State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Table of Contents**

User Usage Agreement Attachments

Usage Agreement.pdf

Usage Agreement.pdf

SERFF Tracking #: AMSI-134040417 State Tracking #: AMSI-134040417

Company Tracking #: OH HOU 2024-06

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# Filing at a Glance

Company: American Strategic Insurance Corp

Product Name: Condo State: Ohio

TOI: 04.0 Homeowners

Sub-TOI: 04.0001 Condominium Homeowners

Filing Type: Rate

Date Submitted: 03/21/2024

SERFF Tr Num: AMSI-134040417 SERFF Status: Closed-FILED State Tr Num: AMSI-134040417

State Status: FILED

Co Tr Num: OH HOU 2024-06

Effective Date 06/21/2024

Requested (New):

Effective Date 08/21/2024

Requested (Renewal):

Author(s): Brian Dedrick, Marquita Redmond, Laurell Cuza

Reviewer(s): Ben Beckman (primary)

Disposition Date: 07/23/2024
Disposition Status: FILED
Effective Date (New): 06/21/2024
Effective Date (Renewal): 08/21/2024

State: Ohio Filing Company: American Strategic Insurance Corp

**TOI/Sub-TOI:** 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

## **General Information**

Project Name: OH HOU 2024-06 Status of Filing in Domicile: Not Filed

Project Number: OH HOU 2024-06 Domicile Status Comments:

Reference Organization: Reference Number:
Reference Title: Advisory Org. Circular:

Filing Status Changed: 07/23/2024

State Status Changed: 07/23/2024 Deemer Date:

Created By: Brian Dedrick Submitted By: Brian Dedrick

Corresponding Filing Tracking Number:

State TOI: 04.0 Homeowners State Sub-TOI: 04.0001 Condominium Homeowners

#### Filing Description:

This filing is to increase our Other Perils base rate for our Ohio Condo (HOU) program in response to an indicated rate need. Please contact me if you have any questions or require additional information at 216-227-8065 or via email at bdedric1@progressive.com.

# **Company and Contact**

# **Filing Contact Information**

Brian Dedrick, Product Manager Brian\_M\_Dedrick@Progressive.com

1 ASI Way N 216-227-8065 [Phone]

St. Petersburg, FL 33702

### **Filing Company Information**

American Strategic Insurance Corp CoCode: 10872 State of Domicile: Florida 1 ASI Way Group Code: 155 Company Type: P & C

St Petersburg, FL 33702 Group Name: Progressive GRP State ID Number:

(866) 274-8765 ext. [Phone] FEIN Number: 59-3459912

State: Ohio Filing Company: American Strategic Insurance Corp

**TOI/Sub-TOI:** 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Filing Fees**

#### **State Fees**

Fee Required? No Retaliatory? No

Fee Explanation:

Per Company: Yes

Company	Amount	<b>Date Processed</b>	Transaction #
American Strategic Insurance Corp	\$50.00	03/21/2024 04:28 PM	282273803

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.: ISO

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

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Correspondence Summary**

**Dispositions** 

Status	Created By	Created On	Date Submitted
FILED	Ben Beckman	07/23/2024	07/23/2024

# **Objection Letters and Response Letters**

Objection Letters Response Letters

Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending Industry Response	Ben Beckman	07/08/2024	07/08/2024	Brian Dedrick	07/19/2024	07/19/2024
Pending Industry Response	Maureen Motter	07/03/2024	07/03/2024	Brian Dedrick	07/05/2024	07/05/2024
Pending Industry Response	Ben Beckman	06/26/2024	06/26/2024	Brian Dedrick	07/03/2024	07/03/2024
Pending Industry Response	Ben Beckman	05/03/2024	05/03/2024	Brian Dedrick	05/15/2024	05/15/2024

**Filing Notes** 

Subject	Note Type	Created By	Created On	Date Submitted
Review status	Note To Reviewer	Brian Dedrick	05/02/2024	05/02/2024
AA Reviewed	Reviewer Note	Ben Beckman	07/23/2024	
AA Sent Letter	Reviewer Note	Ben Beckman	07/08/2024	
AA Sent Letter	Reviewer Note	Ben Beckman	05/03/2024	

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Disposition**

Disposition Date: 07/23/2024 Effective Date (New): 06/21/2024 Effective Date (Renewal): 08/21/2024

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.

	Overall %	Overall %	Written Premium	<b>Number of Policy</b>	Written	Maximum %	Minimum %
Company	Indicated	Rate	Change for	<b>Holders Affected</b>	Premium for	Change	Change
Name:	Change:	Impact:	this Program:	for this Program:	this Program:	(where req'd):	(where req'd):
American Strategic	17.400%	10.000%	\$310,987	6,329	\$3,109,437	13.200%	2.800%

Schedule	Schedule Item	Schedule Item Status	<b>Public Access</b>
Rate	Rate manual	Filed	Yes
Supporting Document	Filing Requirements Summary - P&C	Filed	Yes
Supporting Document	Profit select justification	Filed	Yes
Supporting Document	AIR model documentation	Filed	Yes
Supporting Document (revised)	KCC responses and model documentation - public	Filed	Yes
Supporting Document	KCC responses and model documentation - public	Superseded/Withdrawn	Yes
Supporting Document	Support for Target Return on Surplus	Filed	Yes
Supporting Document	Response letter 07-18-24	Filed	Yes

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Objection Letter**

Objection Letter Status Pending Industry Response

Objection Letter Date 07/08/2024
Submitted Date 07/08/2024
Respond By Date 07/22/2024

Dear Brian Dedrick,

#### Introduction:

RESPOND BY: 07/22/2024

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

#### Objection 1

Comments: Provide a narrative that contrasts and compares the definitions and functionalities of Surplus and Contingency Capital. Support accordingly.

## Objection 2

Comments: Provide the underlying assumptions, data, and calculations used to derive the listed Contingency Capital by company.

## **Objection 3**

Comments: Verify that the next future filing will continue to evaluate the Target Return on Surplus and Selected Profit Margin for reasonability.

#### Conclusion:

Sincerely,

Ben Beckman

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Objection Letter**

Objection Letter Status Pending Industry Response

Objection Letter Date 07/03/2024
Submitted Date 07/03/2024
Respond By Date 07/12/2024

Dear Brian Dedrick,

Introduction:

RESPOND BY: 07/12/2024

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

#### Objection 1

Comments: The redacted materials should not have been submitted using the SERFF Confidentiality Functionality. Resubmit without using the functionality.

## Objection 2

Comments: The factual statement & attestation should not have been submitted using the SERFF Confidentiality Functionality. Resubmit without using the functionality.

## **Objection 3**

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

# Conclusion:

Sincerely,

Maureen Motter

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Objection Letter**

Objection Letter Status Pending Industry Response

Objection Letter Date 06/26/2024
Submitted Date 06/26/2024
Respond By Date 07/10/2024

Dear Brian Dedrick,

#### Introduction:

RESPOND BY: 07/10/2024

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

### Objection 1

Comments: Provide the referenced Karen Clark & Company (KCC) materials to reply to the original objections for that model.

### Objection 2

Comments: We are unable to determine how the Target Return on Surplus is not excessive. Provide a narrative that details the underlying assumptions, data, and calculations use to determine the appropriateness of this Target return. Revise and supersede accordingly.

#### Conclusion:

Sincerely,

Ben Beckman

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Objection Letter**

Objection Letter Status Pending Industry Response

Objection Letter Date 05/03/2024
Submitted Date 05/03/2024
Respond By Date 05/17/2024

Dear Brian Dedrick,

#### Introduction:

RESPOND BY: 05/17/2024

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

## Objection 1

Comments: Clarify the total number of exposures (Ohio, countrywide, and non-US) and the premium volume (Ohio, countrywide, and non-US) included in the referenced historical experience used in the derivation and testing of each Model (KCC & AIR, Exhibit I-6). Discuss the credibility of the data.

### Objection 2

Comments: Provide a complete, detailed list of all rating characteristics used as inputs in each model. Such should clearly illustrate that no prohibited characteristics were utilized.

#### Objection 3

Comments: Provide additional narrative that clearly demonstrates the appropriateness and actuarial soundness of the model building and testing technique utilized.

### Objection 4

Comments: Provide exhibits that include outputs on the accuracy and goodness of fit of the models utilized to derive the proposed Severe Convective Storm, Hurricane, and Winter Storm Loads.

#### **Objection 5**

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

#### Objection 6

Comments: We are unable to determine how the proposed product complies with Ohio Bulletin 2015-01, Price Optimization. Provide a more detailed narrative that clearly illustrates how the proposed filing complies with the aforementioned Ohio Bulletin. Such should clearly detail how rates do not vary based upon factors unrelated to the risk of loss (customer price sensitivity, customer elasticity, profit margins, etc.), that is, all rates should vary only upon objective factors relating to the risk of loss.

### Objection 7

Comments: Verify the proposed product complies with Ohio Bulletin 2015-01, Price Optimization.

### **Objection 8**

Comments: Provide support for the selected profit load. Such should illustrate how a reasonable rate of return is targeted. Include the underlying data applicable to the derivation of the corresponding premium to surplus ratio.

#### Conclusion:

Sincerely,

Ben Beckman

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Response Letter**

Response Letter Status Submitted to State

Response Letter Date 07/19/2024 Submitted Date 07/19/2024

Dear Ben Beckman,

Introduction:

### Response 1

#### Comments:

Please see attached response letter.

### Related Objection 1

Comments: Provide a narrative that contrasts and compares the definitions and functionalities of Surplus and Contingency Capital. Support accordingly.

## Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes		
Satisfied - Item:	Response letter 07-18-24	
Comments:		
Attachment(s):	07-19 response to 07-08 objections.pdf	

# Response 2

#### Comments:

Please see attached response letter.

# Related Objection 2

Comments: Provide the underlying assumptions, data, and calculations used to derive the listed Contingency Capital by company.

# Changed Items:

No Form Schedule items changed.

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes		
Satisfied - Item:	Response letter 07-18-24	
Comments:		
Attachment(s):	07-19 response to 07-08 objections.pdf	

# Response 3

#### Comments:

Please see attached response letter.

# **Related Objection 3**

Comments: Verify that the next future filing will continue to evaluate the Target Return on Surplus and Selected Profit Margin for reasonability.

# Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes		
Satisfied - Item:	Response letter 07-18-24	
Comments:		
Attachment(s):	07-19 response to 07-08 objections.pdf	

#### Conclusion:

Sincerely,

Brian Dedrick

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Response Letter**

Response Letter Status Submitted to State

Response Letter Date 07/05/2024 Submitted Date 07/05/2024

Dear Ben Beckman,

Introduction:

### Response 1

#### Comments:

The redacted item has been deleted from the confidential section and posted to the public section.

### Related Objection 1

Comments: The redacted materials should not have been submitted using the SERFF Confidentiality Functionality. Resubmit without using the functionality.

# Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

<b>Supporting Document Sched</b>	Supporting Document Schedule Item Changes		
Satisfied - Item:	KCC responses and model documentation - public		
Comments:			
Attachment(s):	Responses from KCC on model.pdf KCC - ASOP reference guide.pdf 8_KCC_TRADE_SECRET_Exhibit_Ohio_DOI_Objections_REDACTED_c2024.07.02.pdf KCC_Ohio_DOI_Attestation_c2024.07.02.pdf		
Previous Version			
Satisfied - Item:	KCC responses and model documentation - public		
Comments:			
Attachment(s):	Responses from KCC on model.pdf KCC - ASOP reference guide.pdf		

# Response 2

Comments:

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

The factual statement & attestation has been deleted from the confidential section and posted to the public section.

#### Related Objection 2

Comments: The factual statement & attestation should not have been submitted using the SERFF Confidentiality Functionality. Resubmit without using the functionality.

## Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

<b>Supporting Document S</b>	Supporting Document Schedule Item Changes		
Satisfied - Item:	KCC responses and model documentation - public		
Comments:			
Attachment(s):	Responses from KCC on model.pdf KCC - ASOP reference guide.pdf 8_KCC_TRADE_SECRET_Exhibit_Ohio_DOI_Objections_REDACTED_c2024.07.02.pdf KCC_Ohio_DOI_Attestation_c2024.07.02.pdf		
Previous Version			
Satisfied - Item:	KCC responses and model documentation - public		
Comments:			
Attachment(s):	Responses from KCC on model.pdf KCC - ASOP reference guide.pdf		

## Response 3

#### Comments:

I acknowledge that the objection letter was sent as part of the intake process on the response and that additional questions may be submitted in a separate letter.

# Related Objection 3

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

# Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

No Supporting Documents changed.

Conclusion:

Sincerely, Brian Dedrick

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Response Letter**

Response Letter Status Submitted to State

Response Letter Date 07/03/2024 Submitted Date 07/03/2024

Dear Ben Beckman,

Introduction:

### Response 1

#### Comments:

Please see the responses and materials provided by KCC.

### Related Objection 1

Comments: Provide the referenced Karen Clark & Company (KCC) materials to reply to the original objections for that model.

## Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes		
Satisfied - Item:	KCC responses and model documentation - public	
Comments:		
Attachment(s):	Responses from KCC on model.pdf KCC - ASOP reference guide.pdf	

# Response 2

#### Comments:

Please see the included support for the target return on surplus.

# Related Objection 2

Comments: We are unable to determine how the Target Return on Surplus is not excessive. Provide a narrative that details the underlying assumptions, data, and calculations use to determine the appropriateness of this Target return. Revise and supersede accordingly.

# Changed Items:

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes			
Satisfied - Item:	Support for Target Return on Surplus		
Comments:			
Attachment(s):	Expected Return on Surplus_2023.pdf		

# Conclusion:

Sincerely,

Brian Dedrick

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Response Letter**

Response Letter Status Submitted to State

Response Letter Date 05/15/2024 Submitted Date 05/15/2024

Dear Ben Beckman,

Introduction:

### Response 1

#### Comments:

For the AIR model, please see the attached documents 'AIR sections 1-4 and 1-5' and 'AIR section 5-17 - Validating the damage functions' and 'AIR section 6-3 - Validating modeled losses.'

For the KCC model, the model vendor Karen Clark & Company (KCC) has asked us to refer you to previous, approved filings where detailed responses to each of the above had been submitted to the Department; STAT-133470075 (Liberty Mutual) and AMFC-133463526 (American Family). We can provide identical materials as provided in those filings upon request.

## Related Objection 1

Comments: Clarify the total number of exposures (Ohio, countrywide, and non-US) and the premium volume (Ohio, countrywide, and non-US) included in the referenced historical experience used in the derivation and testing of each Model (KCC & AIR, Exhibit I-6). 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: AIR model documentation				
Comments:				
Attachment(e):	AIR sections 1-4 and 1-5.pdf AIR section 5-17 - Validating the damage functions.pdf AIR section 6-3 - Validating modeled losses.pdf AIR section 5.pdf			

# Response 2

#### Comments:

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

For the AIR model, please see the attached document 'AIR section 5.'

For the KCC model, the model vendor Karen Clark & Company (KCC) has asked us to refer you to previous, approved filings where detailed responses to each of the above had been submitted to the Department; STAT-133470075 (Liberty Mutual) and AMFC-133463526 (American Family). We can provide identical materials as provided in those filings upon request.

#### Related Objection 2

Comments: Provide a complete, detailed list of all rating characteristics used as inputs in each model. 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:	AIR model documentation		
Comments:			
Attachment(s):	AIR sections 1-4 and 1-5.pdf AIR section 5-17 - Validating the damage functions.pdf AIR section 6-3 - Validating modeled losses.pdf AIR section 5.pdf		

# Response 3

#### Comments:

For the AIR model, please see the document 'AIR section 5-17 - Validating the damage functions' and 'AIR section 6-3 - Validating modeled losses.'

For the KCC model, the model vendor Karen Clark & Company (KCC) has asked us to refer you to previous, approved filings where detailed responses to each of the above had been submitted to the Department; STAT-133470075 (Liberty Mutual) and AMFC-133463526 (American Family). We can provide identical materials as provided in those filings upon request.

# **Related Objection 3**

Comments: Provide additional narrative that clearly demonstrates the appropriateness and actuarial soundness of the model building and testing technique utilized.

# Changed Items:

No Form Schedule items changed.

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes			
Satisfied - Item:	AIR model documentation		
Comments:			
Attachment(s):	AIR sections 1-4 and 1-5.pdf AIR section 5-17 - Validating the damage functions.pdf AIR section 6-3 - Validating modeled losses.pdf AIR section 5.pdf		

# Response 4

#### Comments:

For the AIR model, please see the attached documents 'AIR section 5-17 - Validating the damage functions' and 'AIR section 6-3 - Validating modeled losses.'

For the KCC model, the model vendor Karen Clark & Company (KCC) has asked us to refer you to previous, approved filings where detailed responses to each of the above had been submitted to the Department; STAT-133470075 (Liberty Mutual) and AMFC-133463526 (American Family). We can provide identical materials as provided in those filings upon request.

# Related Objection 4

Comments: Provide exhibits that include outputs on the accuracy and goodness of fit of the models utilized to derive the proposed Severe Convective Storm, Hurricane, and Winter Storm Loads.

# Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes			
Satisfied - Item:	AIR model documentation		
Comments:			
Attachment(s):	AIR sections 1-4 and 1-5.pdf AIR section 5-17 - Validating the damage functions.pdf AIR section 6-3 - Validating modeled losses.pdf AIR section 5.pdf		

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

### Response 5

#### Comments:

For the AIR model, the vendor has stated, "Verisk modeling methodology complies with the Actuarial Standard of Practice. The US hurricane model doc in addition to the Progressives actuaries experience working with the model is sufficient in providing answers to ASOPs 23 and 56."

For the KCC model, the model vendor Karen Clark & Company (KCC) has asked us to refer you to previous, approved filings where detailed responses to each of the above had been submitted to the Department; STAT-133470075 (Liberty Mutual) and AMFC-133463526 (American Family). We can provide identical materials as provided in those filings upon request.

#### Related Objection 5

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

### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes			
Satisfied - Item:	AIR model documentation		
Comments:			
Attachment(s):	AIR sections 1-4 and 1-5.pdf AIR section 5-17 - Validating the damage functions.pdf AIR section 6-3 - Validating modeled losses.pdf AIR section 5.pdf		

### Response 6

#### Comments:

Both the current and proposed programs comply with Ohio Bulletin 2015-01. The only change to the program with this filing is the base rate for Other Perils. The rating factors are not changing. The rating factors were demonstrated to be based entirely on loss costs with the factor justification filed previously (AMSI-133360907).

# Related Objection 6

Comments: We are unable to determine how the proposed product complies with Ohio Bulletin 2015-01, Price Optimization. Provide a more detailed narrative that clearly illustrates how the proposed filing complies with the aforementioned Ohio Bulletin. Such should clearly detail how rates do not vary based upon factors unrelated to the risk of loss (customer price sensitivity, customer elasticity, profit margins, etc.), that is, all rates should vary only upon objective factors relating to the risk of loss.

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

### Response 7

#### Comments:

The product complies with Ohio Bulletin 2015-01, Price Optimization.

## Related Objection 7

Comments: Verify the proposed product complies with Ohio Bulletin 2015-01, Price Optimization.

### Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

# Response 8

#### Comments:

Profit load justification is attached.

# Related Objection 8

Comments: Provide support for the selected profit load. Such should illustrate how a reasonable rate of return is targeted. Include the underlying data applicable to the derivation of the corresponding premium to surplus ratio.

# Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

 State:
 Ohio

 Filing Company:
 American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

Supporting Document Schedule Item Changes			
Satisfied - Item: Profit select justification			
Comments:			
Attachment(s):	OH HO6 202406 Profit Load Calculation pdf		

#### Conclusion:

Sincerely, Brian Dedrick

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Note To Reviewer**

Created By:

Brian Dedrick on 05/02/2024 08:50 AM

Last Edited By:

Filing Rules Migration

**Submitted On:** 

06/21/2024 02:00 AM

Subject:

Review status

**Comments:** 

Good morning,

I'm inquiring on the review status of this filing. Can you tell us when we can expect to receive a response?

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Reviewer Note**

**Created By:** 

Ben Beckman on 07/23/2024 11:14 AM

Subject:

AA Reviewed

**Comments:** 

Χ

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Reviewer Note**

Created By:

Ben Beckman on 07/08/2024 11:00 AM

Subject:

AA Sent Letter

**Comments:** 

Χ

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Reviewer Note**

Created By:

Ben Beckman on 05/03/2024 09:40 AM

Last Edited By:

Filing Rules Migration

**Submitted On:** 

06/21/2024 02:00 AM

Subject:

AA Sent Letter

**Comments:** 

Χ

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **Rate Information**

Rate data applies to filing.

Filing Method: File & Use

Rate Change Type: Increase

Overall Percentage of Last Rate Revision: 0.000%

Effective Date of Last Rate Revision: 04/19/2023

Filing Method of Last Filing: File & Use

SERFF Tracking Number of Last Filing: AMSI-133360907

**Company Rate Information** 

	Overall %	Overall %	Written Premium	<b>Number of Policy</b>	Written	Maximum %	Minimum %
Company	Indicated	Rate	Change for	<b>Holders Affected</b>	Premium for	Change	Change
Name:	Change:	Impact:	this Program:	for this Program:	this Program:	(where req'd):	(where req'd):
American Strategic Insurance Corp	17.400%	10.000%	\$310,987	6,329	\$3,109,437	13.200%	2.800%

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# Rate/Rule Schedule

Item	Schedule Item				Previous State	
No.	Status	Exhibit Name	Rule # or Page #	Rate Action	Filing Number	Attachments
1	Filed 07/23/2024	Rate manual	Base rates page only	Replacement		OH 202406 Rate manual - base rates page.pdf

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# **Supporting Document Schedules**

Satisfied - Item:	Filing Requirements Summary - P&C			
Comments:				
Attachment(s):	OH HO6 202406 Actuarial Exhibits I1-8.pdf OH HO6 202406 State+CW 5 Yr P&L.pdf OH HO6 202406 Exhibit A Incr OB.pdf OH HO6 202406 Histogram Exhibit.pdf			
Item Status:	Filed			
Status Date:	07/23/2024			
Satisfied - Item:	Profit select justification			
Comments:				
Attachment(s):	OH HO6 202406 Profit Load Calculation.pdf			
Item Status:	Filed			
Status Date:	07/23/2024			
Satisfied - Item:	AIR model documentation			
Comments:				
Attachment(s):	AIR sections 1-4 and 1-5.pdf AIR section 5-17 - Validating the damage functions.pdf AIR section 6-3 - Validating modeled losses.pdf AIR section 5.pdf			
Item Status:	Filed			
Status Date:	07/23/2024			
Satisfied - Item:	KCC responses and model documentation - public			
Comments:				
Attachment(s):	Responses from KCC on model.pdf KCC - ASOP reference guide.pdf 8_KCC_TRADE_SECRET_Exhibit_Ohio_DOI_Objections_REDACTED_c2024.07.02.pdf KCC_Ohio_DOI_Attestation_c2024.07.02.pdf			
Item Status:	Filed			
Status Date:	07/23/2024			
Satisfied - Item:	Support for Target Return on Surplus			
Comments:				
Attachment(s):	Expected Return on Surplus_2023.pdf			
Item Status:	Filed			

State: Ohio Filing Company: American Strategic Insurance Corp

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Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

**Status Date:** 07/23/2024

Satisfied - Item: Response letter 07-18-24

**Comments:** 

Attachment(s): 07-19 response to 07-08 objections.pdf

Item Status: Filed

**Status Date:** 07/23/2024

State: Ohio Filing Company: American Strategic Insurance Corp

TOI/Sub-TOI: 04.0 Homeowners/04.0001 Condominium Homeowners

Product Name: Condo

Project Name/Number: OH HOU 2024-06/OH HOU 2024-06

# **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)
07/03/2024	Superseded/With drawn 07/23/2024		KCC responses and model documentation - public		Responses from KCC on model.pdf KCC - ASOP reference guide.pdf