

## Table of Contents

### User Usage Agreement Attachments

Usage Agreement [Usage Agreement.pdf](#)

Form Attachments	(ex. Form Name	Form Number	Attachment Name)
Actual Cash Value Loss Settlement	HO 04 81		<a href="#">HO 04 81 10 23 Actual Cash Value Loss Settlement (clean).pdf</a>
Personal Property Replacement Cost Coverage	HO 04 90		<a href="#">HO 04 90 09 22 Personal Property Replacement Cost Coverage.pdf</a>
Scheduled Structures Away From The Residence Premises Coverage	HO 04 92		<a href="#">HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (clean).pdf</a>
Kansas Amendatory Endorsement	HO 81 18		<a href="#">HO 81 18 10 23 Kansas Amendatory Endorsement V2 (clean).pdf</a>
Dwelling Cosmetic Hail Damage Coverage For Metal Roof	HO 84 05		<a href="#">HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (clean).pdf</a>
Ordinance Or Law Coverage	HO 84 16		<a href="#">HO 84 16 09 22 Ordinance Or Law Coverage.pdf</a>
Scheduled Structures Cosmetic Hail Damage	HO 84 19		<a href="#">HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (clean).pdf</a>
Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage	HO 84 23		<a href="#">HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage.pdf</a>
Other Structures Blanket Coverage	HO 84 24		<a href="#">HO 84 24 10 23 Other Structures Blanket Coverage (clean).pdf</a>
Roof Replacement Cost Coverage For Windstorm And Hail	HO 86 05		<a href="#">HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail.pdf</a>
Roof Surface Payment Schedule	HO 88 02		<a href="#">HO 88 02 10 22 Roof Surface Payment Schedule.pdf</a>
Dwelling And Other Structures Replacement Cost Coverage	MH 84 01		<a href="#">MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (clean).pdf</a>
Homeowners Application - Kansas	UF 40 09		<a href="#">UF 40 09 10 23 Homeowners Policy Application - Kansas (clean).pdf</a>
Renters Policy Application - Kansas	UF 40 25		<a href="#">UF 40 25 10 23 Renters Policy Application - Kansas (clean).pdf</a>
Condominium Unit-Owners Policy Application - Kansas	UF 40 26		<a href="#">UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (clean).pdf</a>

Manufactured Homeowners Policy Application - Kansas	UF 40 27	<a href="#">UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (clean).pdf</a>
<i>Kansas Amendatory Endorsement</i>	<i>HO 81 18</i>	<a href="#">HO 81 18 10 23 Kansas Amendatory Endorsement (clean).pdf</a>
<b>Rate-Rule Attachments</b>	(ex. Document Name	Attachment Name)
Kansas Advance Homeowners Rate/Rule Manual		<a href="#">KS Advance Property Manual Revised &amp; New Pages 2-10-24.pdf</a>
<b>Supporting Document Attachments</b>	(ex. Supporting Document Name	Attachment Name)
Explanatory Memo - Rates		<a href="#">11-21-23 KS Advance Property Memo in Response to Objections Dated 11-17-23.pdf</a>
<i>Explanatory Memo - Rates</i>		<a href="#">KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</a>
<i>Explanatory Memo - Rates</i>		<a href="#">KS Advance Property Memo 2-10-24.pdf</a>
Actuarial Justification		<a href="#">11-21-23 KS Advance Exhibits in Response to Objections Dated 11-17-23.pdf</a>
<i>Actuarial Justification</i>		<a href="#">KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</a>
<i>Actuarial Justification</i>		<a href="#">KS Advance Property Exhibits 2-10-24.pdf</a>
Explanatory Memo - Forms		<a href="#">Kansas AFIC Forms Filing Memorandum.pdf</a>
Complete and Current Manual for all Rate/Rule Filings		<a href="#">KS Advance Property Manual 02-10-2024.pdf</a>
Exhibit of Premiums and Losses		<a href="#">Kansas Premium and Loss Experience Exhibit D-4.pdf</a>
Rate/Rule Filing Checklist		<a href="#">Kansas Rate Rule Filing Checklist 02-10-2024.pdf</a>
Redline Requirement		<a href="#">KS Advance Property Manual 02-10-2024 - Redline.pdf</a>
Forms List Template		<a href="#">KS AFIC Updated Forms List (clean).pdf</a>
Tracked Versions of Updated Forms		<a href="#">HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf</a>
Tracked Versions of Updated Forms		<a href="#">HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</a>
Tracked Versions of Updated Forms		<a href="#">HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf</a>

Tracked Versions of Updated Forms	<a href="#"><u>HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf</u></a>
Tracked Versions of Updated Forms	<a href="#"><u>HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf</u></a>
Tracked Versions of Updated Forms	<a href="#"><u>HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf</u></a>
Tracked Versions of Updated Forms	<a href="#"><u>HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</u></a>
Tracked Versions of Updated Forms	<a href="#"><u>HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf</u></a>
Tracked Versions of Updated Forms	<a href="#"><u>HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf</u></a>
Tracked Versions of Updated Forms	<a href="#"><u>HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf</u></a>
Tracked Versions of Updated Forms	<a href="#"><u>MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf</u></a>
Tracked Versions of Updated Forms	<a href="#"><u>UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf</u></a>
Tracked Versions of Updated Forms	<a href="#"><u>UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf</u></a>
Tracked Versions of Updated Forms	<a href="#"><u>UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf</u></a>
Tracked Versions of Updated Forms	<a href="#"><u>UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf</u></a>
Tracked Versions of Updated Forms	<a href="#"><u>HO 81 18 10 23 Kansas Amendatory Endorsement V2 (tracked).pdf</u></a>

<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf</u></a>
--	---

<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</u></a>
--	---

<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf</u></a>
--	---

<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf</u></a>
--	---

<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf</u></a>
<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf</u></a>
<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>HO 81 18 10 23 Kansas Amendatory Endorsement (tracked).pdf</u></a>
<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</u></a>
<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf</u></a>
<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf</u></a>
<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf</u></a>
<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf</u></a>
<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf</u></a>
<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf</u></a>
<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf</u></a>
<i>Tracked Versions of Updated Forms</i>	<a href="#"><u>UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf</u></a>

Listing of Updated, Deleted & New Manual Pages

[KS Advance Listing of ALL Updated New & Deleted Manual Pages 2-10-24.pdf](#)

8/21/23 Response to Objections  
Dated 7/24/23

[KS 8-21-23 Response to Objections Dated 7-24-23.pdf](#)

8/21/23 Exhibit O1-1 Deductible  
Factor Support Exhibit in Response  
to Objections Dated 7/24/23

[Exhibit O1-1.pdf](#)

9/11/23 Responses to the Objections  
Dated 8/28/23

[9-11-23 Response to the Objections Dated 8-28-23.pdf](#)

9/11/23 Exhibit O2 in Response to  
Objection 5 Dated 8/258/23

[Exhibit O2.pdf](#)

10/2/23 Exhibit O3 in Response to  
Objections Dated 9/14/23

[Exhibit O3.pdf](#)

10/2/23 Response to Objections  
Dated 9/14/23

[10-2-23 KS Advance Response to Objections Dated 9-14-23.pdf](#)

10/16/23 Response to the Objections  
Dated 10/11/23

[10-16-23 KS Adv Response to the Objections Dated 10-11-23.pdf](#)

10/16/23 Exhibit O4 in Response to  
Objection 3 Dated 10/11/23

[Exhibit O4.pdf](#)

10/23/23 Response to Objections  
Dated 10/20/23

[10-23-23 Response to the Objections Dated 10-20-23.pdf](#)

10/23/23 Exhibit O5 in Response to  
Objection 1 Dated 10/20/23

[Exhibit O5.pdf](#)

11/1/23 Response to the Objection  
Dated 11/1/23

[11-1-23 Response to the Objection Dated 11-1-23.pdf](#)

11/8/23 Response to the Objection  
Dated 11/6/23

[11-8-23 KS Adv Response to Objection Dated 11-6-23.pdf](#)

11/16/23 Response to the Objections  
Dated 11-9-23 & Note to Filer Dated  
11-13-23

[11-16-23 Response to the Obj Dated 11-9-23 & Note to Filer Dated 11-13-23.pdf](#)

11/21/23 Response to the Objections  
Dated 11/17/23

[11-21-23 Response KS Adv Objection Dated 11-17-23.pdf](#)

**Correspondence Attachments** (ex. Correspondence Type Attachment Name)

Objection Letter

[KS P&C Checklist Final.xlsm](#)

## Filing at a Glance

Company:	American Family Insurance Company
Product Name:	Homeowners
State:	Kansas
TOI:	04.0 Homeowners
Sub-TOI:	04.0000 Homeowners Sub-TOI Combinations
Filing Type:	Rate/Rule/Form
Date Submitted:	06/28/2023
SERFF Tr Num:	AMFC-133722886
SERFF Status:	Closed-Approved and Filed
State Tr Num:	AMFC-133722886
State Status:	Approved and Filed
Co Tr Num:	KS-HOA-AFIC-23RRF-0779
Effective Date	02/10/2024
Requested (New):	
Effective Date	02/10/2024
Requested (Renewal):	
Author(s):	Mary Korth, Rose Faison, Christine Cass, Sharon Raymond, Amber Marwaha, Aaron Johnson, Anna Thomas, Matthew Hegedus, Jessica Hare, Brenda Bunkelman, John Key
Reviewer(s):	Emily Beets (primary)
Disposition Date:	11/28/2023
Disposition Status:	Approved and Filed
Effective Date (New):	02/16/2024
Effective Date (Renewal):	02/16/2024

## General Information

Project Name: Rate/Rule/Form Revision  
Project Number: KS-HOA-AFIC-23RRF-0779  
Reference Organization:  
Reference Title:  
Filing Status Changed: 11/28/2023  
State Status Changed: 11/28/2023  
Created By: Christine Cass  
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: Christine Cass

State Sub-TOI: 04.0000 Homeowners Sub-TOI Combinations

### Filing Description:

American Family Insurance Company (AFIC) hereby respectfully submits the enclosed Rate/Rule/Form filing for your review and approval for our Advance Homeowners Program offering coverage for our homeowners, renters, condominium unit owners, and manufactured homeowners.

Please see the Filing Memorandums, Tracked Endorsements and manual pages attached beneath the "Supporting Documentation" tab for details on the changes.

Please see the new and revised Endorsements attached beneath the "Form Schedule" tab for details on the changes to aid in your review.

Should you have any questions or concerns regarding this filing, please do not hesitate to contact me. Thank you!

Christine C. Cass – Senior State Filings Associate – ccass@homesite.com – 617-448-7005

## Company and Contact

### Filing Contact Information

Christine Cass, Senior State Filing Specialist	ccass@homesite.com
290 Congress Street	617-448-7005 [Phone]
Boston, MA 02210	

### Filing Company Information

American Family Insurance Company	CoCode: 10386	State of Domicile: Wisconsin
6000 American Parkway	Group Code: 473	Company Type:
Madison, WI 53783-0001	Group Name:	State ID Number:
(608) 249-2111 ext. [Phone]	FEIN Number: 39-1835307	

---

Filing Fees

State Fees

Fee Required? No

Retaliatory? No

Fee Explanation:



## Correspondence Summary

### Dispositions

Status	Created By	Created On	Date Submitted
Approved and Filed	Emily Beets	11/28/2023	11/28/2023

### Objection Letters and Response Letters

#### Objection Letters

Status	Created By	Created On	Date Submitted
Disapproved and Not Filed	Emily Beets	11/17/2023	11/17/2023
Disapproved and Not Filed	Emily Beets	11/09/2023	11/09/2023
Disapproved and Not Filed	Emily Beets	11/06/2023	11/06/2023
Disapproved and Not Filed	Emily Beets	11/01/2023	11/01/2023
Disapproved and Not Filed	Emily Beets	10/20/2023	10/20/2023
Disapproved and Not Filed	Emily Beets	10/11/2023	10/11/2023
Disapproved and Not Filed	Emily Beets	09/14/2023	09/14/2023
Disapproved and Not Filed	Emily Beets	08/28/2023	08/28/2023
Disapproved and Not Filed	Emily Beets	07/24/2023	07/24/2023

#### Response Letters

Responded By	Created On	Date Submitted
Christine Cass	11/21/2023	11/21/2023
Christine Cass	11/16/2023	11/16/2023
Christine Cass	11/08/2023	11/08/2023
Christine Cass	11/01/2023	11/01/2023
Christine Cass	10/23/2023	10/23/2023
Christine Cass	10/16/2023	10/16/2023
Christine Cass	10/02/2023	10/02/2023
Christine Cass	09/11/2023	09/11/2023
Christine Cass	08/21/2023	08/21/2023

### Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Supporting Document	11/16/23 Response to the Objections Dated 11-9-23 & Note to Filer Dated 11-13-23	Christine Cass	11/16/2023	11/16/2023

### Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
RE request for effective date change	Note To Filer	Emily Beets	12/01/2023	12/01/2023

**Filing Notes**

<b>Subject</b>	<b>Note Type</b>	<b>Created By</b>	<b>Created On</b>	<b>Date Submitted</b>
Effective Date Change Request	Note To Reviewer	Jessica Hare	12/01/2023	12/01/2023
Amendment Submitted in response to the 11/16/23 Note to Filer	Note To Reviewer	Christine Cass	11/16/2023	11/16/2023
item not attached to company objection letter	Note To Filer	Emily Beets	11/16/2023	11/16/2023
11/13 Call - One More Request	Note To Filer	Craig Van Aalst	11/13/2023	11/13/2023
11/9 Phone Call	Note To Reviewer	Christine Cass	11/09/2023	11/09/2023
RE call	Note To Filer	Emily Beets	11/09/2023	11/09/2023
RE conference call request	Note To Filer	Emily Beets	11/09/2023	11/09/2023
Re: Previous Note to Reviewer Conference Call Request - Update	Note To Reviewer	Christine Cass	11/09/2023	11/09/2023
Conference Call Request	Note To Reviewer	Christine Cass	11/09/2023	11/09/2023
Thank You for The Call on 10/30/2023	Note To Reviewer	Christine Cass	10/30/2023	10/30/2023
RE conference call	Note To Filer	Emily Beets	09/21/2023	09/21/2023
re requested conference call	Note To Filer	Emily Beets	09/21/2023	09/21/2023
Conference Call Request Monday, 9/25 or Tuesday, 9/26	Note To Reviewer	Christine Cass	09/20/2023	09/20/2023

Disposition

Disposition Date: 11/28/2023  
Effective Date (New): 02/16/2024  
Effective Date (Renewal): 02/16/2024  
- Effective Date (New) changed from 02/10/2024 to 02/16/2024 and Effective Date (Renewal) changed from 02/10/2024 to 02/16/2024 by Beets, Emily on 12/01/2023.  
Status: Approved and 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 Family Insurance Company	25.000%	19.500%	\$19,271,645	48,650	\$98,580,080	335.800%	-41.900%

Schedule	Schedule Item	Schedule Item Status	Public Access
Form	Actual Cash Value Loss Settlement	Approved and Filed	Yes
Form	Personal Property Replacement Cost Coverage	Approved and Filed	Yes
Form	Scheduled Structures Away From The Residence Premises Coverage	Approved and Filed	Yes
Form (revised)	Kansas Amendatory Endorsement	Approved and Filed	Yes
Form	Dwelling Cosmetic Hail Damage Coverage For Metal Roof	Approved and Filed	Yes
Form	Ordinance Or Law Coverage	Approved and Filed	Yes
Form	Scheduled Structures Cosmetic Hail Damage	Approved and Filed	Yes
Form	Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage	Approved and Filed	Yes
Form	Other Structures Blanket Coverage	Approved and Filed	Yes
Form	Roof Replacement Cost Coverage For Windstorm And Hail	Approved and Filed	Yes
Form	Roof Surface Payment Schedule	Approved and Filed	Yes
Form	Dwelling And Other Structures Replacement Cost Coverage	Approved and Filed	Yes
Form	Homeowners Application - Kansas	Approved and Filed	Yes
Form	Renters Policy Application - Kansas	Approved and Filed	Yes

<b>Schedule</b>	<b>Schedule Item</b>	<b>Schedule Item Status</b>	<b>Public Access</b>
<b>Form</b>	Condominium Unit-Owners Policy Application - Kansas	Approved and Filed	Yes
<b>Form</b>	Manufactured Homeowners Policy Application - Kansas	Approved and Filed	Yes
<b>Form</b>	Kansas Amendatory Endorsement	Deemed Approved	Yes
<b>Rate</b>	Kansas Advance Homeowners Rate/Rule Manual	Filed	Yes
<b>Supporting Document (revised)</b>	Explanatory Memo - Rates		Yes
<b>Supporting Document</b>	Explanatory Memo - Rates	Disapproved and Not Filed	Yes
<b>Supporting Document</b>	Explanatory Memo - Rates	Disapproved and Not Filed	Yes
<b>Supporting Document (revised)</b>	Actuarial Justification		Yes
<b>Supporting Document</b>	Actuarial Justification	Disapproved and Not Filed	Yes
<b>Supporting Document</b>	Actuarial Justification	Deemed Approved	Yes
<b>Supporting Document</b>	Explanatory Memo - Forms		Yes
<b>Supporting Document</b>	Complete and Current Manual for all Rate/Rule Filings		Yes
<b>Supporting Document</b>	Exhibit of Premiums and Losses		Yes
<b>Supporting Document</b>	Explanatory Memo - Rules		Yes
<b>Supporting Document</b>	Previously Approved Tracking Numbers		Yes
<b>Supporting Document</b>	Rate/Rule Filing Checklist		Yes
<b>Supporting Document</b>	Redline Requirement		Yes
<b>Supporting Document</b>	Forms List Template		Yes
<b>Supporting Document (revised)</b>	Tracked Versions of Updated Forms		Yes
<b>Supporting Document</b>	Tracked Versions of Updated Forms	Disapproved and Not Filed	Yes
<b>Supporting Document</b>	Listing of Updated, Deleted & New Manual Pages		Yes
<b>Supporting Document</b>	8/21/23 Response to Objections Dated 7/24/23		Yes
<b>Supporting Document</b>	8/21/23 Exhibit O1-1 Deductible Factor Support Exhibit in Response to Objections Dated 7/24/23		Yes
<b>Supporting Document</b>	9/11/23 Responses to the Objections Dated 8/28/23		Yes
<b>Supporting Document</b>	9/11/23 Exhibit O2 in Response to Objection 5 Dated 8/258/23		Yes
<b>Supporting Document</b>	10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23		Yes
<b>Supporting Document</b>	10/2/23 Response to Objections Dated 9/14/23		Yes
<b>Supporting Document</b>	10/16/23 Response to the Objections Dated 10/11/23		Yes
<b>Supporting Document</b>	10/16/23 Exhibit O4 in Response to Objection 3 Dated 10/11/23		Yes

<b>Schedule</b>	<b>Schedule Item</b>	<b>Schedule Item Status</b>	<b>Public Access</b>
<b>Supporting Document</b>	10/23/23 Response to Objections Dated 10/20/23		Yes
<b>Supporting Document</b>	10/23/23 Exhibit O5 in Response to Objection 1 Dated 10/20/23		Yes
<b>Supporting Document</b>	11/1/23 Response to the Objection Dated 11/1/23		Yes
<b>Supporting Document</b>	11/8/23 Response to the Objection Dated 11/6/23		Yes
<b>Supporting Document</b>	11/16/23 Response to the Objections Dated 11-9-23 & Note to Filer Dated 11-13-23		Yes
<b>Supporting Document</b>	11/21/23 Response to the Objections Dated 11/17/23		Yes

## Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	11/17/2023
Submitted Date	11/17/2023
Respond By Date	

---

*Dear Christine Cass,*

### **Introduction:**

*This will acknowledge your letter whereby you submitted the captioned filing.*

### **Objection 1**

*- 11/16/23 Response to the Objections Dated 11-9-23 & Note to Filer Dated 11-13-23 (Supporting Document)*

*Comments: Please see objection 1 from the letter dated 11/9/23*

*Pursuant to KSA 40-955, please provide numerical frequency and severity data for hail to support and justify Kansas has higher rates of frequency and severity than other states.*

### **Objection 2**

*- Actuarial Justification (Supporting Document)*

*- 11/16/23 Response to the Objections Dated 11-9-23 & Note to Filer Dated 11-13-23 (Supporting Document)*

*Comments: Please see objection 1 from the letter dated 11/9/23*

*Please see exhibit C-4*

*Please see age of home factors.*

*Please further explain how the final factor selections were determined for this rating variable. It appears the final selection is based on the indication in places where this may not be intuitive if factors should be increasing as the home ages. For example, home age 34 is 0.624 while home age 33 is 1.010 and home age 35 is 1.005. Pursuant to KSA 40-955, further explanation is required.*

### **Objection 3**

*- 11/16/23 Response to the Objections Dated 11-9-23 & Note to Filer Dated 11-13-23 (Supporting Document)*

*Comments: Please see objection 1 from the letter dated 11/9/23*

*The Department notes the company is automatically moving policies with roofs at 15 years of age and over from RCV to ACV.*

*As this is a reduction in coverage for these policyholders, pursuant to K.A.R 40-1-39 and K.A.R 40-1-32, please provide further information as to how the policyholder will be notified regarding changes to the policy and consent will be obtained of the insured/policyholder. Please clarify if a credit or rate decrease will be applied with these changes and if the policyholder will have the option to purchase RCV if so desired. Finally, describe the timeline and procedure of re-applying RCV if the policyholder were to install a new roof.*

### **Conclusion:**

*The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to*

*requesting a hearing.*

*Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.*

*If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.*

*Sincerely,  
Emily Beets*

## Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	11/09/2023
Submitted Date	11/09/2023
Respond By Date	

---

*Dear Christine Cass,*

### **Introduction:**

*This will acknowledge your letter whereby you submitted the captioned filing.*

### **Objection 1**

*Comments: Pursuant to KSA 40-955, please provide specific exhibits to show that stucco, siding, etc. claims have been worse than expected from the original pricing of this product.*

### **Objection 2**

*Comments: Please provide the analysis that indicated no significant relationship between the policyholder's insurance score and hail risk, pursuant to KSA 40-955.*

### **Objection 3**

*Comments: Pursuant to KSA 440-955, please explain why portions of the model refresh are redacted.*

### **Objection 4**

*Comments: Please complete the document attached at the end of the letter.*

### **Conclusion:**

*The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.*

*Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.*

*If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.*

*Sincerely,  
Emily Beets*



***Attachment KS P&C Checklist Final.xlsm is not a PDF document and cannot be reproduced here.***

## Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	11/06/2023
Submitted Date	11/06/2023
Respond By Date	

---

*Dear Christine Cass,*

**Introduction:**

*This will acknowledge your letter whereby you submitted the captioned filing.*

**Objection 1**

*Comments: Pursuant to KSA 40-955, please further clarify and justify why Kansas is seeing larger policyholder dislocation than Missouri. The company has indicated the use of Countrywide data is necessary in applying weather related losses, as Kansas data is not fully credible, but has also suggested Kansas has worth loss history than other filed states; therefore seeing more dislocation. Due to the proximity and similar weather patterns and home structures in Missouri, the Department requests additional support to reflect why more Kansas policyholders will see large rate increases.*

**Conclusion:**

*The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.*

*Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.*

*If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.*

*Sincerely,*

*Emily Beets*

## Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	11/01/2023
Submitted Date	11/01/2023
Respond By Date	

---

*Dear Christine Cass,*

### **Introduction:**

*This will acknowledge your letter whereby you submitted the captioned filing.*

### **Objection 1**

*- 10/23/23 Exhibit O5 in Response to Objection 1 Dated 10/20/23 (Supporting Document)*

*Comments: Thank you for the additional information on the policyholders seeing increases over 120%/\$3000 on this filing. Due to the large # of policyholders seeing large increases, please advise how soon before the capped changes would be realized and the average rate change and average policy premium these policyholders will see in the aggregate.*

### **Conclusion:**

*The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.*

*Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.*

*If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.*

*Sincerely,*

*Emily Beets*

## Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	10/20/2023
Submitted Date	10/20/2023
Respond By Date	

---

*Dear Christine Cass,*

### **Introduction:**

*This will acknowledge your letter whereby you submitted the captioned filing.*

### **Objection 1**

- 10/16/23 Response to the Objections Dated 10/11/23 (Supporting Document)*
  - 10/16/23 Exhibit 04 in Response to Objection 3 Dated 10/11/23 (Supporting Document)*
- Comments: Please see objection 3 from the prior letter dated 10/11/23*

*The Department has revised exhibit 04-1.2 and Exhibit 04-1.3 and unable to locate support and justification for the following: high replacement costs, old roofs both under RCV and ACV, ISG, exterior type, high replacement cost, and attached car stalls. Pursuant to KSA 40-955, please advise.*

### **Objection 2**

- 10/16/23 Response to the Objections Dated 10/11/23 (Supporting Document)*
- Comments: Please see objection 4 from the letter dated 10/11/23*

*Pursuant to KSA 40-955, please clarify if the list of SERFF filing numbers is a conclusive list for all filings for this rate and model refresh.*

### **Conclusion:**

*The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.*

*Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.*

*If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.*

*Sincerely,  
Emily Beets*

## Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	10/11/2023
Submitted Date	10/11/2023
Respond By Date	

---

Dear Christine Cass,

### **Introduction:**

*This will acknowledge your letter whereby you submitted the captioned filing.*

### **Objection 1**

- Kansas Amendatory Endorsement, HO 81 18, 10 23 (Form)
  - 10/2/23 Response to Objections Dated 9/14/23 (Supporting Document)
- Comments: Please see objection 1 from the Department's letter dated 9/14/23

*Pursuant to KSA 40-955, please describe in further detail the coverage impact policyholders will see from the proposed changes for HO 81 18 10 23, including but not limited to additional roofing and/or cosmetic damage restrictions or changes to loss settlement provisions.*

### **Objection 2**

- Kansas Advance Homeowners Rate/Rule Manual, Please see the Listing of New & Updated Manual Pages in the Supporting Documents tab. There is not enough room in this field to list all the pages. (Rate)
  - 10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23 (Supporting Document)
  - 10/2/23 Response to Objections Dated 9/14/23 (Supporting Document)
- Comments: Please see objection 2 and objection 4 from the Department letter dated 9/14/23

*Pursuant to KSA 40-955, please provide further clarification and justification as to how Kansas would not be subsidizing other states/other losses by using countrywide changes for rating changes in Kansas.*

### **Objection 3**

- 10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23 (Supporting Document)
  - 10/2/23 Response to Objections Dated 9/14/23 (Supporting Document)
- Comments: Please see objection 3 and objection 5 from the Department's letter dated 9/14/23

Re: Exhibit 03-2.1 and Exhibit 03-2.2

*The Department has reviewed the captioned exhibits and pursuant to KSA 40-955, please advise as to the current and proposed premiums capped and uncapped for those policyholders seeing rate increases over 120% and premium increases over \$3000.*

*Additionally, please advise of the location of all support and justification exhibits for those characteristics contemplated in the captioned exhibits, including high replacement costs, old roofs both under RCV and AV, ISG, exterior type, high replacement cost, and attached car stalls.*

### **Objection 4**

- 10/2/23 Response to Objections Dated 9/14/23 (Supporting Document)
- Comments: Please see objection 6 from the prior letter dated 9/14/2023

*Pursuant to KSA 40-955, please provide the SERFF filing numbers of other filings approved, any pending and/or disapproved with*

*this proposed rate and model refresh.*

**Conclusion:**

*The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.*

*Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.*

*If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.*

*Sincerely,*

*Emily Beets*

## Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	09/14/2023
Submitted Date	09/14/2023
Respond By Date	

---

Dear Christine Cass,

### **Introduction:**

*This will acknowledge your letter whereby you submitted the captioned filing.*

### **Objection 1**

- Kansas Amendatory Endorsement, HO 81 18, 10 23 (Form)
  - Dwelling Cosmetic Hail Damage Coverage For Metal Roof, HO 84 05, 10 23 (Form)
  - Scheduled Structures Cosmetic Hail Damage , HO 84 19, 10 23 (Form)
  - Roof Replacement Cost Coverage For Windstorm And Hail, HO 86 05, 10 22 (Form)
  - Roof Surface Payment Schedule, HO 88 02, 10 22 (Form)
  - 9/11/23 Responses to the Objections Dated 8/28/23 (Supporting Document)
- Comments: Please see objection 1 from the prior letter

*Pursuant to KSA 40-955, please advise the changes to the above captioned forms will not result in a rate or coverage impact for policyholders.*

### **Objection 2**

- 9/11/23 Responses to the Objections Dated 8/28/23 (Supporting Document)
- Comments: Please see objection 5 from the prior letter

*Construction & Exterior: Based on the past 5-year company-wide hail experience analysis via GLM, the company has observed that policies with stucco exterior are exposed to more hail risk than other exterior type. Pursuant to KSA 40-955, please provide numerical support and justification including final indications and selections.*

*Roofing surface & Age: Based on the past 5-year state-wide hail experience, architectural shingles with roof age of 6-10 under the replacement cost value method experience the highest risk of loss. Pursuant to KSA 40-955, please provide numerical support and justification including final indications and selections.*

*Insurance Score Group: Based on the past 5-year company-wide hail experience analysis via GLM, the company did not notice any significant relationship between policyholders insurance score group and hail risk. Therefore, it is proposed to set the factors 1.000 for an insurance score group for hail peril, meaning that policies with better insurance score will no longer receive a discount while policies with worse insurance score will no longer receive additional premium on hail peril. This policyholder has an ISG of 4, resulting in a hail premium increase from absence of the ISG discount.*

*Territory: KCC US Severe Convective Storm Reference Model indicates that northern Kansas has a higher hail risk. The property of this policy locates in Saline County, which is one of the counties with greater hail risk, and hence experiencing a hail premium increase higher than average. Pursuant to KSA 40-955, please provide numerical support and justification including final indications and selections.*

### **Objection 3**

- 9/11/23 Responses to the Objections Dated 8/28/23 (Supporting Document)
- Comments: Please see objection 3 from the prior letter

*The company has indicated as per Exhibit D-1, less than 1% of the total book will be experiencing more than 120% increase in premium before the rate capping. Pursuant to KSA 40-955, how many policies will this be, and please provide their characteristics*

and rate increases capped and uncapped.

**Objection 4**

- 9/11/23 Responses to the Objections Dated 8/28/23 (Supporting Document)

Comments: Please see objection 9 from the prior filing

*Roofing surface & Age: Based on the past 5-year state-wide hail experience, architectural shingles with roof age of 6-10 under the replacement cost value method experience the most roof risk loss. Pursuant to KSA 40-955, please provide numerical support and justification including final indications and selections.*

*Car stall: Based on the past 5-year company-wide hail experience analysis via GLM, more car stalls indicate greater hail risk. Pursuant to KSA 40-955, please provide numerical support and justification, including final indications and selections.*

**Objection 5**

- 9/11/23 Responses to the Objections Dated 8/28/23 (Supporting Document)

Comments: Please see objection 9 from the prior letter

*The company has indicated as shown in Exhibit D-1, 1.7% of the total book will be experiencing more than \$3,000 increase in premium before the rate capping. Pursuant to KSA 40-955, please provide the characteristics of these policyholders as well as the capped and uncapped amounts of these changes.*

**Objection 6**

Comments: Please provide a list of states with recent rate changes and similar policy dislocation the company has had filed and approved recently corresponding with this rate increase.

**Conclusion:**

The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.

Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.

If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.

Sincerely,

Emily Beets



## Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	08/28/2023
Submitted Date	08/28/2023
Respond By Date	

---

*Dear Christine Cass,*

### **Introduction:**

*This will acknowledge your letter whereby you submitted the captioned filing.*

### **Objection 1**

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: objection 2*

*Please see objection 2 from the prior letter*

*Please summarize the changes to cosmetic damage coverages/exclusions being proposed in the captioned filing. Please advise if the current rates contemplate the coverage which may be excluded or reduced by changes proposed. Such explanation is necessary as a restriction of coverage is tantamount to a rate increase which may result in an excessive premium rate level unless a corresponding rate decrease is filed, pursuant to KSA 40-954.*

### **Objection 2**

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 3 from the prior letter*

*The company indicates in response to objection 3 to the prior letter the uncapped maximum rate increase for this filing is 335.8%; however, the rate/rule tab shows the maximum rate increase to be 362,400%. Pursuant to KSA 40-955, please advise and amend filing accordingly.*

### **Objection 3**

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 3 from the prior letter:*

*Pursuant to KSA 40-953, please explain why frame construction stucco exterior, architectural shingles with roof age of 9 under the replacement cost value method, the insurance score placement and census block group would impact hail risk and roof risk loss.*

*Please advise if this policyholder is an outlier or if other policyholder can expect to see similar increases.*

### **Objection 4**

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 6 and objection 21 from the prior letter*

*The company indicates the company has updated the ACV to match the indicated factors; however, the Department is unable to locate an exhibit where this information is reflected. Pursuant to KSA 40-955, please advise and amend filing accordingly.*

### **Objection 5**

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 6 from the prior letter*

*Please provide further explanation as to what the overall rate impact the changes to deductible factors is having on the current book of business. Please provide modeled indications and final selections.*

**Objection 6**

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 12 from the prior letter*

*Pursuant to KSA 40-955, please advise if the company has always used 20 years of experience to determine the wind/hail provision and provide SERFF filing #s where previously used.*

**Objection 7**

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 14 from the prior letter*

*Pursuant to KSA 40-955, please provide a high level explanation as for why the loss ratio for 2019 is higher than for other years.*

**Objection 8**

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 22 from the prior letter*

*The Department again requests the company provide further clarify and justify any factor selections over indication as well as any factor selections at full indication. Please provide an explanation using lay terms.*

**Objection 9**

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 26 from the prior letter*

*The company indicates the policyholder seeing the largest premium impact is seeing a dollar increase larger than average because the policyholder premium is much larger than average. Please provide the current policyholder premium. Pursuant to KSA 40-953, please explain why the insurance score group, architectural shingles, roof age, and attached car stalls are making this policyholder a greater hail risk as well as a higher roof risk.*

*Please explain if this policyholder will be an outlier or if other policyholders will see unusually large increases like this.*

**Conclusion:**

*The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.*

*Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.*

*If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.*

*Sincerely,*

*Emily Beets*

## Objection Letter

Objection Letter Status	Disapproved and Not Filed
Objection Letter Date	07/24/2023
Submitted Date	07/24/2023
Respond By Date	

---

Dear Christine Cass,

### **Introduction:**

*This will acknowledge your letter whereby you submitted the captioned filing.*

### **Objection 1**

- Actual Cash Value Loss Settlement, HO 04 81, 10 23 (Form)
- Scheduled Structures Away From The Residence Premises Coverage, HO 04 92, 10 23 (Form)
- Scheduled Structures Cosmetic Hail Damage , HO 84 19, 10 23 (Form)
- Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage, HO 84 23, 10 22 (Form)
- Other Structures Blanket Coverage, HO 84 24, 10 23 (Form)
- Roof Replacement Cost Coverage For Windstorm And Hail, HO 86 05, 10 22 (Form)
- Roof Surface Payment Schedule, HO 88 02, 10 22 (Form)
- Dwelling And Other Structures Replacement Cost Coverage, MH 84 01, 10 23 (Form)
- Kansas Advance Homeowners Rate/Rule Manual, Please see the Listing of New & Updated Manual Pages in the Supporting

Documents tab. There is not enough room in this field to list all the pages. (Rate)

*Comments: Please advise if the current rates contemplate the coverage which would be excluded by the proposed endorsement. Such explanation is necessary as a restriction of coverage is tantamount to a rate increase which may result in an excessive premium rate level unless a corresponding rate decrease is filed, pursuant to KSA 40-954.*

*In Rules section, please see Rule E-47, E-49,*

### **Objection 2**

- Dwelling Cosmetic Hail Damage Coverage For Metal Roof, HO 84 05, 10 23 (Form)

*Comments: The homeowners policy includes an optional exclusion for cosmetic damages. It appears the form redefines a covered peril in a manner that is not within the best interests of the people of this state pursuant to KSA 40-954. You are excluding cosmetic damage that is a covered peril under the policy so that the damage will not be covered until that part of the property fails. This can cause a more significant loss in the future. Please advise if the corresponding rates are discounted to reflect this exclusion. The rate manual rule must provide a detailed explanation of how the exclusion will be used and indicate that the form is optional. Also, please provide the notice that would be provided to the insured regarding this exclusion.*

### **Objection 3**

*Comments: Pursuant to K.S.A. 40-955(e) please provide support and justification as to how the company derived the proposed overall rate indication. Exhibit A-1, exhibit 5 of 5, shows the overall rate impact of 19.5%, and the rate/rule schedule shows an overall rate impact of 15.9%. Please advise and amend filing accordingly.*

### **Objection 4**

- Actuarial Justification (Supporting Document)

*Comments: Please see the maximum rate increase on the rate/rule schedule tab*

*Please see exhibit D-1, page 1 of 2*

*Pursuant to K.S.A. 40-955 (e), please provide the characteristics of the policyholder seeing the maximum rate increase, and explain why these particular characteristics are causing this policyholder to see a rate increase larger than average.*

*As this rate increase appears to be excessive, please explain if a cap will be placed on the policy, if the increase is for an annual or semi-annual policy, if the characteristics are due to policyholder level changes and/or filed changes, what the premium change will be dollars on an uncapped basis (and a capped basis if applicable) and if no cap is being placed, why the company is not choosing to implement a cap on this policy. If a cap is being placed on the policy, please clarify the time period in which the rate increase will be realized for this policyholder.*

*Additionally, please further clarify and justify why this policyholder would pose such an extraordinary risk above average for this book of business to warrant such a large rate increase. (ie- high number of claims, high coverage values, objective and measurable property risks)*

#### **Objection 5**

*- Kansas Advance Homeowners Rate/Rule Manual, Please see the Listing of New & Updated Manual Pages in the Supporting Documents tab. There is not enough room in this field to list all the pages. (Rate)*

*Comments: Condo Order of Rating*

*Owners Order of Rating*

*Manufactured Homes Order of Rating*

*Renters Order of Rating*

*Pursuant to KSA 40-955, please provide further clarification if the currently proposed changes will result in a rate or coverage impact to policyholders and advise of the overall impact.*

#### **Objection 6**

*- Kansas Advance Homeowners Rate/Rule Manual, Please see the Listing of New & Updated Manual Pages in the Supporting Documents tab. There is not enough room in this field to list all the pages. (Rate)*

*Comments: car stalls - HO /hail*

*deductible - HO - pages R030-1 through 37 (new and revised factors)*

*dwelling use - HO /hail*

*ISG/tenure factors - HO/hail*

*replacement cost add-on - HO*

*roof class - HO, class and 3 hail*

*solar panels - HO /hail*

*square footage - HO/hail*

*territory assignment - HO /hail*

*wind/hail deductible factors - HO (new and revised)*

*deductibles - renters/all others*

*deductible - condo/all other and water*

*Pursuant to K.S.A. 40-955(e), please provide further support and justification for the proposed (factor/premium/rate) changes. The current evidence does not support the company's rationale and further information will be required.*

#### **Objection 7**

*Comments: ISG- tenure factors/HO - hail*

*Pursuant to K.S.A. 40-5104(d), (e) and (f) no insurer authorized to do business in Kansas which utilizes credit information to underwrite or rate risks, shall take an adverse action against a consumer solely because such consumer does not have a credit card account or consider an absence of credit information or an inability to calculate an insurance score in underwriting or rating personal insurance, unless the insurer does one of the following:*

*(1) Treat the consumer as if the applicant or insured had neutral credit information, as defined by the insurer; or*

*(2) exclude the use of credit information as a factor and use only other underwriting criteria.*

*(f) Take an adverse action against a consumer based on credit information, unless an insurer obtains and uses a credit report issued or an insurance score calculated within 90 days from the date the personal insurance policy is first written or notice of renewal is issued.*

### **Objection 8**

*- Kansas Advance Homeowners Rate/Rule Manual, Please see the Listing of New & Updated Manual Pages in the Supporting Documents tab. There is not enough room in this field to list all the pages. (Rate)*

*Comments: premium stabilization - HO, renters, condos, manufactured homes*

*Pursuant to K.S.A. 40-953 and K.S.A. 40-954 please further clarify and justify the need for introduction of the captioned factor and rationalize the relevance of this item in the rating of this line of business.*

### **Objection 9**

*- Actuarial Justification (Supporting Document)*

*Comments: Please see exhibit A-3.1, pages 1-9*

*Please see exhibit A-3.2, pages 1-3*

*Please see Exhibit A-3.3, pages 1-4*

*Please see Exhibit A-3.4, pages 3-9*

*Pursuant to KSA 40-955, please clarify and justify all unadjusted loss ratios over 100% for all coverage types and lines of business for line 3 on the above captioned exhibits.*

### **Objection 10**

*- Actuarial Justification (Supporting Document)*

*Comments: Please see exhibits A-3.1, pages 1-9*

*Please see exhibits A-3.2, pages 1-3*

*Please see exhibit A-3.3, pages 1-4*

*Please see exhibit A-3.4, page 1-9*

*Pursuant to KSA 40-955, please define line 8, allocated non base premium on the above captioned exhibits for all coverage types and all lines of business.*

### **Objection 11**

*- Actuarial Justification (Supporting Document)*

*Comments: Please see exhibit A-3.1, pages 1-9*

*Please see exhibits A-3.2, pages 1-3*

*Please see exhibit A-3.3, pages 1-4*

*Please see exhibit A-3.4, pages 1-9*

*Pursuant to KSA 40-955, please clarify and justify all projected ultimate loss ratios over 100% (line #9) on the above captioned exhibits for all coverage types and all lines of business.*

**Objection 12**

*- Actuarial Justification (Supporting Document)*

*Comments: Please see exhibit A-3.1, pages 1-9*

*Please see exhibit A-3.2,, pages 1-3*

*Please see exhibit A-3.3, pages 1-4*

*Please see exhibit A-3.4, pages 1-9*

*Pursuant to KSA 40-955, please clarify and justify all exhibits where the company uses 100% credibility (line #14) on the above captioned exhibits for all coverage types and all lines of business, as there appears to be quite a bit of volatility in the data for this program.*

**Objection 13**

*- Actuarial Justification (Supporting Document)*

*Comments: Exhibit A, 3.2*

*pages 1 of 3 (renters - all other peril)*

*Pursuant to KSA 40-955, please explain why the policyholders are not receiving a rate decrease when the indication is -4.9%*

**Objection 14**

*- Actuarial Justification (Supporting Document)*

*Comments: Exhibit A-3.3*

*page 1 of 4*

*Pursuant to KSA 40-955, please clarify and justify the large weighted loss ratio on line 11 of the above captioned exhibit for the "all other" exhibit for condos.*

**Objection 15**

*- Actuarial Justification (Supporting Document)*

*Comments: Please see exhibit A-3.4, page 1 of 9*

*Pursuant to KSA 40-955, please clarify and justify proposing a 2.4% rate increase for fire peril for manufactured homes when the company has no incurred losses on line 2 of the captioned exhibit.*

**Objection 16**

*- Actuarial Justification (Supporting Document)*

*Comments: Please see Exhibit A-3.4, page 2 of 9 /hail indication for manufactured homes*

*Please see Exhibit A-3.4, page 7 of 9/wind indication for manufactured homes*

*Pursuant to KSA 40-955, please advise why there is no data available for line 4 or line 5 in the above captioned exhibit.*

**Objection 17**

*- Actuarial Justification (Supporting Document)*

*Comments: EXHIBIT B-1*

*Page 1 of 1*

*EXHIBIT B-1.1*

*Page 1 of 1*

*Pursuant to KSA 40-955, please further clarify and justify the use of aged data back to 2003 in loss development. Please also advise why no newer data than 2022 has been used in rate creation for a filing with an effective date of February 2024. Further clarify the evaluation date of the data used in the table.*

**Objection 18**

*- Actuarial Justification (Supporting Document)*

*Comments: Exhibit C-1.1, page 1-3 (age of home - water - owners)*

*Pursuant to KSA 40-955, please further clarify and justify how factors were determined for the captioned rate supporting exhibit for home ages 0-14 when there is no indication.*

**Objection 19**

*- Actuarial Justification (Supporting Document)*

*Comments: Exhibit C-2, page 1 of 1, Kansas - square footage, homeowners, other peril*

*Exhibit C3.1, page 1 through 3, Kansas - owners, replacement cost, water peril*

*Exhibit C3.1, pages 4 through 6, Kansas- owners, replacement cost, wind peril*

*Pursuant to KSA 40-855, please further clarify and justify why the company is taking full indications on the above captioned rating exhibits.*

**Objection 20**

*- Actuarial Justification (Supporting Document)*

*Comments: Exhibit C-4*

*page 1 of 18*

*Pursuant to KSA 40-955, please further clarify and justify the use of aged data back to 2015 in model development. Please also advise why no newer data than 2022 has been used in rate creation for a filing with an effective date of February 2024.*

**Objection 21**

*Comments: Exhibit C-4*

*page 1 of 18*

*Wind/Hail Model*

*Karen Clark and Company Hail Model*

*Rates developed using generalized linear modeling or other predictive modeling techniques must include a detailed narrative of the modeling process. This should include a description of the*

*modeling data, variable selection process, data dictionary, model testing & validation, and any judgements made throughout the process.*

**Objection 22**

*- Actuarial Justification (Supporting Document)*

*Comments: Exhibit C-4, pages 2-4, C-4. Coverage A Limit Factor*

*Exhibit C-4, page 5, C-16. Age of Home*

*D-2. Age of Home Discount*

*Exhibit C-4, pages 6-7, C-24. Home Type*

*Exhibit C-4, pages 7-10, C-18. Construction and Exterior Type Factor*

*Exhibit C-4, pages 10-18, C-29. Roof Characteristics by Rate Factor*

*Pursuant to KSA 40-955, please provide further clarification and justification for any factor selections over indication, as well as any factor selections at full indication.*

**Objection 23**

*- Actuarial Justification (Supporting Document)*

*Comments: Exhibit D1, pages 1-2*

*Pursuant to KSA 40-955, please advise if the company will be capping the large increases proposed in this filing, if so, please advise of the capping practice proposed. If capping is not proposed, please further explain why policy impacts will not be capped for this filing.*

**Objection 24**

*- Actuarial Justification (Supporting Document)*

*Comments: Exhibit D-1, page 1 of 2*

*The Department notes the company indicates the minimum rate increase is -42.0% on the above captioned exhibit; however, the Department notes the company has reported the minimum rate change is reported as minimum -41.900%% on the rate/rule schedule tab, Please advise to this discrepancy and amend filing accordingly.*

**Objection 25**

*- Actuarial Justification (Supporting Document)*

*Comments: Please see exhibit D-1, page 1 of 2*

*The Department notes the average dollar increase is relatively high in the submitted filing. Pursuant to KSA 40-955, please advise what the average policyholder premium is for this book of business and if the proposed average dollar change is for an annual or semi-annual policy.*

**Objection 26**

*- Actuarial Justification (Supporting Document)*

*Comments: Please see Exhibit D-1, page 2 of 2*

*Pursuant to K.S.A. 40-955 (e), please provide the characteristics of the policyholder seeing the maximum rate dollar increase and explain why these particular characteristics are causing this policyholder to see a premium increase larger than average.*

*As this dollar increase appears to be excessive, please explain if a cap will be placed on the policy, if the increase is for an annual or semi-annual policy, if the characteristics are due to policyholder level changes and/or filed changes, what the rate change will be as a*



*percentage on an uncapped basis (and a capped basis if applicable) and if no cap is being placed, why the company is not choosing to implement a cap on this policy. If a cap is being placed on the policy, please clarify the time period in which the premium increase will be realized for this policyholder.*

*Additionally, please further clarify and justify why this policyholder would pose such an extraordinary risk above average for this book of business to warrant such a large dollar increase. (ie- high number of claims, high coverage values, objective and measurable property risks)*

**Objection 27**

*- Kansas Amendatory Endorsement, HO 81 18, 10 23 (Form)*

*Comments: Pursuant to K.S.A. 40-907 any condition or stipulation in an application, policy or contract of fire insurance hereafter made making the policy void in case the insured premises become vacant, shall not prevent recovery on such policy if it shall be shown by the plaintiff that the insured premises had ceased to be vacant and were occupied at the time of the loss.*

**Objection 28**

*- Kansas Amendatory Endorsement, HO 81 18, 10 23 (Form)*

*Comments: The changes proposed to the definition to ACV may be more restrictive than what was previously proposed and my not align with the requirements of Bulletin 1983-19. Please clarify and justify the proposed changes.*

**Objection 29**

*- Kansas Amendatory Endorsement, HO 81 18, 10 23 (Form)*

*Comments: Section 1 - additional coverage, how we settle losses*

*Several of the endorsements in the filing broaden or further restrict the standard coverage; however, we did not locate the rating considerations in the rating plan. It is necessary to explain how the rating plan takes into account the restricting and broadening of coverage with each endorsement; submit the specific rating consideration that will be given with each endorsement when attached to a policy; or file manual rules which specifically state when each endorsement will be attached to a policy if rating considerations will not be given. Please refer to K.S.A. 40-953 and K.S.A. 40-954.*

**Objection 30**

*- Kansas Amendatory Endorsement, HO 81 18, 10 23 (Form)*

*Comments: Section II, additional coverage*

*Pursuant to KSA 40-953, including defense costs within the limits of liability may be considered an unreasonable restriction of coverage creating the possibility of excessive rates. Please provide substantial justification of the need to have defense costs within the limits of liability or amend the file accordingly.*

**Conclusion:**

*The captioned forms are disapproved pending your reply and our subsequent review. Pursuant to K.S.A. 40-964 we hereby give notice that a hearing regarding the disapproval of such forms will be conducted, if requested, in accordance with the Kansas Administrative Procedure Act. We suggest, however, that you resubmit revised forms or provide a rationale for our review prior to requesting a hearing.*

*Pursuant to K.S.A. 40-955 if this filing includes rates, the rates shall not become effective until such time as they are approved.*

*If we do not receive a response within 30 days this filing will be withdrawn for lack of company response.*

*Sincerely,*

*Emily Beets*

## Response Letter

Response Letter Status	Submitted to State
Response Letter Date	11/21/2023
Submitted Date	11/21/2023

---

*Dear Emily Beets,*

**Introduction:**

*Thank you for the review of this filing.*

**Response 1**

**Comments:**

*Please see the attached documents.*

**Related Objection 1**

*Applies To:*

*- 11/16/23 Response to the Objections Dated 11-9-23 & Note to Filer Dated 11-13-23 (Supporting Document)*

*Comments: Please see objection 1 from the letter dated 11/9/23*

*Pursuant to KSA 40-955, please provide numerical frequency and severity data for hail to support and justify Kansas has higher rates of frequency and severity than other states.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Explanatory Memo - Rates
Comments:	
Attachment(s):	11-21-23 KS Advance Property Memo in Response to Objections Dated 11-17-23.pdf
Previous Version	
Satisfied - Item:	Explanatory Memo - Rates
Comments:	
Attachment(s):	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
Previous Version	
Satisfied - Item:	Explanatory Memo - Rates
Comments:	
Attachment(s):	KS Advance Property Memo 2-10-24.pdf

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Property Memo in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Exhibits in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Supporting Document Schedule Item Changes</b>	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Property Memo in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Exhibits in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	11/21/23 Response to the Objections Dated 11/17/23
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 Response KS Adv Objection Dated 11-17-23.pdf

## **Response 2**

### **Comments:**

*Please see the attached documents.*

**Related Objection 2**

*Applies To:*

- *Actuarial Justification (Supporting Document)*
- *11/16/23 Response to the Objections Dated 11-9-23 & Note to Filer Dated 11-13-23 (Supporting Document)*

*Comments: Please see objection 1 from the letter dated 11/9/23*

*Please see exhibit C-4*

*Please see age of home factors.*

*Please further explain how the final factor selections were determined for this rating variable. It appears the final selection is based on the indication in places where this may not be intuitive if factors should be increasing as the home ages. For example, home age 34 is 0.624 while home age 33 is 1.010 and home age 35 is 1.005. Pursuant to KSA 40-955, further explanation is required.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Property Memo in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Property Memo in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Exhibits in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Supporting Document Schedule Item Changes</b>	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Property Memo in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Exhibits in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	11/21/23 Response to the Objections Dated 11/17/23
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 Response KS Adv Objection Dated 11-17-23.pdf

### **Response 3**

#### **Comments:**

*Please see the attached documents.*



**Related Objection 3**

*Applies To:*

- 11/16/23 Response to the Objections Dated 11-9-23 & Note to Filer Dated 11-13-23 (Supporting Document)

*Comments:* Please see objection 1 from the letter dated 11/9/23

*The Department notes the company is automatically moving policies with roofs at 15 years of age and over from RCV to ACV.*

*As this is a reduction in coverage for these policyholders, pursuant to K.A.R 40-1-39 and K.A.R 40-1-32, please provide further information as to how the policyholder will be notified regarding changes to the policy and consent will be obtained of the insured/ policyholder. Please clarify is a credit or rate decrease will be applied with these changes and if the policyholder will have the option to purchase RCV if so desired. Finally, describe the timeline and procedure of re-applying RCV if the policyholder were to install a new roof.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Property Memo in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Property Memo in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Exhibits in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Supporting Document Schedule Item Changes</b>	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Property Memo in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Exhibits in Response to Objections Dated 11-17-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf</i>
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	11/21/23 Response to the Objections Dated 11/17/23
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 Response KS Adv Objection Dated 11-17-23.pdf

**Conclusion:**

*Please reach out if you have any questions. Thank you.*

*Sincerely,*

*Christine Cass*

## Response Letter

Response Letter Status	Submitted to State
Response Letter Date	11/16/2023
Submitted Date	11/16/2023

---

*Dear Emily Beets,*

### **Introduction:**

*Thank you for the review of this filing. In addition to the responses below, we have also responded to the Note to Filer question dated 11/13/23.*

### **Response 1**

#### **Comments:**

*Please see the attached document.*

### **Related Objection 1**

*Comments: Pursuant to KSA 40-955, please provide specific exhibits to show that stucco, siding, etc. claims have been worse than expected from the original pricing of this product.*

### **Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

*No Supporting Documents changed.*

### **Response 2**

#### **Comments:**

*Please see the attached document.*

### **Related Objection 2**

*Comments: Please provide the analysis that indicated no significant relationship between the policyholder's insurance score and hail risk, pursuant to KSA 40-955.*

### **Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

*No Supporting Documents changed.*

### **Response 3**

#### **Comments:**

*Please see the attached document.*

### **Related Objection 3**

*Comments: Pursuant to KSA 440-955, please explain why portions of the model refresh are redacted.*

### **Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

*No Supporting Documents changed.*

**Response 4**

**Comments:**

*Please see the attached document.*

**Related Objection 4**

*Comments: Please complete the document attached at the end of the letter.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

*No Supporting Documents changed.*

**Conclusion:**

*We appreciate the expedited review of our responses. Thank you.*

*Sincerely,*

*Christine Cass*

## Response Letter

Response Letter Status	Submitted to State
Response Letter Date	11/08/2023
Submitted Date	11/08/2023

---

*Dear Emily Beets,*

**Introduction:**

*Thank you for the review of this filing.*

**Response 1**

**Comments:**

*Please see the attached document.*

**Related Objection 1**

*Comments: Pursuant to KSA 40-955, please further clarify and justify why Kansas is seeing larger policyholder dislocation than Missouri. The company has indicated the use of Countrywide data is necessary in applying weather related losses, as Kansas data is not fully credible, but has also suggested Kansas has worth loss history than other filed states; therefore seeing more dislocation. Due to the proximity and similar weather patterns and home structures in Missouri, the Department requests additional support to reflect why more Kansas policyholders will see large rate increases.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

### Supporting Document Schedule Item Changes

Satisfied - Item:	11/8/23 Response to the Objection Dated 11/6/23
Comments:	
Attachment(s):	11-8-23 KS Adv Response to Objection Dated 11-6-23.pdf

**Conclusion:**

*We need to let I/S know by the end of the day tomorrow, Thursday, November 9th, if we are able to implement this change with the filed Effective Dates of 2/10/2024 for New Business & Renewal Business.*

*We would appreciate any effort you are able to make in sending additional questions or closing out this filing, within that timeframe.*

*Much appreciated!*

*Sincerely,*

*Christine Cass*

## Response Letter

Response Letter Status	Submitted to State
Response Letter Date	11/01/2023
Submitted Date	11/01/2023

---

*Dear Emily Beets,*

**Introduction:**

*Thank you for the review of this filing.*

**Response 1**

**Comments:**

*Please see the attached document.*

**Related Objection 1**

*Applies To:*

*- 10/23/23 Exhibit O5 in Response to Objection 1 Dated 10/20/23 (Supporting Document)*

*Comments: Thank you for the additional information on the policyholders seeing increases over 120%/\$3000 on this filing. Due to the large # of policyholders seeing large increases, please advise how soon before the capped changes would be realized and the average rate change and average policy premium these policyholders will see in the aggregate.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

### Supporting Document Schedule Item Changes

<b>Satisfied - Item:</b>	11/1/23 Response to the Objection Dated 11/1/23
<b>Comments:</b>	
<b>Attachment(s):</b>	11-1-23 Response to the Objection Dated 11-1-23.pdf

**Conclusion:**

*Thank you.*

*Sincerely,*

*Christine Cass*



Response Letter

Response Letter Status	Submitted to State
Response Letter Date	10/23/2023
Submitted Date	10/23/2023

Dear Emily Beets,

Introduction:

Thank you for the review of this filing.

Response 1

Comments:

Please see the attached documents.

Related Objection 1

Applies To:

- 10/16/23 Response to the Objections Dated 10/11/23 (Supporting Document)
- 10/16/23 Exhibit 04 in Response to Objection 3 Dated 10/11/23 (Supporting Document)

Comments: Please see objection 3 from the prior letter dated 10/11/23

The Department has revised exhibit 04-1.2 and Exhibit 04-1.3 and unable to locate support and justification for the following: high replacement costs, old roofs both under RCV and ACV, ISG, exterior type, high replacement cost, and attached car stalls. Pursuant to KSA 40-955, please advise.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	10/23/23 Response to Objections Dated 10/20/23
Comments:	
Attachment(s):	10-23-23 Response to the Objections Dated 10-20-23.pdf

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/23/23 Response to Objections Dated 10/20/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-23-23 Response to the Objections Dated 10-20-23.pdf

  

<b>Satisfied - Item:</b>	10/23/23 Exhibit O5 in Response to Objection 1 Dated 10/20/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O5.pdf

## **Response 2**

### **Comments:**

*Please see the attached document.*

## **Related Objection 2**

*Applies To:*

- 10/16/23 Response to the Objections Dated 10/11/23 (Supporting Document)

*Comments: Please see objection 4 from the letter dated 10/11/23*

*Pursuant to KSA 40-955, please clarify if the list of SERFF filing numbers is a conclusive list for all filings for this rate and model refresh.*

### **Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/23/23 Response to Objections Dated 10/20/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-23-23 Response to the Objections Dated 10-20-23.pdf

### **Conclusion:**

*Thank you.*

*Sincerely,*

*Christine Cass*

## Response Letter

Response Letter Status	Submitted to State
Response Letter Date	10/16/2023
Submitted Date	10/16/2023

---

*Dear Emily Beets,*

### **Introduction:**

*Thank you for the review of this filing.*

### **Response 1**

#### **Comments:**

*Please see the attached document.*

### **Related Objection 1**

*Applies To:*

- Kansas Amendatory Endorsement, HO 81 18, 10 23 (Form)*
- 10/2/23 Response to Objections Dated 9/14/23 (Supporting Document)*

*Comments: Please see objection 1 from the Department's letter dated 9/14/23*

*Pursuant to KSA 40-955, please describe in further detail the coverage impact policyholders will see from the proposed changes for HO 81 18 10 23, including but not limited to additional roofing and/or cosmetic damage restrictions or changes to loss settlement provisions.*

### **Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

### **Supporting Document Schedule Item Changes**

<b>Satisfied - Item:</b>	10/16/23 Response to the Objections Dated 10/11/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-16-23 KS Adv Response to the Objections Dated 10-11-23.pdf

### **Response 2**

#### **Comments:**

**Related Objection 2**

*Applies To:*

- *Kansas Advance Homeowners Rate/Rule Manual, Please see the Listing of New & Updated Manual Pages in the Supporting Documents tab. There is not enough room in this field to list all the pages. (Rate)*

- *10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23 (Supporting Document)*

- *10/2/23 Response to Objections Dated 9/14/23 (Supporting Document)*

*Comments: Please see objection 2 and objection 4 from the Department letter dated 9/14/23*

*Pursuant to KSA 40-955, please provide further clarification and justification as to how Kansas would not be subsidizing other states/other losses by using countrywide changes for rating changes in Kansas.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/16/23 Response to the Objections Dated 10/11/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-16-23 KS Adv Response to the Objections Dated 10-11-23.pdf

**Response 3****Comments:**

*Please see the attached documents.*

**Related Objection 3**

*Applies To:*

- *10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23 (Supporting Document)*

- *10/2/23 Response to Objections Dated 9/14/23 (Supporting Document)*

*Comments: Please see objection 3 and objection 5 from the Department's letter dated 9/14/23*

*Re: Exhibit 03-2.1 and Exhibit 03-2.2*

*The Department has reviewed the captioned exhibits and pursuant to KSA 40-955, please advise as to the current and proposed premiums capped and uncapped for those policyholders seeing rate increases over 120% and premium increases over \$3000.*

*Additionally, please advise of the location of all support and justification exhibits for those characteristics contemplated in the captioned exhibits, including high replacement costs, old roofs both under RCV and AV, ISG, exterior type, high replacement cost, and attached car stalls.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/16/23 Response to the Objections Dated 10/11/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-16-23 KS Adv Response to the Objections Dated 10-11-23.pdf

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/16/23 Response to the Objections Dated 10/11/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-16-23 KS Adv Response to the Objections Dated 10-11-23.pdf

<b>Satisfied - Item:</b>	10/16/23 Exhibit O4 in Response to Objection 3 Dated 10/11/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O4.pdf

**Response 4**

**Comments:**

*Please see the attached document.*

**Related Objection 4**

*Applies To:*

- 10/2/23 Response to Objections Dated 9/14/23 (Supporting Document)

Comments: Please see objection 6 from the prior letter dated 9/14/2023

Pursuant to KSA 40-955, please provide the SERFF filing numbers of other filings approved, any pending and/or disapproved with this proposed rate and model refresh.

**Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	10/16/23 Response to the Objections Dated 10/11/23
Comments:	
Attachment(s):	10-16-23 KS Adv Response to the Objections Dated 10-11-23.pdf

**Conclusion:**

Thank you.

Sincerely,

Christine Cass

## Response Letter

Response Letter Status	Submitted to State
Response Letter Date	10/02/2023
Submitted Date	10/02/2023

---

*Dear Emily Beets,*

**Introduction:**

*Thank you for the review of this filing.*

**Response 1**

**Comments:**

*Please see the attached document.*

**Related Objection 1**

*Applies To:*

- *Roof Replacement Cost Coverage For Windstorm And Hail, HO 86 05, 10 22 (Form)*
- *Roof Surface Payment Schedule, HO 88 02, 10 22 (Form)*
- *Dwelling Cosmetic Hail Damage Coverage For Metal Roof, HO 84 05, 10 23 (Form)*
- *Scheduled Structures Cosmetic Hail Damage , HO 84 19, 10 23 (Form)*
- *Kansas Amendatory Endorsement, HO 81 18, 10 23 (Form)*
- *9/11/23 Responses to the Objections Dated 8/28/23 (Supporting Document)*

*Comments: Please see objection 1 from the prior letter*

*Pursuant to KSA 40-955, please advise the changes to the above captioned forms will not result in a rate or coverage impact for policyholders.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

### Supporting Document Schedule Item Changes

Satisfied - Item:	10/2/23 Response to Objections Dated 9/14/23
Comments:	
Attachment(s):	10-2-23 KS Advance Response to Objections Dated 9-14-23.pdf

## **Response 2**

### **Comments:**

*Please see the attached documents.*

## **Related Objection 2**

*Applies To:*

*- 9/11/23 Responses to the Objections Dated 8/28/23 (Supporting Document)*

*Comments: Please see objection 5 from the prior letter*

*Construction & Exterior: Based on the past 5-year company-wide hail experience analysis via GLM, the company has observed that policies with stucco exterior are exposed to more hail risk than other exterior type. Pursuant to KSA 40-955, please provide numerical support and justification including final indications and selections.*

*Roofing surface & Age: Based on the past 5-year state-wide hail experience, architectural shingles with roof age of 6-10 under the replacement cost value method experience the highest risk of loss. Pursuant to KSA 40-955, please provide numerical support and justification including final indications and selections.*

*Insurance Score Group: Based on the past 5-year company-wide hail experience analysis via GLM, the company did not notice any significant relationship between policyholders insurance score group and hail risk. Therefore, it is proposed to set the factors 1.000 for an insurance score group for hail peril, meaning that policies with better insurance score will no longer receive a discount while policies with worse insurance score will no longer receive additional premium on hail peril. This policyholder has an ISG of 4, resulting in a hail premium increase from absence of the ISG discount.*

*Territory: KCC US Severe Convective Storm Reference Model indicates that northern Kansas has a higher hail risk. The property of this policy locates in Saline County, which is one of the counties with greater hail risk, and hance experiencing a hail premium increase higher than average. Pursuant to KSA 40-955, please provide numerical support and justification including final indications and selections.*

### **Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O3.pdf



Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O3.pdf

  

<b>Satisfied - Item:</b>	10/2/23 Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-2-23 KS Advance Response to Objections Dated 9-14-23.pdf

### **Response 3**

#### **Comments:**

*Please see the attached documents.*

### **Related Objection 3**

*Applies To:*

*- 9/11/23 Responses to the Objections Dated 8/28/23 (Supporting Document)*

*Comments: Please see objection 3 from the prior letter*

*The company has indicated as per Exhibit D-1, less than 1% of the total book will be experiencing more than 120% increase in premium before the rate capping. Pursuant to KSA 40-955, how many policies will this be, and please provide their characteristics and rate increases capped and uncapped.*

### **Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O3.pdf

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O3.pdf
<b>Satisfied - Item:</b>	10/2/23 Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-2-23 KS Advance Response to Objections Dated 9-14-23.pdf

#### **Response 4**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 4**

*Applies To:*

*- 9/11/23 Responses to the Objections Dated 8/28/23 (Supporting Document)*

*Comments: Please see objection 9 from the prior filing*

*Roofing surface & Age: Based on the past 5-year state-wide hail experience, architectural shingles with roof age of 6-10 under the replacement cost value method experience the most roof risk loss. Pursuant to KSA 40-955, please provide numerical support and justification including final indications and selections.*

*Car stall: Based on the past 5-year company-wide hail experience analysis via GLM, more car stalls indicate greater hail risk. Pursuant to KSA 40-955, please provide numerical support and justification, including final indications and selections.*

#### **Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O3.pdf

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O3.pdf

<b>Satisfied - Item:</b>	10/2/23 Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-2-23 KS Advance Response to Objections Dated 9-14-23.pdf

#### **Response 5**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 5**

*Applies To:*

*- 9/11/23 Responses to the Objections Dated 8/28/23 (Supporting Document)*

*Comments: Please see objection 9 from the prior letter*

*The company has indicated as shown in Exhibit D-1, 1.7% of the total book will be experiencing more than \$3,000 increase in premium before the rate capping. Pursuant to KSA 40-955, please provide the characteristics of these policyholders as well as the capped and uncapped amounts of these changes.*

#### **Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O3.pdf

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O3.pdf

<b>Satisfied - Item:</b>	10/2/23 Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-2-23 KS Advance Response to Objections Dated 9-14-23.pdf

#### **Response 6**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 6**

*Comments: Please provide a list of states with recent rate changes and similar policy dislocation the company has had filed and approved recently corresponding with this rate increase.*

##### **Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O3.pdf

<b>Supporting Document Schedule Item Changes</b>	
<b>Satisfied - Item:</b>	10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O3.pdf
<b>Satisfied - Item:</b>	10/2/23 Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-2-23 KS Advance Response to Objections Dated 9-14-23.pdf

**Conclusion:**

*Thank you.*

*Sincerely,*

*Christine Cass*

## Response Letter

Response Letter Status	Submitted to State
Response Letter Date	09/11/2023
Submitted Date	09/11/2023

---

*Dear Emily Beets,*

**Introduction:**

*Thank you for the review of this filing.*

**Response 1**

**Comments:**

*Please see the attached document.*

**Related Objection 1**

*Applies To:*

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: objection 2*

*Please see objection 2 from the prior letter*

*Please summarize the changes to cosmetic damage coverages/exclusions being proposed in the captioned filing. Please advise if the current rates contemplate the coverage which may be excluded or reduced by changes proposed. Such explanation is necessary as a restriction of coverage is tantamount to a rate increase which may result in an excessive premium rate level unless a corresponding rate decrease is filed, pursuant to KSA 40-954.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
Satisfied - Item:	9/11/23 Responses to the Objections Dated 8/28/23
Comments:	
Attachment(s):	9-11-23 Response to the Objections Dated 8-28-23.pdf

**Response 2****Comments:**

*Please see the attached document.*

**Related Objection 2**

*Applies To:*

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 3 from the prior letter*

*The company indicates in response to objection 3 to the prior letter the uncapped maximum rate increase for this filing is 335.8%; however, the rate/rule tab shows the maximum rate increase to be 362,400%. Pursuant to KSA 40-955, please advise and amend filing accordingly.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	9/11/23 Responses to the Objections Dated 8/28/23
<b>Comments:</b>	
<b>Attachment(s):</b>	9-11-23 Response to the Objections Dated 8-28-23.pdf

**Response 3****Comments:**

*Please see the attached document.*

**Related Objection 3**

*Applies To:*

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 3 from the prior letter:*

*Pursuant to KSA 40-953, please explain why frame construction stucco exterior, architectural shingles with roof age of 9 under the replacement cost value method, the insurance score placement and census block group would impact hail risk and roof risk loss.*

*Please advise if this policyholder is an outlier or if other policyholder can expect to see similar increases.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
Satisfied - Item:	9/11/23 Responses to the Objections Dated 8/28/23
Comments:	
Attachment(s):	9-11-23 Response to the Objections Dated 8-28-23.pdf

**Response 4****Comments:**

*Please see the attached document.*

**Related Objection 4**

*Applies To:*

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 6 and objection 21 from the prior letter*

*The company indicates the company has updated the ACV to match the indicated factors; however, the Department is unable to locate an exhibit where this information is reflected. Pursuant to KSA 40-955, please advise and amend filing accordingly.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
Satisfied - Item:	9/11/23 Responses to the Objections Dated 8/28/23
Comments:	
Attachment(s):	9-11-23 Response to the Objections Dated 8-28-23.pdf

**Response 5**



**Comments:**

*Please see the attached documents.*

**Related Objection 5**

*Applies To:*

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 6 from the prior letter*

*Please provide further explanation as to what the overall rate impact the changes to deductible factors is having on the current book of business. Please provide modeled indications and final selections.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	9/11/23 Responses to the Objections Dated 8/28/23
<b>Comments:</b>	
<b>Attachment(s):</b>	9-11-23 Response to the Objections Dated 8-28-23.pdf

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	9/11/23 Responses to the Objections Dated 8/28/23
<b>Comments:</b>	
<b>Attachment(s):</b>	9-11-23 Response to the Objections Dated 8-28-23.pdf

<b>Satisfied - Item:</b>	9/11/23 Exhibit O2 in Response to Objection 5 Dated 8/258/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O2.pdf

**Response 6****Comments:**

*Please see the attached document.*

**Related Objection 6**

*Applies To:*

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 12 from the prior letter*

*Pursuant to KSA 40-955, please advise if the company has always used 20 years of experience to determine the wind/hail provision and provide SERFF filing #s where previously used.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
Satisfied - Item:	9/11/23 Responses to the Objections Dated 8/28/23
Comments:	
Attachment(s):	9-11-23 Response to the Objections Dated 8-28-23.pdf

**Response 7**

**Comments:**

*Please see the attached document.*

**Related Objection 7**

*Applies To:*

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 14 from the prior letter*

*Pursuant to KSA 40-955, please provide a high level explanation as for why the loss ratio for 2019 is higher than for other years.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	9/11/23 Responses to the Objections Dated 8/28/23
<b>Comments:</b>	
<b>Attachment(s):</b>	9-11-23 Response to the Objections Dated 8-28-23.pdf

### **Response 8**

#### **Comments:**

*Please see the attached document.*

### **Related Objection 8**

*Applies To:*

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 22 from the prior letter*

*The Department again requests the company provide further clarify and justify any factor selections over indication as well as any factor selections at full indication. Please provide an explanation using lay terms.*

#### **Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	9/11/23 Responses to the Objections Dated 8/28/23
<b>Comments:</b>	
<b>Attachment(s):</b>	9-11-23 Response to the Objections Dated 8-28-23.pdf

### **Response 9**

#### **Comments:**

*Please see the attached document.*

### **Related Objection 9**

*Applies To:*

*- 8/21/23 Response to Objections Dated 7/24/23 (Supporting Document)*

*Comments: Please see objection 26 from the prior letter*

*The company indicates the policyholder seeing the largest premium impact is seeing a dollar increase larger than average because the policyholder premium is much larger than average. Please provide the current policyholder premium. Pursuant to KSA 40-953, please explain why the insurance score group, architectural shingles, roof age, and attached car stalls are making this policyholder a greater hail risk as well as a higher roof risk.*

*Please explain if this policyholder will be an outlier or if other policyholders will see unusually large increases like this.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
Satisfied - Item:	9/11/23 Responses to the Objections Dated 8/28/23
Comments:	
Attachment(s):	9-11-23 Response to the Objections Dated 8-28-23.pdf

**Conclusion:**

*Thank you.*

*Sincerely,*

*Christine Cass*

## Response Letter

Response Letter Status	Submitted to State
Response Letter Date	08/21/2023
Submitted Date	08/21/2023

---

*Dear Emily Beets,*

### **Introduction:**

*Thank you for the review of this filing.*

### **Response 1**

#### **Comments:**

*Please see the attached document.*

### **Related Objection 1**

*Applies To:*

- Actual Cash Value Loss Settlement, HO 04 81, 10 23 (Form)*
- Scheduled Structures Away From The Residence Premises Coverage, HO 04 92, 10 23 (Form)*
- Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage, HO 84 23, 10 22 (Form)*
- Other Structures Blanket Coverage, HO 84 24, 10 23 (Form)*
- Roof Replacement Cost Coverage For Windstorm And Hail, HO 86 05, 10 22 (Form)*
- Roof Surface Payment Schedule, HO 88 02, 10 22 (Form)*
- Dwelling And Other Structures Replacement Cost Coverage, MH 84 01, 10 23 (Form)*
- Scheduled Structures Cosmetic Hail Damage , HO 84 19, 10 23 (Form)*
- Kansas Advance Homeowners Rate/Rule Manual, Please see the Listing of New & Updated Manual Pages in the Supporting Documents tab. There is not enough room in this field to list all the pages. (Rate)*

*Comments: Please advise if the current rates contemplate the coverage which would be excluded by the proposed endorsement. Such explanation is necessary as a restriction of coverage is tantamount to a rate increase which may result in an excessive premium rate level unless a corresponding rate decrease is filed, pursuant to KSA 40-954.*

*In Rules section, please see Rule E-47, E-49,*

### **Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

### **Response 2**

#### **Comments:**

*Please see the attached document.*

### **Related Objection 2**

*Applies To:*

- Dwelling Cosmetic Hail Damage Coverage For Metal Roof, HO 84 05, 10 23 (Form)

*Comments: The homeowners policy includes an optional exclusion for cosmetic damages. It appears the form redefines a covered peril in a manner that is not within the best interests of the people of this state pursuant to KSA 40-954. You are excluding cosmetic damage that is a covered peril under the policy so that the damage will not be covered until that part of the property fails. This can cause a more significant loss in the future. Please advise if the corresponding rates are discounted to reflect this exclusion. The rate manual rule must provide a detailed explanation of how the exclusion will be used and indicate that the form is optional. Also, please provide the notice that would be provided to the insured regarding this exclusion.*

#### **Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

### **Response 3**

#### **Comments:**

*Please see the attached document.*

### **Related Objection 3**

*Comments: Pursuant to K.S.A. 40-955(e) please provide support and justification as to how the company derived the proposed overall rate indication. Exhibit A-1, exhibit 5 of 5, shows the overall rate impact of 19.5%, and the rate/rule schedule shows an overall rate impact of 15.9%. Please advise and amend filing accordingly.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

**Response 4**

**Comments:**

*Please see the attached documents. Once the Post Submission Update from 7/25/23 is processed, we will submit another Post Submission Update to change the Total Written Premium amount, as well as the Maximum & Minimum % Change Fields, of the Rate/Rule Schedule tab.*

**Related Objection 4**

*Applies To:*

*- Actuarial Justification (Supporting Document)*

*Comments: Please see the maximum rate increase on the rate/rule schedule tab*

*Please see exhibit D-1, page 1 of 2*

*Pursuant to K.S.A. 40-955 (e), please provide the characteristics of the policyholder seeing the maximum rate increase, and explain why these particular characteristics are causing this policyholder to see a rate increase larger than average.*

*As this rate increase appears to be excessive, please explain if a cap will be placed on the policy, if the increase is for an annual or semi-annual policy, if the characteristics are due to policyholder level changes and/or filed changes, what the premium change will be dollars on an uncapped basis (and a capped basis if applicable) and if no cap is being placed, why the company is not choosing to implement a cap on this policy. If a cap is being placed on the policy, please clarify the time period in which the rate increase will be realized for this policyholder.*

*Additionally, please further clarify and justify why this policyholder would pose such an extraordinary risk above average for this book of business to warrant such a large rate increase. (ie- high number of claims, high coverage values, objective and measurable property risks)*

**Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>



Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 5**

##### **Comments:**

*Please see the attached document.*

#### **Related Objection 5**

*Applies To:*

*- Kansas Advance Homeowners Rate/Rule Manual, Please see the Listing of New & Updated Manual Pages in the Supporting Documents tab. There is not enough room in this field to list all the pages. (Rate)*

*Comments: Condo Order of Rating  
Owners Order of Rating  
Manufactured Homes Order of Rating  
Renters Order of Rating*

*Pursuant to KSA 40-955, please provide further clarification if the currently proposed changes will result in a rate or coverage impact to policyholders and advise of the overall impact.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

**Response 6**

**Comments:**

*Please see the attached documents.*

**Related Objection 6**

*Applies To:*

*- Kansas Advance Homeowners Rate/Rule Manual, Please see the Listing of New & Updated Manual Pages in the Supporting Documents tab. There is not enough room in this field to list all the pages. (Rate)*

*Comments: car stalls - HO /hail  
deductible - HO - pages R030-1 through 37 (new and revised factors)  
dwelling use - HO /hail  
ISG/tenure factors - HO/hail  
replacement cost add-on - HO  
roof class - HO, class and 3 hail  
solar panels - HO /hail  
square footage - HO/hail  
territory assignment - HO /hail  
wind/hail deductible factors - HO (new and revised)  
deductibles - renters/all others  
deductible - condo/all other and water*

*Pursuant to K.S.A. 40-955(e), please provide further support and justification for the proposed (factor/premium/rate) changes. The current evidence does not support the company's rationale and further information will be required.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Supporting Document Schedule Item Changes</b>	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>
<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>
<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>
<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>
<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf
<b>Satisfied - Item:</b>	8/21/23 Exhibit O1-1 Deductible Factor Support Exhibit in Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O1-1.pdf

### Response 7

#### Comments:

Please see the attached documents.

### Related Objection 7

Comments: ISG- tenure factors/HO - hail

Pursuant to K.S.A. 40-5104(d), (e) and (f) no insurer authorized to do business in Kansas which utilizes credit information to underwrite or rate risks, shall take an adverse action against a consumer solely because such consumer does not have a credit card account or consider an absence of credit information or an inability to calculate an insurance score in underwriting or rating personal insurance, unless the insurer does one of the following:

(1) Treat the consumer as if the applicant or insured had neutral credit information, as defined by the insurer; or

(2) exclude the use of credit information as a factor and use only other underwriting criteria.

(f) Take an adverse action against a consumer based on credit information, unless an insurer obtains and uses a credit report issued or an insurance score calculated within 90 days from the date the personal insurance policy is first written or notice of renewal is issued.

**Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	8/21/23 Response to Objections Dated 7/24/23
Comments:	
Attachment(s):	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

**Response 8**

**Comments:**

Please see the attached documents.

**Related Objection 8**

Applies To:

- Kansas Advance Homeowners Rate/Rule Manual, Please see the Listing of New & Updated Manual Pages in the Supporting Documents tab. There is not enough room in this field to list all the pages. (Rate)

*Comments: premium stabilization - HO, renters, condos, manufactured homes*

*Pursuant to K.S.A. 40-953 and K.S.A. 40-954 please further clarify and justify the need for introduction of the captioned factor and rationalize the relevance of this item in the rating of this line of business.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

**Response 9**

**Comments:**

*Please see the attached documents.*

**Related Objection 9**

*Applies To:*

*- Actuarial Justification (Supporting Document)*

*Comments: Please see exhibit A-3.1, pages 1-9*

*Please see exhibit A-3.2, pages 1-3*

*Please see Exhibit A-3.3, pages 1-4*

*Please see Exhibit A-3.4, pages 3-9*

*Pursuant to KSA 40-955, please clarify and justify all unadjusted loss ratios over 100% for all coverage types and lines of business for line 3 on the above captioned exhibits.*

**Changed Items:**



No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 10**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 10**

*Applies To:*

*- Actuarial Justification (Supporting Document)*

*Comments: Please see exhibits A-3.1, pages 1-9*

*Please see exhibits A-3.2, pages 1-3*

*Please see exhibit A-3.3, pages 1-4*

*Please see exhibit A-3.4, page 1-9*

*Pursuant to KSA 40-955, please define line 8, allocated non base premium on the above captioned exhibits for all coverage types and all lines of business.*

**Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 11**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 11**

*Applies To:*

- *Actuarial Justification (Supporting Document)*

*Comments: Please see exhibit A-3.1, pages 1-9*

*Please see exhibits A-3.2, pages 1-3*

*Please see exhibit A-3.3, pages 1-4*

*Please see exhibit A-3.4, pages 1-9*

*Pursuant to KSA 40-955, please clarify and justify all projected ultimate loss ratios over 100% (line #9) on the above captioned exhibits for all coverage types and all lines of business.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

## Response 12

### Comments:

*Please see the attached documents.*

## Related Objection 12

*Applies To:*

- *Actuarial Justification (Supporting Document)*

Comments: Please see exhibit A-3.1, pages 1-9

Please see exhibit A-3.2., pages 1-3

Please see exhibit A-3.3, pages 1-4

Please see exhibit A-3.4, pages 1-9

Pursuant to KSA 40-955, please clarify and justify all exhibits where the company uses 100% credibility (line #14) on the above captioned exhibits for all coverage types and all lines of business, as there appears to be quite a bit of volatility in the data for this program.

**Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Explanatory Memo - Rates
Comments:	
Attachment(s):	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
Previous Version	
Satisfied - Item:	Explanatory Memo - Rates
Comments:	
Attachment(s):	KS Advance Property Memo 2-10-24.pdf



Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

### **Response 13**

#### **Comments:**

*Please see the attached documents.*

### **Related Objection 13**

*Applies To:*

- *Actuarial Justification (Supporting Document)*

*Comments: Exhibit A, 3.2*

*pages 1 of 3 (renters - all other peril)*

*Pursuant to KSA 40-955, please explain why the policyholders are not receiving a rate decrease when the indication is -4.9%*

**Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 14**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 14**

*Applies To:*

- Actuarial Justification (Supporting Document)

*Comments: Exhibit A-3.3*

**Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 15**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 15**

*Applies To:*

- Actuarial Justification (Supporting Document)

*Comments: Please see exhibit A-3.4, page 1 of 9*

*Pursuant to KSA 40-955, please clarify and justify proposing a 2.4% rate increase for fire peril for manufactured homes when the company has no incurred losses on line 2 of the captioned exhibit.*

#### **Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 16**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 16**

*Applies To:*

- Actuarial Justification (Supporting Document)

*Comments: Please see Exhibit A-3.4, page 2 of 9 /hail indication for manufactured homes*

*Please see Exhibit A-3.4, page 7 of 9/wind indication for manufactured homes*

*Pursuant to KSA 40-955, please advise why there is no data available for line 4 or line 5 in the above captioned exhibit.*

#### **Changed Items:**



No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 17**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 17**

*Applies To:*

- *Actuarial Justification (Supporting Document)*

Comments: EXHIBIT B-1

Page 1 of 1

EXHIBIT B-1.1

Page 1 of 1

Pursuant to KSA 40-955, please further clarify and justify the use of aged data back to 2003 in loss development. Please also advise why no newer data than 2022 has been used in rate creation for a filing with an effective date of February 2024. Further clarify the evaluation date of the data used in the table.

**Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Explanatory Memo - Rates
Comments:	
Attachment(s):	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
Previous Version	
Satisfied - Item:	Explanatory Memo - Rates
Comments:	
Attachment(s):	KS Advance Property Memo 2-10-24.pdf

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 18**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 18**

*Applies To:*

- Actuarial Justification (Supporting Document)

*Comments: Exhibit C-1.1, page 1-3 (age of home - water - owners)*

*Pursuant to KSA 40-955, please further clarify and justify how factors were determined for the captioned rate supporting exhibit for home ages 0-14 when there is no indication.*

#### **Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 19**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 19**

*Applies To:*

- *Actuarial Justification (Supporting Document)*

*Comments: Exhibit C-2, page 1 of 1, Kansas - square footage, homeowners, other peril*

*Exhibit C3.1, page 1 through 3, Kansas - owners, replacement cost, water peril*

*Exhibit C3.1, pages 4 through 6, Kansas- owners, replacement cost, wind peril*

*Pursuant to KSA 40-855, please further clarify and justify why the company is taking full indications on the above captioned rating exhibits.*

**Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>



Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 20**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 20**

*Applies To:*

- *Actuarial Justification (Supporting Document)*

*Comments: Exhibit C-4*

**Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 21**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 21**

Comments: Exhibit C-4  
page 1 of 18

Wind/Hail Model  
Karen Clark and Company Hail Model

Rates developed using generalized linear modeling or other predictive modeling techniques must include a detailed narrative of the modeling process. This should include a description of the modeling data, variable selection process, data dictionary, model testing & validation, and any judgments made throughout the process.

**Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	8/21/23 Response to Objections Dated 7/24/23
Comments:	
Attachment(s):	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

**Response 22**

**Comments:**

Please see the attached documents.

**Related Objection 22**

Applies To:

- Actuarial Justification (Supporting Document)

*Comments: Exhibit C-4, pages 2-4, C-4. Coverage A Limit Factor*  
*Exhibit C-4, page 5, C-16. Age of Home*  
*D-2. Age of Home Discount*  
*Exhibit C-4, pages 6-7, C-24. Home Type*  
*Exhibit C-4, pages 7-10, C-18. Construction and Exterior Type Factor*  
*Exhibit C-4, pages 10-18, C-29. Roof Characteristics by Rate Factor*

*Pursuant to KSA 40-955, please provide further clarification and justification for any factor selections over indication, as well as any factor selections at full indication.*

**Changed Items:**

*No Form Schedule items changed.*

*No Rate/Rule Schedule items changed.*

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

### **Response 23**

#### **Comments:**

*Please see the attached documents.*

### **Related Objection 23**

*Applies To:*

- Actuarial Justification (Supporting Document)

*Comments: Exhibit D1, pages 1-2*

*Pursuant to KSA 40-955, please advise if the company will be capping the large increases proposed in this filing, if so, please advise of the capping practice proposed. If capping is not proposed, please further explain why policy impacts will not be capped for this filing.*

### **Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>



Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 24**

##### **Comments:**

Please see the attached documents. Once the Post Submission Update from 7/25/23 is processed, we will update the items in the Rate/Rule Schedule so they correctly correspond to the amounts shown in the Exhibits.

#### **Related Objection 24**

Applies To:

- Actuarial Justification (Supporting Document)

Comments: Exhibit D-1, page 1 of 2

The Department notes the company indicates the minimum rate increase is -42.0% on the above captioned exhibit; however, the Department notes the company has reported the minimum rate change is reported as minimum -41.900%% on the rate/rule schedule tab, Please advise to this discrepancy and amend filing accordingly.

**Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 25**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 25**

*Applies To:*

- *Actuarial Justification (Supporting Document)*

*Comments: Please see exhibit D-1, page 1 of 2*

*The Department notes the average dollar increase is relatively high in the submitted filing. Pursuant to KSA 40-955, please advise what the average policyholder premium is for this book of business and if the proposed average dollar change is for an annual or semi-annual policy.*

#### **Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 26**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 26**

*Applies To:*

- *Actuarial Justification (Supporting Document)*

Comments: Please see Exhibit D-1, page 2 of 2

Pursuant to K.S.A. 40-955 (e), please provide the characteristics of the policyholder seeing the maximum rate dollar increase and explain why these particular characteristics are causing this policyholder to see a premium increase larger than average.

As this dollar increase appears to be excessive, please explain if a cap will be placed on the policy, if the increase is for an annual or semi-annual policy, if the characteristics are due to policyholder level changes and/or filed changes, what the rate change will be as a percentage on an uncapped basis (and a capped basis if applicable) and if no cap is being placed, why the company is not choosing to implement a cap on this policy. If a cap is being placed on the policy, please clarify the time period in which the premium increase will be realized for this policyholder.

Additionally, please further clarify and justify why this policyholder would pose such an extraordinary risk above average for this book of business to warrant such a large dollar increase. (ie- high number of claims, high coverage values, objective and measurable property risks)

**Changed Items:**

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Explanatory Memo - Rates
Comments:	
Attachment(s):	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
Previous Version	
Satisfied - Item:	Explanatory Memo - Rates
Comments:	
Attachment(s):	KS Advance Property Memo 2-10-24.pdf

<b>Supporting Document Schedule Item Changes</b>	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>
<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Explanatory Memo - Rates</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Memo 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Exhibits 2-10-24 in Response to OBJ 1 Dated 7-24-23.pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Actuarial Justification</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>KS Advance Property Exhibits 2-10-24.pdf</i>

<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

#### **Response 27**

##### **Comments:**

*Please see the attached documents.*

#### **Related Objection 27**

*Applies To:*

- Kansas Amendatory Endorsement, HO 81 18, 10 23 (Form)

*Comments: Pursuant to K.S.A. 40-907 any condition or stipulation in an application, policy or contract of fire insurance hereafter made making the policy void in case the insured premises become vacant, shall not prevent recovery on such policy if it shall be shown by the plaintiff that the insured premises had ceased to be vacant and were occupied at the time of the loss.*

#### **Changed Items:**



Form Schedule Item Changes										
Item No.	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments	Submitted
1	Kansas Amendatory Endorsement	HO 81 18	10 23	END	Replaced	Previous Filing Number:	AMFC-1306275 68		HO 81 18 10 23 Kansas Amendatory Endorsement V2 (clean).pdf	Date Submitted: 08/21/2023 By: Christine Cass
						Replaced Form Number:	HO 81 18			
						Replaced Edition Date:	01 15			
Previous Version										
1	Kansas Amendatory Endorsement	HO 81 18	10 23	END	Replaced	Previous Filing Number:	AMFC-1306275 68		HO 81 18 10 23 Kansas Amendatory Endorsement (clean).pdf	Date Submitted: 06/28/2023 By: Christine Cass
						Replaced Form Number:	HO 81 18			
						Replaced Edition Date:	01 15			

No Rate/Rule Schedule items changed.

**Supporting Document Schedule Item Changes**

<b>Satisfied - Item:</b>	Tracked Versions of Updated Forms
<b>Comments:</b>	
<b>Attachment(s):</b>	HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf HO 81 18 10 23 Kansas Amendatory Endorsement V2 (tracked).pdf

*Previous Version*

<b>Satisfied - Item:</b>	<i>Tracked Versions of Updated Forms</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf HO 81 18 10 23 Kansas Amendatory Endorsement (tracked).pdf HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Tracked Versions of Updated Forms
<b>Comments:</b>	
<b>Attachment(s):</b>	HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf HO 81 18 10 23 Kansas Amendatory Endorsement V2 (tracked).pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Tracked Versions of Updated Forms</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf</i> <i>HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf</i> <i>HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf</i> <i>HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf</i> <i>HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf</i> <i>HO 81 18 10 23 Kansas Amendatory Endorsement (tracked).pdf</i> <i>HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf</i> <i>HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf</i> <i>HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf</i> <i>MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf</i> <i>UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf</i> <i>UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf</i>
<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

**Response 28****Comments:**

Please see the attached documents.

**Related Objection 28**

Applies To:

- Kansas Amendatory Endorsement, HO 81 18, 10 23 (Form)

Comments: The changes proposed to the definition to ACV may be more restrictive than what was previously proposed and may not align with the requirements of Bulletin 1983-19. Please clarify and justify the proposed changes.

**Changed Items:**

Form Schedule Item Changes										
Item No.	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments	Submitted
1	Kansas Amendatory Endorsement	HO 81 18	10 23	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 81 18 10 23 Kansas Amendatory Endorsement V2 (clean).pdf	Date Submitted: 08/21/2023 By: Christine Cass
						Replaced Form Number:	HO 81 18			
						Replaced Edition Date:	01 15			
Previous Version										
1	Kansas Amendatory Endorsement	HO 81 18	10 23	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 81 18 10 23 Kansas Amendatory Endorsement (clean).pdf	Date Submitted: 06/28/2023 By: Christine Cass
						Replaced Form Number:	HO 81 18			
						Replaced Edition Date:	01 15			

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Tracked Versions of Updated Forms
<b>Comments:</b>	
<b>Attachment(s):</b>	HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf HO 81 18 10 23 Kansas Amendatory Endorsement V2 (tracked).pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Tracked Versions of Updated Forms</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf</i> <i>HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf</i> <i>HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf</i> <i>HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf</i> <i>HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf</i> <i>HO 81 18 10 23 Kansas Amendatory Endorsement (tracked).pdf</i> <i>HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf</i> <i>HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf</i> <i>HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf</i> <i>MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf</i> <i>UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf</i> <i>UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Tracked Versions of Updated Forms
<b>Comments:</b>	
<b>Attachment(s):</b>	HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf HO 81 18 10 23 Kansas Amendatory Endorsement V2 (tracked).pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Tracked Versions of Updated Forms</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf</i> <i>HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf</i> <i>HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf</i> <i>HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf</i> <i>HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf</i> <i>HO 81 18 10 23 Kansas Amendatory Endorsement (tracked).pdf</i> <i>HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf</i> <i>HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf</i> <i>HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf</i> <i>MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf</i> <i>UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf</i> <i>UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf</i>
<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

**Response 29****Comments:**

Please see the attached documents.

**Related Objection 29**

Applies To:

- Kansas Amendatory Endorsement, HO 81 18, 10 23 (Form)

Comments: Section 1 - additional coverage, how we settle losses

Several of the endorsements in the filing broaden or further restrict the standard coverage; however, we did not locate the rating considerations in the rating plan. It is necessary to explain how the rating plan takes into account the restricting and broadening of coverage with each endorsement; submit the specific rating consideration that will be given with each endorsement when attached to a policy; or file manual rules which specifically state when each endorsement will be attached to a policy if rating considerations will not be given. Please refer to K.S.A. 40-953 and K.S.A. 40-954.

**Changed Items:**

Form Schedule Item Changes										
Item No.	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments	Submitted
1	Kansas Amendatory Endorsement	HO 81 18	10 23	END	Replaced	Previous Filing Number:	AMFC-1306275 68		HO 81 18 10 23 Kansas Amendatory Endorsement V2 (clean).pdf	Date Submitted: 08/21/2023 By: Christine Cass
						Replaced Form Number:	HO 81 18			
						Replaced Edition Date:	01 15			
Previous Version										
1	Kansas Amendatory Endorsement	HO 81 18	10 23	END	Replaced	Previous Filing Number:	AMFC-1306275 68		HO 81 18 10 23 Kansas Amendatory Endorsement (clean).pdf	Date Submitted: 06/28/2023 By: Christine Cass
						Replaced Form Number:	HO 81 18			
						Replaced Edition Date:	01 15			



No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Tracked Versions of Updated Forms
<b>Comments:</b>	
<b>Attachment(s):</b>	HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf HO 81 18 10 23 Kansas Amendatory Endorsement V2 (tracked).pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Tracked Versions of Updated Forms</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf</i> <i>HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf</i> <i>HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf</i> <i>HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf</i> <i>HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf</i> <i>HO 81 18 10 23 Kansas Amendatory Endorsement (tracked).pdf</i> <i>HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf</i> <i>HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf</i> <i>HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf</i> <i>MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf</i> <i>UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf</i> <i>UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf</i>



Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Tracked Versions of Updated Forms
<b>Comments:</b>	
<b>Attachment(s):</b>	HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf HO 81 18 10 23 Kansas Amendatory Endorsement V2 (tracked).pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Tracked Versions of Updated Forms</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf</i> <i>HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf</i> <i>HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf</i> <i>HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf</i> <i>HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf</i> <i>HO 81 18 10 23 Kansas Amendatory Endorsement (tracked).pdf</i> <i>HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf</i> <i>HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf</i> <i>HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf</i> <i>MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf</i> <i>UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf</i> <i>UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf</i>
<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

**Response 30****Comments:**

Please see the attached documents.

**Related Objection 30**

Applies To:

- Kansas Amendatory Endorsement, HO 81 18, 10 23 (Form)

Comments: Section II, additional coverage

Pursuant to KSA 40-953, including defense costs within the limits of liability may be considered an unreasonable restriction of coverage creating the possibility of excessive rates. Please provide substantial justification of the need to have defense costs within the limits of liability or amend the file accordingly.

**Changed Items:**

Form Schedule Item Changes										
Item No.	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments	Submitted
1	Kansas Amendatory Endorsement	HO 81 18	10 23	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 81 18 10 23 Kansas Amendatory Endorsement V2 (clean).pdf	Date Submitted: 08/21/2023 By: Christine Cass
						Replaced Form Number:	HO 81 18			
						Replaced Edition Date:	01 15			
Previous Version										
1	Kansas Amendatory Endorsement	HO 81 18	10 23	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 81 18 10 23 Kansas Amendatory Endorsement (clean).pdf	Date Submitted: 06/28/2023 By: Christine Cass
						Replaced Form Number:	HO 81 18			
						Replaced Edition Date:	01 15			

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Tracked Versions of Updated Forms
<b>Comments:</b>	
<b>Attachment(s):</b>	HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf HO 81 18 10 23 Kansas Amendatory Endorsement V2 (tracked).pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Tracked Versions of Updated Forms</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf</i> <i>HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf</i> <i>HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf</i> <i>HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf</i> <i>HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf</i> <i>HO 81 18 10 23 Kansas Amendatory Endorsement (tracked).pdf</i> <i>HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf</i> <i>HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf</i> <i>HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf</i> <i>MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf</i> <i>UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf</i> <i>UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf</i>

Supporting Document Schedule Item Changes	
<b>Satisfied - Item:</b>	Tracked Versions of Updated Forms
<b>Comments:</b>	
<b>Attachment(s):</b>	HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf HO 81 18 10 23 Kansas Amendatory Endorsement V2 (tracked).pdf
<i>Previous Version</i>	
<b>Satisfied - Item:</b>	<i>Tracked Versions of Updated Forms</i>
<b>Comments:</b>	
<b>Attachment(s):</b>	<i>HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf</i> <i>HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf</i> <i>HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf</i> <i>HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf</i> <i>HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf</i> <i>HO 81 18 10 23 Kansas Amendatory Endorsement (tracked).pdf</i> <i>HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf</i> <i>HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf</i> <i>HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf</i> <i>HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf</i> <i>MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf</i> <i>UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf</i> <i>UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf</i> <i>UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf</i>
<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf

**Conclusion:**

*Thank you.*

*Sincerely,*

*Christine Cass*

## Amendment Letter

Submitted Date: 11/16/2023

Comments:

I am sorry that I failed to attach this document to the Objection Responses:

Please see the below document for the responses to all of the Objections Dated 11/9/23, as well as the question asked in the Note to Filer Dated 11/13/23.

Changed Items:

*No Form Schedule Items Changed.*

*No Rate Schedule Items Changed.*

Supporting Document Schedule Item Changes	
Satisfied - Item:	11/16/23 Response to the Objections Dated 11-9-23 & Note to Filer Dated 11-13-23
Comments:	
Attachment(s):	11-16-23 Response to the Obj Dated 11-9-23 & Note to Filer Dated 11-13-23.pdf

## Note To Filer

**Created By:**

Emily Beets on 12/01/2023 10:06 AM

**Last Edited By:**

Emily Beets

**Submitted On:**

12/01/2023 10:06 AM

**Subject:**

RE request for effective date change

**Comments:**

The DOI has changed the effective dates to 2/16/24 per the company's request

## Note To Reviewer

**Created By:**

Jessica Hare on 12/01/2023 09:45 AM

**Last Edited By:**

Jessica Hare

**Submitted On:**

12/01/2023 09:45 AM

**Subject:**

Effective Date Change Request

**Comments:**

Thank you so much for the recent approval of this filing. We need to revise our effective dates of this filing to 02/16/2024 for new and renewal business.

Thanks!

Jessica



## **Note To Reviewer**

**Created By:**

Christine Cass on 11/16/2023 05:07 PM

**Last Edited By:**

Emily Beets

**Submitted On:**

11/28/2023 09:02 AM

**Subject:**

Amendment Submitted in response to the 11/16/23 Note to Filer

**Comments:**

Thanks for letting me know about my mistake. I've submitted an Amendment, attaching the Response document. Please let me know if you have any questions! Thank you!

## Note To Filer

**Created By:**

Emily Beets on 11/16/2023 01:24 PM

**Last Edited By:**

Emily Beets

**Submitted On:**

11/28/2023 09:02 AM

**Subject:**

item not attached to company objection letter

**Comments:**

During DOI review of company responses to objection letter dated 11/9/23, it is noted the company is referring to an attached document; however, the DOI is unable to find where the new document has been submitted with the response or uploaded to the SERFF filing. Please advise and amend filing in order to continue response review.

Thanks!

## **Note To Filer**

**Created By:**

Craig Van Aalst on 11/13/2023 12:04 PM

**Last Edited By:**

Emily Beets

**Submitted On:**

11/28/2023 09:02 AM

**Subject:**

11/13 Call - One More Request

**Comments:**

In addition to the information we discussed on today's call. Please provide the SERFF tracking number of the currently approved GLM.

Thank you.

## Note To Reviewer

**Created By:**

Christine Cass on 11/09/2023 03:48 PM

**Last Edited By:**

Emily Beets

**Submitted On:**

11/28/2023 09:02 AM

**Subject:**

11/9 Phone Call

**Comments:**

Thanks so much! We'll call you at 4pm. Talk to you soon.

## Note To Filer

**Created By:**

Emily Beets on 11/09/2023 02:47 PM

**Last Edited By:**

Emily Beets

**Submitted On:**

11/28/2023 09:02 AM

**Subject:**

RE call

**Comments:**

amending availability from 3:30pm to 430 pm, depending on ability to loop in our assistant director. Please feel free to reach out via email or phone as well. Thanks!

## Note To Filer

**Created By:**

Emily Beets on 11/09/2023 02:33 PM

**Last Edited By:**

Emily Beets

**Submitted On:**

11/28/2023 09:02 AM

**Subject:**

RE conference call request

**Comments:**

I am available this afternoon. Between 3pm and 3:30pm is fine. Please let me know via SERFF or email. Thanks.

## Note To Reviewer

**Created By:**

Christine Cass on 11/09/2023 02:29 PM

**Last Edited By:**

Emily Beets

**Submitted On:**

11/28/2023 09:02 AM

**Subject:**

Re: Previous Note to Reviewer Conference Call Request - Update

**Comments:**

If you are unavailable this afternoon, would there be a time tomorrow (preferably morning) that we could speak with you?

## Note To Reviewer

**Created By:**

Christine Cass on 11/09/2023 02:14 PM

**Last Edited By:**

Emily Beets

**Submitted On:**

11/28/2023 09:02 AM

**Subject:**

Conference Call Request

**Comments:**

Would you be available for a Conference Call this afternoon with myself and the Actuarial Analyst, Lawrence Cho?

If so, please let me know what time works for you.

Thank you for your consideration.



## Note To Reviewer

**Created By:**

Christine Cass on 10/30/2023 03:41 PM

**Last Edited By:**

Emily Beets

**Submitted On:**

11/28/2023 09:02 AM

**Subject:**

Thank You for The Call on 10/30/2023

**Comments:**

Thank you for discussing this filing with me earlier today. As stated, it would be great to hear back from the Assistant Director, if possible, sometime this week, We are up against an Implementation Deadline the week of 11/6/2023. Thank you.

## Note To Filer

**Created By:**

Emily Beets on 09/21/2023 08:24 AM

**Last Edited By:**

Emily Beets

**Submitted On:**

11/28/2023 09:02 AM

**Subject:**

RE conference call

**Comments:**

My email is Emily.Beets@ks.gov. At this time, we would not need any other personnel on the call. Thanks.

## Note To Filer

**Created By:**

Emily Beets on 09/21/2023 08:22 AM

**Last Edited By:**

Emily Beets

**Submitted On:**

11/28/2023 09:02 AM

**Subject:**

re requested conference call

**Comments:**

I would be available for a discussion between 10am and 11am CST and 1pm and 3pm CST on Tuesday next week. Thanks.

## Note To Reviewer

**Created By:**

Christine Cass on 09/20/2023 07:56 PM

**Last Edited By:**

Emily Beets

**Submitted On:**

11/28/2023 09:02 AM

**Subject:**

Conference Call Request Monday, 9/25 or Tuesday, 9/26

**Comments:**

Would you be available for a conference call to discuss the Objections Dated 9/14/2023?

Please let us know if there are any times that would work on Monday, September 25th or Tuesday, September 26th.

Please include the name and email address of the people on your end whom would like to attend and we will send out a calendar invite with a link to the call.

If you'd rather call me to discuss, please call me at

617-448-7005

Respectfully,

Christine C. Cass  
Senior State Filings Associate

## Post Submission Update Request Processed On 08/28/2023

Status: Allowed  
Created By: Christine Cass  
Processed By: Emily Beets  
Comments:

### Company Rate Information:

Company Name: American Family Insurance Company

Field Name	Requested Change	Prior Value
Overall % Rate Impact	19.500%	15.900%

## Post Submission Update Request Processed On 08/29/2023

Status: Allowed  
Created By: Christine Cass  
Processed By: Emily Beets  
Comments:

### Company Rate Information:

Company Name: American Family Insurance Company

Field Name	Requested Change	Prior Value
Maximum %Change (where required)	335.800%	362.400%

## Form Schedule

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
1	Approved and Filed 11/28/2023	Actual Cash Value Loss Settlement	HO 04 81	10 23	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 04 81 10 23 Actual Cash Value Loss Settlement (clean).pdf
							Replaced Form Number:	HO 04 81		
							Replaced Edition Date:	07 19		
2	Approved and Filed 11/28/2023	Personal Property Replacement Cost Coverage	HO 04 90	09 22	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 04 90 09 22 Personal Property Replacement Cost Coverage.pdf
							Replaced Form Number:	HO 04 90		
							Replaced Edition Date:	01 14		
3	Approved and Filed 11/28/2023	Scheduled Structures Away From The Residence Premises Coverage	HO 04 92	10 23	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (clean).pdf
							Replaced Form Number:	HO 04 92		
							Replaced Edition Date:	07 16		
4	Approved and Filed 11/28/2023	Kansas Amendatory Endorsement	HO 81 18	10 23	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 81 18 10 23 Kansas Amendatory Endorsement V2 (clean).pdf
							Replaced Form Number:	HO 81 18		
							Replaced Edition Date:	01 15		
5	Approved and Filed 11/28/2023	Dwelling Cosmetic Hail Damage Coverage For Metal Roof	HO 84 05	10 23	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (clean).pdf
							Replaced Form Number:	HO 84 05		
							Replaced Edition Date:	07 16		
6	Approved and Filed 11/28/2023	Ordinance Or Law Coverage	HO 84 16	09 22	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 84 16 09 22 Ordinance Or Law Coverage.pdf
							Replaced Form Number:	HO 84 16		
							Replaced Edition Date:	01 14		

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
7	Approved and Filed 11/28/2023	Scheduled Structures Cosmetic Hail Damage	HO 84 19	10 23	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (clean).pdf
							Replaced Form Number:	HO 84 19		
							Replaced Edition Date:	07 16		
8	Approved and Filed 11/28/2023	Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage	HO 84 23	10 22	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage.pdf
							Replaced Form Number:	HO 84 23		
							Replaced Edition Date:	01 15		
9	Approved and Filed 11/28/2023	Other Structures Blanket Coverage	HO 84 24	10 23	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 84 24 10 23 Other Structures Blanket Coverage (clean).pdf
							Replaced Form Number:	HO 84 24		
							Replaced Edition Date:	01 15		
10	Approved and Filed 11/28/2023	Roof Replacement Cost Coverage For Windstorm And Hail	HO 86 05	10 22	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail.pdf
							Replaced Form Number:	HO 86 05		
							Replaced Edition Date:	01 14		
11	Approved and Filed 11/28/2023	Roof Surface Payment Schedule	HO 88 02	10 22	END	Replaced	Previous Filing Number:	AMFC-130627568		HO 88 02 10 22 Roof Surface Payment Schedule.pdf
							Replaced Form Number:	HO 88 02		
							Replaced Edition Date:	01 14		
12	Approved and Filed 11/28/2023	Dwelling And Other Structures Replacement Cost Coverage	MH 84 01	10 23	END	Replaced	Previous Filing Number:	AMFC-130627568		MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (clean).pdf
							Replaced Form Number:	MH 84 01		
							Replaced Edition Date:	01 14		



Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
13	Approved and Filed 11/28/2023	Homeowners Application - Kansas	UF 40 09	10 23	ABE	Replaced	Previous Filing Number:	AMFC-133338162		UF 40 09 10 23 Homeowners Policy Application - Kansas (clean).pdf
							Replaced Form Number:	UF 40 09		
							Replaced Edition Date:	04 22		
14	Approved and Filed 11/28/2023	Renters Policy Application - Kansas	UF 40 25	10 23	ABE	Replaced	Previous Filing Number:	AMFC-133338162		UF 40 25 10 23 Renters Policy Application - Kansas (clean).pdf
							Replaced Form Number:	UF 40 25		
							Replaced Edition Date:	04 22		
15	Approved and Filed 11/28/2023	Condominium Unit-Owners Policy Application - Kansas	UF 40 26	10 23	ABE	Replaced	Previous Filing Number:	AMFC-133338162		UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (clean).pdf
							Replaced Form Number:	UF 40 26		
							Replaced Edition Date:	04 22		
16	Approved and Filed 11/28/2023	Manufactured Homeowners Policy Application - Kansas	UF 40 27	10 23	ABE	Replaced	Previous Filing Number:	AMFC-131607944		UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (clean).pdf
							Replaced Form Number:	UF 40 27		
							Replaced Edition Date:	08 18		

#### Form Type Legend:

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

Rate Information

Rate data applies to filing.

Filing Method:	Prior Approval
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	14.900%
Effective Date of Last Rate Revision:	02/10/2023
Filing Method of Last Filing:	Prior Approval
SERFF Tracking Number of Last Filing:	AMFC-133338162

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 Family Insurance Company	25.000%	19.500%	\$19,271,645	48,650	\$98,580,080	335.800%	-41.900%

## Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1	Filed 11/28/2023	Kansas Advance Homeowners Rate/Rule Manual	Please see the Listing of New & Updated Manual Pages in the Supporting Documents tab. There is not enough room in this field to list all the pages.	Replacement	AMFC-133338162	KS Advance Property Manual Revised & New Pages 2-10-24.pdf

## Supporting Document Schedules

<b>Satisfied - Item:</b>	Explanatory Memo - Rates
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Property Memo in Response to Objections Dated 11-17-23.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	Actuarial Justification
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 KS Advance Exhibits in Response to Objections Dated 11-17-23.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	Explanatory Memo - Forms
<b>Comments:</b>	
<b>Attachment(s):</b>	Kansas AFIC Forms Filing Memorandum.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	Complete and Current Manual for all Rate/Rule Filings
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Manual 02-10-2024.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	Exhibit of Premiums and Losses
<b>Comments:</b>	
<b>Attachment(s):</b>	Kansas Premium and Loss Experience Exhibit D-4.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	Explanatory Memo - Rules
<b>Comments:</b>	Please see the Filing Memorandum attached under the heading "Explanatory Memo - Rates" above.
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	Previously Approved Tracking Numbers
<b>Comments:</b>	AMFC-133338162 - This is both the most recent filing & the most recent filing where the rates/rules being revised were most recently approved.
<b>Attachment(s):</b>	
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	Rate/Rule Filing Checklist
<b>Comments:</b>	
<b>Attachment(s):</b>	Kansas Rate Rule Filing Checklist 02-10-2024.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	Redline Requirement
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Property Manual 02-10-2024 - Redline.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	Forms List Template
<b>Comments:</b>	
<b>Attachment(s):</b>	KS AFIC Updated Forms List (clean).pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	Tracked Versions of Updated Forms
<b>Comments:</b>	

<b>Attachment(s):</b>	HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf UF 40 26 10 23 Condominium Unit-Owners Policy Application - Kansas (tracked).pdf HO 81 18 10 23 Kansas Amendatory Endorsement V2 (tracked).pdf
<b>Item Status:</b>	
<b>Status Date:</b>	
<b>Satisfied - Item:</b>	Listing of Updated, Deleted & New Manual Pages
<b>Comments:</b>	
<b>Attachment(s):</b>	KS Advance Listing of ALL Updated New & Deleted Manual Pages 2-10-24.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	
<b>Satisfied - Item:</b>	8/21/23 Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	KS 8-21-23 Response to Objections Dated 7-24-23.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	
<b>Satisfied - Item:</b>	8/21/23 Exhibit O1-1 Deductible Factor Support Exhibit in Response to Objections Dated 7/24/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O1-1.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	
<b>Satisfied - Item:</b>	9/11/23 Responses to the Objections Dated 8/28/23
<b>Comments:</b>	
<b>Attachment(s):</b>	9-11-23 Response to the Objections Dated 8-28-23.pdf
<b>Item Status:</b>	

<b>Status Date:</b>	
<b>Satisfied - Item:</b>	9/11/23 Exhibit O2 in Response to Objection 5 Dated 8/258/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O2.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	
<b>Satisfied - Item:</b>	10/2/23 Exhibit O3 in Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O3.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	
<b>Satisfied - Item:</b>	10/2/23 Response to Objections Dated 9/14/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-2-23 KS Advance Response to Objections Dated 9-14-23.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	
<b>Satisfied - Item:</b>	10/16/23 Response to the Objections Dated 10/11/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-16-23 KS Adv Response to the Objections Dated 10-11-23.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	
<b>Satisfied - Item:</b>	10/16/23 Exhibit O4 in Response to Objection 3 Dated 10/11/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O4.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	
<b>Satisfied - Item:</b>	10/23/23 Response to Objections Dated 10/20/23
<b>Comments:</b>	
<b>Attachment(s):</b>	10-23-23 Response to the Objections Dated 10-20-23.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	10/23/23 Exhibit O5 in Response to Objection 1 Dated 10/20/23
<b>Comments:</b>	
<b>Attachment(s):</b>	Exhibit O5.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	11/1/23 Response to the Objection Dated 11/1/23
<b>Comments:</b>	
<b>Attachment(s):</b>	11-1-23 Response to the Objection Dated 11-1-23.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	11/8/23 Response to the Objection Dated 11/6/23
<b>Comments:</b>	
<b>Attachment(s):</b>	11-8-23 KS Adv Response to Objection Dated 11-6-23.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	11/16/23 Response to the Objections Dated 11-9-23 & Note to Filer Dated 11-13-23
<b>Comments:</b>	
<b>Attachment(s):</b>	11-16-23 Response to the Obj Dated 11-9-23 & Note to Filer Dated 11-13-23.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	

<b>Satisfied - Item:</b>	11/21/23 Response to the Objections Dated 11/17/23
<b>Comments:</b>	
<b>Attachment(s):</b>	11-21-23 Response KS Adv Objection Dated 11-17-23.pdf
<b>Item Status:</b>	
<b>Status Date:</b>	



## 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)
08/21/2023	Disapproved and Not Filed 11/28/2023	Supporting Document	Explanatory Memo - Rates	11/21/2023	KS Advance Property Memo 2-10-24 in Response to OBJ 1 Dated 7-24- 23.pdf (Superceded)
08/21/2023	Disapproved and Not Filed 11/28/2023	Supporting Document	Actuarial Justification	11/21/2023	KS Advance Property Exhibits 2-10- 24 in Response to OBJ 1 Dated 7- 24-23.pdf (Superceded)

Creation Date	Schedule Item Status	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
06/28/2023	Disapproved and Not Filed 11/28/2023	Supporting Document	Tracked Versions of Updated Forms	08/21/2023	HO 84 16 09 22 Ordinance Or Law Coverage (tracked).pdf HO 84 19 10 23 Scheduled Structures Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 23 10 22 Sewer Back-Up, Septic Back-Up, And Sump Overflow Coverage (tracked).pdf HO 04 81 10 23 Actual Cash Value Loss Settlement (tracked).pdf HO 04 90 09 22 Personal Property Replacement Cost Coverage (tracked).pdf HO 04 92 10 23 Scheduled Structures Away From The Residence Premises (tracked).pdf HO 81 18 10 23 Kansas Amendatory Endorsement (tracked).pdf (Superceded) HO 84 05 10 23 Dwelling Cosmetic Hail Damage Coverage For Metal Roof (tracked).pdf HO 84 24 10 23 Other Structures Blanket Coverage (tracked).pdf HO 86 05 10 22 Roof Replacement Cost Coverage For Windstorm And Hail (tracked).pdf HO 88 02 10 22 Roof Surface Payment Schedule (tracked).pdf MH 84 01 10 23 Dwelling And Other Structures Replacement Cost Coverage (tracked).pdf UF 40 09 10 23 Homeowners Policy Application - Kansas (tracked).pdf UF 40 25 10 23 Renters Policy Application - Kansas (tracked).pdf UF 40 26 10 23 Condominium Unit- Owners Policy Application - Kansas (tracked).pdf UF 40 27 10 23 Manufactured Homeowners Policy Application - Kansas (tracked).pdf

<b>Creation Date</b>	<b>Schedule Item Status</b>	<b>Schedule</b>	<b>Schedule Item Name</b>	<b>Replacement Creation Date</b>	<b>Attached Document(s)</b>
06/26/2023	Deemed Approved 11/28/2023	Form	Kansas Amendatory Endorsement	08/21/2023	HO 81 18 10 23 Kansas Amendatory Endorsement (clean).pdf (Supceded)
06/26/2023	Disapproved and Not Filed 11/28/2023	Supporting Document	Explanatory Memo - Rates	08/21/2023	KS Advance Property Memo 2-10-24.pdf (Supceded)
06/26/2023	Deemed Approved 11/28/2023	Supporting Document	Actuarial Justification	08/21/2023	KS Advance Property Exhibits 2-10-24.pdf (Supceded)