

State: Connecticut**Filing Company:** American Commerce Insurance Company**TOI/Sub-TOI:** 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations**Product Name:** CT Homeowner MAPS Rate Rule Filing eff 08/18/2025**Project Name/Number:** Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

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User Usage Agreement

Attachments

Usage Agreement

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Filing at a Glance

Company: American Commerce Insurance Company
Product Name: CT Homeowner MAPS Rate Rule Filing eff 08/18/2025
State: Connecticut
TOI: 04.0 Homeowners
Sub-TOI: 04.0000 Homeowners Sub-TOI Combinations
Filing Type: Rate/Rule
Date Submitted: 01/16/2025
SERFF Tr Num: AMEC-134363726
SERFF Status: Pending Industry Response
State Tr Num: 202500234
State Status: Active Suspense
Co Tr Num: CT HOMEOWNER MAPS RATE RULE FILING EFF 08/18/2025

Effective Date: 08/18/2025
Requested (New):
Effective Date:
Requested (Renewal):
Author(s): Sharon Janeczek, Kathryn O'Leary, Jeanie Moulton, Kimberly Guevara
Reviewer(s): Susan Gozzo Andrews (primary), Andy Kolodziejczyk, Qing He
Disposition Date:
Disposition Status:
Effective Date (New):
Effective Date (Renewal):

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General Information

Project Name: Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff Status of Filing in Domicile: Not Filed
 Project Number: Domicile Status Comments: OH is our domicile state.
 Reference Organization: Reference Number:
 Reference Title: Advisory Org. Circular:
 Filing Status Changed: 05/30/2025
 State Status Changed: 02/13/2025 Deemer Date:
 Created By: Kathryn O'Leary Submitted By: Jeanie Moulton
 Corresponding Filing Tracking Number:

Filing Description:

American Commerce Insurance Company respectfully submits the introduction of a new Homeowner rating plan in the state of Connecticut. This new rating plan will be referred to as MAPS (MAPFRE Adaptive Pricing System) while the existing plan will be referred to as the legacy home program. The MAPS rating plan will be effective for new business written on or after 8/18/2025 while the legacy home program will remain for any policy originally written prior to 8/18/2025.

Company and Contact

Filing Contact Information

Kathryn O'Leary , State Filing Specialist I koleary@mapfreusa.com
 211 Main St 800-922-8276 [Phone]
 Webster, MA 06281

Filing Company Information

American Commerce Insurance Company	CoCode: 19941	State of Domicile: Ohio
211 Main Street	Group Code: 411	Company Type:
Webster , MA 01570	Group Name:	State ID Number:
(800) 922-8276 ext. [Phone]	FEIN Number: 31-4361173	

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Filing Fees

State Fees

Fee Required? Yes
 Fee Amount: \$50.00
 Retaliatory? Yes
 Fee Explanation: OH is our Retaliatory state
 Per Company: Yes

Company	Amount	Date Processed	Transaction #
American Commerce Insurance Company	\$50.00	01/16/2025 03:39 PM	305592140

EFT Total **\$50.00**

SERFF Tracking #: AMEC-134363726

State Tracking #:

202500234

Company Tracking #:

CT HOMEOWNER MAPS RATE RULE
FILING EFF 0...

State: Connecticut

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Filing Company:

American Commerce Insurance Company

Correspondence Summary

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Pending industry response	Susan Gozzo Andrews	05/30/2025	05/30/2025
Industry response received	Andy Kolodziejczyk	05/05/2025	05/05/2025
Pending industry response	Andy Kolodziejczyk	04/23/2025	04/23/2025
Pending industry response	Susan Gozzo Andrews	02/13/2025	02/13/2025
Pending industry response	Susan Gozzo Andrews	02/12/2025	02/12/2025
Pending industry response	Andy Kolodziejczyk	02/03/2025	02/03/2025
Pending industry response	Susan Gozzo Andrews	02/13/2025	02/13/2025

Response Letters

Responded By	Created On	Date Submitted
Kathryn O'Leary	05/07/2025	05/07/2025
Kathryn O'Leary	05/02/2025	05/02/2025
Jeanie Moulton	04/28/2025	04/28/2025
Kathryn O'Leary	02/12/2025	02/12/2025
Kathryn O'Leary	02/03/2025	02/03/2025
Jeanie Moulton	04/28/2025	04/28/2025

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Please disregard 4/8 Confidentiality Request	Note To Filer	Andy Kolodziejczyk	04/08/2025	04/08/2025
Confidentiality Request	Note To Filer	Andy Kolodziejczyk	04/08/2025	04/08/2025
Request Extension on Objections Due	Note To Reviewer	Kathryn O'Leary	03/21/2025	03/21/2025
Request Extension on Objections Due	Note To Reviewer	Kathryn O'Leary	03/06/2025	03/06/2025
Confidentiality initial response to Company	Note To Filer	Susan Gozzo Andrews	02/11/2025	02/13/2025
Confidentiality Request	Note To Reviewer	Kathryn O'Leary	02/03/2025	02/03/2025
Documents submitted as Confidential	Note To Filer	Andy Kolodziejczyk	02/03/2025	02/03/2025

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Objection Letter

Objection Letter Status	Pending industry response
Objection Letter Date	05/30/2025
Submitted Date	05/30/2025
Respond By Date	06/20/2025

Dear Kathryn O'Leary ,

Introduction:

Please review the following comments and respond accordingly.

Objection 1

Comments: 1. In reference to Exhibit III, please clarify what coverage is displayed in this exhibit. Additionally, please clarify how many years of data are displayed. The footnote indicates 5, but the documentation discusses modeling on 10 years of data. Please provide actual vs model selected Pure Premium relativities by decile.

2. For the lift charts provided:

- a. Are the lift charts provided for all perils combined?
- b. Are all perils capped at 25% of Coverage A?

3. Please add individual peril lift charts to Exhibit III using Connecticut only data.

4. In reference to Question 1.g of the GLM Checklist, please include what, if any, controls were put in place for the third party data.

5. In reference to Question 1.i of the GLM Checklist, you indicate that no holdout set was used.

- a. What steps were taken to test for overfitting?
- b. What is the threshold used for the amount of data necessary to retain a holdout dataset?
- c. Was cross validation considered?

6. In reference to Exhibit VII Theft Freq (Page 7 of 43):

- a. Did you investigate the sharp decline in effective year betas over the course of the experience period (2020 to 2021 in particular)?
- b. Can you provide your interpretation of the intercept of this model? The model results imply that frequency is 24 times higher than the baseline MA model. Is the model reacting to another variable in the model?
- c. Please provide sample calculations for going from MA to CT for the Theft peril.

7. In reference to Exhibit VII Theft Severity (Page 8 of 43):

- a. How do you interpret the average minimum temperature in the context of theft severity?
- b. Have you considered what might be a rational explanation for these results?

8. In reference to Exhibit VII Water Weather Frequency (page 9 of 43), what is causing the sharp decrease in effective year betas post-2020?

9. In reference to Exhibit VII Water Nonweather Frequency (page 11 of 43) and Wind Frequency (page 13 of 43), what is causing such a high intercept beta? Intercepts shown are 154.452 for Water NW and 105.739 for Wind.

10. In reference to In Exhibit VII Hurricane Pure Prem, are you concerned at all of overfitting by modeling on a one hot encoded version of ZIP code?

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If you would like to discuss this further, please reach out to me at susan.gozzo.andrews@ct.gov Susan Gozzo Andrews, FCAS, MAAA, RPLU+, PIR.

Conclusion:

Sincerely,

Susan Gozzo Andrews

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Objection Letter

Objection Letter Status	Industry response received
Objection Letter Date	05/05/2025
Submitted Date	05/05/2025
Respond By Date	05/13/2025

Dear Kathryn O'Leary ,

Introduction:

Please review the following comments and respond accordingly.

Objection 1

- CT MAPS Homeowner Rule Manual eff 08/18/25, Complete Set (Rate)

Comments: Thank you for the objection response received on 5/2. Please review the follow-up question and adjust accordingly.

Rule C-24: Roof Condition Factor: The Department understands the factors are based on the Roof Condition Score received from Cape Analytics. What the Department requests, similar to what was requested in the Cape Analytics filing was to define each roof rating factor as listed in exhibit 31 in the rule.

Conclusion:

Sincerely,

Andy Kolodziejczyk

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Objection Letter

Objection Letter Status	Pending industry response
Objection Letter Date	04/23/2025
Submitted Date	04/23/2025
Respond By Date	05/06/2025

Dear Kathryn O'Leary ,

Introduction:

Please review the following comments and respond accordingly.

Objection 1

- CT MAPS Homeowner Rule Manual eff 08/18/25, Complete Set (Rate)

Comments: 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."

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.

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.

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.

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.

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.

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.

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.

Conclusion:

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Sincerely,

Andy Kolodziejczyk

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Objection Letter

Objection Letter Status	Pending industry response
Objection Letter Date	02/13/2025
Submitted Date	02/13/2025
Respond By Date	04/28/2025

Dear Kathryn O'Leary ,

Introduction:

Please review the following comments and respond accordingly.

Objection 1

Comments: Preliminary Objections Public

1. Please provide qualifications for the actuaries involved in developing the model, and the peer review and sign-off from your Chief Actuary and/or Chief Data Analytics Officer regarding the data governance and modeling per Actuarial Standards of Practice - ASOP 23, ASOP 25, ASOP 38 and ASOP 56. In additional, please comment on the rating variables in the models with potential unintentional bias and unfair discriminatory consequences.

2. Confidentiality Your actuarial memo confidentiality request discussed Exhibits IV IX. We did not find Exhibits VIII or Exhibit IX. Were these intended to be filed? We do see your Note to Reviewer that the request should only include Exhibits IV VII. Please update your Actuarial memo to this effect as well.

3. Please explain which of your two programs this program will go into your legacy program; the \$33M book of business or the \$2M Premier Living book. Please provide SERFF tracking numbers for the most recent rule/rate manuals for the book that this will replace. Please comment on if you will continue to do separate filings for each program in the future; would that then be three.

4. Red-lines In your actuarial memo you discuss 10 rating variables that will be added to your program and the move into multi-perils rating. The Department does expect to see Red-line from your CURRENT program for Rates, Rules and Rate Order of Calculation. Please provide with more narrative as necessary to better explain.

Missing Specifically from Actuarial Checklist Section B, item 7: We consider this to be questions 5, 6, 7, 8 and 9

5. Filing Memo/Road map - We note your 10 pages of exhibits for in Filing support with no narrative is NOT sufficient for a Rate Page manual of 252 pages.

Please provide a road map in either chart/ word document to show for each table in the Rate Manual, where the source of the factors can be found. Literally, this would be for every rate table in your rate manual.

If a table/rates are from one of your previous programs, please provide the SERFF tracking number.

If from a competitor filing, please provide the SERFF tracking number for a CT filing. If your rates/factors are not exactly from one source, please provide an exhibit to show the selected factors, your competitors with SERFF tracking number and any calculations to arrive at your selected factors

If the factors are from the GLM, please provide exhibits showing the indicated, current (if applicable), proposed factor and % change from current (if applicable); this is requested in the Actuarial Checklist Section B, item 5a.

6. For your rate pages you stated that Final selections can be found in the rate pages. The only deviation is for the THEFT peril at the highest limits of the deductible / AOI curve to account for a reversal. Please see Exhibit II. And we do see this.

However, we see many items in the Rate Pages that are not listed as variables in the GLM Data Dictionary. We do need to see GLM model output for the items in the Rate Tables with current and selected.; and details on how they were created. See the below:

For Exhibit 3 Policy Type - is this from the GLM or other source?

For Exhibit 4 table by Form by Coverage A and Deductible table constructed as we see single variables in the Data Dictionary for

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Coverage and Deductible and in addition you have provided increased limit factor tables. And similarly, for Exhibit 5 by Form by Coverage C and Deductible. Same for Exhibit 6 and Exhibit 7 with Hurricane Deductible \$ and % ; and Coverage A respectively.

7. There are other tables we see in the Rate manual that does not seem to come from the GLM but perhaps from a prior program such as Exhibit 15 Dwelling Usage; please explain the source of the factors. This may also pertain to Fire Alarm Exhibit 22; possibly Burglar Alarm Exhibit 23 although that may be in the GLM, Sprinkler System Exhibit 24, Lightning Protective Device Exhibit 25, Gated Community Exhibit 26, Affinity Discount Exhibit 27, and Association Discount Exhibit 28. Also Secondary Heating Sources Exhibit 36, Oil Tank Factor Exhibit 37, Windstorm Mitigation Truss Bracing Factor Exhibit 38, Windstorm Mitigation Gable Bracing Factor Exhibit 39, Windstorm Mitigation Hurricane Shutters Factor Exhibit 40, Mitigation Plywood Shutters Factor Exhibit 41, Windstorm Mitigation Hurricane Straps Factor Exhibit 42, Windstorm Mitigation Reinforced Exterior Doors Factor Exhibit 43, and Windstorm Mitigation Laminated Windows Factor Exhibit 44.

8. Similarly, we need support for optional coverages and endorsements coverages including: Computer Coverage Exhibit 49, Replacement Cost Loss Settlement for Certain Non-Building Structures on Resident Premises Exhibit 50, Building Additions and Alterations Increased Limit Exhibit 51, Livestock Collision Exhibit 52, Identity Fraud Expenses Exhibit 53, Scheduled Personal Property Exhibit 54, Coverage C Increased Limits of Liability Exhibit 55, Personal Property Replacement Cost Loss Settlement Exhibit 56, Refrigerated Property Exhibit 57, Special Property Exhibit 58, Extended Theft Coverage for Residence Premises Occasionally Rented to Others Exhibit 59, Unit-Owners Coverage C Special Coverage Exhibit 60, Unit-Owners Rental to Others Exhibit 61, Theft of Building Material Exhibit 62, Valuable Possessions Coverage Endorsement Exhibit 63, Increased Limits on Business Property Exhibit 64, Specified Additional Amount of Insurance for Coverage A Exhibit 65, Loss Assessment Coverage Exhibit 66, Credit Card, EFT Card, Forgery/Counterfeit Money Increased Limit; Ordinance or Law Increased Amount of Coverage Exhibit 68, Personal Injury Exhibit 69, Structure Rented to Others Residence Premises Exhibit 70, Permitted Incidental Occupancies Residence Premises Exhibit 71, Additional Residence Rented to Others Exhibit 72, Business Pursuits Exhibit 73, Incidental Farming Personal Liability On Premises Exhibit 74, Watercraft Exhibit 75, Additional Insured Student Living Away from Resident Premises Exhibit 76, Special Loss Settlement Exhibit 77, Other Insured Location Occupied by Insured Exhibit 78, Secondary Residence Liability Credit, Limited Water Back-up and Sump Discharge or Overflow Coverage Exhibit 80, Earthquake Coverage Exhibit 81, Earthquake Loss Assessment Exhibit 82, Service Line Coverage Exhibit 83, Home Systems Protection Exhibit 84, Guaranteed Replacement Cost Exhibit 85, MAPFRE Advantage Plus Exhibit 86, MAPFRE Elite Plus Exhibit 87, Endorsement Combination Discount Exhibit 88, Umbrella Base Rate Exhibit 89 and Umbrella Increased Limit Factor Exhibit 90, and Umbrella Flat Rates Exhibit 91. For these items we would be thinking a red-line of an existing program with these items or competitors support exhibit for each of them; showing competitors and company selected with SERFF Tracking numbers with an explanation for these items.

9. Other items we expected comment on for this new program with more detail than the sentences in the actuarial memo;

- a. Base Rates how developed from current CT program, adjustments to get to proper starting level
- b. Expected Expense Exhibit
- c. Minimum Premium Support Exhibit 48
- d. Expense Fee calculation/Support if applicable
- e. Rate Algorithm Rate Order of Calculation please provide a Red line from your existing program.

10. Increase Limit Factor Analysis -

- a. Please provide an actuarial narrative describing your data and methodology.
- b. Please prepare an exhibit to show your calculations to demonstrate the selected factors follow the consistency test the marginal premium per \$1000 of coverage should decrease as the limit of coverage increases as presented in in Miccoliss actuarial paper attached. This would be for each of your Exhibit 1 exhibits for Coverage B, C, D, E and F.

11. Please explain what the Pure Premium Exhibit III is and what it is trying to tell us.

12. Rule C-5 Tier We are looking for the definitions of each item in the Table to be defined in the Rules. Please tell us where the rules

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for each item would be; For example, we see some have similar names perhaps; like for Financial Merit; but where is PNI Financial Merit Score defined? Is pre-program loss claim counts the same as the Loss History Rule C-32? Where is Smoker/Non-Smoker defined and how would this information be obtained? Where is Prior Homeowner Carrier defined and how would be information be obtained?

If you would like to discuss this further, please reach out to me at susan.gozzo.andrews@ct.gov Susan Gozzo Andrews, FCAS, MAAA, RPLU+, PIR.

Conclusion:

Sincerely,
Susan Gozzo Andrews

ON THE THEORY OF INCREASED LIMITS AND EXCESS OF LOSS PRICING

ROBERT S. MICCOLIS

DISCUSSION BY SHELDON ROSENBERG

Bob Miccolis has presented a paper which discusses the mathematical theory underlying many aspects of increased limits ratemaking. Committees and staff of Insurance Services Office have put much of this theory into practice in reviewing increased limits loss experience. In so doing, practical problems have arisen and interim solutions developed pending further study. Some of these problems and solutions comprise this discussion.

CONSISTENCY IN INCREASED LIMITS TABLES

Extension to 2 Dimensional Tables

The Miccolis test for consistency is that "the marginal premium per \$1000 of coverage should decrease as the limit of coverage increases." As discussed later in the paper, this consistency test can be extended to two-dimensional tables as well. That is, consider an increased limits table that appears as follows:

Aggregate Limit (in thousands)	Occurrence Limit (in thousands)			
	25	50	100	250
25	1.00			
50	1.50	1.70		
100	1.80	2.03	2.50	
250	2.00	2.25	2.80	3.20

This table must now "pass" the consistency test for each occurrence limit (down each column), as well as for each aggregate limit (across each row). The table passes this test for the \$25,000 occurrence limit because

$\frac{.50}{25} > \frac{.30}{50} > \frac{.20}{150}$. That is, marginal premiums per \$1000 of aggregate

coverage are decreasing, as the occurrence limit is held fixed. The table fails to pass this test for the \$250,000 aggregate limit because

$$\frac{.25}{25} < \frac{.55}{50}.$$

There is yet another consistency test that can be performed on a two-dimensional table. This test has in fact been used in conjunction with the previously discussed test in developing occurrence/aggregate and claim/accident tables at Insurance Services Office.

The test itself can best be described by examining the hypothetical table drawn up above. Consider an insured who is considering switching from a \$25,000 occurrence limit to a \$50,000 occurrence limit. The question becomes the following: if one assumes that his aggregate limit remains constant, then for which aggregate limit will his decision to change occurrence limits give him the greatest vs. the smallest increases in coverage?

His increase in coverage will be most significant when the aggregate is highest. To see this, consider the extreme situation of having no aggregate at all (i.e. infinite aggregate coverage). In this case, the insured's switching from a \$25,000 occurrence limit to a \$50,000 occurrence limit will give him a potential increase of \$25,000 for each and every occurrence, since no aggregate can ever be applied to stop payments at a certain amount. The other extreme is for an insured who has a \$25,000 aggregate and is contemplating a switch from \$25,000 to \$50,000 in his occurrence coverage. Of course, he gets nothing in additional coverage because the \$25,000 aggregate acts as a cap on his occurrence coverage as well.

The pattern thus emerges. For any two occurrence limits in an Increased Limits Table, the differences in the factors must not decrease, as the aggregates grow. This follows from the above discussion because increasing aggregates imply increasing differences in coverage between the given pair of occurrence limits. The way to reflect this in increased limits tables is to make sure that differences between the occurrence limit factors increase (or at least do not decrease) as aggregates increase. Note that our hypothetical table passes this test for the \$25,000 and \$50,000 occurrence limits because $1.70-1.50 \leq 2.03-1.80 \leq 2.25-2.00$.

This argument can of course be extended to test the differences in any pair of aggregate limits, for all occurrence limits. In comparing the "100" and "250" aggregate limits for the "25", "50", and "100" occurrence limits, the table again passes the test since $2.00-1.80 \leq 2.25-2.03 \leq 2.80-2.50$.

Anti-selection and Consistency

Miccolis notes that while "there can be anti-selection . . . this should not restrict the general applicability of the consistency test".

If one assumes that there is no anti-selection or that its effects are minimal, then one can assume that the inherent underlying severity distribution is identical for all insureds. Thus increased limits factors can be developed using one smooth curve to represent all policy limits. The factors resulting from this curve will then automatically pass the consistency test as described by Miccolis because the curve will produce decreasing severity values by layer. However, if we wish to reflect anti-selection, then each policy limit must have a curve fit to its own loss data.

Increased limits factors for the various policy limits will now result from the various loss curves, each of which is unrelated to any other one. In such a situation, marginal premium per \$1000 of additional coverage can increase from one policy limit to the next.

Anti-selection can take two forms. One often encountered is adverse selection, in which purchasing higher limits is associated with adverse loss experience. This can occur for two different reasons. Firstly, insureds who can expect higher loss potential could be more inclined to purchase higher limits. Secondly, liability law suits or settlements may be influenced by the policy limit. Thus the same accident may result in higher losses for the insured that purchased higher policy limits.

The mirror image of "adverse" selection might be labeled "favorable" selection, in which the insureds with the highest policy limits show the best loss experience. There are two reasons why this might occur. Firstly, financially secure insureds may be better risks. Yet since they have more assets to protect, they will be inclined to purchase higher limits. Secondly, insurance companies, knowing that these are the better risks, would be more willing to insure them at higher limits.

While anti-selection can affect increased limits factors, it does not always do so. If anti-selection produces differences by policy limit in the relationships among indemnity severity values, then increased limits factors are affected. However, it may well be that anti-selection produces increasing or decreasing basic limits severities by policy limit, but maintains the same proportionate relationship in severities for all other policy limit cut-offs as

well. In this case, increased limits factors would not be affected by anti-selection. Consider the following two examples:

Example A: Anti-selection does affect increased limits factors

Average Indemnity severity resulting from purchasers of:

at "cut-offs" of	<u>POLICY LIMIT \$50,000</u>	<u>POLICY LIMIT \$100,000</u>
\$ 25,000	\$ 5,000	\$ 7,000
50,000	7,500	8,500
100,000	10,000	11,000

Based on these results, increased limits factors (I.L.F.) could be calculated as follows:

Policy Limit	<u>I.L.F. not reflecting anti-selection</u>	<u>I.L.F. reflecting anti-selection</u>
\$ 25,000	1.00	1.00
50,000	1.33 (i.e. \$ 8,000/6,000)	1.50 (\$ 7,500/5,000)
100,000	1.75 (i.e. \$10,500/6,000)	1.57 (\$11,000/7,000)

Example B: Anti-selection does not affect increased limits factors

Indemnity severity resulting from purchasers of:

at "cut-offs" of	<u>POLICY LIMIT \$50,000</u>	<u>POLICY LIMIT \$100,000</u>
\$ 25,000	\$ 5,000	\$ 6,000
50,000	7,500	9,000
100,000	10,000	12,000

Based on these results, increased limits factors could be calculated as follows:

Policy Limit	<u>I.L.F. not reflecting anti-selection</u>	<u>I.L.F. reflecting anti-selection</u>
\$ 25,000	1.00	1.00
50,000	1.50 (i.e. \$ 8,250/5,500)	1.50 (\$ 7,500/5,000)
100,000	2.00 (i.e. \$11,000/5,500)	2.00 (\$12,000/6,000)

In each example, the basic limit is assumed to be \$25,000. Indemnity severities are calculated based on smooth loss curves for each policy limit separately, with the severity values "cut off" (i.e. limited) at various points representing key policy limits in an increased limits table. Note that because loss curves extend for infinite loss values, severity values could be calculated for "cut-offs" higher than the policy limit purchased. Increased limits factors not reflecting anti-selection are calculated by averaging the severity values for both policy limits (this assumes equal weights for both policy limits), and dividing these resulting increased limits average severities by the basic limit average severity. To reflect anti-selection, the severity value at a "cut-off" is equal to the value for that policy limit. This is true for the increased limit in question, as well as the basic limit. Note that in Example A, the increased limits factors differ depending on whether anti-selection was reflected, while in Example B, the factors are identical with or without reflecting anti-selection.

LOSS DEVELOPMENT

As Miccolis states in his paper, "it is very likely that [a] distribution of immature claim values will change considerably as these claims develop". In general, this varying development will exhibit an upward pattern over intervals of claim size. Displayed in Table 1 are the mean and standard deviation for one year of data fitted to a log normal distribution over three different evaluation periods for Physicians, Surgeons, and Hospitals. The increase over time in the mean and standard deviation is evidence of the upward pattern of development. An important reason for this is that IBNR claims, when they eventually get reported, tend to wind up in the higher claim size intervals. The I.S.O. closed claim surveys, for both Malpractice and Product Liability, demonstrate that the longer the time interval between the occurrence of a claim and the reporting of that claim, the higher the average size of the claim.

At Insurance Services Office, loss development factors have been calculated by claim size interval by comparing "theoretical" (the result of smooth loss curves) claim counts per interval as of various evaluation levels. These factors have exhibited the generally upward pattern by claim size interval referred to above.

TABLE I

POLICY YEAR 1972

Evaluated as of	Physicians		Surgeons		Hospitals	
27 months	Mean	12,421	Mean	13,177	Mean	8,772
	S.D.	58,126	S.D.	53,467	S.D.	42,526
39 months	Mean	16,972	Mean	19,384	Mean	14,364
	S.D.	75,410	S.D.	77,923	S.D.	85,968
51 months	Mean	22,974	Mean	24,784	Mean	19,072
	S.D.	126,314	S.D.	115,847	S.D.	148,045

THE USE OF A THEORETICAL CURVE AS A MODEL FOR LOSS DISTRIBUTION

As Miccolis notes, there are many problems in dealing with empirical distributions.

In addition to those mentioned in his paper two other properties of the claim size distribution tend to bias the results. Firstly, the existence of "cluster points" (intervals where the number of claims drastically rises and immediately drops) magnify the discontinuity between intervals. Usually these cluster points appear at intervals which contain a round number such as \$25,000, \$50,000 or \$100,000. As an example see Table 2 which displays Surgeons data of Companies reporting to ISO for Policy Year 1972 evaluated as of March 31, 1975. This clustering phenomenon may result in a poor fit when any continuous curve is applied to the data. The existence of cluster points should not pre-empt the use of a theoretical distribution, however, since their presence may be artificial for the following reasons:

- (1) Policy limits will truncate losses to the limit of an insured's policy. This is not the sole reason for cluster points however, since such points were present for amounts such as \$25,000 and \$50,000 even when the underlying data corresponded to a policy limit of \$100,000. To illustrate this point, consider Table 3 which is Physicians data of companies reporting to ISO for policy year 1974 evaluated as of March 31, 1976. This data contains only those losses which were incurred on policies whose limit was \$100,000, yet clusters appear at \$5,000, \$10,000, \$15,000, \$20,000, \$25,000 and \$50,000.

- (2) At early evaluation points when the raw data is relatively immature, most losses are still outstanding. These claims are rarely reserved for amounts other than round figures.

A second property of the raw data included in the claim size distribution is that gaps are present for certain intervals where no claims appear. Fitting a curve alleviates this problem because of its smooth nature.

ISO has recognized these weaknesses in the empirical distributions and consequently has chosen to fit a theoretical distribution to the data and use this curve in computing increased limits factor. Initially a log-normal distribution was considered to be an appropriate representation of the data; the fitting problem at cluster points was not considered crucial, as mentioned above. The curve was fit by solving the Maximum Likelihood equations for the parameters μ and σ^2 .

One other advantage of using a theoretical distribution to represent the data is that it facilitated the computation of variance at each policy limit. This variance was then used as a basis for risk adjustments.

TREND

When discussing the issue of trending loss distributions, Miccolis first considers the case where trend affects all claims in the same way, i.e. each loss is increased by the same multiplicative factor. This assumption leads to the equation:

$$(1) \quad F(x) = F(x/a)$$

where $F(x)$ is the trended cumulative distribution, "a" is the annual trend factor, and $F(x)$ is the untrended cumulative distribution. If one differentiates both sides of this equation the result is:

$$f(x) = F'(x) = F'(x/a) - 1/a f(x/a)$$

The trended probability distribution function $f(x)$ can thus be defined in terms of $f(x)$.

It is interesting to note that if x is lognormally distributed with parameters μ and σ^2 before trend, then x will also be lognormally distributed with

TABLE 2

INSURANCE SERVICES OFFICE
SURGEONS PROFESSIONAL LIABILITY
CLAIMS SIZE DISTRIBUTION

POLICY YEAR 1972*

Claim Size Intervals		Claims	Loss	Claim Size Intervals		Claims	Loss
0-	250	192	16,321	20,001-	21,000	10	203,022
251-	500	122	50,918	21,001-	22,000	1	22,000
501-	1,000	226	205,580	22,001-	23,000	13	293,007
1,001-	2,000	272	444,820	23,001-	24,000	3	71,290
2,001-	3,000	323	838,154	24,001-	25,000	104	2,548,951
3,001-	4,000	150	545,173	25,001-	30,000	45	1,256,077
4,001-	5,000	425	2,076,934	30,001-	35,000	41	1,388,629
5,001-	6,000	53	303,156	35,001-	40,000	27	1,037,669
6,001-	7,000	60	399,909	40,001-	45,000	15	659,608
7,001-	8,000	116	862,936	45,001-	50,000	67	3,345,275
8,001-	9,000	29	254,676	50,001-	55,000	14	731,821
9,001-	10,000	190	1,875,453	55,001-	60,000	10	600,000
10,001-	11,000	33	345,854	60,001-	65,000	13	822,507
11,001-	12,000	31	368,930	65,001-	70,000	7	486,000
12,001-	13,000	34	427,736	70,001-	75,000	26	1,940,495
13,001-	14,000	9	123,698	75,001-	80,000	9	687,631
14,001-	15,000	130	1,916,898	80,001-	85,000	5	425,000
15,001-	16,000	19	294,270	85,001-	90,000	2	180,000
16,001-	17,000	11	181,967	90,001-	95,000	1	90,540
17,001-	18,000	13	230,802	95,001-100,000		61	6,091,246
18,001-	19,000	7	130,650	100,001-110,000		8	835,605
19,001-	20,000	102	2,039,998	110,001-120,000		2	239,000

**INSURANCE SERVICES OFFICE
SURGEONS PROFESSIONAL LIABILITY
CLAIMS SIZE DISTRIBUTION
POLICY YEAR 1972***

TABLE 2 (Cont.)

Claim Size Intervals	Claims	Loss	Claim Size Intervals	Claims	Loss
				1	350,000
120,001- 130,000			340,001- 350,000		
130,001- 140,000	1	140,000	350,001- 360,000		
140,001- 150,000	5	741,467	360,001- 370,000		
150,001- 160,000			370,001- 380,000		
160,001- 170,000			380,001- 390,000	1	390,000
170,001- 180,000			390,001- 400,000		
180,001- 190,000			400,001- 410,000		
190,001- 200,000	2	400,000	410,001- 420,000		
200,001- 210,000	2	413,750	420,001- 430,000		
210,001- 220,000	1	211,000	430,001- 440,000		
220,001- 230,000			440,001- 450,000		
230,001- 240,000			450,001- 460,000		
240,001- 250,000	2	500,000	460,001- 470,000		
250,001- 260,000			470,001- 480,000		
260,001- 270,000			480,001- 490,000		
270,001- 280,000			490,001- 500,000	1	500,000
280,001- 290,000			500,001- 600,000		
290,001- 300,000	1	300,000	600,001- 700,000		
300,001- 310,000			700,001- 800,000		
310,001- 320,000			800,001- 900,000		
320,001- 330,000			900,001-1,000,000		
330,001- 340,000			1,000,001+		
			TOTAL	3,048	41,836,423

*Evaluated as of 3/31/75

TABLE 3

INSURANCE SERVICES OFFICE
PHYSICIANS PROFESSIONAL LIABILITY
CLAIMS SIZE DISTRIBUTION

POLICY YEAR 1974*
POLICY LIMIT 100/300

Claim Size Intervals	Claims	Loss	Claim Size Intervals	Claims	Loss
0- 250	54	7,324	18,001- 19,000		
251- 500	57	24,980	19,001- 20,000	27	540,000
501- 1,000	123	117,448	20,001- 21,000	1	20,500
1,001- 2,000	90	147,741	21,001- 22,000	2	43,565
2,001- 3,000	108	281,101	22,001- 23,000		
3,001- 4,000	41	149,235	23,001- 24,000	1	24,000
4,001- 5,000	177	876,986	24,001- 25,000	24	600,000
5,001- 6,000	12	70,289	25,001- 30,000	7	207,500
6,001- 7,000	10	67,462	30,001- 35,000	8	280,000
7,001- 8,000	39	295,795	35,001- 40,000	3	118,736
8,001- 9,000	5	43,500	40,001- 45,000	1	45,000
9,001- 10,000	68	680,000	45,001- 50,000	17	850,000
10,001- 11,000	3	31,780	50,001- 55,000		
11,001- 12,000	6	72,000	55,001- 60,000	3	180,000
12,001- 13,000	3	37,500	60,001- 65,000	1	65,000
13,001- 14,000	2	27,333	65,001- 70,000	2	140,000
14,001- 15,000	29	434,620	70,001- 75,000	8	600,000
15,001- 16,000	1	15,804	75,001- 80,000	1	79,020
16,001- 17,000	1	17,000	80,001- 85,000	1	85,000
17,001- 18,000	1	17,500	85,001- 90,000		
			90,001- 95,000		
			95,001-100,000	17	1,700,000
			TOTAL	954	8,993,719

*Evaluated as of 3/31/76

parameters $\mu + \ln a$ and σ^2 after trend. To see that this follows, consider equation (1) and the fact that:

$$f(x) = \frac{1}{x\sigma\sqrt{2\pi}} e^{-\frac{1}{2} \left(\frac{\ln x - \mu}{\sigma} \right)^2}$$

$$\text{Then } f(x) = \frac{1}{a} f(x/a) = \frac{1}{a} \frac{1}{(x/a)\sigma\sqrt{2\pi}} e^{-\frac{1}{2} \left(\frac{\ln(x/a) - \mu}{\sigma} \right)^2}$$

$$= \frac{1}{x\sigma\sqrt{2\pi}} e^{-\frac{1}{2} \left(\frac{\ln x - (\mu + \ln a)}{\sigma} \right)^2}$$

i.e. $f(x)$ is a lognormal distribution with parameters $\mu + \ln a$ and σ^2 .

Once again it is important to keep in mind that this argument is valid only if one assumes that the effects of inflation are so that each loss is multiplied by the same multiplicative factor. It is clear though, that if this assumption is made and if the lognormal distribution can be assumed to represent the underlying loss severity distribution then trend should not affect the parameter σ^2 . Thus if a good fit is achieved via a lognormal distribution and yet the parameter is observed to be changing over time, then this would indicate that trend does not affect all claims equally.

With this point in mind, consider the following values for μ and σ^2 which were computed by fitting a lognormal distribution to the indicated data.

While the σ^2 parameter seems to be changing over time, a hasty conclusion should not be drawn since:

- (1) The underlying data is relatively immature (as of 27 months) and thus is largely affected by reserving procedures. To get a proper picture of the effects of trend one should analyze fully developed claims.
- (2) As mentioned above, the argument depends on whether or not the data is adequately represented by the lognormal distribution. If the quality of fit changes from year to year, then one cannot analyze the effects of trend by tracing the movement of an artificial parameter.

TABLE 4

Policy*		Physicians	Surgeons	Hospitals
Year	μ	7.8616	8.0562	7.4799
1972	σ^2	3.1311	2.8601	3.1988
1973	μ	7.9609	8.3099	7.7801
	σ^2	2.5031	2.6183	3.1040
1974	μ	8.1901	8.4578	7.8295
	σ^2	2.3395	2.4240	3.6419

*As of 27 months of maturity.

ALLOCATED LOSS ADJUSTMENT EXPENSES

Miccolis mentions in the final paragraph of his introduction that there are many practical problems concerning loss adjustment expenses which cannot be resolved solely by the mathematical model presented in his paper.

Perhaps the overriding reason for this is that an insurer's legal costs in defending an insured are not bounded by the limit of the insured's policy. The sum of the indemnity portion and the cost of lost adjustment expenses may and in many cases does exceed the limit of the insured's policy. This is where Miccolis' model becomes inoperative since the equation

$$g(x;K) = \begin{cases} x, & 0 < x < K, K > 0 \\ K, & x \geq K \end{cases}$$

is no longer applicable.

As an alternative to using the model in pricing allocated loss adjustment expenses for layers of coverage above basic limits, ISO has investigated raw data to actually compute the average amount of allocated per claim for each policy limit for which data was available. An increasing pattern in these numbers may be matched by a similar pattern for the average basic limits severity by policy limit. In such a case, a constant percentage charge of the basic limits indemnity will produce an increasing dollar amount for allocated loss adjustment expense by policy limit. Therefore, another test was to compute the ratio of allocated loss adjustment expenses to basic limit losses by policy limit. If this ratio forms an increasing

TABLE 5

**INSURANCE SERVICES OFFICE
ALLOCATED LOSS ADJUSTMENT EXPENSE
BY POLICY LIMIT***

PHYSICIANS

(1) Policy Limit	(2) # of Claims	(3) Avg. B/L Ind.	(4) Avg. ALAE	(5) $(4) \div (3)$
100,000	956	\$6,713	\$3,482	.519
200,000	83	6,120	2,048	.335
250,000	96	7,833	2,635	.336
500,000	57	5,474	2,088	.381
1,000,000	230	8,591	3,130	.364
All LimitsØ				
Combined	1,601	6,988	3,066	.439

SURGEONS

(1) Policy Limit	(2) # of Claims	(3) Avg. B/L Ind.	(4) Avg. ALAE	(5) $(4) \div (3)$
100,000	1,693	\$8,156	\$4,115	.505
200,000	260	7,885	2,085	.264
250,000	322	9,161	2,112	.231
500,000	140	9,286	3,157	.340
1,000,000	457	8,565	3,365	.393
All LimitsØ				
Combined	3,118	8,270	3,496	.423

HOSPITALS

(1) Policy Limit	(2) # of Claims	(3) Avg. B/L Ind.	(4) Avg. ALAE	(5) $(4) \div (3)$
100,000	565	\$4,745	\$2,508	.529
200,000	178	5,124	2,011	.392
250,000	368	6,307	3,022	.479
300,000	412	6,391	2,697	.422
500,000	818	6,620	2,502	.378
1,000,000	1,242	8,820	3,738	.424
All Policy Limits CombinedØ	4,411	6,397	2,706	.423

*Policy Year 1974 data evaluated as of March 31, 1976.

ØIncludes limits not listed.

progression as policy limits increase then an increasing percentage of the basic limit rate should be charged for allocated loss adjustment expenses.

As the tables for Physicians, Surgeons, and Hospitals below show, however, a progression did not materialize. Therefore, in initial pricing considerations, a constant percentage of the Average Basic Limits Severity was loaded into each policy limit in order to construct the increased limit factors. Of course this decision, based as it was on empirical data, is subject to change as more data become available for analysis.

SUMMARY

The conclusion of Miccolis' paper is that the complete solution to the problem of pricing increased limits coverage requires "actual data, judgment, and 'some' further study." This review, prepared with the assistance of George Burger and Aaron Halpert, has presented data (of companies reporting to ISO) and has indicated the judgment needed to develop such data to a form in which the mathematical models can be applied.

The CAS is indebted to Mr. Miccolis for his contribution to the Proceedings.

State: Connecticut **Filing Company:** American Commerce Insurance Company
TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations
Product Name: CT Homeowner MAPS Rate Rule Filing eff 08/18/2025
Project Name/Number: Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

Objection Letter

Objection Letter Status	Pending industry response
Objection Letter Date	02/12/2025
Submitted Date	02/12/2025
Respond By Date	02/17/2025

Dear Kathryn O'Leary ,

Introduction:

Please review the following comments and respond accordingly.

Objection 1

Comments: Please send in a Post Submission update to this filing. While we understand that this is a new program/company for CT; we need to have the portion of the Rate /Rule tab filled in that asks for Company name, indicated change, % change , written premium etc. even though we know most of these fields will say 0% or 0\$. This is because of our internal reporting that we need this information. Thank you.

Conclusion:

Sincerely,

Susan Gozzo Andrews

State:	Connecticut	Filing Company:	American Commerce Insurance Company
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations		
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025		
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /		

Objection Letter

Objection Letter Status	Pending industry response
Objection Letter Date	02/03/2025
Submitted Date	02/03/2025
Respond By Date	02/10/2025

Dear Kathryn O'Leary ,

Introduction:

Dear Kathryn O'Leary:

This letter is being sent regarding the company's request for filing confidentiality. If after reading the information below, the company would like to continue to request filing confidentiality, please submit a request via a Note to Reviewer in SERFF.

Please be advised that, per CGS 38a-686 (b)(6)(A), only elements pertaining to financial history measurement programs may be considered trade secret. However, the Department may decide to allow a model or any supporting documentation relative to the model to be trade secret if the company provides written documentation citing specific reasons why the documents must be kept confidential.

The supporting documentation must state specifically which documents in the filing should be assigned confidentiality. The Department will not allow all documents to be marked confidential/trade secret. The Department will only consider requests in which the company has provided compelling data that comprehensively supports the need for confidentiality.

When making a confidential/trade secret filing with us, the Department relies on the language in FOIA CGS section 1-210(b)(5) copied below, which states that the model and/or supporting information derives independent value by not being generally known and steps have been taken to protect its secrecy.

•(5)(A) Trade secrets, which for purposes of the Freedom of Information Act, are defined as information, including formulas, patterns, compilations, programs, devices, methods, techniques, processes, drawings, cost data, customer lists, film or television scripts or detailed production budgets that (i) derive independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from their disclosure or use, and (ii) are the subject of efforts that are reasonable under the circumstances to maintain secrecy;

If the Department were to receive an FOIA request for this filing in the future, we would notify the company of the request. The company is then responsible for defending the confidentiality request.

When the Department makes a decision on the request for confidentiality, a Note to Filer will be placed in SERFF.

Please note that the Department will require that this process be followed on any future filing confidentiality requests regarding models unrelated to financial history measurement programs.

Please contact the Department if you have any questions.

Sincerely,

Andy Kolodziejczyk
Associate Insurance Examiner
Andrew.Kolodziejczyk@ct.gov

State: Connecticut

Filing Company: American Commerce Insurance Company

TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations

Product Name: CT Homeowner MAPS Rate Rule Filing eff 08/18/2025

Project Name/Number: Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

CT Insurance Department

Conclusion:

Sincerely,

Andy Kolodziejczyk

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:			American Commerce Insurance Company
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	05/07/2025
Submitted Date	05/07/2025

Dear Susan Gozzo Andrews,

Introduction:

The American Commerce Insurance Company respectfully responds to the objection dated 05/05/2025.

Response 1

Comments:

We have updated Rule C-24 to add the definitions of the roof condition scores as defined by Cape Analytics in SERFF Tracking # CAIN-132913657.

Related Objection 1

Applies To:

- CT MAPS Homeowner Rule Manual eff 08/18/25, Complete Set (Rate)

Comments: Thank you for the objection response received on 5/2. Please review the follow-up question and adjust accordingly.

Rule C-24: Roof Condition Factor: The Department understands the factors are based on the Roof Condition Score received from Cape Analytics. What the Department requests, similar to what was requested in the Cape Analytics filing was to define each roof rating factor as listed in exhibit 31 in the rule.

Changed Items:

No Form Schedule items changed.

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
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State: Connecticut
TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations
Product Name: CT Homeowner MAPS Rate Rule Filing eff 08/18/2025
Project Name/Number: Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

Rate Schedule Item Changes

Item No.	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Date Submitted
1	CT MAPS Homeowner Rule Manual eff 08/18/25	Complete Set	New		05/07/2025 By: Kathryn O'Leary
<i>Previous Version</i>					
1	CT MAPS Homeowner Rule Manual eff 08/18/25	Complete Set	New		05/02/2025 By: Kathryn O'Leary
<i>Previous Version</i>					
1	CT MAPS Homeowner Rule Manual eff 08/18/25	Complete Set	New		04/28/2025 By: Jeanie Moulton
<i>Previous Version</i>					
1	CT MAPS Homeowner Rule Manual eff 08/18/25	Complete Set	New		01/16/2025 By: Jeanie Moulton

No Supporting Documents changed.

Conclusion:

Thank you for your consideration.

Sincerely,

Kathryn O'Leary

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:	American Commerce Insurance Company		
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	05/02/2025
Submitted Date	05/02/2025

Dear Susan Gozzo Andrews,

Introduction:

The American Commerce Insurance Company respectfully responds to the objection dated 04/23/2025.

Response 1

Comments:

Our responses are located in the document "CT Homeowner Objection Response 04.23.25".

Related Objection 1

Applies To:

- CT MAPS Homeowner Rule Manual eff 08/18/25, Complete Set (Rate)

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:	American Commerce Insurance Company		
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

Comments: 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."

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.

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.

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.

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.

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.

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.

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.

Changed Items:

No Form Schedule items changed.

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
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State:	Connecticut	Filing Company:	American Commerce Insurance Company
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations		
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025		
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /		

Rate Schedule Item Changes

Item No.	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Date Submitted
1	CT MAPS Homeowner Rates Pages eff 08/18/25	Complete Set	New		05/02/2025 By: Kathryn O'Leary
<i>Previous Version</i>					
1	CT MAPS Homeowner Rates Pages eff 08/18/25	Complete Set	New		04/28/2025 By: Jeanie Moulton
<i>Previous Version</i>					
1	CT MAPS Homeowner Rates Pages eff 08/18/25	Complete Set	New		01/16/2025 By: Jeanie Moulton
2	CT MAPS Homeowner Rule Manual eff 08/18/25	Complete Set	New		05/02/2025 By: Kathryn O'Leary
<i>Previous Version</i>					
2	CT MAPS Homeowner Rule Manual eff 08/18/25	Complete Set	New		04/28/2025 By: Jeanie Moulton
<i>Previous Version</i>					
2	CT MAPS Homeowner Rule Manual eff 08/18/25	Complete Set	New		01/16/2025 By: Jeanie Moulton

Supporting Document Schedule Item Changes

Satisfied - Item:	Objection Response 04.23.25 Support
Comments:	
Attachment(s):	Trampoline Support.pdf CT Homeowner Objection Response 04.23.25.pdf

Conclusion:

Thank you for your consideration.

Sincerely,

Kathryn O'Leary

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:	American Commerce Insurance Company		
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	04/28/2025
Submitted Date	04/28/2025

Dear Susan Gozzo Andrews,

Introduction:

American Commerce Insurance respectfully replies to the 02/13/25 objection.

Response 1

Comments:

Please see the CT Home Objection Response Confidential 2024_02_13 attachment with supports.

Related Objection 1

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:	American Commerce Insurance Company		
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

Comments: Preliminary Objections Sent out 2/13/2025 Confidential Section:

Data Dictionary

1. Please add an additional column to Exhibit V to tell us if these variables exist in the Rating Algorithm as we would see them show as a separate item as listed here in this Exhibit. If they are being used in combination; the Department needs to see the math that will get us to the Rating tables that we see. Please in this column say Rating Variable, Control or Offset.

2. Regarding the variable WA_AA30.SCR - please explain what vendor credit model this is. Is it Lexis Nexis Attract 3.0? Please work with Lexis NEXIS to provide us with the exact Credit Scoring model you will be using in CT; and provide us with the proper SERFF Tracking number where CT has approved this model. We would expect details on this to have been included in your modeling memo; please revise accordingly.

3. Similarly for CAPE Analytics variables; Please provide appropriate CT SERFF tracking numbers for the score models you are using has been approved. We would expect details on this to have been included in your modeling memo; please revise accordingly.

a. Regarding CAPE ANALYTICS Roof Condition Rating Variable - CAPE has filed RCRv3 with CT which was approved. CAPE has just submitted RCRv4 with the department which will go under consultant review. Please tell us what version of the Roof Condition Rating Score that American Commerce will be using from CAPE Analytics. You will not be able to use RCRv4 until we have reviewed this.

b. Please work with Cape Analytics to confirm and obtain the SERFF tracking numbers for the other SCORE models from CAPE that they have been filed that you are using.

c. A CAPE Analytics POOL Score has not been filed in CT; is our understanding. If this is true, American Commerce cannot use it until CAPE has submitted a filing to the Department for approval. If you are receiving a score from CAPE and using that; that would be part of their model that would need to be filed in CT.

4. AIR Touchstone - Please explain what AIR models you are using at a high level such as Version number, Demand Surge on/off status, etc. and what perils you are using this for. We would expect details on this to have been included in your modeling memo; please revise accordingly.

Territory Analysis/ Territory Factors Exhibit 8 in Rate Manual - Questions 5,6 and 7

5. Please provide your Territory analysis outside the GLM that produced the factors that we see in Exhibit 8. We do need to see and understand your Clustering methodology that was used. We will not accept just indicated as final factors. Please provide more explanation and exhibits detailing your analysis. It would be acceptable to provide excel spreadsheets as needed.

6. Please provide a comparison of the resulting selected relativities by Territory to the territory relativities you are currently using in your two existing Homeowners programs. Please explain major differences.

7. Please explain why an other In-state and out of state factor category is needed for HO-3; and explain how you derived these factors. We see that you have used these categories for HO-4 and Ho-6 also but are using 1.00. Please confirm and cite the Rule that will define these categories.

8. Age of Home Exhibit 11 / Year Built Exhibit 12 - The variable we see in the Data Dictionary is Build year. Is this the same as Age of Home?? We do see that Year Built is in Exhibit 12. Please explain how they are the same or different. Please provide an example of how the C-12, C-13 definitions and indicated factors from the model output are used to create the two tables we see in the manual.

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:	American Commerce Insurance Company		
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

9. Please confirm that Yes/No indicator for multi-policy is the variable used for the Account Discount Exhibit 13 Table.

10. Roof Type for Exhibit 14 We do not see Roof Type in the standard set of variables in your Data Dictionary - is Roof Type something that specifically comes out of the Touchstone modeling that we see listed as a variable in your Hurricane model. But we do not see the Touchstone model checked for the Wind/Hail model. Are you making an assumption from the Hurricane factors to the Wind/Hail or are these factors from outside the model?

11. For Prior Claims Loss History Factors in Exhibit 45, we see the variables for prior claims in the GLM model. Is this same information also used for Accident Free Factors in Exhibit 46. If not from the model for Exhibit 46, please provide source of the factors selected.

12. How is Presence of Animal variable used in the modeling? What perils? We see a check in the Other Frequency offset; please explain how these OFFSETS work, versus the other non-offset columns for a peril.

13. Tier Sections i, II and III

It seems that some elements in your Tier may be in your GLM and others may not be. We do not have proper actuarial support for your final factors nor the necessary support for the Tier assignment has not been provided for the Rate pages. Please note in CT, only the credit score information can be held confidential under our statutes, the other elements in the derivation of the Tier need to be in public display. Most carriers will include a separate Tier manual with rule/rate factors or the Tier rate pages can be an appendix to your manuals. Specifically, we need the following:

- I. To be displayed in the Rate Manual and be put in the Rate/Rule tab section in SERFF:
 - a. A narrative explaining how the elements are combined together (it looks like from Rule C-9 that your factors are multiplied together) to get an aggregate score. Then the narrative needs to say that looking up the aggregate score in a Table will get the Tier assignments of 1-500.
 - b. Tier Assignment : The Table with the Aggregate Score and Tier Assignments needs to go in the Rate Manual.
 - c. Tier Components; The rating tables for each of the elements from Rule C-9 as defined in your manual would go in the rate manual.
 - d. If you would like the PNI table for Insurance Score can be put in a Confidential Section in the Rate Rule Section.
 - e. Tier Factors: The final Tier Factors as shown in Exhibit 3.

We do note that in prior American Commerce Rate filings we do see Tier Components; Tier Assignment and Tier Factors listed in the table of contents for the Rate manual as 7a, 7b and 7c. So, it does seem that the company is aware of what is required in CT.

II. Actuarial Support is needed for each of these elements with a narrative. It is not just the final factors for these components even. We need an explanation of how you did this analysis - is it a combination of GLM output and part residual analysis?? For components that are from a residual analysis what is the source of the data, how many years of experience; provide us with the analysis in the categories you are selecting for each component with loss ratios and indicated factors, and then your final selected factors for each component. Then your analysis to get your split points for the aggregate score and Tier assignment. Then finally your mapping of Tiers 1-500 (does that go back into the glm for example?) to generate those Tier factors.

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TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

III.Tier examples - Please provide us with 5 policy examples with various policy details for each of the tier components, and show the derivation of the component factors, through the aggregate factor to the tier assignment to the Final Tier factors. Please provide in sufficient detail for our team to be able to verify the calculations.

If you would like to discuss this further, please reach out to me at susan.gozzo.andrews@ct.gov Susan Gozzo Andrews, FCAS, MAAA, RPLU+, PIR.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Supporting Document Schedule Item Changes	
Satisfied - Item:	Objection Response 02.13.25 Supports
Comments:	
Attachment(s):	CT Home Objection Response Public 2024_02_13.pdf CT MAPS Home 8-18-25 Expected Expense Exhibit.pdf Filing Road Map.pdf Red Line ROC.pdf

Conclusion:

Thank you for your consideration.

Sincerely,

Jeanie Moulton

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:	American Commerce Insurance Company		
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	04/28/2025
Submitted Date	04/28/2025

Dear Susan Gozzo Andrews,

Introduction:

American Commerce Insurance respectfully replies to the 02/13/25 objection.

Response 1

Comments:

Please see the CT Home Objection Response Public 2024_02_13 attachment with supports.

Related Objection 1

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:	American Commerce Insurance Company		
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

Comments: Preliminary Objections Public

1. Please provide qualifications for the actuaries involved in developing the model, and the peer review and sign-off from your Chief Actuary and/or Chief Data Analytics Officer regarding the data governance and modeling per Actuarial Standards of Practice - ASOP 23, ASOP 25, ASOP 38 and ASOP 56. In addition, please comment on the rating variables in the models with potential unintentional bias and unfair discriminatory consequences.

2. Confidentiality Your actuarial memo confidentiality request discussed Exhibits IV IX. We did not find Exhibits VIII or Exhibit IX. Were these intended to be filed? We do see your Note to Reviewer that the request should only include Exhibits IV VII. Please update your Actuarial memo to this effect as well.

3. Please explain which of your two programs this program will go into your legacy program; the \$33M book of business or the \$2M Premier Living book. Please provide SERFF tracking numbers for the most recent rule/rate manuals for the book that this will replace. Please comment on if you will continue to do separate filings for each program in the future; would that then be three.

4. Red-lines In your actuarial memo you discuss 10 rating variables that will be added to your program and the move into multi-perils rating. The Department does expect to see Red-line from your CURRENT program for Rates, Rules and Rate Order of Calculation. Please provide with more narrative as necessary to better explain.

Missing Specifically from Actuarial Checklist Section B, item 7: We consider this to be questions 5, 6, 7, 8 and 9

5. Filing Memo/Road map - We note your 10 pages of exhibits for in Filing support with no narrative is NOT sufficient for a Rate Page manual of 252 pages.

Please provide a road map in either chart/ word document to show for each table in the Rate Manual, where the source of the factors can be found. Literally, this would be for every rate table in your rate manual.

If a table/rates are from one of your previous programs, please provide the SERFF tracking number.

If from a competitor filing, please provide the SERFF tracking number for a CT filing. If your rates/factors are not exactly from one source, please provide an exhibit to show the selected factors, your competitors with SERFF tracking number and any calculations to arrive at your selected factors

If the factors are from the GLM, please provide exhibits showing the indicated, current (if applicable), proposed factor and % change from current (if applicable); this is requested in the Actuarial Checklist Section B, item 5a.

6. For your rate pages you stated that Final selections can be found in the rate pages. The only deviation is for the THEFT peril at the highest limits of the deductible / AOI curve to account for a reversal. Please see Exhibit II. And we do see this.

However, we see many items in the Rate Pages that are not listed as variables in the GLM Data Dictionary. We do need to see GLM model output for the items in the Rate Tables with current and selected.; and details on how they were created. See the below:

For Exhibit 3 Policy Type - is this from the GLM or other source?

For Exhibit 4 table by Form by Coverage A and Deductible table constructed as we see single variables in the Data Dictionary for Coverage and Deductible and in addition you have provided increased limit factor tables. And similarly, for Exhibit 5 by Form by Coverage C and Deductible. Same for Exhibit 6 and Exhibit 7 with Hurricane Deductible \$ and % ; and Coverage A respectively.

7. There are other tables we see in the Rate manual that does not seem to come from the GLM but perhaps from a prior program such as Exhibit 15 Dwelling Usage; please

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
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TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

explain the source of the factors. This may also pertain to Fire Alarm Exhibit 22; possibly Burglar Alarm Exhibit 23 although that may be in the GLM, Sprinkler System Exhibit 24, Lightning Protective Device Exhibit 25, Gated Community Exhibit 26, Affinity Discount Exhibit 27, and Association Discount Exhibit 28. Also Secondary Heating Sources Exhibit 36, Oil Tank Factor Exhibit 37, Windstorm Mitigation Truss Bracing Factor Exhibit 38, Windstorm Mitigation Gable Bracing Factor Exhibit 39, Windstorm Mitigation Hurricane Shutters Factor Exhibit 40, Mitigation Plywood Shutters Factor Exhibit 41, Windstorm Mitigation Hurricane Straps Factor Exhibit 42, Windstorm Mitigation Reinforced Exterior Doors Factor Exhibit 43, and Windstorm Mitigation Laminated Windows Factor Exhibit 44.

8. Similarly, we need support for optional coverages and endorsements coverages including: Computer Coverage Exhibit 49, Replacement Cost Loss Settlement for Certain Non-Building Structures on Resident Premises Exhibit 50, Building Additions and Alterations Increased Limit Exhibit 51, Livestock Collision Exhibit 52, Identity Fraud Expenses Exhibit 53, Scheduled Personal Property Exhibit 54, Coverage C Increased Limits of Liability Exhibit 55, Personal Property Replacement Cost Loss Settlement Exhibit 56, Refrigerated Property Exhibit 57, Special Property Exhibit 58, Extended Theft Coverage for Residence Premises Occasionally Rented to Others Exhibit 59, Unit-Owners Coverage C Special Coverage Exhibit 60, Unit-Owners Rental to Others Exhibit 61, Theft of Building Material Exhibit 62, Valuable Possessions Coverage Endorsement Exhibit 63, Increased Limits on Business Property Exhibit 64, Specified Additional Amount of Insurance for Coverage A Exhibit 65, Loss Assessment Coverage Exhibit 66, Credit Card, EFT Card, Forgery/Counterfeit Money Increased Limit; Ordinance or Law Increased Amount of Coverage Exhibit 68, Personal Injury Exhibit 69, Structure Rented to Others Residence Premises Exhibit 70, Permitted Incidental Occupancies Residence Premises Exhibit 71, Additional Residence Rented to Others Exhibit 72, Business Pursuits Exhibit 73, Incidental Farming Personal Liability On Premises Exhibit 74, Watercraft Exhibit 75, Additional Insured Student Living Away from Resident Premises Exhibit 76, Special Loss Settlement Exhibit 77, Other Insured Location Occupied by Insured Exhibit 78, Secondary Residence Liability Credit, Limited Water Back-up and Sump Discharge or Overflow Coverage Exhibit 80, Earthquake Coverage Exhibit 81, Earthquake Loss Assessment Exhibit 82, Service Line Coverage Exhibit 83, Home Systems Protection Exhibit 84, Guaranteed Replacement Cost Exhibit 85, MAPFRE Advantage Plus Exhibit 86, MAPFRE Elite Plus Exhibit 87, Endorsement Combination Discount Exhibit 88, Umbrella Base Rate Exhibit 89 and Umbrella Increased Limit Factor Exhibit 90, and Umbrella Flat Rates Exhibit 91. For these items we would be thinking a red-line of an existing program with these items or competitors support exhibit for each of them; showing competitors and company selected with SERFF Tracking numbers with an explanation for these items.

9. Other items we expected comment on for this new program with more detail than the sentences in the actuarial memo;

- a. Base Rates how developed from current CT program, adjustments to get to proper starting level
- b. Expected Expense Exhibit
- c. Minimum Premium Support Exhibit 48
- d. Expense Fee calculation/Support if applicable
- e. Rate Algorithm Rate Order of Calculation please provide a Red line from your existing program.

10. Increase Limit Factor Analysis -

- a. Please provide an actuarial narrative describing your data and methodology.
- b. Please prepare an exhibit to show your calculations to demonstrate the selected factors follow the consistency test the marginal premium per \$1000 of coverage should decrease as the limit of coverage increases as presented in in Miccoliss actuarial paper attached. This would be for each of your Exhibit 1 exhibits for Coverage B, C, D, E and F.

11. Please explain what the Pure Premium Exhibit III is and what it is trying to tell us.

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TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

12. Rule C-5 Tier We are looking for the definitions of each item in the Table to be defined in the Rules. Please tell us where the rules for each item would be; For example, we see some have similar names perhaps; like for Financial Merit; but where is PNI Financial Merit Score defined? Is pre-program loss claim counts the same as the Loss History Rule C-32? Where is Smoker/Non-Smoker defined and how would this information be obtained? Where is Prior Homeowner Carrier defined and how would be information be obtained?

If you would like to discuss this further, please reach out to me at susan.gozzo.andrews@ct.gov Susan Gozzo Andrews, FCAS, MAAA, RPLU+, PIR.

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	CT MAPS Homeowner Rates Pages eff 08/18/25	Complete Set	New		04/28/2025 By: Jeanie Moulton
Previous Version					
1	CT MAPS Homeowner Rates Pages eff 08/18/25	Complete Set	New		01/16/2025 By: Jeanie Moulton
2	CT MAPS Homeowner Rule Manual eff 08/18/25	Complete Set	New		04/28/2025 By: Jeanie Moulton
Previous Version					
2	CT MAPS Homeowner Rule Manual eff 08/18/25	Complete Set	New		01/16/2025 By: Jeanie Moulton
3	CT MAPS Homeowner Tier Rate Pages eff 08/18/25	Complete Set	New		04/28/2025 By: Jeanie Moulton

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:	American Commerce Insurance Company		
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

Supporting Document Schedule Item Changes

Satisfied - Item:	Actuarial Memorandum
Comments:	
Attachment(s):	Actuarial Memorandum v2.pdf
Previous Version	
Satisfied - Item:	<i>Actuarial Memorandum</i>
Comments:	
Attachment(s):	<i>Actuarial Memorandum.pdf</i>

Supporting Document Schedule Item Changes

Satisfied - Item:	Actuarial Memorandum
Comments:	
Attachment(s):	Actuarial Memorandum v2.pdf
Previous Version	
Satisfied - Item:	<i>Actuarial Memorandum</i>
Comments:	
Attachment(s):	<i>Actuarial Memorandum.pdf</i>

Satisfied - Item:

Satisfied - Item:	HO Rate Profiles
Comments:	
Attachment(s):	CT ACIC MAPS HO Rate Profile 08_18_25 v2.pdf CT ACIC MAPS HO Rate Profile 08_18_25 v2.xlsx
Previous Version	
Satisfied - Item:	<i>HO Rate Profiles</i>
Comments:	
Attachment(s):	<i>CT ACIC MAPS HO Rate Profile 08_18_25.pdf</i> <i>CT ACIC MAPS HO Rate Profile 08_18_25.xlsx</i>

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:	American Commerce Insurance Company		
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

Supporting Document Schedule Item Changes

Satisfied - Item:	Actuarial Memorandum
Comments:	
Attachment(s):	Actuarial Memorandum v2.pdf
Previous Version	
Satisfied - Item:	<i>Actuarial Memorandum</i>
Comments:	
Attachment(s):	<i>Actuarial Memorandum.pdf</i>

Satisfied - Item:	HO Rate Profiles
Comments:	
Attachment(s):	CT ACIC MAPS HO Rate Profile 08_18_25 v2.pdf CT ACIC MAPS HO Rate Profile 08_18_25 v2.xlsx
Previous Version	
Satisfied - Item:	<i>HO Rate Profiles</i>
Comments:	
Attachment(s):	<i>CT ACIC MAPS HO Rate Profile 08_18_25.pdf</i> <i>CT ACIC MAPS HO Rate Profile 08_18_25.xlsx</i>

Satisfied - Item:	Supporting Exhibits
Comments:	
Attachment(s):	Exhibit I - Non-Modeled Factors.pdf Exhibit II - Price Modeled vs Selected-2025_04_25.pdf Exhibit III - Pure Premium vs Proposed Premium Relativity v2.pdf
Previous Version	
Satisfied - Item:	<i>Supporting Exhibits</i>
Comments:	
Attachment(s):	<i>Exhibit I - Non-Modeled Factors.pdf</i> <i>Exhibit II - Price Modeled vs Selected-2025_01_09.pdf</i> <i>Exhibit III - Pure Premium vs Proposed Premium Relativity.pdf</i>

Conclusion:

Thank you for your consideration.

Sincerely,
Jeanie Moulton

State: Connecticut **Filing Company:** American Commerce Insurance Company
TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations
Product Name: CT Homeowner MAPS Rate Rule Filing eff 08/18/2025
Project Name/Number: Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	02/12/2025
Submitted Date	02/12/2025

Dear Susan Gozzo Andrews,

Introduction:

The American Commerce Insurance Company respectfully responds to the objection dated 02/12/2025.

Response 1

Comments:

The requested Post Submission Update has been submitted.

Related Objection 1

Comments: Please send in a Post Submission update to this filing. While we understand that this is a new program/company for CT; we need to have the portion of the Rate /Rule tab filled in that asks for Company name, indicated change, % change , written premium etc. even though we know most of these fields will say 0% or 0\$. This is because of our internal reporting that we need this information. Thank you.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

Thank you for your consideration.

Sincerely,

Kathryn O'Leary

State: Connecticut **Filing Company:** American Commerce Insurance Company
TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations
Product Name: CT Homeowner MAPS Rate Rule Filing eff 08/18/2025
Project Name/Number: Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	02/03/2025
Submitted Date	02/03/2025

Dear Susan Gozzo Andrews,

Introduction:

The American Commerce Insurance Company respectfully responds to the objection dated 02/03/2025.

Response 1

Comments:

A Note to Reviewer has been submitted for the Confidentiality Request as requested.

Changed Items:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

No Supporting Documents changed.

Conclusion:

Thank you for your consideration.

Sincerely,

Kathryn O'Leary

State: Connecticut**Filing Company:** American Commerce Insurance Company**TOI/Sub-TOI:** 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations**Product Name:** CT Homeowner MAPS Rate Rule Filing eff 08/18/2025**Project Name/Number:** Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

Note To Filer

Created By:

Andy Kolodziejczyk on 04/08/2025 08:59 AM

Last Edited By:

Andy Kolodziejczyk

Submitted On:

04/08/2025 08:59 AM

Subject:

Please disregard 4/8 Confidentially Request

Comments:

Please disregard the latest request. Send in error.

Thanks,

Andy

State: Connecticut**Filing Company:**

American Commerce Insurance Company

TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations**Product Name:** CT Homeowner MAPS Rate Rule Filing eff 08/18/2025**Project Name/Number:** Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

Note To Filer

Created By:

Andy Kolodziejczyk on 04/08/2025 08:55 AM

Last Edited By:

Andy Kolodziejczyk

Submitted On:

04/08/2025 08:55 AM

Subject:

Confidentiality Request

Comments:

Good morning - The Department process for documents submitted as "Confidential" are as follows:

- The Division Director and the Department Actuary will determine if the confidentiality request is approved or not. The Department Actuary will review the documentation that the company has provided.
- When a decision is made, the Department Actuary will put a note to filer in the SERFF filing communicating the decision on the confidentiality request.

The documents submitted can remain confidential until a decision has been made.

A letter explaining how the Department handles confidentiality requests will be sent via an objection.

State: Connecticut **Filing Company:** American Commerce Insurance Company
TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations
Product Name: CT Homeowner MAPS Rate Rule Filing eff 08/18/2025
Project Name/Number: Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

Note To Reviewer

Created By:

Kathryn O'Leary on 03/21/2025 03:33 PM

Last Edited By:

Kathryn O'Leary

Submitted On:

03/21/2025 03:34 PM

Subject:

Request Extension on Objections Due

Comments:

Good Afternoon,

Based on the Department's comment regarding the approval status of the different CAPE roof condition models, we contacted CAPE for confirmation of which model scores had been provided to us. While it had been our understanding that we received scores from the approved RCRv3 model, CAPE confirmed we had instead received scores from RCRv4. As such, we are requesting an extension on the response date for these objections so that we can obtain RCRv3 scores and remodel perils where CAPE roof condition rating was used. We would like to request an extension on the response due dates from 3/21/25 to 4/28/25.

Thank you

State: Connecticut**Filing Company:**

American Commerce Insurance Company

TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations**Product Name:** CT Homeowner MAPS Rate Rule Filing eff 08/18/2025**Project Name/Number:** Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

Note To Reviewer

Created By:

Kathryn O'Leary on 03/06/2025 12:38 PM

Last Edited By:

Kathryn O'Leary

Submitted On:

03/06/2025 12:39 PM

Subject:

Request Extension on Objections Due

Comments:

Good Afternoon,

The American Commerce Insurance Company respectfully requests a two-week extension on the objections due from tomorrow 03/07/25 to 03/21/25.

Thank you

State: Connecticut **Filing Company:** American Commerce Insurance Company
TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations
Product Name: CT Homeowner MAPS Rate Rule Filing eff 08/18/2025
Project Name/Number: Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

Note To Filer

Created By:

Susan Gozzo Andrews on 02/11/2025 09:05 AM

Last Edited By:

Susan Gozzo Andrews

Submitted On:

02/13/2025 04:25 PM

Subject:

Confidentiality initial response to Company

Comments:

The Department has reviewed your request to keep this model confidential citing trade secrets. While we have no insurance statutes to cover these types of risk models, based on our attorney's interpretation of our FOIA statutes, we believe the models would be protected. Should we receive a FOIA request for the model, we will notify the company and it will be the company's responsibility to defend its position. If you are in agreement with this understanding, you may mark your modeling support as confidential in SERFF.

This would pertain to your initial request you asked for the following items to be confidential;

- Modeling Memo
- GLM Checklist
- Exhibits IV – IX

The Department notes that Exhibits VIII and IX were not included in the original actuarial memo in the filing submission. But we do see your note to Reviewer is saying Exhibits IV - VII.

If additional exhibits are created with regard to objection responses, we would ask that you request additional confidentiality and update your initial request in your actuarial memo accordingly.

State: Connecticut**Filing Company:**

American Commerce Insurance Company

TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations**Product Name:** CT Homeowner MAPS Rate Rule Filing eff 08/18/2025**Project Name/Number:** Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

Note To Reviewer

Created By:

Kathryn O'Leary on 02/03/2025 03:01 PM

Last Edited By:

Kathryn O'Leary

Submitted On:

02/03/2025 03:13 PM

Subject:

Confidentiality Request

Comments:

The American Commerce Insurance Company is requesting the following items to be treated as confidential with this filing:

- Modeling Memo
- GLM Checklist
- Exhibits IV – VII

These documents contain information pertaining to company specific modeling data and practices, pricing methodologies, and financial history measurement programs that derive independent economic value from not being generally known.

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TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations
Product Name: CT Homeowner MAPS Rate Rule Filing eff 08/18/2025
Project Name/Number: Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

Note To Filer

Created By:

Andy Kolodziejczyk on 02/03/2025 10:57 AM

Last Edited By:

Andy Kolodziejczyk

Submitted On:

02/03/2025 10:57 AM

Subject:

Documents submitted as Confidential

Comments:

Good morning - The Department process for documents submitted as "Confidential" are as follows:

- The Division Director and the Department Actuary will determine if the confidentiality request is approved or not. The Department Actuary will review the documentation that the company has provided.
- When a decision is made, the Department Actuary will put a note to filer in the SERFF filing communicating the decision on the confidentiality request.

The documents submitted can remain confidential until a decision has been made.

A letter explaining how the Department handles confidentiality requests will be sent via an objection.

State: Connecticut **Filing Company:** American Commerce Insurance Company
TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations
Product Name: CT Homeowner MAPS Rate Rule Filing eff 08/18/2025
Project Name/Number: Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

Post Submission Update Request Processed On 02/13/2025

Status: Allowed
 Created By: Kathryn O'Leary
 Processed By: Susan Gozzo Andrews
 Comments:

Rate Information:

Field Name	Requested Change	Prior Value
Rate Data Applies	Yes	No

Company Rate Information:

Company Name: American Commerce Insurance Company

Field Name	Requested Change	Prior Value
Overall % Indicated Change	0.000%	
Overall % Rate Impact	0.000%	
Written Premium Change for this Program	\$0	
Number of Policy Holders Affected for this Program	0	
Written Premium for this Program	\$0	
Maximum %Change (where required)	0.000%	
Minimum %Change (where required)	0.000%	

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:			American Commerce Insurance Company
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

Rate Information

Rate data applies to filing.

Filing Method:

Rate Change Type:

%

Overall Percentage of Last Rate Revision:

%

Effective Date of Last Rate Revision:

Filing Method of Last Filing:

SERFF Tracking Number of Last Filing:

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):
American Commerce Insurance Company	0.000%	0.000%	\$0	0	\$0	0.000%	0.000%

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:	American Commerce Insurance Company		
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1		CT MAPS Homeowner Rates Pages eff 08/18/25	Complete Set	New		CT Homeowners MAPS Rate Pages Eff 8.18.25 v3.pdf
2		CT MAPS Homeowner Rule Manual eff 08/18/25	Complete Set	New		CT MAPS Homeowner Rules Manual eff 08.18.25 v4.pdf CT Legacy Homeowner Rules eff 04.01.24 mu to MAPS Homeowner Rules eff 8.18.25 v3.pdf
3		CT MAPS Homeowner Tier Rate Pages eff 08/18/25	Complete Set	New		CT Homeowners MAPS Tier Rate Pages Eff 8.18.25.pdf

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:	American Commerce Insurance Company		
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

Supporting Document Schedules

Satisfied - Item:	Actuarial Memorandum
Comments:	
Attachment(s):	Actuarial Memorandum v2.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Checklist - Actuarial
Comments:	
Attachment(s):	Actuarial Checklist.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Checklist - HO Coastal
Comments:	
Attachment(s):	Checklist - HO Coastal - May 2022.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Checklist - HO Rates
Comments:	
Attachment(s):	Checklist - HO Rates.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Checklist - HO Rules
Comments:	
Attachment(s):	Checklist - HO Rules - May 2022.pdf
Item Status:	
Status Date:	
Bypassed - Item:	Checklist - HO Underwriting Guidelines
Bypass Reason:	N/A to this filing
Attachment(s):	
Item Status:	
Status Date:	

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
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State:	Connecticut	Filing Company:	American Commerce Insurance Company
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations		
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025		
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /		

Satisfied - Item:	Filing Memorandum
Comments:	
Attachment(s):	CT MAPS Home Rate.Rule Filing eff 8.18.25 Cover Letter.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Force Placed Guidelines
Comments:	Yes
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	HO Rate Profiles
Comments:	
Attachment(s):	CT ACIC MAPS HO Rate Profile 08_18_25 v2.pdf CT ACIC MAPS HO Rate Profile 08_18_25 v2.xlsx
Item Status:	
Status Date:	

Satisfied - Item:	instructions for completing HO rate matrix
Comments:	Acknowledged
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Side-by-Side Comparison
Bypass Reason:	N/A for this filing
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Supporting Exhibits
Comments:	
Attachment(s):	Exhibit I - Non-Modeled Factors.pdf Exhibit II - Price Modeled vs Selected-2025_04_25.pdf Exhibit III - Pure Premium vs Proposed Premium Relativity v2.pdf
Item Status:	

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
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State: Connecticut
TOI/Sub-TOI: 04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations
Product Name: CT Homeowner MAPS Rate Rule Filing eff 08/18/2025
Project Name/Number: Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /

Status Date:	
Satisfied - Item:	Objection Response 02.13.25 Supports
Comments:	
Attachment(s):	CT Home Objection Response Public 2024_02_13.pdf CT MAPS Home 8-18-25 Expected Expense Exhibit.pdf Filing Road Map.pdf Red Line ROC.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Objection Response 04.23.25 Support
Comments:	
Attachment(s):	Trampoline Support.pdf CT Homeowner Objection Response 04.23.25.pdf
Item Status:	
Status Date:	

SERFF Tracking #:	AMEC-134363726	State Tracking #:	202500234	Company Tracking #:	CT HOMEOWNER MAPS RATE RULE FILING EFF 0...
State:	Connecticut	Filing Company:	American Commerce Insurance Company		
TOI/Sub-TOI:	04.0 Homeowners/04.0000 Homeowners Sub-TOI Combinations				
Product Name:	CT Homeowner MAPS Rate Rule Filing eff 08/18/2025				
Project Name/Number:	Christine Gaines, Jerad Cooper, Rick Avonti, Thatcher Iliff /				

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)
05/02/2025		Rate	CT MAPS Homeowner Rule Manual eff 08/18/25	05/07/2025	CT MAPS Homeowner Rules Manual eff 08.18.25 v3.pdf (Superceded) CT Legacy Homeowner Rules eff 04.01.24 mu to MAPS Homeowner Rules eff 8.18.25 V2.pdf (Superceded)
04/28/2025		Rate	CT MAPS Homeowner Rates Pages eff 08/18/25	05/02/2025	CT Homeowners MAPS Rate Pages Eff 8.18.25 v2.pdf (Superceded)
04/28/2025		Rate	CT MAPS Homeowner Rule Manual eff 08/18/25	05/02/2025	CT Legacy Homeowner Rules eff 04.01.24 mu to MAPS Homeowner Rules eff 8.18.25.pdf (Superceded) CT MAPS Homeowner Rules Manual eff 08.18.25 v2.pdf (Superceded)
01/15/2025		Rate	CT MAPS Homeowner Rates Pages eff 08/18/25	04/28/2025	CT Homeowners MAPS Rate Pages Eff 8.18.25.pdf (Superceded)
01/15/2025		Rate	CT MAPS Homeowner Rule Manual eff 08/18/25	04/28/2025	CT MAPS Homeowner Rules Manual eff 08.18.24.pdf (Superceded)
01/15/2025		Supporting Document	Supporting Exhibits	04/28/2025	Exhibit I - Non-Modeled Factors.pdf (Superceded) Exhibit II - Price Modeled vs Selected-2025_01_09.pdf (Superceded) Exhibit III - Pure Premium vs Proposed Premium Relativity.pdf (Superceded)
12/27/2024		Supporting Document	HO Rate Profiles	04/28/2025	CT ACIC MAPS HO Rate Profile 08_18_25.pdf (Superceded) CT ACIC MAPS HO Rate Profile 08_18_25.xlsx (Superceded)
12/27/2024		Supporting Document	Actuarial Memorandum	04/28/2025	Actuarial Memorandum.pdf (Superceded)