

CT Homeowners MAPS Rate Rule Filing eff 08/18/2025

SERFF#: AMEC-134363726

Objection Dated: 04/23/2025

Objection 1:

- Rule B-3 - Cancellations: Per GSC Sec. 38a-316g. (A)(i)(2): The following provision is to be included after 2.a. "The notice will state that you may avoid cancellation and continue coverage under this Policy by paying the unpaid premium before the effective date of cancellation."

Response: This statement is printed on the notices sent to the insured. I have added it to Rule B-3 as requested.

- Rule B-10 - Financial Merit Rule: To comply with CSC CGS 38a-686 (C) (i), for renewals, an insured with current FM score of No Hit or No Score cannot be assigned to a higher rating Tier with a new valid FM score.

At renewal, if requested by the insured, if the current FM score is returned as a No Hit or a No Score and a valid insurance score is returned upon re-order, a new FM score will be assigned for use in Tier using the valid Financial Merit insurance score returned.

Response: This has been removed from the Rule. A No Hit or No score will only be assigned to a new Tier if the insured requested rescore would assign them to a lower rated Tier.

- Rule C-1 - Limits of Liability: - For HO3 policies, the minimum base limits allowed in Conn. for Coverages C.& D. are 40% and 30%, respectively. The Department will allow companies to issue policies with Section I coverages that are below department standards, however the company would be required to include a disclosure message that is clearly visible on the Declarations Page if the insured chooses a limit less than that. The Department believes that this is in the best interest of the insured and is a good consumer protection.

Response: Minimum Coverage C limits have been increased to 40% and minimum Coverage D limits have been increased to 30%. Rule C-1 and F-1 have been updated accordingly. The Rate Manual Exhibit 18 and Exhibit 19 have also been updated to align with the available limit options.

- Rule C-22 - Pool Factor: More details needed in the rule explaining the pool rating elements in Exhibit 29. The rule should include all the variables and explain how the Pool Factor is calculated and assigned.

Response: This original rule language was filed with an error. This pool factor is based on whether a pool exists rather than a calculated score. The Rate and Rule Manuals have been updated to show a Y/N indicator for this step. The existence of the pool is reported to us through Cape

Analytics' aerial imagery report.

- Rule C-23 - Trampoline Factor: The Department has done a review of companies requesting trampoline surcharges and have determined that they are not in the best interests of consumers. This type of exposure is typically temporary however, the surcharge seems to remain on the policy for years when they should not. The Department has allowed companies to provide actuarial data specific to Conn. risks to support that the liability rates do not already contemplate the risk due to the volatility of their presence. If the company cannot provide Conn. data to support a Trampoline surcharge, removal of the rule and rate table exhibit 30 would be required.

Response: Please see the Trampoline Support exhibit for data to support the Trampoline Factor. This exhibit demonstrates that even with the proposed surcharge, policies with trampoline presence still have a worse incurred loss ratio relativity. At each renewal we will receive an updated aerial imagery report from Cape Analytics and the presence of a trampoline will be updated if applicable at each renewal.

- Rule C-24 - Roof Condition Factor: Same request, more details needed in the rule explaining the roof rating elements in Exhibit 31. The rule should include all the variables and explain how the Roof Condition Factor is calculated and assigned.

Response: This roof condition factor is based on the Roof Condition Score we will receive from Cape Analytics. The SERFF Tracking Number for the approval of this model is CAIN-132913657.

- Rule C-25 - Tree Overhang Factor: Same request, more details needed in the rule explaining the Tree Overhang rating elements in Exhibit 32. The rule should include all the variables and explain how the Tree Overhang Factor is calculated and assigned.

Response: The rule has been amended to add the definitions of Tree Overhang. The amount of Tree Overhang is reported to us through Cape Analytics' aerial imagery report.

- Rule C-27 - Yard Debris Factor: Same request, more details in the rule explaining the Yard Debris rating elements in Exhibit 34. The rule should include all the variables and explain how the Yard Debris Factor is calculated and assigned.

Response: The presence of yard debris is reported to us through Cape Analytics' aerial imagery report. The rule has been amended to add clarification on determining the amount of yard debris for rating.