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VA1120 Auto Rates Index

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Filing at a Glance

Company:	Progressive Northern Insurance Company
Product Name:	Commercial Auto Program
State:	Virginia
TOI:	20.0 Commercial Auto
Sub-TOI:	20.0001 Business Auto
Filing Type:	Rate/Rule
Date Submitted:	11/18/2020
SERFF Tr Num:	PRGS-132598715
SERFF Status:	Closed-Filed
State Tr Num:	
State Status:	Filed
Co Tr Num:	VA1120 AUTO RR-COM
Effective Date	11/19/2020
Requested (New):	
Effective Date	01/10/2021
Requested (Renewal):	
Author(s):	Timothy Sprow, Chris Corrigan
Reviewer(s):	Victoria Brannan (primary)
Disposition Date:	03/16/2021
Disposition Status:	Filed
Effective Date (New):	11/19/2020
Effective Date (Renewal):	01/10/2021

General Information

Project Name: VA1120 Auto RR-COM
Project Number: VA1120 Auto RR-COM
Reference Organization:
Reference Title:
Filing Status Changed: 03/16/2021
State Status Changed: 03/16/2021
Created By: Timothy Sprow
Corresponding Filing Tracking Number:

Status of Filing in Domicile: Not Filed
Domicile Status Comments: Wisconsin
Reference Number:
Advisory Org. Circular:

Deemer Date:
Submitted By: Timothy Sprow

Filing Description:
Rate and Rule Filing

Company and Contact

Filing Contact Information

Lacey McGinley, Product Manager
300 N. Commons Blvd
Mayfield Village, OH 44134

LACEY_M_MCGINLEY@progressive.com
440-910-8822 [Phone]

Filing Company Information

Progressive Northern Insurance
Company
c/o CT Corporation System
8025 Excelsior Dr, # 200
Madison, WI 53717
(608) 833-4821 ext. [Phone]

CoCode: 38628
Group Code: 155
Group Name:
FEIN Number: 34-1318335

State of Domicile: Wisconsin
Company Type:
State ID Number:

Filing Fees

State Fees

Fee Required? No

Retaliatory? No

Fee Explanation:

State Specific

Did you review the General Instructions?: Yes

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Filed	Victoria Brannan	03/16/2021	03/16/2021

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Info requested from Company	Victoria Brannan	03/02/2021	03/02/2021
Info requested from Company	Victoria Brannan	01/26/2021	01/26/2021

Response Letters

Responded By	Created On	Date Submitted
Timothy Sprow	03/08/2021	03/09/2021
Timothy Sprow	02/08/2021	02/08/2021

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Rate	VA1120 Body Type Group Assignment Table	Timothy Sprow	03/11/2021	03/11/2021
Rate	VA1120 Business Class Group Assignment Table	Timothy Sprow	03/11/2021	03/11/2021
Supporting Document	Side by Side Documents	Timothy Sprow	03/11/2021	03/11/2021
Rate	VA1120 Body Type Group Assignment Table	Timothy Sprow	03/09/2021	03/11/2021
Rate	VA1120 Business Class Group Assignment Table	Timothy Sprow	03/09/2021	03/11/2021
Rate	VA1120 Rate Order of Calculations Clean	Timothy Sprow	02/18/2021	02/18/2021
Rate	VA1120 Auto Rules	Timothy Sprow	02/18/2021	02/18/2021
Supporting Document	VA1120 Auto Rules Index	Timothy Sprow	02/18/2021	02/18/2021
Supporting Document	VA1120 Auto Rates Index	Timothy Sprow	02/18/2021	02/18/2021
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Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
S01 and S02 reference tables	Note To Reviewer	Timothy Sprow	03/11/2021	03/11/2021
Note to Timothy	Note To Filer	Victoria Brannan	03/11/2021	03/11/2021
Phone call	Note To Reviewer	Timothy Sprow	03/11/2021	03/11/2021

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Note to Timothy Sprow	Note To Filer	Victoria Brannan	03/10/2021	03/10/2021
Filing question	Note To Reviewer	Timothy Sprow	03/10/2021	03/10/2021
Objection response extension request	Note To Reviewer	Timothy Sprow	02/05/2021	02/05/2021

Disposition

Disposition Date: 03/16/2021

Effective Date (New): 11/19/2020

Effective Date (Renewal): 01/10/2021

Status: Filed

Comment: Filed approval to amend the following Rate/Rule Pages:

VA 1120 Rate Stabilization

VA1120 Auto Rules Index

VA1120 Auto Rates Index

VA1120 Changed Rates

VA1120 Rate Order of Calculations

VA1120 Body Type Group Assignment Table

VA1120 Business Class Group Assignment Table

VA1120 Symbol FCT TBL

VA1120 Auto Rules

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):
Progressive Northern Insurance Company	-9.500%	0.100%	\$87,886	16,773	\$87,885,882	25.000%	-25.000%

Schedule	Schedule Item	Schedule Item Status	Public Access
Rate (revised)	VA1120 Changed Rates clean	Filed	Yes
Rate (revised)	VA1120 Rate Order of Calculations Clean	Filed	Yes
Rate (revised)	VA1120 Body Type Group Assignment Table	Filed	Yes
Rate (revised)	VA1120 Business Class Group Assignment Table	Filed	Yes
Rate	VA1120 Symbol FCT TBL	Filed	Yes
Rate (revised)	VA1120 Auto Rules	Filed	Yes
Rate	VA1120 Changed Rates clean	Withdrawn	Yes
Rate	VA1120 Rate Order of Calculations Clean	Withdrawn	Yes
Rate	VA1120 Body Type Group Assignment Table	Withdrawn	Yes

Schedule	Schedule Item	Schedule Item Status	Public Access
Rate	VA1120 Body Type Group Assignment Table	Withdrawn	Yes
Rate	VA1120 Business Class Group Assignment Table	Withdrawn	Yes
Rate	VA1120 Business Class Group Assignment Table	Withdrawn	Yes
Rate	VA1120 Auto Rules	Withdrawn	Yes
Rate	VA1120 Auto Rules	Withdrawn	Yes
Rate	VA1120 Auto Rules	Withdrawn	Yes
Supporting Document	COF-1 Rate Certification	Filed	Yes
Supporting Document	NAIC's Loss Costs Adoption Forms		Yes
Supporting Document	Virginia Advisory Filing Adoption Form		Yes
Supporting Document (revised)	Side by Side Documents		Yes
Supporting Document	Filing Memo		Yes
Supporting Document	VA 1120 Rate Stabilization	Filed	Yes
Supporting Document (revised)	VA1120 Auto Rules Index	Filed	Yes
Supporting Document (revised)	VA1120 Auto Rates Index	Filed	Yes
Supporting Document	VA1120 Auto Objection Response Document		Yes
Supporting Document	Side by Side Documents		Yes
Supporting Document	Side by Side Documents		Yes
Supporting Document	Side by Side Documents		Yes
Supporting Document	Side by Side Documents		Yes
Supporting Document	VA1120 Auto Rules Index	Withdrawn	Yes
Supporting Document	VA1120 Auto Rates Index	Withdrawn	Yes

Objection Letter

Objection Letter Status	Info requested from Company
Objection Letter Date	03/02/2021
Submitted Date	03/02/2021
Respond By Date	03/09/2021

Dear Lacey McGinley,

Introduction:

Thank you for your response sent via SERFF dated 2.8.21

Objection 1

- VA1120 Auto Rules, all (Rate)

Comments: Rule G11:

This Rule will need to be amended to show the expiration date of the Rate Stabilization to be 1.9.2027. This was discussed with upper management and this is the date that will need to be used for the expiration in order for the filing to be approved.

Objection 2

- VA1120 Changed Rates clean, all (Rate)

- VA1120 Body Type Group Assignment Table, all (Rate)

- VA1120 Business Class Group Assignment Table, all (Rate)

Comments: A definition of the symbols on these pages is required. The manual must reflect all information that is in your system. We have to be able to manually rate all coverages to match what is in your system. Your manual will need all symbols defined in order to develop the calculations you have in your system. Please advise if these symbols are elsewhere in your manual.

Conclusion:

Your submission has been placed in suspense pending your response

Sincerely,

Victoria Brannan

Objection Letter

Objection Letter Status	Info requested from Company
Objection Letter Date	01/26/2021
Submitted Date	01/26/2021
Respond By Date	02/09/2021

Dear Lacey McGinley,

Introduction:

Thank you for your submission sent via SERFF dated 11.18.2020.

Objection 1

- VA1120 Changed Rates clean, all (Rate)

Comments: Please verify if the Index is intended to replace a current page in your file? If not, this must be removed from the Rate/Rule Schedule tab and added to the Supporting Docs Tab.

If it is intended to replace an existing page, it needs to be the entire set not just parts.

Objection 2

- VA1120 Changed Rates clean, all (Rate)

- VA1120 Body Type Group Assignment Table, all (Rate)

- VA1120 Business Class Group Assignment Table, all (Rate)

Comments: Are the above pages intended to replace S01/S02 Pages? These pages cannot be accepted as breakdown of the information on these pages will need to be defined as they are shown on the existing pages for Rules S01/S02.

Objection 3

Comments: Rule Index Auto Page: Please submit a final copy. The submitted pages include strike-out lines.

Objection 4

- VA1120 Auto Rules, all (Rate)

Comments: Rule D02:

Please review this page. The G and X will need to be realigned to the correct line to eliminate confusion.

Objection 5

- VA1120 Auto Rules, all (Rate)

Comments: G11 - Renewal Rate Stabilization:

Please review Page 34, you have referenced NY column when it should be U/N column. Please advise.

Objection 6

- VA1120 Auto Rules, all (Rate)

Comments: Rule G11 - Renewal Rate Stabilization:

1. When reviewing the Rate Stabilization Rule G11 and your Rate Stabilization Plan Projection, the wording for the dates should be 1.10.21 through 1.9.2026.

2. Please confirm that the reason you have amending your rate capping is because you are adding a new variable to your rating

algorithm.

3. Please confirm that the previous Rate Transition capping of 3 years has not been The Effective date of the last transition rule was 4-24-13. Which should have expired 4.23.16.

Objection 7

- VA1120 Auto Rules, all (Rate)

Comments: Rule G11 - Renewal Rate Stabilization

1. When reviewing the Rate Stabilization Plan Projection and page 34, the effective dates seems to be 6 years and not 5 years which is the maximum number of years you can have. Your date show effective January 10, 2021 to January 10, 2027.

2. Please confirm that the previous Rate Transition capping of 3 years has not been used in several years. The effective date of that last transition rule was April 24, 2013.

Objection 8

- VA1120 Auto Rules, all (Rate)

Comments: Rule G06:

Please review Step 2. Was it your intention to eliminate the last part of the wording?

Objection 9

- VA1120 Auto Rules, all (Rate)

Comments: Open High Credit Ratio:

The chart is reversed from the prior chart. Was this you intention?

Objection 10

- VA1120 Auto Rules, all (Rate)

Comments: Most Recent Deliquesces

This rule included a breakdown of 1 thru 6. You will need this breakdown included on this page.

:

Objection 11

- VA1120 Auto Rules, all (Rate)

Comments: Revolving Trade Counts:

This page will need a more detailed explanation for how this will be used.

Objection 12

- VA1120 Auto Rules, all (Rate)

Comments: Rule DR08 - Driver Definition

Please review Rule DR08. You may want to review the wording on this Rule pursuant to the Omnibus Clause in Virginia that anyone

driving with the insureds permission is a covered driver for the liability. You may want to want to review the wording or add wording for Virginia specifically. This Rule will need further detailed definition. You will also need to amend the companion SERFF Filing PRGS-132598687 to match in definition.

Objection 13

Comments: Since the Effective dates have passed, please let me know if you wish to use the same dates. If not, please submit a post submission update to amend the effective dates.

Conclusion:

Your submission has been placed in suspense pending your response.

Since I am working from home, you can reach me a 804-371-9292 and leave a message or email me at Victoria.brannan@scc.virginia.gov

Thanks

Sincerely,

Victoria Brannan

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	03/08/2021
Submitted Date	03/09/2021

Dear Victoria Brannan,

Introduction:

Response 1

Comments:

Rule G11 has been revised

Related Objection 1

Applies To:

- VA1120 Auto Rules, all (Rate)

Comments: Rule G11:

This Rule will need to be amended to show the expiration date of the Rate Stabilization to be 1.9.2027. This was discussed with upper management and this is the date that will need to be used for the expiration in order for the filing to be approved.

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	VA1120 Auto Rules	all	Replacement	PRGS-131263590	03/09/2021 By: Timothy Sprow
<i>Previous Version</i>					
1	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/18/2021 By:
<i>Previous Version</i>					
1	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
1	VA1120 Auto Rules	all	Replacement	PRGS-131263590	11/18/2020 By: Timothy Sprow

Supporting Document Schedule Item Changes	
Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Auto Rate Order of Calculations side by side v2.pdf VA1120 Body Type Group Assignment Table V2 side by side.pdf VA1120 Business Class Group Assignment Table V2 side by side.pdf VA1120 Changed Auto Rules side by side V4.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf</i> <i>VA1120 Business Class Group Assignment Table side by side.pdf</i> <i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i> <i>VA1120 Auto Rate Order of Calculations side by side v2.pdf</i> <i>VA1120 Changed Auto Rules side by side V3.pdf</i>
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Comments:

Body Type Group Assignment and Business Class Group Assignment Tables have been revised

Related Objection 2

Applies To:

- VA1120 Body Type Group Assignment Table, all (Rate)*
- VA1120 Business Class Group Assignment Table, all (Rate)*
- VA1120 Changed Rates clean, all (Rate)*

Comments: A definition of the symbols on these pages is required. The manual must reflect all information that is in your system. We have to be able to manually rate all coverages to match what is in your system. Your manual will need all symbols defined in order to develop the calculations you have in your system. Please advise if these symbols are elsewhere in your manual.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Auto Rate Order of Calculations side by side v2.pdf VA1120 Body Type Group Assignment Table V2 side by side.pdf VA1120 Business Class Group Assignment Table V2 side by side.pdf VA1120 Changed Auto Rules side by side V4.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf</i> <i>VA1120 Business Class Group Assignment Table side by side.pdf</i> <i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i> <i>VA1120 Auto Rate Order of Calculations side by side v2.pdf</i> <i>VA1120 Changed Auto Rules side by side V3.pdf</i>
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf</i> <i>VA1120 Business Class Group Assignment Table side by side.pdf</i> <i>VA1120 Rate Order of Calculations side by side.pdf</i> <i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i> <i>VA1120 Changed Auto Rules side by side V2.pdf</i>
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
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Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf</i> <i>VA1120 Business Class Group Assignment Table side by side.pdf</i> <i>VA1120 Rate Order of Calculations side by side.pdf</i> <i>VA1120 Auto Rules side by side.pdf</i> <i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i>

Conclusion:

Sincerely,

Timothy Sprow

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	02/08/2021
Submitted Date	02/08/2021

Dear Victoria Brannan,

Introduction:

Response 1

Comments:

The mark-up version of the Rates Index has been moved to Supporting Docs. A clean, replacement version of the Rates Index has also been added to Supporting Docs.

Related Objection 1

Applies To:

- VA1120 Changed Rates clean, all (Rate)

Comments: Please verify if the Index is intended to replace a current page in your file? If not, this must be removed from the Rate/Rule Schedule tab and added to the Supporting Docs Tab.

If it is intended to replace an existing page, it needs to be the entire set not just parts.

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	VA1120 Changed Rates clean	all	Replacement	PRGS-131631588	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
1	VA1120 Changed Rates clean	all	Replacement	PRGS-131631588	11/18/2020 By: Timothy Sprow

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Changed Auto Rules side by side V2.pdf

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Satisfied - Item:	<i>Side by Side Documents</i>
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Satisfied - Item:	VA1120 Auto Rates Index
Comments:	
Attachment(s):	VA1120 Auto Rates Index clean.pdf VA1120 Auto Rates Index side by side.pdf

Response 2

Comments:

The prior format required manual entry of the same information in multiple locations and different formats within our filing. To improve quality control in our rate and rule updates, we have aligned the filing to include Body Type Group and Business Class Group mappings in a single format that can be validated against our rating system for accuracy, rather than having to be manually keyed.

The Business Class Group Assignment and Body Type Group Assignment tables provide mappings to Business Class Group and Body Type Group as previously listed within Rules S01/S02. The Business Class descriptions remain in Rule BT01.

Related Objection 2

Applies To:

- VA1120 Changed Rates clean, all (Rate)
- VA1120 Body Type Group Assignment Table, all (Rate)
- VA1120 Business Class Group Assignment Table, all (Rate)

Comments: Are the above pages intended to replace S01/S02 Pages? These pages cannot be accepted as breakdown of the information on these pages will need to defined as they are shown on the existing pages for Rules S01/S02.

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	VA1120 Changed Rates clean	all	Replacement	PRGS-131631588	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
<i>1</i>	<i>VA1120 Changed Rates clean</i>	<i>all</i>	<i>Replacement</i>	<i>PRGS-131631588</i>	<i>11/18/2020 By: Timothy Sprow</i>

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Response 3

Comments:

A clean and side by side version of the Rules Index has been added to Supporting Docs.

Related Objection 3

Comments: Rule Index Auto Page: Please submit a final copy. The submitted pages includes Strike-out lines.

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	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
<i>1</i>	<i>VA1120 Auto Rules</i>	<i>all</i>	<i>Replacement</i>	<i>PRGS-131263590</i>	<i>11/18/2020 By: Timothy Sprow</i>

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Changed Auto Rules side by side V2.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Auto Rules side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf</i>

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Changed Auto Rules side by side V2.pdf

Previous Version

Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Auto Rules side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf</i>

Satisfied - Item:	VA1120 Auto Rules Index
Comments:	
Attachment(s):	VA1120 Auto Rules Index.pdf VA1120 Auto Rules Index side by side.pdf

Response 4

Comments:

The rule has been amended.

Related Objection 4

Applies To:

- VA1120 Auto Rules, all (Rate)

Comments: Rule D02:

Please review this page. the G and X will need to be realigned to the correct line to eliminated confusion.

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	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
1	VA1120 Auto Rules	all	Replacement	PRGS-131263590	11/18/2020 By: Timothy Sprow

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf
Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Changed Auto Rules side by side V2.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf</i> <i>VA1120 Business Class Group Assignment Table side by side.pdf</i> <i>VA1120 Rate Order of Calculations side by side.pdf</i> <i>VA1120 Auto Rules side by side.pdf</i> <i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i>

Response 5

Comments:

The rule has been amended.

Related Objection 5

Applies To:

- *VA1120 Auto Rules, all (Rate)*

Comments: G11 - Renewal Rate Stabilization:

Please review Page 34, you have referenced NY column when it should be U/N column. Please advise.

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	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
1	VA1120 Auto Rules	all	Replacement	PRGS-131263590	11/18/2020 By: Timothy Sprow

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf
Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Changed Auto Rules side by side V2.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf</i> <i>VA1120 Business Class Group Assignment Table side by side.pdf</i> <i>VA1120 Rate Order of Calculations side by side.pdf</i> <i>VA1120 Auto Rules side by side.pdf</i> <i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i>

Response 6

Comments:

1. When reviewing the Rate Stabilization Rule G11 and your Rate Stabilization Plan Projection, The wording for the dates should be 1.10.21 through 1.9.2026.

The dates provided were based on prior discussions with the Bureau of Insurance. Our understanding is that no policy should be impacted by the filed rate capping plan for more than 5 years. A policy that renews into the filed plan on the earliest possible date of 1.10.21 would not be capped beyond 1.9.26. However, with annual policy terms, an existing policy could renew into this plan for the first time as late as 1.9.22. For that policy, the 5-year period would extend through 1.9.27. The dates provided are a maximum range to cover all existing policies, but an individual policy will not be capped by the plan for more than 5 years from its first renewal into the plan on or after 1.10.21.

2. Please confirm that the reason you have amending your rate capping is because you are adding a new variables to your rating algorithm.

We utilize rate capping to provide our insureds more stability in their rate level at renewal despite company-driven changes to our rating algorithm. Those changes might include adding/removing variables, updating base rates, or updating rating factors. In this filing, we are making updates on all three fronts.

3. Please confirm that the previous Rate Transition capping of 3 years has not been The Effective date of the last transition rule was 4-24-13. Which should have expired 4.23.16.

Rule G11 has remained in effect because we did not file an expiration date or withdraw the rule. We have implemented multiple rate revisions since the rule was filed in 2013. Our prior understanding of the 3-year period was based on rate revision implementation. With each new rate revision, we introduce company-driven changes that impact our insureds' rates. Our rate capping was intended to provide ongoing stability in the face of those changes. With each revision, we recalculate a policy's filed rate and determine whether the resulting change meets the threshold for applying a cap. If so, we generate a rate cap for the policy at renewal.

No single revision had a capping impact for more than 3 years, but to the extent we implemented subsequent revisions during that time, a new cap may have been calculated and applied, starting a new 3-year window.

We now understand that the Bureau expects a policy to be fully uncapped within 5-years of renewing into a filed rate capping plan, regardless of the timing or rate impact of subsequent revisions during those 5 years. We have amended our plan accordingly to ensure policies reach an uncapped rate within the filed timeframe.

Related Objection 6

Applies To:

- VA1120 Auto Rules, all (Rate)

Comments: Rule G11 - Renewal Rate Stabilization:

1. When reviewing the Rate Stabilization Rule G11 and your Rate Stabilization Plan Projection, The wording for the dates should be 1.10.21 through 1.9.2026.
2. Please confirm that the reason you have amending your rate capping is because you are adding a new variables to your rating algorithm.
3. Please confirm that the previous Rate Transition capping of 3 years has not been The Effective date of the last transition rule was 4-24-13. Which should have expired 4.23.16.

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	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
<i>1</i>	<i>VA1120 Auto Rules</i>	<i>all</i>	<i>Replacement</i>	<i>PRGS-131263590</i>	<i>11/18/2020 By: Timothy Sprow</i>

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf
Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Changed Auto Rules side by side V2.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Auto Rules side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf</i>

Response 7

Comments:

1. When reviewing the Rate Stabilization Plan Projection and page 34, the effective dates seems to be 6 years and not 5 years which is the maximum number of years you can have. Your dates show effective January 10, 2021 to January 10, 2027.

Please see responses to Objection 6.

2. Please confirm that the previous Rate Transition capping of 3 years has not been used in several years. The effective date of that last transition rule was April 24, 2013.

Please see responses to Objection 6.

Related Objection 7

Applies To:

- VA1120 Auto Rules, all (Rate)

Comments: Rule G11 - Renewal Rate Stabilization

1. When reviewing the Rate Stabilization Plan Projection and page 34, the effective dates seems to be 6 years and not 5 years which is the maximum number of years you can have. Your date show effective January 10, 2021 to January 10, 2027.

2. Please confirm that the previous Rate Transition capping of 3 years has not been used in several years. The effective date of that last transition rule was April 24, 2013.

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	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
1	VA1120 Auto Rules	all	Replacement	PRGS-131263590	11/18/2020 By: Timothy Sprow

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf
Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Changed Auto Rules side by side V2.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf</i> <i>VA1120 Business Class Group Assignment Table side by side.pdf</i> <i>VA1120 Rate Order of Calculations side by side.pdf</i> <i>VA1120 Auto Rules side by side.pdf</i> <i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i>

Response 8

Comments:

Yes, we intended to remove the last sentence.

Related Objection 8

Applies To:

- VA1120 Auto Rules, all (Rate)

Comments: Rule G06:

Please review Step 2. Was it your intention to eliminate the last part of the wording?

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	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
<i>1</i>	<i>VA1120 Auto Rules</i>	<i>all</i>	<i>Replacement</i>	<i>PRGS-131263590</i>	<i>11/18/2020 By: Timothy Sprow</i>

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Changed Auto Rules side by side V2.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Auto Rules side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf</i>

Response 9**Comments:**

The chart is formatted in a different order than in the prior filing. The Value and Points are accurate as filed.

Related Objection 9

Applies To:

- VA1120 Auto Rules, all (Rate)

Comments: Open High Credit Ratio:

The chart is reversed from the prior chart. Was this your intention?

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	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
1	VA1120 Auto Rules	all	Replacement	PRGS-131263590	11/18/2020 By: Timothy Sprow

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf
Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Changed Auto Rules side by side V2.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf</i> <i>VA1120 Business Class Group Assignment Table side by side.pdf</i> <i>VA1120 Rate Order of Calculations side by side.pdf</i> <i>VA1120 Auto Rules side by side.pdf</i> <i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i>

Response 10

Comments:

The rule has been amended.

Related Objection 10

Applies To:

- VA1120 Auto Rules, all (Rate)

Comments: Most Recent Deliquesces

This rule included a breakdown of 1 thru 6. You will need this breakdown included on this page.

:

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	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
<i>1</i>	<i>VA1120 Auto Rules</i>	<i>all</i>	<i>Replacement</i>	<i>PRGS-131263590</i>	<i>11/18/2020 By: Timothy Sprow</i>

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf
Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Changed Auto Rules side by side V2.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf</i> <i>VA1120 Business Class Group Assignment Table side by side.pdf</i> <i>VA1120 Rate Order of Calculations side by side.pdf</i> <i>VA1120 Auto Rules side by side.pdf</i> <i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i>

Response 11

Comments:

The count of revolving trade lines (e.g. credit cards) is a newly added variable. The Revolving Trade Counts table defines how many points will be applied to the Financial Responsibility score based on the number of revolving trade lines.

Related Objection 11

Applies To:

- VA1120 Auto Rules, all (Rate)

Comments: Revolving Trade Counts:

This page will need a more detailed explanation for how this will be used.

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	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
1	VA1120 Auto Rules	all	Replacement	PRGS-131263590	11/18/2020 By: Timothy Sprow

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Response 12

Comments:

The rule has been amended.

Related Objection 12

Applies To:

- VA1120 Auto Rules, all (Rate)

Comments: Rule DR08 - Driver Definition

Please review Rule DR08. You may want to review the wording on this Rule pursuant to the Omnibus Clause in Virginia that anyone driving with the insureds permission is a covered driver for the liability. You may want to want to review the wording or add wording for Virginia specifically. This Rule will need further detailed definition. You will also need to amend the companion SERFF Filing PRGS-132598687 to match in definition.

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	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
<i>1</i>	<i>VA1120 Auto Rules</i>	<i>all</i>	<i>Replacement</i>	<i>PRGS-131263590</i>	<i>11/18/2020 By: Timothy Sprow</i>

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Changed Auto Rules side by side V2.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Auto Rules side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf</i>

Response 13**Comments:**

Effective dates should remain as filed: 11/19/2020 for new business and 01/10/2021 for renewal business.

Related Objection 13

Comments: Since the Effective dates have passed, please let me know if you wish to use the same dates. If not, please submit a post submission update to amend the effective dates.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf

Conclusion:

*Sincerely,
Timothy Sprow*

Amendment Letter

Submitted Date: 03/11/2021

Comments:

S01 and S02 rule reference tables:

VA1120 Body Type Group Assignment Table S02 clean v3

VA1120 Business Class Group Assignment Table S01 clean v3

VA1120 Body Type Group Assignment Table S02 side by side v3

VA1120 Business Class Group Assignment Table S01 side by side v3

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	VA1120 Body Type Group Assignment Table	all	Replacement	PRGS-131263590	03/11/2021 By:
<i>Previous Version</i>					
1	VA1120 Body Type Group Assignment Table	all	Replacement	PRGS-131263590	03/11/2021 By:
<i>Previous Version</i>					
1	VA1120 Body Type Group Assignment Table	all	Replacement	PRGS-131263590	11/18/2020 By: Timothy Sprow
2	VA1120 Business Class Group Assignment Table	all	Replacement	PRGS-131263590	03/11/2021 By:
<i>Previous Version</i>					
2	VA1120 Business Class Group Assignment Table	all	Replacement	PRGS-131263590	03/11/2021 By:
<i>Previous Version</i>					
2	VA1120 Business Class Group Assignment Table	all	Replacement	PRGS-131263590	11/18/2020 By: Timothy Sprow

Supporting Document Schedule Item Changes	
Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Auto Rate Order of Calculations side by side v2.pdf VA1120 Changed Auto Rules side by side V4.pdf VA1120 Body Type Group Assignment Table S02 side by side v3.pdf VA1120 Business Class Group Assignment Table S01 side by side v3.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i> <i>VA1120 Auto Rate Order of Calculations side by side v2.pdf</i> <i>VA1120 Body Type Group Assignment Table V2 side by side.pdf</i> <i>VA1120 Business Class Group Assignment Table V2 side by side.pdf</i> <i>VA1120 Changed Auto Rules side by side V4.pdf</i>
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf</i> <i>VA1120 Business Class Group Assignment Table side by side.pdf</i> <i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i> <i>VA1120 Auto Rate Order of Calculations side by side v2.pdf</i> <i>VA1120 Changed Auto Rules side by side V3.pdf</i>
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf</i> <i>VA1120 Business Class Group Assignment Table side by side.pdf</i> <i>VA1120 Rate Order of Calculations side by side.pdf</i> <i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i> <i>VA1120 Changed Auto Rules side by side V2.pdf</i>
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf</i>

	<i>VA1120 Business Class Group Assignment Table side by side.pdf</i> <i>VA1120 Rate Order of Calculations side by side.pdf</i> <i>VA1120 Auto Rules side by side.pdf</i> <i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i>
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Amendment Letter

Submitted Date: 03/11/2021

Comments:

Victoria,
I noticed that two of the files included in my recent objection response may have not been attached correctly so I am sending them in this amendment.
VA1120 Body Type Group Assignment Table V2
VA1120 Business Class Group Assignment Table V2

Sincerely,
Tim Sprow

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	VA1120 Body Type Group Assignment Table	all	Replacement	PRGS-131263590	03/11/2021 By:
<i>Previous Version</i>					
1	VA1120 Body Type Group Assignment Table	all	Replacement	PRGS-131263590	11/18/2020 By: Timothy Sprow
2	VA1120 Business Class Group Assignment Table	all	Replacement	PRGS-131263590	03/11/2021 By:
<i>Previous Version</i>					
2	VA1120 Business Class Group Assignment Table	all	Replacement	PRGS-131263590	11/18/2020 By: Timothy Sprow

No Supporting Documents Changed.

Amendment Letter

Submitted Date: 02/18/2021

Comments:

We identified a few omissions related to our introduction of a new EFT discount table. Rule D06, the Rule Index, Rate Order of Calculations, and Rate Index have been amended accordingly.

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	VA1120 Rate Order of Calculations Clean	all	Replacement	PRGS-131263590	02/18/2021 By:
<i>Previous Version</i>					
1	VA1120 Rate Order of Calculations Clean	all	Replacement	PRGS-131263590	11/18/2020 By: Timothy Sprow
2	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/18/2021 By:
<i>Previous Version</i>					
2	VA1120 Auto Rules	all	Replacement	PRGS-131263590	02/08/2021 By: Timothy Sprow
<i>Previous Version</i>					
2	VA1120 Auto Rules	all	Replacement	PRGS-131263590	11/18/2020 By: Timothy Sprow

Supporting Document Schedule Item Changes	
Satisfied - Item:	VA1120 Auto Rules Index
Comments:	
Attachment(s):	VA1120 Auto Rules Index.pdf VA1120 Auto Rules Index side by side v2.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>VA1120 Auto Rules Index</i>
Comments:	
Attachment(s):	<i>VA1120 Auto Rules Index.pdf VA1120 Auto Rules Index side by side.pdf</i>
Satisfied - Item:	VA1120 Auto Rates Index
Comments:	
Attachment(s):	VA1120 Auto Rates Index clean v2.pdf VA1120 Auto Rates Index side by side v2.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>VA1120 Auto Rates Index</i>
Comments:	
Attachment(s):	<i>VA1120 Auto Rates Index clean.pdf VA1120 Auto Rates Index side by side.pdf</i>
Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Auto Rate Order of Calculations side by side v2.pdf VA1120 Changed Auto Rules side by side V3.pdf
<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Changed Auto Rules side by side V2.pdf</i>

<i>Previous Version</i>	
Satisfied - Item:	<i>Side by Side Documents</i>
Comments:	
Attachment(s):	<i>VA1120 Body Type Group Assignment Table side by side.pdf</i> <i>VA1120 Business Class Group Assignment Table side by side.pdf</i> <i>VA1120 Rate Order of Calculations side by side.pdf</i> <i>VA1120 Auto Rules side by side.pdf</i> <i>VA1120 Symbol FCT TBL side by side.pdf</i> <i>VA1120 Rates side by side.pdf</i>

Note To Reviewer

Created By:

Timothy Sprow on 03/11/2021 02:02 PM

Last Edited By:

Timothy Sprow

Submitted On:

03/11/2021 02:02 PM

Subject:

S01 and S02 reference tables

Comments:

Hi Victoria,

It was a pleasure speaking with you.

I just sent an amendment of the tables that indicate which rule (S01/S02) each table is tied to.

VA1120 Body Type Group Assignment Table S02 clean v3

VA1120 Business Class Group Assignment Table S01 clean v3

Sincerely,

Tim Sprow

Note To Filer

Created By:

Victoria Brannan on 03/11/2021 11:36 AM

Last Edited By:

Victoria Brannan

Submitted On:

03/11/2021 11:37 AM

Subject:

Note to Timothy

Comments:

I am available now until 4 PM

Note To Reviewer

Created By:

Timothy Sprow on 03/11/2021 07:46 AM

Last Edited By:

Timothy Sprow

Submitted On:

03/11/2021 07:49 AM

Subject:

Phone call

Comments:

Hi Victoria

Do you have time at 10:30 today?

Also, can you send me your email?

Thank you.

Tim

Tim_Spro@Progressive.com

Note To Filer

Created By:

Victoria Brannan on 03/10/2021 02:43 PM

Last Edited By:

Victoria Brannan

Submitted On:

03/10/2021 02:43 PM

Subject:

Note to Timothy Sprow

Comments:

Can you please call me at 804-874-5951 tomorrow morning at 7 Am EST. I think there is a mis-communication on what we required to be in your manual.

I will be on-line until 4 PM today.

Note To Reviewer

Created By:

Timothy Sprow on 03/10/2021 12:37 PM

Last Edited By:

Timothy Sprow

Submitted On:

03/10/2021 12:38 PM

Subject:

Filing question

Comments:

Hi Victoria,

I am reaching out to you regarding our Commercial Auto filing, SERFF Tr Num: PRGS-132598715

I received a message that you may have some questions regarding the filing?

If that is the case, I'd be happy to help?

Sincerely,

Tim Sprow

Tim_SproW@Progressive.com

Note To Reviewer

Created By:

Timothy Sprow on 02/05/2021 07:53 AM

Last Edited By:

Timothy Sprow

Submitted On:

02/05/2021 07:53 AM

Subject:

Objection response extension request

Comments:

Dear Victoria Brannan,

We would like to request a one week extension on our objection response.

We are asking to extend to 02/16/21.

Thank you.

Tim Sprow

Rate Information

Rate data applies to filing.

Filing Method:	File and Use
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	6.400%
Effective Date of Last Rate Revision:	09/13/2018
Filing Method of Last Filing:	File and Use
SERFF Tracking Number of Last Filing:	PRGS-131631588

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):
Progressive Northern Insurance Company	-9.500%	0.100%	\$87,886	16,773	\$87,885,882	25.000%	-25.000%

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1	Filed 03/16/2021	VA1120 Changed Rates clean	all	Replacement	PRGS-131631588	VA1120 Rates.pdf
2	Filed 03/16/2021	VA1120 Rate Order of Calculations Clean	all	Replacement	PRGS-131263590	VA1120 Auto Rate Order of Calculations Clean v2.pdf
3	Filed 03/16/2021	VA1120 Body Type Group Assignment Table	all	Replacement	PRGS-131263590	VA1120 Body Type Group Assignment Table S02 clean v3.pdf
4	Filed 03/16/2021	VA1120 Business Class Group Assignment Table	all	Replacement	PRGS-131263590	VA1120 Business Class Group Assignment Table S01 clean v3.pdf
5	Filed 03/16/2021	VA1120 Symbol FCT TBL	all	Replacement	PRGS-131631588	VA1120 Symbol FCT TBL.pdf
6	Filed 03/16/2021	VA1120 Auto Rules	all	Replacement	PRGS-131263590	VA1120 Changed Auto Rules clean V4.pdf

Supporting Document Schedules

Satisfied - Item:	COF-1 Rate Certification
Comments:	
Attachment(s):	VA1120 Auto COF-1 (05-05).pdf
Item Status:	Filed
Status Date:	03/16/2021

Bypassed - Item:	NAIC's Loss Costs Adoption Forms
Bypass Reason:	NA
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Virginia Advisory Filing Adoption Form
Bypass Reason:	NA
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Side by Side Documents
Comments:	
Attachment(s):	VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Auto Rate Order of Calculations side by side v2.pdf VA1120 Changed Auto Rules side by side V4.pdf VA1120 Body Type Group Assignment Table S02 side by side v3.pdf VA1120 Business Class Group Assignment Table S01 side by side v3.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Filing Memo
Comments:	
Attachment(s):	VA 1120 Filing Memo Auto.pdf
Item Status:	
Status Date:	

Satisfied - Item:	VA 1120 Rate Stabilization
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Comments:	
Attachment(s):	VA 1120 Rate Stabilization Plan Projection.pdf RateStab345-A Form.pdf.pdf
Item Status:	Filed
Status Date:	03/16/2021

Satisfied - Item:	VA1120 Auto Rules Index
Comments:	
Attachment(s):	VA1120 Auto Rules Index.pdf VA1120 Auto Rules Index side by side v2.pdf
Item Status:	Filed
Status Date:	03/16/2021

Satisfied - Item:	VA1120 Auto Rates Index
Comments:	
Attachment(s):	VA1120 Auto Rates Index clean v2.pdf VA1120 Auto Rates Index side by side v2.pdf
Item Status:	Filed
Status Date:	03/16/2021

Satisfied - Item:	VA1120 Auto Objection Response Document
Comments:	
Attachment(s):	VA1120 Auto Objection Response.pdf
Item Status:	
Status Date:	

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)
03/09/2021	Withdrawn 03/16/2021	Rate	VA1120 Body Type Group Assignment Table	03/11/2021	VA1120 Body Type Group Assignment Table V2 clean.pdf (Superseded)
03/09/2021	Withdrawn 03/16/2021	Rate	VA1120 Business Class Group Assignment Table	03/11/2021	VA1120 Business Class Group Assignment Table V2 clean.pdf (Superseded)
03/08/2021		Supporting Document	Side by Side Documents	03/11/2021	VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Auto Rate Order of Calculations side by side v2.pdf VA1120 Body Type Group Assignment Table V2 side by side.pdf (Superseded) VA1120 Business Class Group Assignment Table V2 side by side.pdf (Superseded) VA1120 Changed Auto Rules side by side V4.pdf
02/18/2021	Withdrawn 03/16/2021	Rate	VA1120 Auto Rules	03/08/2021	VA1120 Changed Auto Rules clean V3.pdf (Superseded)
02/18/2021		Supporting Document	Side by Side Documents	03/08/2021	VA1120 Body Type Group Assignment Table side by side.pdf (Superseded) VA1120 Business Class Group Assignment Table side by side.pdf (Superseded) VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Auto Rate Order of Calculations side by side v2.pdf VA1120 Changed Auto Rules side by side V3.pdf (Superseded)

Creation Date	Schedule Item Status	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
02/08/2021		Supporting Document	Side by Side Documents	02/18/2021	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf (Superceded) VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf VA1120 Changed Auto Rules side by side V2.pdf (Superceded)
02/08/2021	Withdrawn 03/16/2021	Supporting Document	VA1120 Auto Rates Index	02/18/2021	VA1120 Auto Rates Index clean.pdf (Superceded) VA1120 Auto Rates Index side by side.pdf (Superceded)
02/03/2021	Withdrawn 03/16/2021	Rate	VA1120 Auto Rules	02/18/2021	VA1120 Changed Auto Rules clean V2.pdf (Superceded)
02/03/2021	Withdrawn 03/16/2021	Supporting Document	VA1120 Auto Rules Index	02/18/2021	VA1120 Auto Rules Index.pdf VA1120 Auto Rules Index side by side.pdf (Superceded)
11/10/2020		Supporting Document	Side by Side Documents	02/08/2021	VA1120 Body Type Group Assignment Table side by side.pdf VA1120 Business Class Group Assignment Table side by side.pdf VA1120 Rate Order of Calculations side by side.pdf VA1120 Auto Rules side by side.pdf (Superceded) VA1120 Symbol FCT TBL side by side.pdf VA1120 Rates side by side.pdf
11/10/2020	Withdrawn 03/16/2021	Rate	VA1120 Rate Order of Calculations Clean	02/18/2021	VA1120 Rate Order of Calculations Clean.pdf (Superceded)
11/10/2020	Withdrawn 03/16/2021	Rate	VA1120 Body Type Group Assignment Table	03/09/2021	VA1120 Body Type Group Assignment Table.pdf (Superceded)
11/10/2020	Withdrawn 03/16/2021	Rate	VA1120 Business Class Group Assignment Table	03/09/2021	VA1120 Business Class Group Assignment Table.pdf (Superceded)

Creation Date	Schedule Item Status	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
11/10/2020	Withdrawn 03/16/2021	Rate	VA1120 Auto Rules	02/03/2021	VA1120 Auto Rules Index.pdf (Superceded) VA1120 Auto Rules.pdf (Superceded)
11/10/2020	Withdrawn 03/16/2021	Rate	VA1120 Changed Rates clean	02/08/2021	VA1120 Auto Rates Index.pdf (Superceded) VA1120 Rates.pdf