

State:

Indiana

Filing Company:

American Modern Property and Casualty Insurance Company

TOI/Sub-TOI:

04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:

Manufactured Home Program

Project Name/Number:

Rate Revision/MH-IN-2024JUN18-07

Table of Contents

User Usage Agreement

Attachments

Usage Agreement

[Usage Agreement.pdf](#)

State:

Indiana

Filing Company:

American Modern Property and Casualty Insurance Company

TOI/Sub-TOI: 04.0 Homeowners/04.0002 Mobile Homeowners

Product Name: Manufactured Home Program

Project Name/Number: Rate Revision/MH-IN-2024JUN18-07

Filing at a Glance

Company:

American Modern Property and Casualty Insurance Company

Product Name:

Manufactured Home Program

State:

Indiana

TOI:

04.0 Homeowners

Sub-TOI:

04.0002 Mobile Homeowners

Filing Type:

Rate

Date Submitted:

08/06/2024

SERFF Tr Num:

AMMH-134200555

SERFF Status:

Closed-Filed

State Tr Num:

EFT OK /

State Status:

Rates OK

Co Tr Num:

MH-IN-2024JUN18-07

Effective Date

10/22/2024

Requested (New):

Effective Date

11/01/2024

Requested (Renewal):

Author(s):

Shannon Bowling

Reviewer(s):

Lawrence Steinert (primary), Kristi Ware

Disposition Date:

08/27/2024

Disposition Status:

Filed

Effective Date (New):

Effective Date (Renewal):

State:

Indiana

Filing Company:

American Modern Property and Casualty Insurance Company

TOI/Sub-TOI:

04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:

Manufactured Home Program

Project Name/Number:

Rate Revision/MH-IN-2024JUN18-07

General Information

Project Name: Rate Revision

Status of Filing in Domicile:

Project Number: MH-IN-2024JUN18-07

Domicile Status Comments:

Reference Organization:

Reference Number:

Reference Title:

Advisory Org. Circular:

Filing Status Changed: 08/27/2024

State Status Changed: 08/27/2024

Created By: Shannon Bowling

Submitted By: Shannon Bowling

Corresponding Filing Tracking Number:

Filing Description:

American Modern Property and Casualty Insurance Company submits for your approval rate revisions to our Manufactured Home Program. Please see the Explanatory Memorandum on the Supporting Documentation tab for further information.

Company and Contact

Filing Contact Information

Shannon Bowling, State Relations Analyst

sbowling@amig.com

7000 Midland Boulevard

800-759-9008 [Phone] 5517 [Ext]

Amelia, OH 45102

513-947-4667 [FAX]

Filing Company Information

American Modern Property and Casualty Insurance Company

CoCode: 42722

State of Domicile: Ohio

7000 Midland Boulevard

Group Code: 361

Company Type: Property and Casualty

Amelia, OH 45102

Group Name: Munich Re

State ID Number:

(800) 759-9008 ext. [Phone]

FEIN Number: 43-1262602

State:

Indiana

Filing Company:

American Modern Property and Casualty Insurance Company

TOI/Sub-TOI:04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:Manufactured Home Program

Project Name/Number:Rate Revision/MH-IN-2024JUN18-07

Filing Fees

State Fees

Fee Required?

Yes

Fee Amount:

\$50.00

Retaliatory?

Yes

Fee Explanation:

Ohio filing fees = \$50.00, Indiana rate filing = \$35.00. Submitting the greater fee of \$50.00.

Per Company:

Yes

| Company | Amount | Date Processed | Transaction # |
|---|---------|---------------------|---------------|
| American Modern Property and Casualty Insurance Company | \$50.00 | 08/06/2024 11:18 AM | 291998410 |

EFT Total

\$50.00

State:Indiana

TOI/Sub-TOI:04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:Manufactured Home Program

Project Name/Number:Rate Revision/MH-IN-2024JUN18-07

Filing Company:American Modern Property and Casualty Insurance Company

Correspondence Summary

Dispositions

| Status | Created By | Created On | Date Submitted |
|--------|-------------------|------------|----------------|
| Filed | Lawrence Steinert | 08/27/2024 | 08/27/2024 |

Objection Letters and Response Letters

Objection Letters

| Status | Created By | Created On | Date Submitted |
|---------------------------|-------------------|------------|----------------|
| Pending Industry Response | Lawrence Steinert | 08/19/2024 | 08/19/2024 |
| Pending Industry Response | Lawrence Steinert | 08/13/2024 | 08/13/2024 |
| Pending Industry Response | Lawrence Steinert | 08/06/2024 | 08/06/2024 |

Response Letters

| Responded By | Created On | Date Submitted |
|-----------------|------------|----------------|
| Alisha Bocker | 08/26/2024 | 08/26/2024 |
| Shannon Bowling | 08/15/2024 | 08/16/2024 |
| Shannon Bowling | 08/12/2024 | 08/12/2024 |

Filing Notes

| Subject | Note Type | Created By | Created On | Date Submitted |
|----------|---------------|-------------------|------------|----------------|
| Rates OK | Reviewer Note | Lawrence Steinert | 08/27/2024 | |
| EFT - R | Reviewer Note | Kristina Shelley | 08/06/2024 | |

State:Indiana

TOI/Sub-TOI:04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:Manufactured Home Program

Project Name/Number:Rate Revision/MH-IN-2024JUN18-07

Filing Company:

American Modern Property and Casualty Insurance Company

Disposition

Disposition Date: 08/27/2024

Effective Date (New):

Effective Date (Renewal):

Status: Filed

Comment:

| 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 | 6.100% | 5.500% | \$532,248 | 10,501 | \$9,688,904 | 11.300% | 0.000% |

| Schedule | Schedule Item | Schedule Item Status | Public Access |
|-------------------------------|---|----------------------|---------------|
| Rate | IN Manufactured Home Program | | Yes |
| Supporting Document | 80 Filing Description/Cover Letter/NAIC Transmittal | | Yes |
| Supporting Document (revised) | 81 Rate Requirements- All Private Passenger Auto and Homeowners Increases/Decreases | | Yes |
| Supporting Document | 81 Rate Requirements- All Private Passenger Auto and Homeowners Increases/Decreases | | Yes |
| Supporting Document | 82 Actuarial Support | | Yes |
| Supporting Document | Side by Side Rate Comparison | | Yes |
| Supporting Document | 8-13-2024 Objection Response Support | | Yes |
| Supporting Document | Midwest SCS Model vs Experience - Response Support | | Yes |

State: Indiana **Filing Company:** American Modern Property and Casualty Insurance Company

TOI/Sub-TOI: 04.0 Homeowners/04.0002 Mobile Homeowners

Product Name: Manufactured Home Program

Project Name/Number: Rate Revision/MH-IN-2024JUN18-07

Objection Letter

| | |
|-------------------------|---------------------------|
| Objection Letter Status | Pending Industry Response |
| Objection Letter Date | 08/19/2024 |
| Submitted Date | 08/19/2024 |
| Respond By Date | |

Dear Shannon Bowling,

Introduction:

Hi,

We have additional questions on this filing.

(1) Thank you for showing the comparison of OH, IN, and IL modeled versus actual SCS losses. Please augment the presentation as follows:

(a) Please show 30 or more years instead of just 8.

(b) With the expanded number of years, please show at least 10 upper midwest states, individually and in total.

Thanks,

Lawrence Steinert, FCAS
Actuary
Indiana Dept. of Insurance
317-234-6622
lsteinert@idoi.in.gov

Conclusion:

Sincerely,
Lawrence Steinert

State:IndianaFiling Company:American Modern Property and Casualty Insurance Company

TOI/Sub-TOI:04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:Manufactured Home Program

Project Name/Number:Rate Revision/MH-IN-2024JUN18-07

Objection Letter

Objection Letter StatusPending Industry Response

Objection Letter Date08/13/2024

Submitted Date08/13/2024

Respond By Date

Dear Shannon Bowling,

Introduction:

Hi,

We have additional questions on this filing.

(1)In Exhibit C-6, line (4), you show an SCS Model Calibration value of 2.186 with corresponding footnote. We cannot accept this type of model second-guessing factor without detailed support demonstrating that it holds up across time and geography. Please address.

Thanks,

Lawrence Steinert, FCAS
Actuary
Indiana Dept. of Insurance
317-234-6622
lsteinert@idoi.in.gov

Conclusion:

Sincerely,
Lawrence Steinert

| | | | |
|-----------------------------|---|------------------------|---|
| State: | Indiana | Filing Company: | American Modern Property and Casualty Insurance Company |
| TOI/Sub-TOI: | 04.0 Homeowners/04.0002 Mobile Homeowners | | |
| Product Name: | Manufactured Home Program | | |
| Project Name/Number: | Rate Revision/MH-IN-2024JUN18-07 | | |

Objection Letter

| | |
|-------------------------|---------------------------|
| Objection Letter Status | Pending Industry Response |
| Objection Letter Date | 08/06/2024 |
| Submitted Date | 08/06/2024 |
| Respond By Date | |

Dear Shannon Bowling,

Introduction:

Hi,

We have questions on this filing.

(1)In Exhibit C-3, Page 1, you show your rate indications for Other than Liability. On line 25, you show your modeled SCS loss provision. This is a very important part of the rate, and yet no footnote or supporting exhibit appears to show its derivation. Please address.

Thanks,

Lawrence Steinert, FCAS
Actuary
Indiana Dept. of Insurance
317-234-6622
lsteinert@idoi.in.gov

Conclusion:

Sincerely,
Lawrence Steinert

State:Indiana

TOI/Sub-TOI:04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:Manufactured Home Program

Project Name/Number:Rate Revision/MH-IN-2024JUN18-07

Filing Company:

American Modern Property and Casualty Insurance Company

Response Letter

Response Letter Status

Submitted to State

Response Letter Date

08/26/2024

Submitted Date

08/26/2024

Dear Lawrence Steinert,

Introduction:

Thank you for your correspondence.

Response 1

Comments:

Please see the attached exhibits. We do not have 30 years of comparisons; the extent of our history of modeled AALs is included. Page 1 restates the previously submitted exhibit supporting the adjustment on Exhibit C-8 by including data for accident years 2008-2015. As additionally requested, pages 2-11 contain comparisons of modeled AALs and ultimate SCS loss for more than 8 accident years for individual states in the upper Midwest. Page 12 compares the sum total of AALs and claims for the same 12 states.

The attached data continues to support the assertion that the model underpredicts actual results. Admittedly, there is notable variance among individual states and accident years, although region-wide totals across many years suggest a model miss of more than 50%. It is our understanding that this is not a result of any particular model deficiency, but rather attributable to persistent changes in the information surrounding and agnostic to the model. Specifically:

The model relies upon PCS to identify SCS events. PCS has not changed their catastrophe threshold of \$25M in many years (since at least 1997) despite considerable changes in economic conditions over that period. As a result, more events are defined as catastrophes each year simply due to inflation and economic expansion. Economic events are outside the purview of the model and do not factor into its predictions, so as the model ages, one would expect its aggregate relevance to deteriorate over time. Climate change is impacting SCS events in similar fashion, causing localized events to become more severe than they had been, say, a decade prior. It is likely that other factors such as social inflation or changes in building materials over time are also impacting the information displayed, but we do not have data to corroborate such events.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

| Supporting Document Schedule Item Changes | |
|---|--|
| Satisfied - Item: | Midwest SCS Model vs Experience - Response Support |
| Comments: | |
| Attachment(s): | Midwest SCS Model vs Experience.pdf |

| | | | | | |
|----------------------|---|-------------------|---|---------------------|--------------------|
| SERFF Tracking #: | AMMH-134200555 | State Tracking #: | EFT OK / | Company Tracking #: | MH-IN-2024JUN18-07 |
| State: | Indiana | Filing Company: | American Modern Property and Casualty Insurance Company | | |
| TOI/Sub-TOI: | 04.0 Homeowners/04.0002 Mobile Homeowners | | | | |
| Product Name: | Manufactured Home Program | | | | |
| Project Name/Number: | Rate Revision/MH-IN-2024JUN18-07 | | | | |

Conclusion:

In addition to this response, I am submitting a post submission update to revise effective dates to the following:
New Business: 10/22/2024
Renewal Business: 11/01/2024

Thank you for your time and attention in this matter.
Sincerely,
Alisha Brocker

State:Indiana

TOI/Sub-TOI:04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:Manufactured Home Program

Project Name/Number:Rate Revision/MH-IN-2024JUN18-07

Filing Company:

American Modern Property and Casualty Insurance Company

Response Letter

Response Letter Status

Submitted to State

Response Letter Date

08/15/2024

Submitted Date

08/16/2024

Dear Lawrence Steinert,

Introduction:

Thank you for your recent correspondence.

Response 1

Comments:

We use Risk Management Solutions (RMS) model results in estimating expected loss costs from Severe Convective Storms (SCS) for most of our residential products. The attached file provided by RMS is to help actuaries to address ASOP 38 when actuaries believe all or part of model results are outside of their area of expertise. The file follows the structure and numbering of ASOP 38. In particular, Section 3.6 of the RMS model file anticipates that adjustments to the RMS model results may be appropriate and necessary.

The SCS model for the United States risks has not changed since version 13.1 (i.e., the RMS SCS model is unchanged since 2013). The model has historically underestimated industry results. For the SCS region including Indiana (comprised of data from Indiana, Ohio, and Illinois), our historical severe convective storm experience compared to RMS modeled expectations is displayed in the attached exhibit.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

| Supporting Document Schedule Item Changes | |
|---|--|
| Satisfied - Item: | 8-13-2024 Objection Response Support |
| Comments: | |
| Attachment(s): | IN MH SCS Model Calibration Support.pdf RMS ASOP 38 SCS Public RL.pdf |

Conclusion:

Thank you for your time and consideration of this submission.

Sincerely,

Shannon Bowling

State:Indiana

TOI/Sub-TOI:04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:Manufactured Home Program

Project Name/Number:Rate Revision/MH-IN-2024JUN18-07

Filing Company:

American Modern Property and Casualty Insurance Company

Response Letter

Response Letter Status

Submitted to State

Response Letter Date

08/12/2024

Submitted Date

08/12/2024

Dear Lawrence Steinert,

Introduction:

Thank you for the recent correspondence.

Response 1

Comments:

Please refer to Exhibit C-6 in the updated Exhibit C - Actuarial Indication Support attachment.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

| Supporting Document Schedule Item Changes | |
|---|---|
| Satisfied - Item: | 81 Rate Requirements- All Private Passenger Auto and Homeowners Increases/Decreases |
| Comments: | |
| Attachment(s): | Exhibit C - Actuarial Indication Support. v2pdf.pdf |
| Previous Version | |
| Satisfied - Item: | 81 Rate Requirements- All Private Passenger Auto and Homeowners Increases/Decreases |
| Comments: | |
| Attachment(s): | Exhibit C - Actuarial Indication Support.pdf |

Conclusion:

Thank you for your time and consideration of this submission.

Sincerely,

Shannon Bowling

State:

Indiana

Filing Company:

American Modern Property and Casualty Insurance Company

TOI/Sub-TOI: 04.0 Homeowners/04.0002 Mobile Homeowners

Product Name: Manufactured Home Program

Project Name/Number: Rate Revision/MH-IN-2024JUN18-07

Reviewer Note

Created By:
Lawrence Steinert on 08/27/2024 07:19 AM

Last Edited By:
Lawrence Steinert

Submitted On:
08/27/2024 07:19 AM

Subject:
Rates OK

Comments:
Rates OK

State:

Indiana

Filing Company:

American Modern Property and Casualty Insurance Company

TOI/Sub-TOI:

04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:

Manufactured Home Program

Project Name/Number:

Rate Revision/MH-IN-2024JUN18-07

Reviewer Note

Created By:
Kristina Shelley on 08/06/2024 11:44 AM

Last Edited By:
Lawrence Steinert

Submitted On:
08/27/2024 07:19 AM

Subject:
EFT - R

Comments:
Personal Lines Rate

State:

Indiana

Filing Company:

American Modern Property and Casualty Insurance Company

TOI/Sub-TOI:04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:Manufactured Home Program

Project Name/Number:Rate Revision/MH-IN-2024JUN18-07

Post Submission Update Request Processed On 08/27/2024

Status:

Allowed

Created By:

Alisha Brocker

Processed By:

Lawrence Steinert

Comments:

General Information:

| Field Name | Requested Change | Prior Value |
|----------------------------------|------------------|-------------|
| Effective Date Requested (New) | 10/22/2024 | 10/09/2024 |
| Effective Date Requested (Renew) | 11/01/2024 | 10/19/2024 |

State:Indiana

TOI/Sub-TOI:04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:Manufactured Home Program

Project Name/Number:Rate Revision/MH-IN-2024JUN18-07

Filing Company:

American Modern Property and Casualty Insurance Company

Rate Information

Rate data applies to filing.

Filing Method:

Rate Change Type:

Overall Percentage of Last Rate Revision:

Effective Date of Last Rate Revision:

Filing Method of Last Filing:

SERFF Tracking Number of Last Filing:

File & Use

Increase

6.063%

11/10/2020

File & Use

AMMH-132297341

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 | 6.100% | 5.500% | \$532,248 | 10,501 | \$9,688,904 | 11.300% | 0.000% |

State:Indiana

TOI/Sub-TOI:04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:Manufactured Home Program

Project Name/Number:Rate Revision/MH-IN-2024JUN18-07

Filing Company:

American Modern Property and Casualty Insurance Company

Rate/Rule Schedule

| Item No. | Schedule Item Status | Exhibit Name | Rule # or Page # | Rate Action | Previous State Filing Number | Attachments |
|----------|----------------------|------------------------------|-------------------------|-------------|------------------------------|---------------|
| 1 | | IN Manufactured Home Program | Base Rate & Rental Rate | Replacement | AMMH-132297341 | IN071MH-A.pdf |

| | | | |
|----------------------|---|-----------------|---|
| State: | Indiana | Filing Company: | American Modern Property and Casualty Insurance Company |
| TOI/Sub-TOI: | 04.0 Homeowners/04.0002 Mobile Homeowners | | |
| Product Name: | Manufactured Home Program | | |
| Project Name/Number: | Rate Revision/MH-IN-2024JUN18-07 | | |

Supporting Document Schedules

| | |
|-------------------|---|
| Satisfied - Item: | 80 Filing Description/Cover Letter/NAIC Transmittal |
| Comments: | |
| Attachment(s): | Explanatory Memorandum.pdf |
| Item Status: | |
| Status Date: | |

| | |
|-------------------|---|
| Satisfied - Item: | 81 Rate Requirements- All Private Passenger Auto and Homeowners Increases/Decreases |
| Comments: | |
| Attachment(s): | Exhibit C - Actuarial Indication Support. v2pdf.pdf |
| Item Status: | |
| Status Date: | |

| | |
|-------------------|------------------------------|
| Satisfied - Item: | 82 Actuarial Support |
| Comments: | |
| Attachment(s): | Exhibit B - Rate Impacts.pdf |
| Item Status: | |
| Status Date: | |

| | |
|-------------------|----------------------------------|
| Satisfied - Item: | Side by Side Rate Comparison |
| Comments: | |
| Attachment(s): | Side by Side Rate Comparison.pdf |
| Item Status: | |
| Status Date: | |

| | |
|-------------------|--|
| Satisfied - Item: | 8-13-2024 Objection Response Support |
| Comments: | |
| Attachment(s): | IN MH SCS Model Calibration Support.pdf RMS ASOP 38 SCS Public RL.pdf |
| Item Status: | |
| Status Date: | |

| | |
|-------------------|--|
| Satisfied - Item: | Midwest SCS Model vs Experience - Response Support |
| Comments: | |
| Attachment(s): | Midwest SCS Model vs Experience.pdf |
| Item Status: | |

| | | | | | |
|----------------------|---|-------------------|---|---------------------|--------------------|
| SERFF Tracking #: | AMMH-134200555 | State Tracking #: | EFT OK / | Company Tracking #: | MH-IN-2024JUN18-07 |
| State: | Indiana | Filing Company: | American Modern Property and Casualty Insurance Company | | |
| TOI/Sub-TOI: | 04.0 Homeowners/04.0002 Mobile Homeowners | | | | |
| Product Name: | Manufactured Home Program | | | | |
| Project Name/Number: | Rate Revision/MH-IN-2024JUN18-07 | | | | |
| Status Date: | | | | | |

State:Indiana

TOI/Sub-TOI:04.0 Homeowners/04.0002 Mobile Homeowners

Product Name:Manufactured Home Program

Project Name/Number:Rate Revision/MH-IN-2024JUN18-07

Filing Company:

American Modern Property and Casualty Insurance Company

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) |
|---------------|----------------------|---------------------|---|---------------------------|---|
| 08/02/2024 | | Supporting Document | 81 Rate Requirements- All Private Passenger Auto and Homeowners Increases/Decreases | 08/12/2024 | Exhibit C - Actuarial Indication Support.pdf (Superceded) |