Exposure Exhibit.pdf Algorithm - Rule A07.pdf

Response 14

Comments:

Please see the attached Algorithm Rule A07 to reflect the mapping from the subcomponents to the roof score.

Related Objection 14

Comments: According to rule R37, the Roof Score is determined using the subcomponents of Roof Condition Rating, Roof Geometry, Roof Covering Material, and Tree Overhang.

Provide the algorithm that is used to determine the roof score from the subcomponents.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Support for the Objection of 09/17/2024
Comments:	
Attachment(s):	Data Dictionary.pdf Lift Chart on Holdout Data.pdf CAPE Analytics Roof Condition Rating Taxonomy - Version 30docx.pdf CAPE Analytics Roof Covering Information for Filingdocx.pdf CAPE Analytics Roof Geometry Information for Filingdocx.pdf CAPE Analytics Tree Overhang Information for Filingdocx.pdf Chi Square P-Values.pdf Exhibit O-4 - Contingency Load Support Calculations.pdf H3-CW-N-0042-202308.pdf IP-CW-N-0012-202212.pdf Premium and Exposure Exhibit.pdf Algorithm - Rule A07.pdf

Response 15

Comments:

Please see attached documents from CAPE Analytics that provides definitions for Roof Condition Rating, Roof Geometry, Roof Covering Material, and Tree Overhang, located under the Supporting Documentation tab:

1. CAPE Analytics Roof Condition Rating Taxonomy - Version 3.0.docx.pdf
2. CAPE Analytics Roof Covering Information for Filing.docx.pdf
3. CAPE Analytics Roof Geometry Information for Filing.docx.pdf
4. CAPE Analytics Tree Overhang Information for Filing.docx.pdf

Related Objection 15

Comments: According to rule R37, the Roof Score is determined using the subcomponents of Roof Condition Rating, Roof Geometry, Roof Covering Material, and Tree Overhang.

Provide objective definitions for each of the subcomponents.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 16**Comments:**

Please see attached exhibits from CAPE, located under the Supporting Documentation tab labeled Trade Secret - Support for the Objection of 09/17/2024.

Related Objection 16

Comments: According to rule R37, the Roof Score is determined using the subcomponents of Roof Condition Rating, Roof Geometry, Roof Covering Material, and Tree Overhang.

Provide the expected proportion of missing values for each of the subcomponents.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 17**Comments:**

Please see attached exhibits from CAPE, located under the Supporting Documentation tab labeled Trade Secret - Support for the Objection of 09/17/2024.

Related Objection 17

Comments: If you assert trade secret on any portion of your response, review Ohio's Trade Secret Policy (attached to the SERFF General Instructions).

PRIOR to submitting the response, confirm the following:

** The materials are marked properly per Item #1. A header or footer should indicate Trade Secret Status Claimed & should appear on unredacted & redacted versions of the files.*

**The factual statement is attached per Item #2.*

**The attestation is attached per Item #3. (Items #2 and #3 can be included in one document.)*

**The unredacted materials are attached per Item #4.*

**The redacted materials are attached per Item #5.*

NOTE: SERFF's Confidential Functionality should ONLY be applied to Item # 4's Unredacted Materials.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

Thank you for your time and attention in this matter.

Sincerely,

Kirstie Vilardo

Amendment Letter

Submitted Date: 08/15/2024

Comments:

Good afternoon,

At this time, we would like to submit an Amendment as well as a Post Submission Update for our filing, the updates are outlined below. An updated Explanatory Memorandum and support have been uploaded under the Supporting Documentation tab. We apologize for any inconvenience this may cause.

- Base Rates – revised Dwelling coverage base rates for all Perils.
- Construction Type – revised factors and added Water Damage to all Construction Types. *Removed the duplicate row for the Dwelling Stucco Severe Convective Storm located at the bottom of page 1.
- Personal Liability – adding revised factors to the filing.
- All Other Peril Deductible – new table with revised factors, additional Dwelling Limits added, removed \$500 option, and new \$7,500 and \$10,000 deductible options added.
**Revised Table Description to read All Other Peril Deductible, no rate impact with the change.
- Windstorm or Hail Deductible – new table with revised factors, additional Dwelling Limits added, removed \$1,000 option, and new \$7,500 and \$10,000 deductible options added
**Revised Table Description to read Windstorm or Hail Deductible, no rate impact with the change.

Changed Items:

No Form Schedule Items Changed.

Rate Schedule Item Changes					
Item No.	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Date Submitted
1	OH Homeowners Flex Program	1-60	Replacement	AMMH-133956698	08/15/2024 By: Angie Bender
Previous Version					
1	OH Homeowners Flex Program	1-60	Replacement	AMMH-133956698	07/26/2024 By: Angie Bender

Supporting Document Schedule Item Changes	
Satisfied - Item:	Rate/Rule Side by Side Comparison - Current vs Proposed
Comments:	
Attachment(s):	Rule Comparison OH071H3-A Current vs. Proposed.pdf Rate Comparison OH071H3-A Current vs. Proposed (Part 1).pdf Rate Comparison OH071H3-A Current vs. Proposed (Part 2).pdf Rate Comparison OH071H3-A Current vs. Proposed (Part 3).pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Rate/Rule Side by Side Comparison - Current vs Proposed</i>
Comments:	
Attachment(s):	<i>Rule Comparison OH071H3-A Current vs. Proposed.pdf Rate Comparison OH071H3-A Current vs. Proposed (Part 1).pdf Rate Comparison OH071H3-A Current vs. Proposed (Part 2).pdf Rate Comparison OH071H3-A Current vs. Proposed (Part 3).pdf</i>
Satisfied - Item:	Explanatory Memorandum
Comments:	
Attachment(s):	Explanatory Memorandum.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Explanatory Memorandum</i>
Comments:	
Attachment(s):	<i>Explanatory Memorandum.pdf</i>
Satisfied - Item:	Filing Requirements Summary - P&C
Comments:	
Attachment(s):	Exhibit C - Actuarial Indication Support.pdf Property-Casualty Underwriting Profit & Loss Statement - OH.pdf Property-Casualty Underwriting Profit & Loss Statement - CW.pdf Exhibit D & I - Additional Rate Support.pdf Exhibit B - Rate Impacts.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Filing Requirements Summary - P&C</i>
Comments:	
Attachment(s):	<i>Exhibit B - Rate Impacts.pdf Exhibit C - Actuarial Indication Support.pdf Property-Casualty Underwriting Profit & Loss Statement - OH.pdf Property-Casualty Underwriting Profit & Loss Statement - CW.pdf Exhibit D & I - Additional Rate Support.pdf</i>

Note To Reviewer

Created By:

Angie Bender on 09/30/2024 09:45 AM

Last Edited By:

Filing Rules Migration

Submitted On:

03/12/2025 02:00 AM

Subject:

Request for Extension - Objection of 09/17/2024

Comments:

Good morning,

We are working to get this objection response to you. Could we please have a 2-week extension until 10/15/2024?

Thank you in advance for your time.

Note To Filer

Created By:

Trent Emig on 09/13/2024 10:13 AM

Last Edited By:

Filing Rules Migration

Submitted On:

03/12/2025 02:00 AM

Subject:

Filing Status

Comments:

It may be a couple more weeks until the analyst has an opportunity to review your filing submission.

It should be noted that this filing submission does not require prior approval. It can be implemented on the requested effective date, whether or not our review is complete.

If you did not or do not intend to implement on the requested effective date, revise the effective date via the post-submission update feature.

On Approval is an acceptable effective date.

Note To Reviewer

Created By:

Angie Bender on 09/12/2024 11:22 AM

Last Edited By:

Filing Rules Migration

Submitted On:

03/12/2025 02:00 AM

Subject:

Filing Status Request

Comments:

Dear Reviewer,

We would like to request an update on the status of this filing. Please advise if there is anything else needed from us to complete the review.

Reviewer Note

Created By:

Brad Wolfenbarger on 11/12/2024 10:03 AM

Last Edited By:

Filing Rules Migration

Submitted On:

03/12/2025 02:00 AM

Subject:

AA Reviewed

Comments:

X

Reviewer Note

Created By:

Brad Wolfenbarger on 10/29/2024 07:30 AM

Last Edited By:

Filing Rules Migration

Submitted On:

03/12/2025 02:00 AM

Subject:

AA Sent Letter

Comments:

X

Reviewer Note

Created By:

Trent Emig on 10/16/2024 10:16 AM

Last Edited By:

Filing Rules Migration

Submitted On:

03/12/2025 02:00 AM

Subject:

CA Review

Comments:

x

Reviewer Note

Created By:

Stewart Trego on 09/17/2024 10:50 AM

Last Edited By:

Filing Rules Migration

Submitted On:

03/12/2025 02:00 AM

Subject:

AA Sent Letter

Comments:

x

Reviewer Note

Created By:

Trent Emig on 09/04/2024 12:33 PM

Last Edited By:

Filing Rules Migration

Submitted On:

03/12/2025 02:00 AM

Subject:

CA Started Letter

Comments:

x

Post Submission Update Request Processed On 08/15/2024

Status: Allowed
Created By: Angie Bender
Processed By: Stewart Trego
Comments:

Company Rate Information:

Company Name:American Modern Property and Casualty Insurance Company

Field Name	Requested Change	Prior Value
Written Premium Change for this Program	\$617556	\$617575
Number of Policy Holders Affected for this Program	3667	3664

Post Submission Update Request Processed On 10/16/2024

Status: Allowed
Created By: Angie Bender
Processed By: Brad Wolfenbarger
Comments:

Company Rate Information:

Company Name:American Modern Property and Casualty Insurance Company

Field Name	Requested Change	Prior Value
Overall % Indicated Change	5.700%	7.900%
Overall % Rate Impact	5.600%	7.900%
Written Premium Change for this Program	\$441678	\$617556
Number of Policy Holders Affected for this Program	3669	3667
Maximum %Change (where required)	223.200%	234.000%
Minimum %Change (where required)	-22.200%	-20.700%

Post Submission Update Request Processed On 11/15/2024

Status: Allowed
Created By: Angie Bender
Processed By: Brad Wolfenbarger
Comments:

General Information:

Field Name	Requested Change	Prior Value
Effective Date Requested (New)	03/12/2025	01/15/2025
Effective Date Requested (Renew)	04/05/2025	02/01/2025

Form Schedule

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
1	Filed 11/12/2024	Residence Held in Trust	H3-CW-C-0002	09-20	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-C-0002-202009.pdf
							Replaced Form Number:	H3-CW-C-0002		
							Replaced Edition Date:	01-19		
2	Filed 11/12/2024	Home-Sharing or Occasional Rental Coverage	H3-CW-C-0008	09-20	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-C-0008-202009.pdf
							Replaced Form Number:	H3-CW-C-0008		
							Replaced Edition Date:	01-19		
3	Filed 11/12/2024	Ordinance or Law Coverage	H3-CW-C-0010	10-20	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-C-0010-202010.pdf
							Replaced Form Number:	H3-CW-C-0010		
							Replaced Edition Date:	01-19		
4	Filed 11/12/2024	Water Damage Coverage	H3-CW-C-0011	01-24	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-C-0011-202401.pdf
							Replaced Form Number:	H3-CW-C-0011		
							Replaced Edition Date:	10-19		
5	Filed 11/12/2024	Scheduled Personal Property Endorsement	H3-CW-C-0013	04-21	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-C-0013-202104.pdf
							Replaced Form Number:	H3-CW-C-0013		
							Replaced Edition Date:	01-19		
6	Filed 11/12/2024	Personal Liability Special Limit for Animal Liability	H3-CW-C-0020	01-21	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-C-0020-202101.pdf
							Replaced Form Number:	H3-CW-C-0020		
							Replaced Edition Date:	01-19		

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
7	Filed 11/12/2024	Extended Replacement Cost Coverage	H3-CW-C-0031	04-20	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-C-0031-202004.pdf
							Replaced Form Number:	H3-CW-C-0031		
							Replaced Edition Date:	08-19		
8	Filed 11/12/2024	Condemnation Exclusion	H3-CW-X-0022	10-20	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-X-0022-202010.pdf
							Replaced Form Number:	H3-CW-G-0002		
							Replaced Edition Date:	01-19		
9	Filed 11/12/2024	Personal Liability Fungi, Wet or Dry Rot, or Bacteria Exclusion	H3-CW-X-0002	01-21	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-X-0002-202101.pdf
							Replaced Form Number:	H3-CW-X-0002		
							Replaced Edition Date:	01-19		
10	Filed 11/12/2024	Animal Liability Exclusion	H3-CW-X-0004	01-21	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-X-0004-202101.pdf
							Replaced Form Number:	H3-CW-X-0004		
							Replaced Edition Date:	01-19		
11	Filed 11/12/2024	Roof Exclusion	H3-CW-X-0006	07-23	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-X-0006-202307.pdf
							Replaced Form Number:	H3-CW-X-0006		
							Replaced Edition Date:	05-19		
12	Filed 11/12/2024	Cosmetic Roof Damage Exclusion - Windstorm or Hail	H3-CW-X-0010	05-23	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-X-0010-202305.pdf
							Replaced Form Number:	H3-CW-X-0010		
							Replaced Edition Date:	01-19		

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
13	Filed 11/12/2024	Criminal Acts Exclusion	H3-CW-X-0011	09-20	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-X-0011-202009.pdf
							Replaced Form Number:	H3-CW-X-0011		
							Replaced Edition Date:	01-19		
14	Filed 11/12/2024	Controlled Substances Exclusion	H3-CW-X-0012	07-20	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-X-0012-202007.pdf
							Replaced Form Number:	H3-CW-X-0012		
							Replaced Edition Date:	01-19		
15	Filed 11/12/2024	Sale of Home Exclusion	H3-CW-X-0013	03-20	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-X-0013-202003.pdf
							Replaced Form Number:	H3-CW-X-0013		
							Replaced Edition Date:	01-19		
16	Filed 11/12/2024	Personal Liability Total Pollution Exclusion	H3-CW-X-0014	03-20	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-X-0014-202003.pdf
							Replaced Form Number:	H3-CW-X-0014		
							Replaced Edition Date:	01-19		
17	Filed 11/12/2024	Personal Liability Assault and Battery Exclusion	H3-CW-X-0017	01-21	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-X-0017-202101.pdf
							Replaced Form Number:	H3-CW-X-0017		
							Replaced Edition Date:	01-19		
18	Filed 11/12/2024	Personal Liability Punitive or Exemplary Damages Exclusion	H3-CW-X-0018	01-21	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-X-0018-202101.pdf
							Replaced Form Number:	H3-CW-X-0018		
							Replaced Edition Date:	01-19		

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
19	Filed 11/12/2024	Personal Liability Lead Liability Exclusion	H3-CW-X-0019	01-21	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-CW-X-0019-202101.pdf
							Replaced Form Number:	H3-CW-X-0019		
							Replaced Edition Date:	01-19		
20	Filed 11/12/2024	Policy Declarations	H1-CW-D-0001	05-22	DEC	Replaced	Previous Filing Number:	AMMH-132299459		H1-CW-D-0001 05-22.pdf
							Replaced Form Number:	H1-CW-D-0001		
							Replaced Edition Date:	01-15		
21	Filed 11/12/2024	Special Provisions - Ohio	H3-OH-A-0001	05-24	END	Replaced	Previous Filing Number:	AMMH-132299459		H3-OH-A-0001-202405.pdf
							Replaced Form Number:	H3-OH-A-0001		
							Replaced Edition Date:	11-19		
22	Filed 11/12/2024	Actual Cash Value Loss Settlement With Roof Benefit Schedule - Reducing Benefit For Roof(s) Of All Ages	H3-CW-C-0052	01-24	END	New				H3-CW-C-0052-202401.pdf
23	Filed 11/12/2024	Actual Cash Value Loss Settlement - Buildings	H3-CW-C-0022	09-20	END	New				H3-CW-C-0022-202009.pdf
24	Filed 11/12/2024	Replacement Cost Settlement with Roof Benefit Schedule - Reducing Benefit For Roof(s) 16 years or Older	H3-CW-C-0055	02-24	END	New				H3-CW-C-0055-202402.pdf
25	Filed 11/12/2024	Modified Functional Replacement Cost Settlement with Roof Benefit Schedule - Reducing Benefit For Roof(s) 16 Years Or Older	H3-CW-C-0054	02-24	END	New				H3-CW-C-0054-202402.pdf

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
26	Filed 11/12/2024	Full Repair Cost Settlement with Roof Benefit Schedule - Reducing Benefit For Roof(s) 16 Years or Older	H3-CW-C-0056	02-24	END	New				H3-CW-C-0056-202402.pdf
27	Filed 11/12/2024	Personal Liability Limited Fungi, Wet or Dry Rot, or Bacteria Coverage	H3-CW-C-0009	01-19	END	Withdrawn	Previous Filing Number:	AMMH-132299459		
							Replaced Form Number:			
							Replaced Edition Date:			
28	Filed 11/12/2024	Actual Cash Value Loss Settlement - Buildings	H3-CW-C-0023	01-19	END	Withdrawn	Previous Filing Number:	AMMH-132299459		
							Replaced Form Number:			
							Replaced Edition Date:			
29	Filed 11/12/2024	Modified Functional Replacement Cost with Roof Covering Restriction 21 Years or Older	H3-CW-C-0024	09-19	END	Withdrawn	Previous Filing Number:	AMMH-132299459		
							Replaced Form Number:			
							Replaced Edition Date:			
30	Filed 11/12/2024	Full Repair Cost with Actual Cash Value Roof	H3-CW-C-0027	09-19	END	Withdrawn	Previous Filing Number:	AMMH-132299459		
							Replaced Form Number:			
							Replaced Edition Date:			
31	Filed 11/12/2024	Modified Functional Replacement Cost with Actual Cash Value Roof	H3-CW-C-0028	09-19	END	Withdrawn	Previous Filing Number:	AMMH-132299459		
							Replaced Form Number:			
							Replaced Edition Date:			

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
32	Filed 11/12/2024	Replacement Cost with Actual Cash Value Roof	H3-CW-C-0029	09-19	END	Withdrawn	Previous Filing Number:	AMMH-132299459		
							Replaced Form Number:			
							Replaced Edition Date:			
33	Filed 11/12/2024	Replacement Cost with Roof Covering Restriction 21 Years or Older	H3-CW-C-0030	09-19	END	Withdrawn	Previous Filing Number:	AMMH-132299459		
							Replaced Form Number:			
							Replaced Edition Date:			
34	Filed 11/12/2024	Full Repair Cost with Roof Covering Restriction 21 Years or Older	H3-CW-C-0003	09-19	END	Withdrawn	Previous Filing Number:	AMMH-132299459		
							Replaced Form Number:			
							Replaced Edition Date:			

Form Type Legend:

ABE	Application/Binder/Enrollment	ADV	Advertising
BND	Bond	CER	Certificate
CNR	Canc/NonRen Notice	DEC	Declarations/Schedule
DSC	Disclosure/Notice	END	Endorsement/Amendment/Conditions
ERS	Election/Rejection/Supplemental Applications	OTH	Other

Rate Information

Rate data applies to filing.

Filing Method:	File and Use
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	19.400%
Effective Date of Last Rate Revision:	04/10/2024
Filing Method of Last Filing:	File and Use
SERFF Tracking Number of Last Filing:	AMMH-133956698

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
American Modern Property and Casualty Insurance Company	5.700%	5.600%	\$441,678	3,669	\$7,855,837	223.200%	-22.200%

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1	Filed 11/12/2024	OH Homeowners Flex Program	1-61	Replacement	AMMH-133956698	OH071H3-C.pdf

Supporting Document Schedules

Satisfied - Item:	Filing Requirements Summary - P&C
Comments:	
Attachment(s):	Exhibit D & I - Additional Rate Support.pdf Exhibit B - Rate Impacts.pdf Property-Casualty Underwriting Profit Loss Statement -OH.pdf Property-Casualty Underwriting Profit Loss Statement -CW.pdf Exhibit C - Actuarial Indication Support.pdf
Item Status:	Filed
Status Date:	11/12/2024
Satisfied - Item:	Rate/Rule Side by Side Comparison - Current vs Proposed
Comments:	
Attachment(s):	Rule Comparison OH071H3-A Current vs. Proposed.pdf Rate Comparison OH071H3-A Current vs. Proposed (Part 1).pdf Rate Comparison OH071H3-A Current vs. Proposed (Part 2).pdf Rate Comparison OH071H3-A Current vs. Proposed (Part 3).pdf
Item Status:	Filed
Status Date:	11/12/2024
Satisfied - Item:	Form Side by Side Comparisons - Current vs Proposed
Comments:	

Attachment(s):	H3-CW-C-0002-201901 vs H3-IL-C-0002-202406.pdf H3-CW-C-0008-201901 vs H3-IL-C-0008-202406.pdf H3-CW-C-0010-201901 V. H3-CW-C-0010-202010.pdf H3-CW-C-0011-201910 v H3-CW-C-0011-202401.pdf H3-CW-C-0013-201901 V. H3-CW-C-0013-202104.pdf H3-CW-C-0020-201901 v H3-CW-C-0020-202101.pdf H3-CW-C-0031-201908 vs H3-CW-C-0031-202004.pdf H3-CW-G-0002-201901 v. H3-CW-X-0022-202010.pdf H3-CW-X-0012-201901 vs H3-CW-X-0012-202007.pdf H3-CW-X-0013-202003 vs H3-CW-X-0013-201901.pdf H3-CW-X-0014-201901 V. H3-CW-X-0014-202003.pdf H3-CW-X-0017-201901 v. H3-CW-X-0017-202101.pdf H3-CW-X-0018-201901 V. H3-CW-X-0018-202101.pdf H3-CW-X-0010-201901 V. H3-CW-X-0010-202305.pdf H3-CW-X-0019-201901 V. H3-CW-X-0019-202101.pdf H1-CW-D-0001-201501 vs H3-CW-D-0001-202205.pdf H3-CW-X-0002-201901 v. H3-CW-X-0002-202101.pdf H3-CW-X-0004-201901 V. H3-CW-X-0004-202101.pdf H3-CW-X-0006-201905 V. H3-CW-X-0006-202307.pdf H3-CW-X-0011-201901 V. H3-CW-X-0011-202009.pdf H3-OH-A-0001-201911 vs H3-OH-A-0001-202405.pdf
Item Status:	Filed
Status Date:	11/12/2024
Satisfied - Item:	Explanatory Memorandum
Comments:	
Attachment(s):	Explanatory Memorandum.pdf
Item Status:	Filed
Status Date:	11/12/2024
Satisfied - Item:	Support for the Objection of 09/17/2024
Comments:	
Attachment(s):	Data Dictionary.pdf Lift Chart on Holdout Data.pdf CAPE Analytics Roof Condition Rating Taxonomy - Version 30docx.pdf CAPE Analytics Roof Covering Information for Filingdocx.pdf CAPE Analytics Roof Geometry Information for Filingdocx.pdf CAPE Analytics Tree Overhang Information for Filingdocx.pdf Chi Square P-Values.pdf Exhibit O-4 - Contingency Load Support Calculations.pdf H3-CW-N-0042-202308.pdf IP-CW-N-0012-202212.pdf Premium and Exposure Exhibit.pdf Algorithm - Rule A07.pdf

Item Status:	Filed
Status Date:	11/12/2024
Satisfied - Item:	Factual Statement & Redacted Materials
Comments:	
Attachment(s):	Factual Statement and Attestation - Request for Trade Secret Protections - OH.pdf OH HO Objection - AMIG - CAPE Responses 092024 - Redacted - Trade Secret Status Requested.pdf
Item Status:	Filed
Status Date:	11/12/2024
Satisfied - Item:	Support for the Objection of 10/29/2024
Comments:	
Attachment(s):	Exhibit O-1.pdf
Item Status:	Filed
Status Date:	11/12/2024

Superseded Schedule Items

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

Creation Date	Schedule Item Status	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
08/14/2024	Filed 11/12/2024	Rate	OH Homeowners Flex Program	10/15/2024	OH071H3-B.pdf (Superseded)
08/14/2024	Filed 11/12/2024	Supporting Document	Filing Requirements Summary - P&C	10/07/2024	Exhibit C - Actuarial Indication Support.pdf (Superseded) Property-Casualty Underwriting Profit & Loss Statement - OH.pdf (Superseded) Property-Casualty Underwriting Profit & Loss Statement - CW.pdf (Superseded) Exhibit D & I - Additional Rate Support.pdf Exhibit B - Rate Impacts.pdf (Superseded)
07/25/2024	Filed 11/12/2024	Supporting Document	Explanatory Memorandum	08/14/2024	Explanatory Memorandum.pdf (Superseded)
07/23/2024	Filed 11/12/2024	Supporting Document	Rate/Rule Side by Side Comparison - Current vs Proposed	08/14/2024	Rule Comparison OH071H3-A Current vs. Proposed.pdf (Superseded) Rate Comparison OH071H3-A Current vs. Proposed (Part 1).pdf (Superseded) Rate Comparison OH071H3-A Current vs. Proposed (Part 2).pdf (Superseded) Rate Comparison OH071H3-A Current vs. Proposed (Part 3).pdf (Superseded)
07/22/2024	Filed 11/12/2024	Rate	OH Homeowners Flex Program	08/14/2024	OH071H3-A.pdf (Superseded)

Creation Date	Schedule Item Status	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
07/18/2024	Filed 11/12/2024	Supporting Document	Filing Requirements Summary - P&C	08/14/2024	Exhibit B - Rate Impacts.pdf (Superceded) Exhibit C - Actuarial Indication Support.pdf Property-Casualty Underwriting Profit & Loss Statement - OH.pdf Property-Casualty Underwriting Profit & Loss Statement - CW.pdf Exhibit D & I - Additional Rate Support.pdf