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Loss Cost Adoption Forms	Loss Cost Adopt Pages 1-2 MDX Liab.pdf
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Loss Cost Adoption Forms	*Loss Cost Adopt Pages 1-2 SIC Liab.pdf*
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Loss Cost Adoption Forms	*Loss Cost Adopt Pages 1-2 MDX PhysDam.pdf*

Filing at a Glance

Companies:	Middlesex Insurance Company Sentry Insurance Company
Product Name:	Commercial Auto
State:	Washington
TOI:	20.0 Commercial Auto
Sub-TOI:	20.0000 Commercial Auto Combinations
Filing Type:	Rate/Rule
Date Submitted:	11/14/2025
SERFF Tr Num:	SEPX-134740514
SERFF Status:	Closed-Approved
State Tr Num:	493993
State Status:	Approved
Co Tr Num:	2026-03-01_WA_CW - SCORECARD.LC.ILF.LCM.PDD FACTORS.AGG DED FACTORS_ S M
Effective Date Requested (New):	03/01/2026
Effective Date Requested (Renewal):	03/01/2026
Author(s):	Meghann Czech
Reviewer(s):	Ted Shisler (primary)
Disposition Date:	01/21/2026
Disposition Status:	Approved
Effective Date (New):	03/01/2026
Effective Date (Renewal):	
Destruction Date:	

General Information

Project Name: CW - SCORECARD.LC.ILF.LCM.PDD Factors.AGG Ded Factors - S M P

Status of Filing in Domicile:

Project Number: Documents\CL Auto\Countrywide\2025\CW - SCORECARD.LC.ILF.LCM.PDD Factors.AGG Ded Factors

Domicile Status Comments:

Reference Organization:

Reference Number:

Reference Title:

Advisory Org. Circular:

Filing Status Changed: 01/21/2026

State Status Changed: 01/21/2026

Deemer Date:

Created By: Meghann Czech

Submitted By: Meghann Czech

Corresponding Filing Tracking Number:

Filing Description:

The proposed written date is 3/1/2026.

The purpose of this filing is to:

- Revise company LCMs
- Revise Physical Damage Deductible Factors, please see additional PD Deductibles Exhibit A for details
- Revise Scorecard, please see additional Scorecard Memo and exhibits for details.

Sincerely,

Meghann Czech
Product & Compliance Analyst
715.346.8380
Meghann.Czech@Sentry.com

Company and Contact

Filing Contact Information

Meghann Czech, Product & Compliance Analyst
Meghann.Czech@sentry.com
1800 North Point Drive
715-346-8380 [Phone]
Stevens Point, WI 54481

Filing Company Information

Middlesex Insurance Company 1800 North Point Drive Stevens Point, WI 54481 (715) 346-6000 ext. [Phone]	CoCode: 23434 Group Code: 169 Group Name: Sentry Insurance Group FEIN Number: 04-1619070	State of Domicile: Wisconsin Company Type: State ID Number:
Sentry Insurance Company 1800 North Point Drive Stevens Point, WI 54481 (715) 346-6000 ext. [Phone]	CoCode: 24988 Group Code: 169 Group Name: Sentry Insurance Group FEIN Number: 39-0333950	State of Domicile: Wisconsin Company Type: State ID Number:

Filing Fees

State Fees

Fee Required?	No
Retaliatory?	No
Fee Explanation:	

State Specific

Is the Co Tracking # field populated on the General Information Tab? (yes/no): yes

Form Tab Only - Are the Form # and Form Description fields populated corresponding to the attached form? (yes/no): NA

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Ted Shisler	01/21/2026	01/21/2026

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Active Suspense	Ted Shisler	12/11/2025	12/11/2025

Response Letters

Responded By	Created On	Date Submitted
Meghann Czech	12/17/2025	12/24/2025

Disposition

Disposition Date: 01/21/2026

Effective Date (New): 03/01/2026

Effective Date (Renewal):

Status: Approved

Comment: We would appreciate you taking part in our online customer survey. This survey is voluntary and confidential and though not all information is required, providing the respective filing number on the last question will help us improve the quality of our services. Please take a minute or two to give us your feedback so we can better serve you.

Take the survey at: http://www.sesrc.wsu.edu/PugetSound/RatesandForms

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):
Middlesex Insurance Company	11.100%	10.700%	$1,199,487	274	$11,184,644	80.300%	-33.900%
Sentry Insurance Company	8.700%	8.600%	$325,286	345	$3,771,052	69.400%	-30.500%

Overall Rate Information for Multiple Company Filings	
Overall Percentage Rate Indicated For This Filing	10.500%
Overall Percentage Rate Impact For This Filing	10.200%
Effect of Rate Filing-Written Premium Change For This Program	$1,524,773
Effect of Rate Filing - Number of Policyholders Affected	619

Schedule	Schedule Item	Schedule Item Status	Public Access
Rate	Company Exception Page		Yes
Rate	Company Exception Page		Yes
Rate	Company Exception Page		Yes
Rate (revised)	Company Exception Page		Yes
Rate	Company Exception Page		Yes
Rate	Company Exception Page		Yes
Rate	Company Exception Page		Yes

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	MARK UPS		Yes
Supporting Document (revised)	Filing Memos & Supporting Documents		Yes
Supporting Document	Filing Memos & Supporting Documents		Yes
Supporting Document (revised)	Loss Cost Adoption Forms		Yes
Supporting Document	Loss Cost Adoption Forms		Yes

Objection Letter

Objection Letter Status	Active Suspense
Objection Letter Date	12/11/2025
Submitted Date	12/11/2025
Respond By Date	

Dear Meghann Czech,

Introduction:

DISAPPROVAL DATE: February 9, 2026

We are holding your filing as disapproved under the provisions of RCW 48.19.100. Your filing is deemed no longer effective after February 9, 2026. Please respond to the following concerns:

Objection 1

Comments: 1. Your indication exhibits contain a note saying that 2025 earned premium through the end of the year was estimated by multiplying the earned premium through June by 2. We object to this method of extrapolation. If the six months of data are significant enough to include in your indication, then it should be possible to incorporate it as a six-month block of time, instead of extrapolating it into a year. If, as the adjacent note states, the data from 2025 are not included in the totals, then it would be preferable to remove them from the exhibit entirely.

Objection 2

Comments: 2. Your complements of credibility are shown to be net trend applied for 1.16 years. You may not use a period longer than one year in trending your permissible loss ratio. Please make the appropriate revisions.

Objection 3

Comments: 3. The exhibit supporting your deductible factors only seems to address Collision and Comprehensive All Perils categories, but your rate page also shows factors for other categories, including Theft, Mischief, and Vandalism with and without Full Glass Coverage, All Perils with Full Glass Coverage, and Specified Causes of Loss All Perils. Please provide support for the remaining deductible factors.

Objection 4

Comments: 4. Your Scorecard Memo has the phrase Proprietary and Confidential in its footer. Please be advised that this filing and all attached documents will be made available to the public if and when the filing is approved and effective. Please confirm that you are okay with this document being made available to the public.

Objection 5

Comments: 5. Please remove all mentions of Carfax in your rate pages. While average mileage and length of ownership are acceptable variables, we expect that the company would determine the values of those variables without explicitly stating the source in the rate manual.

Objection 6

Comments: 6. Please remove the no records factors from the Current Owner Average Commercial Mileage and Current Owner Average Days of Ownership variables under the Scorecard Rating Plan. You may not omit risk criteria if the information is not available at the time of underwriting evaluation. All risk information must be known prior to rating. Otherwise, your scoring rules may be considered unfairly discriminatory.

Objection 7

Comments: 7. Regarding the Transition Rule under your Scorecard Rating Plan, the filing of a premium capping rule should be accompanied by a description of the circumstances that make such a rule necessary (such as a revision to a rating plan, acquisition of a book of business from an unaffiliated insurer, etc.), as well as a histogram showing the disruption to the book of business in the *absence of the rule. Please provide this.*

We recommend you review our guidance document related to premium capping available on our Speed to Market page at https://www.insurance.wa.gov/speed-market-toolsproperty-and-casualty-filers.

Conclusion:

We encourage you to respond promptly to these concerns. If we do not receive your response by February 9, 2026, your filing will be closed, and we will reconsider it only if you resubmit it as a new filing.

Sincerely,

Ted Shisler

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	12/17/2025
Submitted Date	12/24/2025

Dear Ted Shisler,

Introduction:

Thank you for your assistance with this filing. Responses below:

Response 1

Comments:

2025 data has been removed from the exhibit.

Related Objection 1

Comments: 1. Your indication exhibits contain a note saying that 2025 earned premium through the end of the year was estimated by multiplying the earned premium through June by 2. We object to this method of extrapolation. If the six months of data are significant enough to include in your indication, then it should be possible to incorporate it as a six-month block of time, instead of extrapolating it into a year. If, as the adjacent note states, the data from 2025 are not included in the totals, then it would be preferable to remove them from the exhibit entirely.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Filing Memos & Supporting Documents
Comments:	
Attachment(s):	NonDO Auto Scorecard Memo 5.0.0 - WA.pdf PD Deductibles Exhibit A - CW.pdf WA MFG REG HRT Auto Filing Memo 2026-03-01 v2.pdf WA Auto SIC MDX Uncapped Histogram Exhibits.pdf
Previous Version	
Satisfied - Item:	*Filing Memos & Supporting Documents*
Comments:	
Attachment(s):	*WA MFG REG HRT Auto FIling Memo 2026-03-01.pdf* *NonDO Auto Scorecard Memo 5.0.0 - WA.pdf* *PD Deductibles Exhibit A - CW.pdf*

Response 2

Comments:

We have revised our net trend to be applied for 1.00 year, and lowered impacts to remain supported by our indications.

Related Objection 2

Comments: 2. Your complements of credibility are shown to be net trend applied for 1.16 years. You may not use a period longer than one year in trending your permissible loss ratio. Please make the appropriate revisions.

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	Company Exception Page	CA-LCM-WA-SIC-1 thru 2	Replacement	SEPX-134279953	12/24/2025 By: Meghann Czech
Previous Version					
1	*Company Exception Page*	*CA-LCM-WA-SIC-1 thru 2*	*Replacement*	*SEPX-134279953*	*11/14/2025* *By: Meghann Czech*

Supporting Document Schedule Item Changes	
Satisfied - Item:	Loss Cost Adoption Forms
Comments:	
Attachment(s):	Loss Cost Adopt Pages 1-2 MDX Liab.pdf Loss Cost Adopt Pages 1-2 MDX PhysDam.pdf Loss Cost Adopt Pages 1-2 SIC Liab v2.pdf Loss Cost Adopt Pages 1-2 SIC PhysDam v2.pdf
Previous Version	
Satisfied - Item:	*Loss Cost Adoption Forms*
Comments:	
Attachment(s):	*Loss Cost Adopt Pages 1-2 SIC Liab.pdf* *Loss Cost Adopt Pages 1-2 SIC PhysDam.pdf* *Loss Cost Adopt Pages 1-2 MDX Liab.pdf* *Loss Cost Adopt Pages 1-2 MDX PhysDam.pdf*

Response 3

Comments:

Our study based on internal company data focused on Collision and Comprehensive All Perils deductibles as that is the vast majority of the deductibles that we write. However, to keep the same relationship for Comprehensive All Perils and All Perils With Full Glass factors, we are also deviating the Full Glass factors from ISO. This was done by adjusting the percentage discount or surcharge by the same amount that it was adjusted for the All Perils factors, along with smoothing to ensure that the consistency test was passed. The same process was followed for the Specified Causes of Loss factors. We are proposing no change to the currently adopted ISO Theft, Mischief, and Vandalism with and without Full Glass Coverage deductible factors. Rather, we are including them in the table for completeness.

Related Objection 3

Comments: 3. The exhibit supporting your deductible factors only seems to address Collision and Comprehensive All Perils categories, but your rate page also shows factors for other categories, including Theft, Mischief, and Vandalism with and without Full Glass Coverage, All Perils with Full Glass Coverage, and Specified Causes of Loss All Perils. Please provide support for the remaining deductible factors.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 4

Comments:

Yes, we are okay with the Scorecard Memo being available to the public.

Related Objection 4

Comments: 4. Your Scorecard Memo has the phrase Proprietary and Confidential in its footer. Please be advised that this filing and all attached documents will be made available to the public if and when the filing is approved and effective. Please confirm that you are okay with this document being made available to the public.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 5

Comments:

Please see the updated CA-RP-SCR-WA pages containing the SCORECARD RATING PLAN. We have removed references to Carfax from Current Owner Average Days of Ownership variable.

Upon review of this objection we noticed that the inclusion of Current Owner Average Commercial Mileage in the CA-RP-SCR-WA pages was redundant because the application of that factor is outside of the SCORECARD RATING PLAN and is already detailed in the CA-CE-CMF pages as part of Auto Liability and Physical Damage - Additional Rating Factors - Commercial Mileage Rating Factors; therefore, we have removed this redundant reference to Current Owner Average Commercial Mileage from the CA-RP-SCR-WA pages. Note that Current Owner Average Commercial Mileage factor is referenced as Policy-Level Average Mileage within CA-CE-CMF. There are no references to Carfax within CA-CE-CMF.

Related Objection 5

Comments: 5. Please remove all mentions of Carfax in your rate pages. While average mileage and length of ownership are acceptable variables, we expect that the company would determine the values of those variables without explicitly stating the source in the rate 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	Company Exception Page	CA-RP-SCR-WA-1 thru 18	Replacement	SEPX-132678638	12/24/2025 By: Meghann Czech

No Supporting Documents changed.

Response 6

Comments:

Please see the updated CA-RP-SCR-WA pages containing the SCORECARD RATING PLAN. We have removed the No Carfax Ownership Records factor from the Business Auto Liability Variables rating table.

With the correction of the redundant reference to Current Owner Average Commercial Mileage variable within CA-RP-SCR-WA - as stated in our response to Objection 5, we have also satisfied the removal of the No Carfax Mileage Records factor. CA-CE-CMF does not contain a No Records factor within the rating table.

Related Objection 6

Comments: 6. Please remove the no records factors from the Current Owner Average Commercial Mileage and Current Owner Average Days of Ownership variables under the Scorecard Rating Plan. You may not omit risk criteria if the information is not available at the time of underwriting evaluation. All risk information must be known prior to rating. Otherwise, your scoring rules may be considered unfairly discriminatory.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 7

Comments:

We have added histogram exhibits for SIC and MDX showing the disruption to the book of business in absence of the rule. The transition rule is necessary to mitigate disruption due to the revision of the scorecard rating plan.

Related Objection 7

Comments: 7. Regarding the Transition Rule under your Scorecard Rating Plan, the filing of a premium capping rule should be accompanied by a description of the circumstances that make such a rule necessary (such as a revision to a rating plan, acquisition of a book of business from an unaffiliated insurer, etc.), as well as a histogram showing the disruption to the book of business in the absence of the rule. Please provide this.

We recommend you review our guidance document related to premium capping available on our Speed to Market page at https://www.insurance.wa.gov/speed-market-toolsproperty-and-casualty-filers.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Filing Memos & Supporting Documents
Comments:	
Attachment(s):	NonDO Auto Scorecard Memo 5.0.0 - WA.pdf PD Deductibles Exhibit A - CW.pdf WA MFG REG HRT Auto Filing Memo 2026-03-01 v2.pdf WA Auto SIC MDX Uncapped Histogram Exhibits.pdf
Previous Version	
Satisfied - Item:	*Filing Memos & Supporting Documents*
Comments:	
Attachment(s):	*WA MFG REG HRT Auto FIling Memo 2026-03-01.pdf* *NonDO Auto Scorecard Memo 5.0.0 - WA.pdf* *PD Deductibles Exhibit A - CW.pdf*

Conclusion:

Please reach out if anything additional is needed.

Thank you,

Sincerely,

Meghann Czech

Post Submission Update Request Processed On 12/29/2025

Status:	Allowed
Created By:	Meghann Czech
Processed By:	Ted Shisler
Comments:	

Company Rate Information:

Company Name:Middlesex Insurance Company

Field Name	Requested Change	Prior Value
Overall % Indicated Change	11.100%	12.700%

Company Name:Sentry Insurance Company

Field Name	Requested Change	Prior Value
Overall % Indicated Change	8.700%	10.500%
Overall % Rate Impact	8.600%	10.300%
Written Premium Change for this Program	$325286	$390217
Maximum %Change (where required)	69.400%	72.100%
Minimum %Change (where required)	-30.500%	-29.500%

Overall Rate Information:

Field Name	Requested Change	Prior Value
Overall Percentage Rate Indicated For This Filing	10.500%	12.200%
Overall Percentage Rate Impact For This Filing	10.200%	10.600%

Rate Information

Rate data applies to filing.

Filing Method:	Use & File
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	11.900%
Effective Date of Last Rate Revision:	01/01/2025
Filing Method of Last Filing:	Use & File
SERFF Tracking Number of Last Filing:	SEPX-134279953

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):
Middlesex Insurance Company	11.100%	10.700%	$1,199,487	274	$11,184,644	80.300%	-33.900%
Sentry Insurance Company	8.700%	8.600%	$325,286	345	$3,771,052	69.400%	-30.500%

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1		Company Exception Page	CA-CE-CMF-1 thru 2	New		CA-CE-CMF-1 2 new MFG.REG.pdf
2		Company Exception Page	CA-CE-PDD-WA-1	New		CA-CE-PDD-WA-1 ed 03 25.pdf
3		Company Exception Page	CA-RP-SCR-WA-1 thru 21	Replacement	SEPX-132678638	CA-RP-SCR-WA-1 through 21 ed 03 26.pdf
4		Company Exception Page	CA-LCM-WA-SIC-1 thru 2	Replacement	SEPX-134279953	WA SIC Auto Manual Pages ed 03-26 FINAL v2.pdf
5		Company Exception Page	CA-LCM-WA-MDX-1 thru 2	Replacement	SEPX-134279953	CA-LCM-WA-MDX-1 and 2 ed 03 26.pdf
6		Company Exception Page	CA-RP-SCR-WA-1 thru 18	Replacement	SEPX-132678638	CA-RP-SCR-WA finals.pdf

Supporting Document Schedules

Satisfied - Item:	MARK UPS
Comments:	
Attachment(s):	WA MDX Auto Manual Pages ed 03-26 MARKUP.pdf WA SIC Auto Manual Pages ed 03-26 MARKUP.pdf carpscrwa_2026-03 mfg reg mark up.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Filing Memos & Supporting Documents
Comments:	
Attachment(s):	NonDO Auto Scorecard Memo 5.0.0 - WA.pdf PD Deductibles Exhibit A - CW.pdf WA MFG REG HRT Auto Filing Memo 2026-03-01 v2.pdf WA Auto SIC MDX Uncapped Histogram Exhibits.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Loss Cost Adoption Forms
Comments:	
Attachment(s):	Loss Cost Adopt Pages 1-2 MDX Liab.pdf Loss Cost Adopt Pages 1-2 MDX PhysDam.pdf Loss Cost Adopt Pages 1-2 SIC Liab v2.pdf Loss Cost Adopt Pages 1-2 SIC PhysDam v2.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)
11/14/2025		Supporting Document	Filing Memos & Supporting Documents	12/22/2025	WA MFG REG HRT Auto FIling Memo 2026-03-01.pdf (Superceded) NonDO Auto Scorecard Memo 5.0.0 - WA.pdf PD Deductibles Exhibit A - CW.pdf
11/14/2025		Supporting Document	Loss Cost Adoption Forms	12/22/2025	Loss Cost Adopt Pages 1-2 SIC Liab.pdf (Superceded) Loss Cost Adopt Pages 1-2 SIC PhysDam.pdf (Superceded) Loss Cost Adopt Pages 1-2 MDX Liab.pdf Loss Cost Adopt Pages 1-2 MDX PhysDam.pdf
11/14/2025		Rate	Company Exception Page	12/22/2025	CA-LCM-WA-SIC-1 and 2 ed 03 26.pdf (Superceded)