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ELECTRONICS PROTECTION COVERAGE	HS EN	HS EN 06 18.pdf
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INCREASED AMOUNT OF INSURANCE FOR PERSONAL PROPERTY LOCATED IN A SELF- STORAGE FACILITY	SS EN	SS EN 06 18.pdf
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Rate-Rule Attachments	(ex. Document Name	Attachment Name)
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<i>New Jersey Renters-General Rules and Rates</i>	New Jersey Renters - GENERAL RULES and RATES AFF RL.pdf
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<i>New Jersey Renters-General Rules and Rates</i>	New Jersey Renters - GENERAL RULES and RATES Redlined.pdf
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Supporting Document Attachments	(ex. Supporting Document Name	Attachment Name)
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Readability Certification New Jersey

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Filing at a Glance

Company:	Century-National Insurance Company
Product Name:	NJ CNIC Renters Rate, Rule and Form Filing
State:	New Jersey
TOI:	04.0 Homeowners
Sub-TOI:	04.0004 Tenant Homeowners
Filing Type:	Form/Rate/Rule
Date Submitted:	05/24/2021
SERFF Tr Num:	GMMX-132849232
SERFF Status:	Closed-Approved
State Tr Num:	21-0963
State Status:	Approved
Co Tr Num:	

Effective Date	11/01/2021
Requested (New):	
Effective Date	11/01/2021
Requested (Renewal):	
Author(s):	Janice Baker
Reviewer(s):	Mandi Valachovic (primary)
Disposition Date:	09/21/2021
Disposition Status:	Approved
Effective Date (New):	11/01/2021
Effective Date (Renewal):	

General Information

Project Name:	Status of Filing in Domicile: Not Filed
Project Number:	Domicile Status Comments:
Reference Organization:	Reference Number:
Reference Title:	Advisory Org. Circular:
Filing Status Changed: 09/21/2021	
State Status Changed: 01/04/2023	Deemer Date:
Created By: Janice Baker	Submitted By: Janice Baker
Corresponding Filing Tracking Number:	

Filing Description:

Century-National Insurance Company (CNI) respectfully submits for your review and approval the attached rate, rule and form filing for our Renters Insurance Program in New Jersey. We are asking for the effective dates of 07/01/2021 for new business and renewal business.

Revised effective date-11/01/2021 for new business and renewal business.

Company and Contact

Filing Contact Information

Janice Baker, Product Regulatory Analyst II	Janice.Baker@NGIC.com
PO Box 3199	336-435-2039 [Phone]
Winston-Salem, NC 27102	336-435-8105 [FAX]

Filing Company Information

Century-National Insurance Company	CoCode: 26905	State of Domicile: California
5630 University Parkway	Group Code: 8	Company Type:
Winston Salem, NC 27105	Group Name: Allstate Ins Grp	State ID Number:
(336) 435-2000 ext. [Phone]	FEIN Number: 94-1368770	

Filing Fees

State Fees

Fee Required? No

Retaliatory? No

Fee Explanation:

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Mandi Valachovic	09/21/2021	09/21/2021

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Pending Industry Response	Mandi Valachovic	09/16/2021	09/16/2021
Pending Industry Response	Mandi Valachovic	08/27/2021	08/27/2021
Pending Industry Response	Mandi Valachovic	06/21/2021	06/21/2021

Response Letters

Responded By	Created On	Date Submitted
Janice Baker	09/20/2021	09/20/2021
Janice Baker	08/31/2021	08/31/2021
Janice Baker	06/23/2021	06/23/2021

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Revised Effective Date	Note To Filer	Mandi Valachovic	09/20/2021	09/20/2021

Disposition

Disposition Date: 09/21/2021

Effective Date (New): 11/01/2021

Effective Date (Renewal):

Status: Approved

Comment: Commissioner Marlene Caride has approved the filing. The filing will become effective November 1, 2021 for new and renewal business. Should this effective date be inconvenient for your needs, please contact us immediately.

Rate data does NOT apply to filing.

Schedule	Schedule Item	Schedule Item Status	Public Access
Form (revised)	Tenants Mandatory Endorsement		Yes
Form	Tenants Mandatory Endorsement		Yes
Form	ELECTRONICS PROTECTION COVERAGE		Yes
Form	INCREASED AMOUNT OF INSURANCE FOR PERSONAL PROPERTY LOCATED IN A SELF-STORAGE FACILITY		Yes
Rate (revised)	New Jersey Renters-General Rules and Rates		Yes
Rate	New Jersey Renters-General Rules and Rates		Yes
Rate	New Jersey Renters-General Rules and Rates		Yes
Supporting Document	Cover Letter		Yes
Supporting Document	Explanatory Memorandum		Yes
Supporting Document (revised)	Side by Side Comparison		Yes
Supporting Document	Side by Side Comparison		Yes
Supporting Document	Readability Certification New Jersey		Yes

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	09/16/2021
Submitted Date	09/16/2021
Respond By Date	09/23/2021

Dear Janice Baker,

Introduction:

For the review of the referenced filing we will require answers to the following questions/concerns.

Objection 1

- Tenants Mandatory Endorsement, CN HO 02 04 NJ, 05 21 (Form)

Comments: It appears the company is introducing a new exclusion for Personal Injury on an existing book of business. The company cited new programs that contained similar exclusionary wording, while this form is already in use with existing insureds and as worded provides such coverage. As reference, ISO offers this coverage as a separate form (HO 24 82) and defers to the companies for a related charge (e.g. \$10-\$15). Given this is a coverage take-away and that to offer the coverage there is generally a cost, we would need the company to provide a rate reduction commensurate with the coverage reduction and also confirm policyholder/agent notification plans of this coverage removal. Does the company plan to offer the related ISO coverage (HO 24 82)? If so, please submit the rule for the charge.

Objection 2

- Tenants Mandatory Endorsement, CN HO 02 04 NJ, 05 21 (Form)

Comments: The Tenant Damage Protection Coverage is unclear if it is an additional coverage or putting a limit on an existing coverage. Please explain how this coverage is either a new coverage component (if so, how?) or if it is limiting an otherwise available coverage subject to the policy limits.

Objection 3

Comments: Please submit a rule for the new \$1,000 theft deductible that says it is only available if the all other perils deductible is less than \$1,000, assuming that is true.

Conclusion:

Sincerely,
Mandi Valachovic

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	08/27/2021
Submitted Date	08/27/2021
Respond By Date	09/03/2021

Dear Janice Baker,

Introduction:

For the review of the referenced filing we will require answers to the following questions/concerns.

Objection 1

Comments: The Affinity Group Credit must comply with the Mass Marketing of Property and Liability Insurance Model Regulation, N.J.A.C.11:2-12.2. A disclosure Notice must be submitted in order to comply with the mass marketing disclosure requirements found in N.J.A.C.11:2-12.10.

Will you continue to write the coverage if the insured is not part of a group?

Conclusion:

Sincerely,

Mandi Valachovic

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	06/21/2021
Submitted Date	06/21/2021
Respond By Date	06/28/2021

Dear Janice Baker,

Introduction:

For the review of the referenced filing we will require answers to the following questions/concerns.

Objection 1

Comments: For the personal property stored in a self storage facility, the company references a buy back of coverage beginning with a limit of \$1,000 for a charge of \$5.80. However, the company's current form says the coverage for the property is a limitation of the Coverage C limit of 10% or \$1,000 whichever is greater. There is no rule with a premium charge for this \$1,000 of coverage. This appears to be a restriction of coverage with the option to buy back for a charge. Please advise. How will this affect existing insureds? What is the dollar and rate impact?

Objection 2

- Tenants Mandatory Endorsement, CN HO 02 04 NJ, 05 21 (Form)

Comments: Are you aware of any competitors in New Jersey with the exclusionary language of personal injury including psychological or emotional injury?

Conclusion:

Sincerely,

Mandi Valachovic

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	09/20/2021
Submitted Date	09/20/2021

Dear Mandi Valachovic,

Introduction:

The following is being submitted in response to the objection letter sent on 09/16/2021:

Response 1

Comments:

1. We have elected to remove the personal injury exclusion .Please see the CN HO 02 04 NJ 05 21 personal injury redline in supporting documentation noting the change , and final copy replacing the original in the form schedule

Related Objection 1

Applies To:

- Tenants Mandatory Endorsement, CN HO 02 04 NJ, 05 21 (Form)

Comments: It appears the company is introducing a new exclusion for Personal Injury on an existing book of business. The company cited new programs that contained similar exclusionary wording, while this form is already in use with existing insureds and as worded provides such coverage. As reference, ISO offers this coverage as a separate form (HO 24 82) and defers to the companies for a related charge (e.g. \$10-\$15). Given this is a coverage take-away and that to offer the coverage there is generally a cost, we would need the company to provide a rate reduction commensurate with the coverage reduction and also confirm policyholder/agent notification plans of this coverage removal. Does the company plan to offer the related ISO coverage (HO 24 82)? If so, please submit the rule for the charge.

Changed Items:

Form Schedule Item Changes										
Item No.	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments	Submitted
1	Tenants Mandatory Endorsement	CN HO 02 04 NJ	05 21	END	Replaced	Previous Filing Number:			CN HO 02 04 NJ 05 21.pdf	Date Submitted: 09/20/2021 By: Janice Baker
						Replaced Form Number:				
						Replaced Edition Date:				
Previous Version										
1	Tenants Mandatory Endorsement	CN HO 02 04 NJ	05 21	END	Replaced	Previous Filing Number:			CN HO 02 04 NJ 05 21.pdf	Date Submitted: 05/24/2021 By: Janice Baker
						Replaced Form Number:				
						Replaced Edition Date:				

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Side by Side Comparison
Comments:	Attached for review.
Attachment(s):	CN HO 02 04 NJ 05 21 personal injury redline.pdf New Jersey Renters - GENERAL RULES and RATES RL.pdf
<i>Previous Version</i>	
Satisfied - Item:	Side by Side Comparison
Comments:	Attached for review.
Attachment(s):	CN HO 02 04 NJ 05 21(Redlined).pdf

Response 2

Comments:

2. This is an addition to the additional coverages section II and is a new coverage component, this does not restrict previous coverage.

Page 14 of the HO 00 04 10 00, Section II Exclusions, F Coverage E Personal liability says Coverage E does not apply to #3 "Property damage" to property rented to, occupied or used by or in the care of an "insured". This exclusion does not apply to "property damage" caused by fire, smoke or explosion.

As such there was no coverage for this prior.

We are adding coverage by adding this item under Section II additional coverages, previously item D for additional coverages was the last item on the broad form. The addition is as follows.

E. Tenant Damage Protection Coverage:

1. We will pay, at the lesser of repair or replacement cost, up to \$1,000 for property damage for sudden and accidental damage to property rented to, occupied or used by or in the care of an insured.

2. This coverage is excess over any amount of an

applicable security deposit that is retained by the landlord or lessor for the same damage or is returned to the insured.

3. \$1,000 is the most we will pay under this coverage regardless of the number of occurrences during the policy period.

4. This coverage does not apply to damage caused by a pet or animal owned by you or intended to be in the care, custody or control of you, an insured, a tenant or an insured, or a resident of your household.

Related Objection 2

Applies To:

- Tenants Mandatory Endorsement, CN HO 02 04 NJ, 05 21 (Form)

Comments: The Tenant Damage Protection Coverage is unclear if it is an additional coverage or putting a limit on an existing coverage. Please explain how this coverage is either a new coverage component (if so, how?) or if it is limiting an otherwise available coverage subject to the policy limits.

Changed Items:

Form Schedule Item Changes										
Item No.	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments	Submitted
1	Tenants Mandatory Endorsement	CN HO 02 04 NJ	05 21	END	Replaced	Previous Filing Number:			CN HO 02 04 NJ 05 21.pdf	Date Submitted: 09/20/2021 By: Janice Baker
						Replaced Form Number:				
						Replaced Edition Date:				
Previous Version										
1	Tenants Mandatory Endorsement	CN HO 02 04 NJ	05 21	END	Replaced	Previous Filing Number:			CN HO 02 04 NJ 05 21.pdf	Date Submitted: 05/24/2021 By: Janice Baker
						Replaced Form Number:				
						Replaced Edition Date:				

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Side by Side Comparison
Comments:	Attached for review.
Attachment(s):	CN HO 02 04 NJ 05 21 personal injury redline.pdf New Jersey Renters - GENERAL RULES and RATES RL.pdf
<i>Previous Version</i>	
Satisfied - Item:	Side by Side Comparison
Comments:	Attached for review.
Attachment(s):	CN HO 02 04 NJ 05 21(Redlined).pdf

Response 3

Comments:

3. Please see the redlined manual and clean manual noting the rule for the theft deductible being added .

Related Objection 3

Comments: Please submit a rule for the new \$1,000 theft deductible that says it is only available if the all other perils deductible is less than \$1,000, assuming that is true.

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	New Jersey Renters-General Rules and Rates	Manual	Replacement		09/20/2021 By: Janice Baker
<i>Previous Version</i>					
1	New Jersey Renters-General Rules and Rates	Manual	Replacement		08/31/2021 By: Janice Baker
<i>Previous Version</i>					
1	New Jersey Renters-General Rules and Rates	Manual	Replacement		05/24/2021 By: Janice Baker

Supporting Document Schedule Item Changes	
Satisfied - Item:	Side by Side Comparison
Comments:	Attached for review.
Attachment(s):	CN HO 02 04 NJ 05 21 personal injury redline.pdf New Jersey Renters - GENERAL RULES and RATES RL.pdf
<i>Previous Version</i>	
Satisfied - Item:	Side by Side Comparison
Comments:	Attached for review.
Attachment(s):	CN HO 02 04 NJ 05 21(Redlined).pdf

Conclusion:

Thank you for your time in reviewing our filing.

Sincerely,

Janice Baker

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	08/31/2021
Submitted Date	08/31/2021

Dear Mandi Valachovic,

Introduction:

The following is being submitted in response to the objection letter sent on 08/27/2021:

Response 1

Comments:

At this time we would like to remove the affinity discount from consideration in the filing. We may reconsider including it again at a later date and would supply the required information as needed. Please see the redlined and final copies of the manual attached to note the removal.

Related Objection 1

Comments: The Affinity Group Credit must comply with the Mass Marketing of Property and Liability Insurance Model Regulation, N.J.A.C.11:2-12.2. A disclosure Notice must be submitted in order to comply with the mass marketing disclosure requirements found in N.J.A.C.11:2-12.10.

Will you continue to write the coverage if the insured is not part of a group?

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	New Jersey Renters-General Rules and Rates	Manual	Replacement		08/31/2021 By: Janice Baker
<i>Previous Version</i>					
1	New Jersey Renters-General Rules and Rates	Manual	Replacement		05/24/2021 By: Janice Baker

No Supporting Documents changed.

Conclusion:

Thank you for your time.
Sincerely,
Janice Baker

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	06/23/2021
Submitted Date	06/23/2021

Dear Mandi Valachovic,

Introduction:

The following is being submitted in response to the objection letter sent on 06/21/2021:

Response 1

Comments:

The policy states Our limit of liability for personal property usually located at an "insured's" residence, other than the "residence premises", is 10% of the limit of liability for Coverage C, or \$1,000, whichever is greater unless items A and B are met. The endorsement broadens the coverage by replacing item b with number two, which advises However, this limitation does not apply to personal property: (2) Usually located in an insured's residence, other than the residence premises. It also provides the indicated coverage for items in a self storage facility. This was previously approved for Spinnaker WOOD-131972767. As an optional coverage, there would be no insureds affected unless it was chosen to be purchased at the limit and rate of their choosing

Related Objection 1

Comments: For the personal property stored in a self storage facility, the company references a buy back of coverage beginning with a limit of \$1,000 for a charge of \$5.80. However, the company's current form says the coverage for the property is a limitation of the Coverage C limit of 10% or \$1,000 whichever is greater. There is no rule with a premium charge for this \$1,000 of coverage. This appears to be a restriction of coverage with the option to buy back for a charge. Please advise. How will this affect existing insureds? What is the dollar and rate impact?

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Response 2

Comments:

Yes, the same item was approved for Spinnaker on their Tenants Mandatory Endorsement under SERFF tracking number WOOD-131972767

Related Objection 2

Applies To:

- Tenants Mandatory Endorsement, CN HO 02 04 NJ, 05 21 (Form)

Comments: Are you aware of any competitors in New Jersey with the exclusionary language of personal injury including psychological or emotional injury?

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

Thank you for your time.

Sincerely,

Janice Baker

Note To Filer

Created By:

Mandi Valachovic on 09/20/2021 04:02 PM

Last Edited By:

Mandi Valachovic

Submitted On:

09/20/2021 04:03 PM

Subject:

Revised Effective Date

Comments:

Good afternoon. I've just received approval for this filing. Please submit a revised effective date that is on or after today's date, 9/20/21. Once I receive the effective date, I will send the approval in Serff. Thank you.

Post Submission Update Request Processed On 09/21/2021

Status: Allowed
Created By: Janice Baker
Processed By: Mandi Valachovic
Comments:

General Information:

Field Name	Requested Change	Prior Value
Effective Date Requested (New)	11/01/2021	07/01/2021
Effective Date Requested (Renew)	11/01/2021	07/01/2021

Filing Description:

Requested Value:

Century-National Insurance Company (CNI) respectfully submits for your review and approval the attached rate, rule and form filing for our Renters Insurance Program in New Jersey. We are asking for the effective dates of 07/01/2021 for new business and renewal business.

Revised effective date-11/01/2021 for new business and renewal business.

Prior Value:

Century-National Insurance Company (CNI) respectfully submits for your review and approval the attached rate, rule and form filing for our Renters Insurance Program in New Jersey. We are asking for the effective dates of 07/01/2021 for new business and renewal business.

Form Schedule

Item No.	Schedule Item Status	Form Name	Form Number	Edition Date	Form Type	Form Action	Action Specific Data		Readability Score	Attachments
1		Tenants Mandatory Endorsement	CN HO 02 04 NJ	05 21	END	Replaced	Previous Filing Number:			CN HO 02 04 NJ 05 21.pdf
							Replaced Form Number:			
							Replaced Edition Date:			
2		ELECTRONICS PROTECTION COVERAGE	HS EN	06 18	END	New				HS EN 06 18.pdf
3		INCREASED AMOUNT OF INSURANCE FOR PERSONAL PROPERTY LOCATED IN A SELF-STORAGE FACILITY	SS EN	06 18	END	New				SS EN 06 18.pdf

Form Type Legend:

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

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		New Jersey Renters-General Rules and Rates	Manual	Replacement		New Jersey Renters - GENERAL RULES and RATES.pdf

Supporting Document Schedules

Satisfied - Item:	Cover Letter
Comments:	Cover Letter attached for review.
Attachment(s):	New Jersey Cover letter-use.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Explanatory Memorandum
Comments:	Attached for review.
Attachment(s):	CNI Explanatory Memo - NJ.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Side by Side Comparison
Comments:	Attached for review.
Attachment(s):	CN HO 02 04 NJ 05 21 personal injury redline.pdf New Jersey Renters - GENERAL RULES and RATES RL.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Readability Certification New Jersey
Comments:	Attached for review.
Attachment(s):	Readability Certification New Jersey.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)
08/31/2021		Rate	New Jersey Renters-General Rules and Rates	09/20/2021	New Jersey Renters - GENERAL RULES and RATES no Affinity.pdf (Superseded) New Jersey Renters - GENERAL RULES and RATES AFF RL.pdf (Superseded)
05/24/2021		Form	Tenants Mandatory Endorsement	09/20/2021	CN HO 02 04 NJ 05 21.pdf (Superseded)
05/24/2021		Rate	New Jersey Renters-General Rules and Rates	08/31/2021	New Jersey Renters - GENERAL RULES and RATES.pdf (Superseded) New Jersey Renters - GENERAL RULES and RATES Redlined.pdf (Superseded)
05/24/2021		Supporting Document	Side by Side Comparison	09/20/2021	CN HO 02 04 NJ 05 21(Redlined).pdf (Superseded)