# Table of Contents

## Filing at a Glance

| | |
|---|---|
| Company: | Integon National Insurance Company |
| Product Name: | INIC_HO_Rate_Rule |
| State: | Virginia |
| TOI: | 04.0 Homeowners |
| Sub-TOI: | 04.0000 Homeowners Sub-TOI Combinations |
| Filing Type: | Rate/Rule |
| Date Submitted: | 10/12/2023 |
| SERFF Tr Num: | GMMX-133849594 |
| SERFF Status: | Closed-Filed |
| State Tr Num: | |
| State Status: | Filed |
| Co Tr Num: | INICHO12312023 |
| Effective Date Requested (New): | 12/31/2023 |
| Effective Date Requested (Renewal): | 12/31/2023 |
| Author(s): | Kristi Harris, Kimberly Snow |
| Reviewer(s): | Flora Worthington (primary) |
| Disposition Date: | 01/09/2024 |
| Disposition Status: | Filed |
| Effective Date (New): | 12/31/2023 |
| Effective Date (Renewal): | 12/31/2023 |

## General Information

Project Name:
Project Number:
Reference Organization:
Reference Title:
Filing Status Changed: 01/09/2024
State Status Changed: 01/09/2024
Created By: Kristi Harris
Corresponding Filing Tracking Number:

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

Deemer Date:
Submitted By: Kristi Harris

Filing Description:

Integon National Insurance Company submits for your review a rate/rule filing for our Homeowners Program. With this filing we are updating our rules and rating plan. The changes to the Rules manual include the removal of Landlord's Furnishings and Earthquake coverage as well as editorial changes needed to align with updated forms from filing (GMMX-133656529)

## Company and Contact

### Filing Contact Information

Kimberly Snow, Product Regulatory Senior Analyst I
Kimberly.Snow@ngic.com
PO Box 3199
336-435-3704 [Phone]
Winston-Salem, NC 27102

### Filing Company Information

Integon National Insurance Company
PO Box 3199
Winston-Salem, NC 27102
(336) 435-2000 ext. [Phone]

CoCode: 29742
Group Code: 8
Group Name: Allstate Ins Grp
FEIN Number: 13-4941245

State of Domicile: North Carolina
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 | Flora Worthington | 01/09/2024 | 01/09/2024 |

## Objection Letters and Response Letters

### Objection Letters

| Status | Created By | Created On | Date Submitted |
|---|---|---|---|
| Info requested from Company | Flora Worthington | 12/12/2023 | 12/12/2023 |
| Info requested from Company | Flora Worthington | 11/08/2023 | 11/08/2023 |

### Response Letters

| Responded By | Created On | Date Submitted |
|---|---|---|
| Kimberly Snow | 12/22/2023 | 12/22/2023 |
| Lisa Ely | 11/21/2023 | 11/21/2023 |

## Amendments

| Schedule | Schedule Item Name | Created By | Created On | Date Submitted |
|---|---|---|---|---|
| Supporting Document | COF-1 Rate Certification | Kimberly Snow | 10/17/2023 | 10/17/2023 |

## Filing Notes

| Subject | Note Type | Created By | Created On | Date Submitted |
|---|---|---|---|---|
| RE: meeting | Note To Reviewer | Kimberly Snow | 12/20/2023 | 12/20/2023 |
| Re: Request for Meeting | Note To Filer | Flora Worthington | 12/20/2023 | 12/20/2023 |
| Request for Meeting | Note To Reviewer | Kimberly Snow | 12/19/2023 | 12/19/2023 |
| COF-1 | Note To Filer | Sarah Kutch | 10/12/2023 | 10/12/2023 |

## Disposition

Disposition Date: 01/09/2024

Effective Date (New): 12/31/2023

Effective Date (Renewal): 12/31/2023

Status: Filed

Comment:

Rate data does NOT apply to filing.

| Schedule | Schedule Item | Schedule Item Status | Public Access |
|---|---|---|---|
| **Rate (revised)** | Home Rate Pages | Filed | Yes |
| **Rate** | Home Rate Pages | | Yes |
| **Rate** | Home Rate Pages | | Yes |
| **Rate (revised)** | Home Rule Manual | Filed | Yes |
| **Rate** | Home Rule Manual | | Yes |
| **Rate** | Home Rule Manual | | Yes |
| **Supporting Document** | Breakdown of Proposed Rate Change | | Yes |
| **Supporting Document (revised)** | COF-1 Rate Certification | | Yes |
| **Supporting Document** | Virginia Advisory Filing Adoption Form | | Yes |
| **Supporting Document** | Filing Memorandum | | Yes |
| **Supporting Document (revised)** | Redline - updated for obj dated 11_08_23 | | Yes |
| **Supporting Document** | Support for objection dated 11/08/2023 | | Yes |
| **Supporting Document** | Redlines & Response to Objection Dated 12/12/2023 | | Yes |
| **Supporting Document** | COF-1 Rate Certification | | Yes |
| **Supporting Document** | Redline | | Yes |

## Objection Letter

| | |
|---|---|
| Objection Letter Status | Info requested from Company |
| Objection Letter Date | 12/12/2023 |
| Submitted Date | 12/12/2023 |
| Respond By Date | 12/26/2023 |

*Dear Kimberly Snow,*

***Introduction:***

*Thank you for your time and objection response. However, the following issues will require your attention.*

***Objection 1***

*- Home Rate Pages, null (Rate)*

*Comments: On the second page, it appears the company incorrectly submitted a page from its NY State manual. Amend to remove the page and ensure the rates reflect the intent of the company for the state of Virginia.*

***Objection 2***

*- Home Rule Manual, null (Rate)*

*Comments: Page G-1 (Page 4):*

*Per 130.G. of Chapter 342 of Title 14 of the VAC,*

*"1. Return premium calculations resulting from an insurer-initiated termination shall be pro rata.*

*2. Terminations for non-payment of premium shall be calculated pro rata.*

*3. Return premium calculations resulting from an insured-initiated termination may be a short rate calculation, except the penalty may not be more than 10% of the pro rata premium for the expired time."*

*As such, it would not be acceptable for the insurer to withhold the minimum premium, as this would not be a pro rata refund. Remove "subject to the minimum premium requirement."*

*Page C3-1 (Page 9):*

*It is the understanding of the Bureau that there is no limit to coverage D under the Premier Client program. Please clarify that this is the intention of the company.*

*The company stated in its objection response that the rate for a decrease in coverage C was for policies listed on page 9. However, page 9 states that for basic policy limits, "the amounts may not be decreased below the percentages shown in the following chart." Please clarify the purpose of a different rate for decreased coverage since Coverage C cannot be lowered below 50% of A (as the company acknowledged in the previous objection response) and it cannot be lowered below the limits on page 9 for those policies. If the rate is only for policies that have already had their coverage optionally increased outside of these programs, please clarify why the discount is less than the surcharge.*

*Remove "up to 24 months" under One Choice - D. The minimum standards state that "Insurers shall provide this coverage for the time reasonably required to return the dwelling to a habitable condition or for the insured's household to become settled in any permanent quarters." It is not acceptable to attach a time frame to this window nor to limit it to the shortest amount of time.*

*Page P26-1 (Page 74):*

*Models which predict losses or expenses beyond the policy period in order to include those expenses in the current premium are not permitted as they may result in unfair discrimination prohibited by Virginia Code Section 38.2-1904 A 3. This is because the difference in premium is not based on a difference in losses or expenses for the risk transfer (i.e. assumed under the contract during the contract policy period).*

*The company may not surcharge customers based "varying levels of policy life expectancy." As such, the company must remove this page and withdraw the applicable rate from its manual.*

*However, the company may surcharge to recover the different costs associated payment method and billing method, though it must file, in detail, all available payment plans including down payment options, installment options and fees (Administrative Letter 1993-6).*

***Conclusion:***

*Should you have any questions, please feel free to contact me at flora.worthington@scc.virginia.gov.*

*Sincerely,*

*Flora Worthington*

## Objection Letter

| | |
|---|---|
| Objection Letter Status | Info requested from Company |
| Objection Letter Date | 11/08/2023 |
| Submitted Date | 11/08/2023 |
| Respond By Date | 11/23/2023 |

*Dear Kimberly Snow,*

***Introduction:***

*Thank you for your submission. The following issues will require your attention.*

***Objection 1***

*- Home Rate Pages, null (Rate)*

*Comments: Page 2:*

*Please clarify what the purpose of the rate for a decrease in Coverage C is for if Coverage C cannot be lowered below the limits outlined in the minimum standards.*

*Page 3:*

*While the company may offer the Coverage C limit for Water Backup for HO 6, it still must make an offer up to A for that form in the unlikely event that A is greater than C. Amend the rate to clarify that the coverage is at least up to Coverage A limit for both forms.*

***Objection 2***

*- Home Rule Manual, null (Rate)*

*Comments: C1-1:*

*Amend the form references on the page from HO 04 41 to SH 04 41, which is the form the company has on file with the Bureau with the applicable title.*

*C2-1:*

*Please refer to Coverage D - Additional Living Expense. Per the minimum standards, Additional Living Expense must be offered for the "time reasonably required to return the dwelling to a habitable condition or for the insured's household to become settled in any permanent quarters." Remove "Shortest" from the company's description.*

*Please amend the second to last sentence to state that "The time period in 1, 2 and 3 above is not limited by the expiration of the policy.*

*C2-2:*

*Amend the Perils Insured Against table to reflect open causes of loss offered with A in the Condo form.*

*C3-1:*

*Please clarify what is meant by "Reasonable expenses" under Premier Client and how the insured is informed of that coverage limit.*

*Amend the Coverage D reference for One Choice to correctly spell out the separate limits offered for Loss of Fair Rental Value and Additional Living Expenses as was done correctly earlier in the rules.*

*A1-1:*

*Remove "or its equivalent," as all forms must be filed with the Bureau.*

*Amend the reference to HO 04 22 to SH 04 22.*

*A5-1:*
*Please refer to D. Scheduled Personal Property. Under 1, amend the reference of SH 04 61 to SH 04 62, which is the form currently on file with the Bureau. Under 2, amend the reference of HO 04 62 to SH 04 62.*

*A6-1:*
*Amend A.1. to reflect the more specific restrictions laid out in the minimum standards. Coverage C is only excluded in certain circumstances such as property rented and in the theft named peril.*

*A9-1:*
*Form SH 05 71 is not on file with the Bureau. Amend the reference to a form the company has on file.*

*A14-1:*
*Amend C, as the examples given actually do have Coverage B extended per the minimum standards.*

*A20-2:*
*Amend the form reference in B to reflect the updated and approved edition date.*

*A27-1:*
*Remove "If the policy is Form HO 2000, it is not eligible for the Premier Client Endorsement." The selection is no longer applicable.*

*L7-1:*
*Amend the form number reference in D to HO 25 75.*

*P17-1:*
*The company must file the definitions it uses to determine whether a protective device is approved or not.*

*P26-1:*
*As a point of clarification, what is the rationale of the company for charging different expenses based on age or insurance score of the insured that are not captured in the other portions of the premium charged?*

***Conclusion:***

*Should you have any questions, please feel free to contact me at flora.worthington@scc.virginia.gov.*

*Sincerely,*
*Flora Worthington*

# Response Letter

| | |
|---|---|
| Response Letter Status | Submitted to State |
| Response Letter Date | 12/22/2023 |
| Submitted Date | 12/22/2023 |

*Dear Flora Worthington,*

***Introduction:***

*On November 8, 2023 and December 12, 2023 National General received questions and objections relating to the Integon National Insurance Company filing GMMX-133849594 in Virginia. As the primary intent behind this rate filing was to move into compliance with the Chapter 342 changes and to accompany the forms filing (GMMX-133656529) to be effective 12/31/23, the filed changes have been implemented. National General proposes that the additional changes arising from filing review that require programming changes will be addressed with a separate filing with separate effective dates to be submitted at a later date.*

*See the attached objection response document in Supporting Documentation.*

***Response 1***

***Comments:***

*We have amended the rate manual accordingly with this filing effective 12/31/23.*

***Related Objection 1***

*Applies To:*

*- Home Rate Pages, null (Rate)*

*Comments: On the second page, it appears the company incorrectly submitted a page from its NY State manual. Amend to remove the page and ensure the rates reflect the intent of the company for the state of Virginia.*

***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 | Home Rate Pages | | Replacement | | 12/22/2023<br>By: Kimberly Snow |
| *Previous Version* | | | | | |
| *1* | *Home Rate Pages* | | *Replacement* | | *11/21/2023*<br>*By: Lisa Ely* |
| *Previous Version* | | | | | |
| *1* | *Home Rate Pages* | | *Replacement* | | *10/12/2023*<br>*By: Kristi Harris* |

| Supporting Document Schedule Item Changes | |
|---|---|
| **Satisfied - Item:** | Redlines & Response to Objection Dated 12/12/2023 |
| **Comments:** | |
| **Attachment(s):** | 2. 123123_VA_INIC_HO_VA Home Rules - Tracked.pdf<br>4. 123123_VA_INIC_HO_VA Home Rates - Tracked.pdf<br>1. 123123_Objection_Responses_VA_INIC_HO_VA Home.pdf |

***Response 2***

***Comments:***

*See the Objection Response document attached in Supporting Documentation*

***Related Objection 2***

*Applies To:*

- *Home Rule Manual, null (Rate)*

*Comments: Page G-1 (Page 4):*

*Per 130.G. of Chapter 342 of Title 14 of the VAC,*

*"1. Return premium calculations resulting from an insurer-initiated termination shall be pro rata.*

*2. Terminations for non-payment of premium shall be calculated pro rata.*

*3. Return premium calculations resulting from an insured-initiated termination may be a short rate calculation, except the penalty may not be more than 10% of the pro rata premium for the expired time."*

*As such, it would not be acceptable for the insurer to withhold the minimum premium, as this would not be a pro rata refund. Remove "subject to the minimum premium requirement."*

*Page C3-1 (Page 9):*

*It is the understanding of the Bureau that there is no limit to coverage D under the Premier Client program. Please clarify that this is the intention of the company.*

*The company stated in its objection response that the rate for a decrease in coverage C was for policies listed on page 9. However, page 9 states that for basic policy limits, "the amounts may not be decreased below the percentages shown in the following chart." Please clarify the purpose of a different rate for decreased coverage since Coverage C cannot be lowered below 50% of A (as the company acknowledged in the previous objection response) and it cannot be lowered below the limits on page 9 for those policies. If the rate is only for policies that have already had their coverage optionally increased outside of these programs, please clarify why the discount is less than the surcharge.*

*Remove "up to 24 months" under One Choice - D. The minimum standards state that "Insurers shall provide this coverage for the time reasonably required to return the dwelling to a habitable condition or for the insured's household to become settled in any permanent quarters." It is not acceptable to attach a time frame to this window nor to limit it to the shortest amount of time.*

*Page P26-1 (Page 74):*

*Models which predict losses or expenses beyond the policy period in order to include those expenses in the current premium are not permitted as they may result in unfair discrimination prohibited by Virginia Code Section 38.2-1904 A 3. This is because the difference in premium is not based on a difference in losses or expenses for the risk transfer (i.e. assumed under the contract during the contract policy period).*

*The company may not surcharge customers based "varying levels of policy life expectancy." As such, the company must remove this page and withdraw the applicable rate from its manual.*

*However, the company may surcharge to recover the different costs associated payment method and billing method, though it must file, in detail, all available payment plans including down payment options, installment options and fees (Administrative Letter 1993-6).*

***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 | Home Rule Manual | | Replacement | | 12/22/2023<br>By: Kimberly Snow |
| *Previous Version* | | | | | |
| *1* | *Home Rule Manual* | | *Replacement* | | *11/21/2023*<br>*By: Lisa Ely* |
| *Previous Version* | | | | | |
| *1* | *Home Rule Manual* | | *Replacement* | | *10/12/2023*<br>*By: Kristi Harris* |

| Supporting Document Schedule Item Changes | |
|---|---|
| **Satisfied - Item:** | Redlines & Response to Objection Dated 12/12/2023 |
| **Comments:** | |
| **Attachment(s):** | 2. 123123_VA_INIC_HO_VA Home Rules - Tracked.pdf<br>4. 123123_VA_INIC_HO_VA Home Rates - Tracked.pdf<br>1. 123123_Objection_Responses_VA_INIC_HO_VA Home.pdf |

***Conclusion:***

*Sincerely,*

*Kimberly Snow*

## Response Letter

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

*Dear Flora Worthington,*

***Introduction:***

*Thank you for reviewing our filing.*

***Response 1***

***Comments:***

*Page 2:*

*Please clarify what the purpose of the rate for a decrease in Coverage C is for if Coverage C cannot be lowered below the limits outlined in the minimum standards.*

*RESPONSE:*

*Per the Rules manual, on page 9, the baseline OneChoice product defaults Coverage C to 50% of Coverage A, and the Premier product defaults Coverage C to 70% of Coverage A. Further, on page 16 of the Rules manual, the limit of liability for Coverage C may be increased; the limit of liability for Coverage C may also be reduced (not to be below 50% of Coverage A), hence the rate on file for a decrease in coverage.*

*Page 3:*

*While the company may offer the Coverage C limit for Water Backup for HO 6, it still must make an offer up to A for that form in the unlikely event that A is greater than C. Amend the rate to clarify that the coverage is at least up to Coverage A limit for both forms.*

*RESPONSE:*

*We have amended the rate manual accordingly.*

***Related Objection 1***

*Applies To:*

- *Home Rate Pages, null (Rate)*

Comments: Page 2:
*Please clarify what the purpose of the rate for a decrease in Coverage C is for if Coverage C cannot be lowered below the limits outlined in the minimum standards.*

*Page 3:*
*While the company may offer the Coverage C limit for Water Backup for HO 6, it still must make an offer up to A for that form in the unlikely event that A is greater than C. Amend the rate to clarify that the coverage is at least up to Coverage A limit for both forms.*

***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 | Home Rate Pages | | Replacement | | 11/21/2023<br>By: Lisa Ely |
| *Previous Version* | | | | | |
| *1* | *Home Rate Pages* | | *Replacement* | | *10/12/2023*<br>*By: Kristi Harris* |

| Supporting Document Schedule Item Changes | |
|---|---|
| **Satisfied - Item:** | Redline - updated for obj dated 11_08_23 |
| **Comments:** | Replaced redlines with changes per objection dated 11/08/23 |
| **Attachment(s):** | 123123_obj_response_1-VA_INIC_HO_VA Home Rules - Tracked.pdf<br>123123-VA_INIC_HO_VA Home Rateload v 5.2 - Tracked.pdf |
| *Previous Version* | |
| **Satisfied - Item:** | *Redline* |
| **Comments:** | |
| **Attachment(s):** | *123123_VA_INIC_Rates - Tracked.pdf*<br>*123123_VA_INIC_Rules - Tracked.pdf* |

***Response 2***

***Comments:***

*C1-1:*

*Amend the form references on the page from HO 04 41 to SH 04 41, which is the form the company has on file with the Bureau with the applicable title.*

*RESPONSE:*

*We have amended the rules manual accordingly.*

*C2-2:*

*Amend the Perils Insured Against table to reflect open causes of loss offered with A in the Condo form.*

*RESPONSE:*

*We have amended the rules manual accordingly.*

*C3-1:*

*Please clarify what is meant by "Reasonable expenses" under Premier Client and how the insured is informed of that coverage limit.*

*Amend the Coverage D reference for One Choice to correctly spell out the separate limits offered for Loss of Fair Rental Value and Additional Living Expenses as was done correctly earlier in the rules.*

*RESPONSE:*

*In the event of a claim, our claim reps will work directly with the customer to consider their current living situation in finding something comparable with respect to Additional Living Expenses or Fair Rental Value while the home is uninhabitable, and while we work towards getting the home repaired or replaced in the shortest reasonable timeframe possible.*

*We have amended the rules manual accordingly.*

*A1-1:*

*Remove "or its equivalent," as all forms must be filed with the Bureau.*

*Amend the reference to HO 04 22 to SH 04 22.*

*RESPONSE:*

*We have amended the rules manual accordingly.*

*A5-1:*

*Please refer to D. Scheduled Personal Property. Under 1, amend the reference of SH 04 61 to SH 04 62, which is the form currently on file with the Bureau. Under 2, amend the reference of HO 04 62 to SH 04 62.*

*RESPONSE:*

*We have amended the rules manual accordingly.*

*A6-1:*

*Amend A.1. to reflect the more specific restrictions laid out in the minimum standards.*

*Coverage C is only excluded in certain circumstances such as property rented and in the theft named peril.*
*RESPONSE:*
*We have amended the rules manual accordingly.*
*A9-1:*
*Form SH 05 71 is not on file with the Bureau. Amend the reference to a form the company has on file.*
*RESPONSE:*
*We have amended the rules manual accordingly.*
*A14-1:*
*Amend C, as the examples given actually do have Coverage B extended per the minimum standards.*
*RESPONSE:*
*As the VA INIC OneChoice product closely follows ISOs forms and rules, we are leveraging ISOs rule wording for this endorsement. Please see attached with this response ISOs multi-state rules manual, and refer to page 47 for rule #510  Permitted Incidental Occupancies  Residence Premises. And please refer to SERFF tracking number ISOF-133808018, Attachment HO-2023-RRU1-VA-Rules.pdf, where ISO in VA only deviates from the multi-state rule wording in paragraph A.*
*A20-2:*
*Amend the form reference in B to reflect the updated and approved edition date.*
*RESPONSE:*
*We have amended the rules manual accordingly.*
*A27-1:*
*Remove "If the policy is Form HO 2000, it is not eligible for the Premier Client Endorsement." The selection is no longer applicable.*
*RESPONSE:*
*We have amended the rules manual accordingly.*
*L7-1:*
*Amend the form number reference in D to HO 25 75.*
*RESPONSE:*
*We have amended the rules manual accordingly.*
*P17-1:*
*The company must file the definitions it uses to determine whether a protective device is approved or not.*
*RESPONSE:*

*We have amended the rules manual accordingly.*
*P26-1:*
*As a point of clarification, what is the rationale of the company for charging different expenses based on age or insurance score of the insured that are not captured in the other portions of the premium charged?*
*RESPONSE:*
*Our rating plan separates out fixed expenses, such as acquisition costs and general expenses spread over the life of the policy. The segmentation in our fixed expense fee rating calculation accounts for varying levels of policy life expectancy.*

***Related Objection 2***

*Applies To:*

- *Home Rule Manual, null (Rate)*

*Comments: C1-1:*
*Amend the form references on the page from HO 04 41 to SH 04 41, which is the form the company has on file with the Bureau with the applicable title.*

*C2-1:*
*Please refer to Coverage D - Additional Living Expense. Per the minimum standards, Additional Living Expense must be offered for the "time reasonably required to return the dwelling to a habitable condition or for the insured's household to become settled in any permanent quarters." Remove "Shortest" from the company's description.*
*Please amend the second to last sentence to state that "The time period in 1, 2 and 3 above is not limited by the expiration of the policy.*

*C2-2:*
*Amend the Perils Insured Against table to reflect open causes of loss offered with A in the Condo form.*

*C3-1:*
*Please clarify what is meant by "Reasonable expenses" under Premier Client and how the insured is informed of that coverage limit.*
*Amend the Coverage D reference for One Choice to correctly spell out the separate limits offered for Loss of Fair Rental Value and Additional Living Expenses as was done correctly earlier in the rules.*

*A1-1:*
*Remove "or its equivalent," as all forms must be filed with the Bureau.*
*Amend the reference to HO 04 22 to SH 04 22.*

*A5-1:*
*Please refer to D. Scheduled Personal Property. Under 1, amend the reference of SH 04 61 to SH 04 62, which is the form currently on file with the Bureau. Under 2, amend the reference of HO 04 62 to SH 04 62.*

*A6-1:*
*Amend A.1. to reflect the more specific restrictions laid out in the minimum standards. Coverage C is only excluded in certain circumstances such as property rented and in the theft named peril.*

*A9-1:*
*Form SH 05 71 is not on file with the Bureau. Amend the reference to a form the company has on file.*

*A14-1:*
*Amend C, as the examples given actually do have Coverage B extended per the minimum standards.*

*A20-2:*
*Amend the form reference in B to reflect the updated and approved edition date.*

*A27-1:*
*Remove "If the policy is Form HO 2000, it is not eligible for the Premier Client Endorsement." The selection is no longer applicable.*

*L7-1:*
*Amend the form number reference in D to HO 25 75.*

*P17-1:*
*The company must file the definitions it uses to determine whether a protective device is approved or not.*

*P26-1:*
*As a point of clarification, what is the rationale of the company for charging different expenses based on age or insurance score of the insured that are not captured in the other portions of the premium charged?*

***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 | Home Rule Manual | | Replacement | | 11/21/2023<br>By: Lisa Ely |
| *Previous Version* | | | | | |
| *1* | *Home Rule Manual* | | *Replacement* | | *10/12/2023*<br>*By: Kristi Harris* |

| Supporting Document Schedule Item Changes | |
|---|---|
| **Satisfied - Item:** | Redline - updated for obj dated 11_08_23 |
| **Comments:** | Replaced redlines with changes per objection dated 11/08/23 |
| **Attachment(s):** | 123123_obj_response_1-VA_INIC_HO_VA Home Rules - Tracked.pdf<br>123123-VA_INIC_HO_VA Home Rateload v 5.2 - Tracked.pdf |
| *Previous Version* | |
| **Satisfied - Item:** | *Redline* |
| **Comments:** | |
| **Attachment(s):** | *123123_VA_INIC_Rates - Tracked.pdf*<br>*123123_VA_INIC_Rules - Tracked.pdf* |


| Supporting Document Schedule Item Changes | |
|---|---|
| **Satisfied - Item:** | Redline - updated for obj dated 11_08_23 |
| **Comments:** | Replaced redlines with changes per objection dated 11/08/23 |
| **Attachment(s):** | 123123_obj_response_1-VA_INIC_HO_VA Home Rules - Tracked.pdf<br>123123-VA_INIC_HO_VA Home Rateload v 5.2 - Tracked.pdf |
| *Previous Version* | |
| **Satisfied - Item:** | *Redline* |
| **Comments:** | |
| **Attachment(s):** | *123123_VA_INIC_Rates - Tracked.pdf*<br>*123123_VA_INIC_Rules - Tracked.pdf* |


| | |
|---|---|
| **Satisfied - Item:** | Support for objection dated 11/08/2023 |
| **Comments:** | |
| **Attachment(s):** | HO-MU-2022-RU-001-C (multistate rules).pdf |

***Conclusion:***

*We trust this will allow you to continue your review of our filing. Please let us know if you have any questions.*

*Sincerely,*

*Lisa Ely*

# Amendment Letter

Submitted Date: 10/17/2023

Comments:

We respectfully submit this amendment to include the required rate certification form.

Changed Items:

*No Form Schedule Items Changed.*

*No Rate Schedule Items Changed.*

| **Supporting Document Schedule Item Changes** | |
|---|---|
| **Satisfied - Item:** | COF-1 Rate Certification |
| **Comments:** | |
| **Attachment(s):** | VA COF-1 (05-05).pdf |
| *Previous Version* | |
| **Bypassed - Item:** | *COF-1 Rate Certification* |
| **Bypass Reason:** | *N/A* |
| **Attachment(s):** | |

## Note To Reviewer

**Created By:**

Kimberly Snow on 12/20/2023 10:44 AM

**Last Edited By:**

Kimberly Snow

**Submitted On:**

12/20/2023 10:44 AM

**Subject:**

RE: meeting

**Comments:**

Hello Flora,
I am sure you are aware but Jeff spoke with Jessica earlier today and this has been resolved. A meeting is no longer needed.

Thanks!

# Note To Filer

**Created By:**

Flora Worthington on 12/20/2023 08:34 AM

**Last Edited By:**

Flora Worthington

**Submitted On:**

12/20/2023 08:34 AM

**Subject:**

Re: Request for Meeting

**Comments:**

Dear Kimberly Snow,

I am available today from 10am-12pm EST - I am also available tomorrow from 9am-12pm EST if you would prefer to call then. Please send any specific questions you have and what time you would like to meet so that I can be better prepared to assist you in this filing.

## Note To Reviewer

**Created By:**

Kimberly Snow on 12/19/2023 03:40 PM

**Last Edited By:**

Kimberly Snow

**Submitted On:**

12/19/2023 03:41 PM

**Subject:**

Request for Meeting

**Comments:**

Good afternoon,
There are some questions regarding this filing we need help with and would like to schedule a quick meeting to discuss. Would you be available anytime tomorrow (12/20)? If so, I will set something up. The call will include Jeff Herrmann who is National General State Manager.

Thank you!

## Note To Filer

**Created By:**

Sarah Kutch on 10/12/2023 03:48 PM

**Last Edited By:**

Sarah Kutch

**Submitted On:**

10/12/2023 03:48 PM

**Subject:**

COF-1

**Comments:**

Administrative Letter 2005-01 requires that rule and rate submissions include a rate standards certification form. Form COF-1, attached to the administrative letter, is used to certify that rules and rates regulated under Chapter 19 are in compliance with the standards set forth in subsections A and B of § 38.2-1904 of the Code of Virginia. When submitting a COF-1 form, review the form closely to ensure that all items are completed, block 1, 2 or 3 has been checked, and the form has been signed by a qualified individual. An interactive PDF version of the COF-1 (05/05) is available in SERFF and on the website for the Bureau of Insurance.

## Rate Information

Rate data does NOT apply to filing.

## Rate/Rule Schedule

| Item No. | Schedule Item Status | Exhibit Name | Rule # or Page # | Rate Action | Previous State Filing Number | Attachments |
|---|---|---|---|---|---|---|
| 1 | Filed 01/09/2024 | Home Rate Pages | | Replacement | | 5. 123123_VA_INIC_HO_VA Home Rates - clean.pdf |
| 2 | Filed 01/09/2024 | Home Rule Manual | | Replacement | | 3. 123123_VA_INIC_HO_VA Home Rules - clean.pdf |

## Supporting Document Schedules

| | |
|---|---|
| **Bypassed - Item:** | Breakdown of Proposed Rate Change |
| **Bypass Reason:** | N/A |
| **Attachment(s):** | |
| **Item Status:** | |
| **Status Date:** | |

| | |
|---|---|
| **Satisfied - Item:** | COF-1 Rate Certification |
| **Comments:** | |
| **Attachment(s):** | VA COF-1 (05-05).pdf |
| **Item Status:** | |
| **Status Date:** | |

| | |
|---|---|
| **Bypassed - Item:** | Virginia Advisory Filing Adoption Form |
| **Bypass Reason:** | N/A |
| **Attachment(s):** | |
| **Item Status:** | |
| **Status Date:** | |

| | |
|---|---|
| **Satisfied - Item:** | Filing Memorandum |
| **Comments:** | |
| **Attachment(s):** | 123123_VA_INIC_Explanatory_Memo.pdf |
| **Item Status:** | |
| **Status Date:** | |

| | |
|---|---|
| **Satisfied - Item:** | Redline - updated for obj dated 11_08_23 |
| **Comments:** | Replaced redlines with changes per objection dated 11/08/23 |
| **Attachment(s):** | 123123_obj_response_1-VA_INIC_HO_VA Home Rules - Tracked.pdf<br>123123-VA_INIC_HO_VA Home Rateload v 5.2 - Tracked.pdf |
| **Item Status:** | |
| **Status Date:** | |

| | |
|---|---|
| **Satisfied - Item:** | Support for objection dated 11/08/2023 |
| **Comments:** | |
| **Attachment(s):** | HO-MU-2022-RU-001-C (multistate rules).pdf |
| **Item Status:** | |

| | |
|---|---|
| **Status Date:** | |

| | |
|---|---|
| **Satisfied - Item:** | Redlines & Response to Objection Dated 12/12/2023 |
| **Comments:** | |
| **Attachment(s):** | 2. 123123_VA_INIC_HO_VA Home Rules - Tracked.pdf<br>4. 123123_VA_INIC_HO_VA Home Rates - Tracked.pdf<br>1. 123123_Objection_Responses_VA_INIC_HO_VA Home.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) |
|---|---|---|---|---|---|
| 11/21/2023 | | Rate | Home Rate Pages | 12/22/2023 | 123123-VA_INIC_HO_VA Home Rateload v 5.2 - Clean.pdf (Superceded) |
| 11/21/2023 | | Rate | Home Rule Manual | 12/22/2023 | 123123_obj_response_1-VA_INIC_HO_VA Home Rules - Clean.pdf (Superceded) |
| 10/11/2023 | | Supporting Document | Redline | 11/21/2023 | 123123_VA_INIC_Rates - Tracked.pdf (Superceded)<br>123123_VA_INIC_Rules - Tracked.pdf (Superceded) |
| 10/11/2023 | | Rate | Home Rate Pages | 11/21/2023 | 123123_VA_INIC_Rates - Clean.pdf (Superceded) |
| 10/11/2023 | | Rate | Home Rule Manual | 11/21/2023 | 123123_VA_INIC_Rules - Clean.pdf (Superceded) |
| 10/11/2023 | | Supporting Document | COF-1 Rate Certification | 10/17/2023 | |