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Filing at a Glance

Company:	AmGUARD Insurance Company
Product Name:	Commercial Auto - Standard
State:	Oregon
TOI:	20.0 Commercial Auto
Sub-TOI:	20.0000 Commercial Auto Combinations
Filing Type:	Rate/Rule
Date Submitted:	12/12/2022
SERFF Tr Num:	AMGD-133477389
SERFF Status:	Closed-Filed
State Tr Num:	AMGD-133477389
State Status:	Review completed
Co Tr Num:	2023-05-01-OR-CA-MILEAGEFACTOR-STANDARD
Effective Date Requested (New):	05/01/2023
Effective Date Requested (Renewal):	05/01/2023
Author(s):	Bill Orasin, Danielle Schreckengost, Suzanne Gatusky-George, Asa Miller, Colleen Murch
Reviewer(s):	David Dahl (primary), Ying Liu
Disposition Date:	12/21/2022
Disposition Status:	Filed
Effective Date (New):	05/01/2023
Effective Date (Renewal):	05/01/2023

General Information

Project Name:
Project Number:
Reference Organization:
Reference Title:
Filing Status Changed: 12/21/2022
State Status Changed: 12/21/2022
Created By: Danielle Schreckengost
Corresponding Filing Tracking Number:

Status of Filing in Domicile:
Domicile Status Comments:
Reference Number:
Advisory Org. Circular:

Deemer Date:
Submitted By: Danielle Schreckengost

Filing Description:

On behalf of AmGUARD Insurance Company, we are proposing new mileage factors to be used for our GUARD Standard Commercial Auto Program.

Company and Contact

Filing Contact Information

Danielle Sabol, State Filings Representative
39 Public Square
PO Box AH
Wilkes-Barre, PA 18703

danielle.sabol@guard.com
570-825-9900 [Phone] 4039 [Ext]

Filing Company Information

AmGUARD Insurance Company
39 Public Square
PO Box AH
Wilkes-Barre, PA 18703-0020
(800) 673-2465 ext. [Phone]

CoCode: 42390
Group Code: 31
Group Name: Berkshire Hathaway Group
FEIN Number: 23-2240321

State of Domicile: Pennsylvania
Company Type: Property and Casualty
State ID Number:

Filing Fees

State Fees

Fee Required?	No
Retaliatory?	No
Fee Explanation:	

State Specific

Have you reviewed the General Instructions attached as a separate pdf at the bottom of the General Instructions page?: Yes
Did you read the instructions regarding how to enter the form number and edition date in the Forms Schedule tab?: N/A
Did you realize Oregon does not respond to Status Requests thru SERFF?: Yes
Please confirm that you have read the Fraud Bulletin 2010-3 located at: https://dfr.oregon.gov/laws-rules/Documents/Bulletins/bulletin2010-03.pdf: Confirmed
For PC files: Mandatory requirement as stated in the product standards: You must attach under the Supporting Documentation tab any Oregon approved amendments that will be used to bring the filed forms into compliance with Oregon laws. For example: Fraud Warning, Domestic Partnership, Cancellation/Non-renewal. This would include an endorsement approved for an advisory organization. Confirm that this has been done.: Confirmed

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Filed	David Dahl	12/21/2022	12/21/2022

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Rate	Commercial Auto - Standard - OR Effective 2023-05-01	Danielle Schreckengost	12/13/2022	12/13/2022

Disposition

Disposition Date: 12/21/2022

Effective Date (New): 05/01/2023

Effective Date (Renewal): 05/01/2023

Status: Filed

Comment:

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
AmGUARD Insurance Company	1.390%	1.390%	$24,829	425	$1,785,419	54.940%	-18.450%

Schedule	Schedule Item	Schedule Item Status	Public Access
Rate (revised)	Commercial Auto - Standard - OR Effective 2023-05-01	Reviewed-No Action	Yes
Rate	Commercial Auto -Towing - OR Effective 2023-05-01	Reviewed-No Action	Yes
Rate	Commercial Auto - Garage - OR Effective 2023-05-01	Reviewed-No Action	Yes
Rate	Commercial Auto - Standard - OR Effective 2023-05-01	Replaced	Yes
Supporting Document	Cover Letter or Explanatory Memorandum	Reviewed-No Action	Yes
Supporting Document	Third party filers letter of authorization	Not Applicable to filing	Yes
Supporting Document	3894 Certification of Compliance	Reviewed-No Action	Yes
Supporting Document	3609 Standards for Motor Vehicle Rates and Rules	Information only	Yes
Supporting Document	3615 Standards for Motor Vehicle	Information only	Yes
Supporting Document	3615A Standards for Motor Vehicle Applications, if only filing an application	Not Applicable to filing	Yes
Supporting Document	Highlighted/Redline form version if a replaced, amended or similar forms	Not Applicable to filing	Yes
Supporting Document	3607 Histogram	Reviewed-No Action	Yes

Amendment Letter

Submitted Date: 12/13/2022

Comments:

We have revised the wording of the rule in the manual.

Changed Items:

No Form Schedule Items Changed.

Rate Schedule Item Changes					
Item No.	**Exhibit Name**	**Rule # or Page #**	**Rate Action**	**Previous State Filing Number**	**Date Submitted**
1	Commercial Auto - Standard - OR Effective 2023-05-01	Rule J	New		12/13/2022 By: Danielle Schreckengost
Previous Version					
1	*Commercial Auto - Standard - OR Effective 2023-05-01*	*Rule J*	*New*		*12/12/2022* *By: Danielle Schreckengost*

No Supporting Documents Changed.

Rate Information

Rate data applies to filing.

Filing Method:	Prior Approval
Rate Change Type:	Decrease
Overall Percentage of Last Rate Revision:	6.120%
Effective Date of Last Rate Revision:	10/01/2022
Filing Method of Last Filing:	Prior Approval
SERFF Tracking Number of Last Filing:	AMGD-133320414

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):
AmGUARD Insurance Company	1.390%	1.390%	$24,829	425	$1,785,419	54.940%	-18.450%

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1	Reviewed-No Action 12/21/2022	Commercial Auto - Standard - OR Effective 2023-05-01	Rule J	New		Commercial Auto - Standard - OR Effective 2023-05-01 - final.pdf
2	Reviewed-No Action 12/21/2022	Commercial Auto -Towing - OR Effective 2023-05-01	Rule 9	New		Commercial Auto - Towing- OR Effective 2023-05-01 - final.pdf
3	Reviewed-No Action 12/21/2022	Commercial Auto - Garage - OR Effective 2023-05-01	Page 8	New		Commercial Auto - Garage - OR Effective 2023-05-01 - final.pdf

Supporting Document Schedules

Satisfied - Item:	Cover Letter or Explanatory Memorandum
Comments:	
Attachment(s):	OR - Mileage Memo Revised 11-09-2022.pdf
Item Status:	Reviewed-No Action
Status Date:	12/21/2022

Bypassed - Item:	Third party filers letter of authorization
Bypass Reason:	N/A This is being filed by the Carrier.
Attachment(s):	
Item Status:	Not Applicable to filing
Status Date:	12/21/2022

Satisfied - Item:	3894 Certification of Compliance
Comments:	
Attachment(s):	Certfication of Compliance.pdf
Item Status:	Reviewed-No Action
Status Date:	12/21/2022

Satisfied - Item:	3609 Standards for Motor Vehicle Rates and Rules
Comments:	Noted
Attachment(s):	
Item Status:	Information only
Status Date:	12/21/2022

Satisfied - Item:	3615 Standards for Motor Vehicle
Comments:	Noted
Attachment(s):	
Item Status:	Information only
Status Date:	12/21/2022

Bypassed - Item:	3615A Standards for Motor Vehicle Applications, if only filing an application
Bypass Reason:	N/A
Attachment(s):	
Item Status:	Not Applicable to filing

Status Date:	12/21/2022

Bypassed - Item:	Highlighted/Redline form version if a replaced, amended or similar forms
Bypass Reason:	N/A We are filing a new rule
Attachment(s):	
Item Status:	Not Applicable to filing
Status Date:	12/21/2022

Satisfied - Item:	3607 Histogram
Comments:	
Attachment(s):	OR - Historgrams and Chart.pdf
Item Status:	Reviewed-No Action
Status Date:	12/21/2022

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)
12/01/2022	Replaced 12/21/2022	Rate	Commercial Auto - Standard - OR Effective 2023-05-01	12/13/2022	Commercial Auto - Standard - OR Effective 2023-05-01 - final.pdf (Superceded)

Oregon Department of Consumer and Business Services
Division of Financial Regulation
350 Winter St. NE, Rm. 410, Salem, Oregon 97301-3881
Mailing address: P.O. Box 14480, Salem, OR 97309-0405
503-378-4140 • Fax: 503-947-7862
http://dfr.oregon.gov

CERTIFICATE OF COMPLIANCE

I, the undersigned authorized filer, hereby certify that the filing submitted complies with the applicable State and Federal regulations, Bulletins, filing requirements and product standards set forth on the Division of Financial Regulation web site. I further certify the filing is not false or misleading in any material respect and that I am authorized to sign and submit this certificate on behalf of the Company identified below (hereinafter Company).

I, the undersigned authorized officer, a duly authorized officer of Company, certify that the undersigned authorized filer is authorized to certify on behalf of Company that this filing complies with the applicable State and Federal regulations, Bulletins, filing requirements, and product standards set forth on the Division of Financial Regulation web site and that the filing is not false or misleading in any material respect.

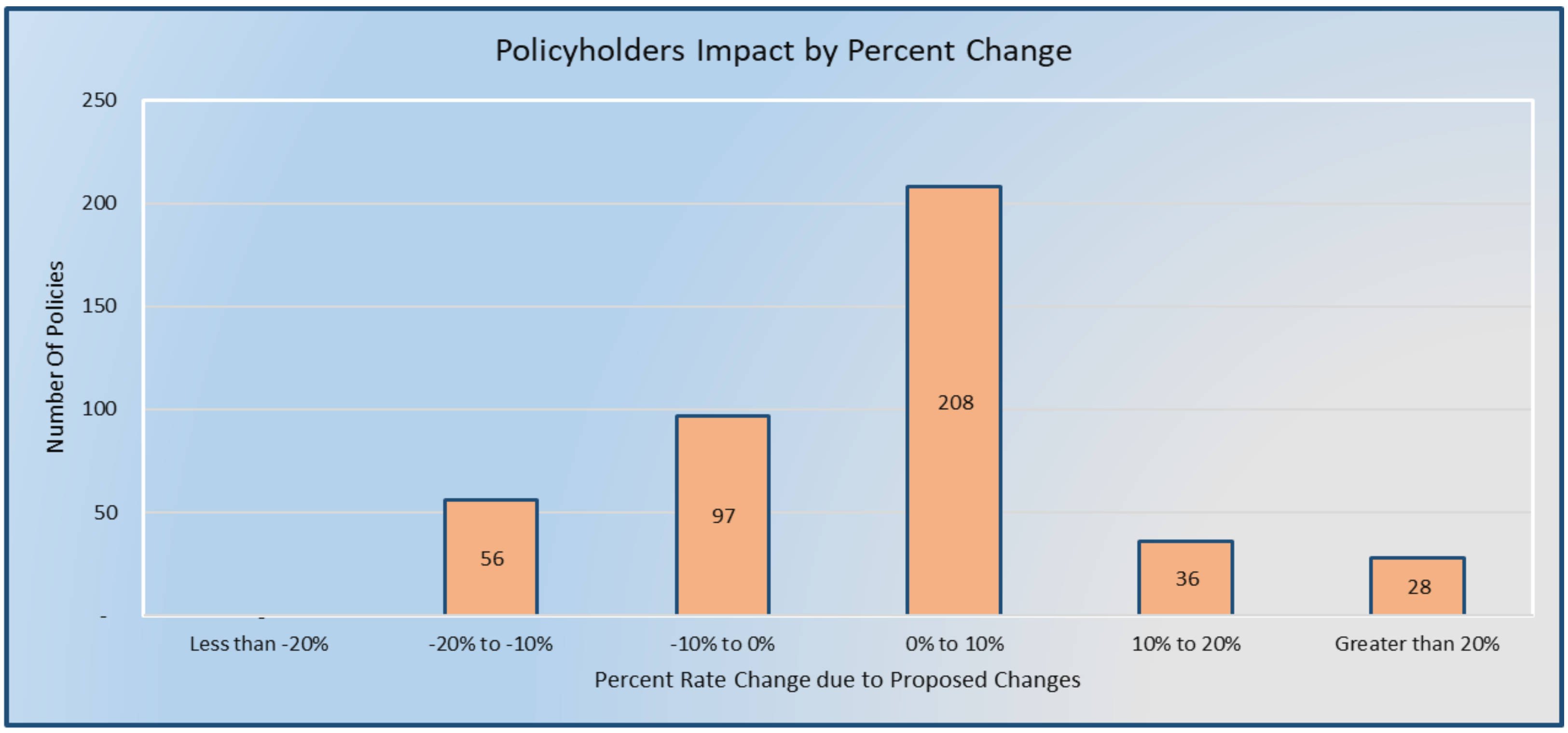
I understand that the Division of Financial Regulation will rely on this certificate and, should it be determined that this filing is materially false or misleading, appropriate corrective and disciplinary action including monetary penalties, as authorized by law, will be taken by the Division of Financial Regulation against the Company.

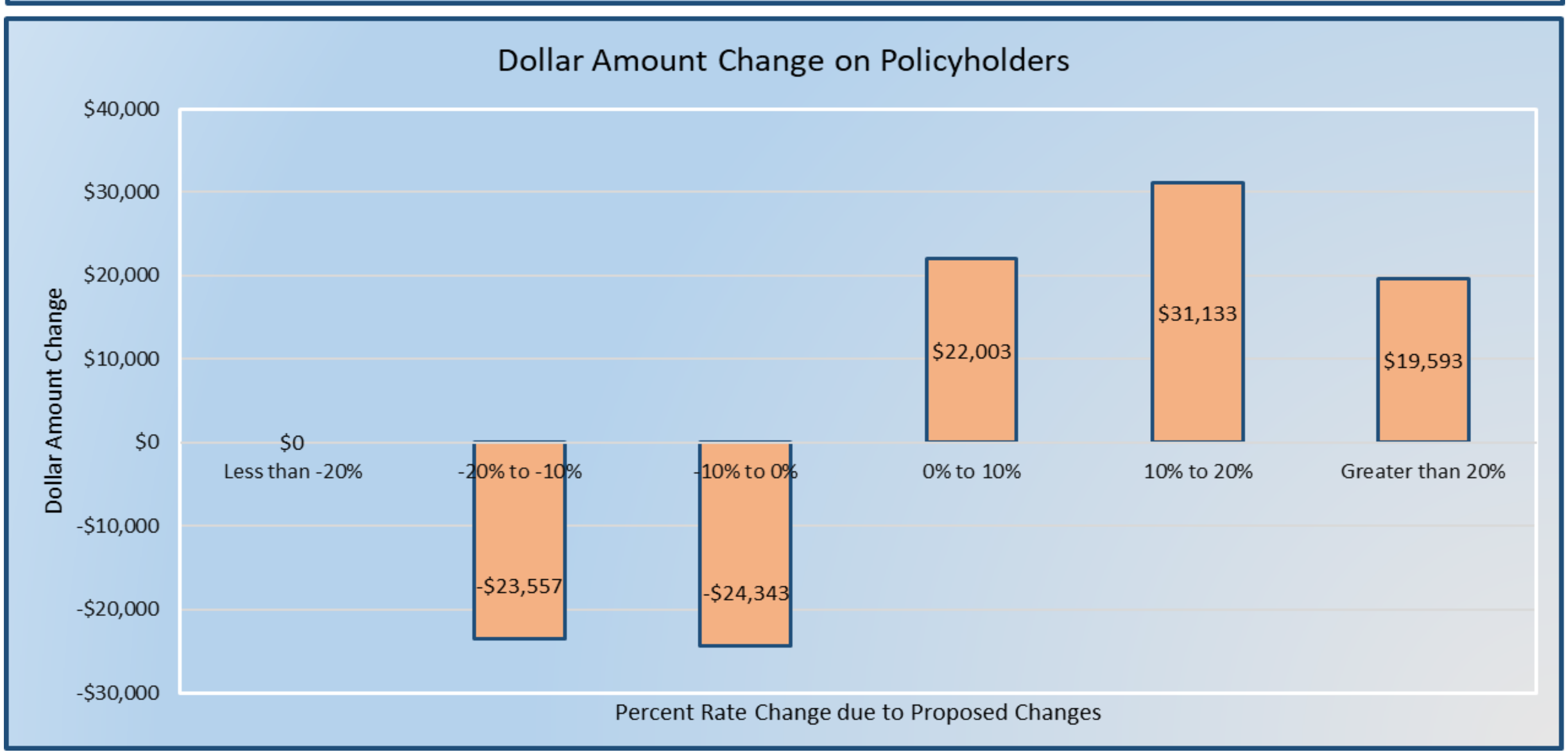
AmGUARD Insurance Company	2023-05-01-OR-CA-MILEAGEFACTOR-STANDARD
Name of Company	Company's form filing number or the primary form number for the filing
Danielle Sabol Digitally signed by Danielle Sabol Date: 2022.12.01 13:18:46 -05'00'	12/1/2022
Signature of authorized filer	Date
Danielle Sabol	39 Public Square
Print name of authorized filer	Address of Company or authorized filer
State Filings Representative	Wilkes Barre, PA 18703
Title	City State ZIP
570-825-9900 ext 4039	danielle.sabol@guard.com
Direct telephone number of authorized filer	Email address of authorized filer
800-673-2465 Ext 4039	
Toll free or collect phone number	Fax number of authorized filer
Amber Ng Digitally signed by Amber Ng Date: 2022.12.01 09:19:56 -05'00'	Chief Actuary
Signature of authorized officer	Officer Title
Amber Ng	12/01/2022
Print name of authorized officer	Date

Berkshire Hathaway GUARD Insurance Companies
Commercial Auto Insurance - Standard Business
State of Oregon
Mileage Factor Filing

Impact on Policyholders					
Impact Range	**By Policy**		**By Written Premium**		
	Policy Count	**% of Total**	**Written Premium**	**Absolute Value of Written Premium**	**% of Total**
Less than -20%	-	0.00%	-	-	0.00%
-20% to -10%	56	13.18%	(23,557)	23,557	19.53%
-10% to 0%	97	22.82%	(24,343)	24,343	20.18%
0% to 10%	208	48.94%	22,003	22,003	18.24%
10% to 20%	36	8.47%	31,133	31,133	25.81%
Greater than 20%	28	6.59%	19,593	19,593	16.24%
Total	425	100.00%	24,829	120,628	100.00%

	Written Premium	**% Impact Due to Rate Changes**	**$ Impact Due to Rate Changes**	**Number of Policies Affected**
Maximum % Impact	$2,536	54.9%	$1,393	1
Minimum % Impact	$5,388	-18.4%	-$994	2
Maximum $ Impact	$46,165	11.8%	$5,465	1





Oregon
Actuarial Memorandum
Commercial Auto Filing
Berkshire Hathaway GUARD Insurance Companies
AmGUARD Insurance Company

In this filing, we are introducing mileage factors to be used in the Commercial Auto rating structure for our Standard book of business. Our proposed effective date for this filing is 5/1/2023.

We will be utilizing the historical annual average mileage of vehicles in our Standard commercial auto policies as part of our rating structure for Auto Liability, Collision and Comprehensive coverages.

A vehicle's mileage is generally regarded as a strong indicator of risk on auto policies. Autos that are driven more are naturally subject to more exposure to loss than autos that are driven less.

With limited internal information we are utilizing the rating factors filed by Trumbull Insurance Company, as found in state filing number HART-133202066. We have done a high-level review on our book of business and these factors are in line with our limited experience. Factors will only apply where we have the verified annual mileage. Only mileage of the current owner will be considered. If no mileage is available, a factor of 1.00 will be applied.

While the overall rate impact for these mileage factors is 1.39%, the impact will vary by vehicle. The average dollar change for this filing is $58. The impact by coverage is summarized in the table below:

Program	Subline of Business	Overall % Impact	Overall Average $ Impact
Guard Standard	Liability/No Fault	1.24%	$58
	Physical Damage	1.89%	
	Total	1.39%	

[See Rule J.]

7. COMMERCIAL AUTO TOWING COVERAGE

A. Description of Coverage
BA 99 23 - Commercial Auto Towing Coverage will mandatorily attach only to policies associated with the Towing Program. This endorsement will provide up to $5,000 in coverage for towing costs and storage costs of a covered auto after towing while awaiting repair.

B. Premium Determination
No charge/credit.

8. PRIVATE PASSENGER HOME DELIVERY AUTOS

Rule F. Private Passenger Home Delivery Autos from the Standard manual does not apply to the Towing Program.

9. MILEAGE FACTOR

Rule J. Mileage Factor from the Standard manual does not apply to the Towing Program

J. MILEAGE FACTORS

This rule applies factors to PPT and TTT where annual average vehicle mileage is verified. Any vehicle where annual mileage cannot be verified at the time of policy issuance will receive a factor of 1.000. This rule does not apply to Towing and Garage Program.

These factors only apply to liability, collision & OTC coverages. They do not apply to Medical Payments, PIP & UM/UIM coverages.

Multiply the vehicle base loss costs by the following factor for the given risk:

Annual Average Mileage		PPT and TTT	
Greater Than	But Less Than or Equal To	Liability	Physical Damage
0	10,000	0.804	0.858
10,000	11,000	0.834	0.881
11,000	12,000	0.865	0.903
12,000	13,000	0.897	0.927
13,000	14,000	0.930	0.950
14,000	15,000	0.965	0.975
15,000	16,000	1.000	1.000
16,000	17,000	1.037	1.025
17,000	18,000	1.076	1.052
18,000	19,000	1.115	1.079
19,000	20,000	1.157	1.106
20,000	21,000	1.200	1.135
21,000	22,000	1.245	1.164
22,000	23,000	1.290	1.194
23,000	24,000	1.338	1.225
24,000	25,000	1.388	1.256
25,000	27,500	1.439	1.289
27,500	30,000	1.493	1.322
30,000	32,500	1.548	1.356
32,500	35,000	1.605	1.391
35,000	+	1.665	1.427

If annual mileage is not available, apply a factor of 1.000

J. MILEAGE FACTORS

This rule does not apply to Towing and Garage Program.

These factors only apply to liability, collision & OTC coverages. They do not apply to Medical Payments, PIP & UM/UIM coverages.

Multiply the vehicle base loss costs by the following factor for the given risk:

Annual Average Mileage		PPT and TTT	
Greater Than	But Less Than or Equal To	Liability	Physical Damage
0	10,000	0.804	0.858
10,000	11,000	0.834	0.881
11,000	12,000	0.865	0.903
12,000	13,000	0.897	0.927
13,000	14,000	0.930	0.950
14,000	15,000	0.965	0.975
15,000	16,000	1.000	1.000
16,000	17,000	1.037	1.025
17,000	18,000	1.076	1.052
18,000	19,000	1.115	1.079
19,000	20,000	1.157	1.106
20,000	21,000	1.200	1.135
21,000	22,000	1.245	1.164
22,000	23,000	1.290	1.194
23,000	24,000	1.338	1.225
24,000	25,000	1.388	1.256
25,000	27,500	1.439	1.289
27,500	30,000	1.493	1.322
30,000	32,500	1.548	1.356
32,500	35,000	1.605	1.391
35,000	+	1.665	1.427

If annual mileage is not available, apply a factor of 1.000

8. MILEAGE FACTORS

Rule J. Mileage Factors from the Standard manual does not apply to the Garage Program.