



September 22, 2022

VIA EMAIL

The Honorable Ricardo Lara
Insurance Commissioner
State of California
300 Capitol Mall, Suite 1700
Sacramento, CA 95814

Re: *Private Passenger Auto Rate Application of Allstate Northbrook Indemnity Co.*
(CDI File No. 22-1730)

Dear Commissioner Lara:

We write to urge you to reject Allstate's above-referenced private passenger auto rate application¹ seeking an overall \$165 million (6.9%) rate hike impacting over 900,000 policyholders. This application includes a discriminatory two-tiered rating system charging higher base rates to lower income workers than professionals with a four-year college degree, such as engineers, who pay 4% lower rates. (See Exh. A, attached.) This system is illegal under Proposition 103 and the Commissioner's regulations, which do not permit the use of occupation and education as rating factors.

Moreover, the Commissioner should notice a public hearing to determine the amount of additional premium overcharges that Allstate has yet to return to California policyholders based on their reduced driving during the period the state's COVID-19 stay-at-home orders were in effect from at least March 2020 to June 2021. Consumer Watchdog's analysis shows that Allstate has so far provided premium credits totaling less than half of the amount that the company overcharged customers during that time period, leaving hundreds of millions of dollars still owed. The Commissioner's October 5, 2021 letter to Allstate confirmed that "the PPA policyholders of Allstate Northbrook Indemnity Company [] should have received substantial additional PPA premium refunds or credits." But to date, you have taken no further action publicly to ensure that Allstate's policyholders receive the refunds they deserve.

Low-income and minority drivers are especially harmed by Allstate's unfairly discriminatory occupation-based rating system,² which only adds to the financial burdens they already face. The voters passed Proposition 103 to stop this kind of unfair rate discrimination based on income or race, and neither occupation nor education have ever been adopted as a lawful rating factor. The Department's September 2019 report confirmed the discriminatory

¹ Publicly noticed on July 22, 2022.

² California Department of Insurance, Investigatory Hearing on the Use of Group Rating in Private Passenger Automobile Insurance (Sept. 17, 2019), http://www.insurance.ca.gov/0400-news/0200-studies-reports/upload/CDI-Affinity-Group-Hearing-Powerpoint9_17_19_Public.pdf.

impact of occupation-based discounts, revealing that only 29% of drivers in predominately minority ZIP codes receive occupation and education-based discounts as compared with 47% of drivers living in ZIP codes with a predominately white population.³ In addition, 75% of drivers in Underserved Communities, as defined by California Code of Regulations, title 10, section 2646.6(c), do not receive these discounts.⁴ And yet, *three years later*, you have yet to adopt a regulation to prohibit these discriminatory rating practices and continue to allow companies to use occupation as a rating factor in violation of Proposition 103.

In a December 2019 decision denying Consumer Watchdog's petition for hearing on a Farmers' auto rate application wherein we challenged that company's discriminatory occupation-based rating system, you vowed to address this issue on an industry-wide basis in a rulemaking proceeding:

Recently, the Commissioner conducted an investigatory hearing regarding the use and impact of such group plans. During the investigatory hearing the Commissioner received evidence that the use of group plans based on education and occupation factors may have an unfairly discriminatory rating impact for certain California consumers, which is prohibited by Insurance Code section 1861.05, subdivision (a). So on December 23, 2019, the Commissioner published an Invitation to Prenotice Public Discussion to explore a possible rulemaking to address any possible unfairly discriminatory rating impact that may result from the use of group plans.

As explained above, the Commissioner has chosen to address on an industry-wide basis concerns about potentially unfairly discriminatory rates due to use of group plans. Proceeding by rulemaking "offers the agency an opportunity to research and develop all relevant arguments from the affected stakeholders and address a problem in a comprehensive way that treats regulated entities in a like manner." (*Association of California Ins. Companies v. Jones* (2017) 2 Cal.5th 376, 393-394.) The process commenced with the above-mentioned prenotice public discussion will likely lead to an industry-wide regulatory solution to Petitioner's allegations regarding Applicants' use of group rating plans. The Commissioner finds that during the pendency of the public discussions and possible rulemaking it would be inefficient for the Department to adjudicate individual insurers' existing group plans in individual rate applications, and that such piecemeal adjudication may create further inequities in the market. Therefore, the Commissioner declines to individually address Petitioner's challenge to Applicants' existing group plans here. Proceeding by rulemaking rather than case-by-case adjudication here is also consistent with the Commissioner's past practices. For example, former Commissioner Low chose to address concerns

³ *Id.* As only about 1/3 of companies the Department surveyed provided the requested data, we urge the Commissioner to subpoena the remaining companies to submit their data and disclose all data to the public.

⁴ *Id.*

regarding the use of persistency as an optional factor in personal auto rating by way of rulemaking rather than case-by-case adjudication. (See, e.g., *In the Matter of the Rates, Rating Plans, or Rating Systems of State Farm Mutual Automobile Insurance Company*, NC-01-01-7149; *In the Matter of the Rates, Rating Plans, or Rating Systems of Mercury Insurance Company*, NC-01-01-7150.)

(See pp. 4–5 of Exh. B, attached.)

Given that it has now been over 18 months⁵ since you have taken any action to move a regulation forward, we call upon you to stop approving discriminatory occupation-based rates in individual rate applications including the pending Allstate application, and those of at least three other companies that Consumer Watchdog has challenged with petitions for hearing: Mercury, GEICO, and Interinsurance Exchange of the Auto Club.

We urge you to:

- (1) reject Allstate’s pending auto rate hike application that includes higher base rates for drivers who do not fall into one of Allstate’s professional occupations with a college degree;
- (2) notice a hearing to determine the amount of additional refunds owed by Allstate based on reduced driving during the COVID-19 pandemic; and
- (3) swiftly adopt final regulations to end discriminatory occupation-based surcharges industrywide, as you promised to do.

Thank you for your attention to this matter.

Sincerely,



Pamela Pressley
Senior Staff Attorney



Daniel L. Sternberg
Staff Attorney

cc:

Bryant Henley (Bryant.Henley@insurance.ca.gov)
Alec Stone (Alec.Stone@insurance.ca.gov)

⁵ The CDI held a second workshop on a draft regulation in March 2021 but has yet to notice a regulation for a formal rulemaking hearing.

EXHIBIT A

RULE 43 – ALLSTATE® AUTO PROGRAMS

Separate base rates are used to determine the applicable premium where the policyholder or spouse is a member of the following program groups:

A. Specialized Professionals

1. General Requirements

- i. All vehicles insured under the policy and all Private Passenger Automobile policies held by the named insured are eligible for the group.
- ii. In the event that the qualifying insured is removed as a rated operator on the policy, the vehicles on the policy will no longer be eligible to receive the base rates for that specific group.
- iii. The group base rates will not apply prior to Allstate verifying program eligibility. Verification of Eligibility may require documentation support provided by the customer.
- vi. Policies which are not eligible for Group A will receive the base rates applicable for the Standard Program. These base rates are listed on Rate Page R-9B.

2. Group Definitions

A. Specialized Professionals Group Eligibility:

When the named insured or spouse is a member of one of the following occupational groups as defined in the Allstate Insurance Company, Allstate Indemnity Company, and Allstate Northbrook Indemnity Company Underwriting Guidelines, all vehicles insured under the policy held by the named insured qualify for the Specialized Professionals program group.

- i) The named insured/applicant or spouse is a degreed professional in the one of the following occupational groups: Education or Library Science, Science, Engineering, or Information Technology.
- ii) Proof of occupation may be required, such as a degree from a four-year accredited college/university, or a professional certification, designation, or license.

B. Standard Program Eligibility:

When the named insured or spouse is ineligible or does not qualify for the Program Group as described in 2.A., all vehicles insured under the policy held by the named insured qualify for the Standard program.

**ALLSTATE INSURANCE GROUP
PRIVATE PASSENGER AUTO
CALIFORNIA
EXHIBIT 14: RATE DISTRIBUTION**

Coverage	Group Insurance Plan	Latest Year Adjusted Earned Premium	Trended Current Level Earned Premium	3-Year Loss Ratio	3-Year Claim Count	Credibility	Coverage Level Indicated Rate Change	Indicated Change by Group Before Credibility Weighting	Credibility- Weighted Indicated Rate Change	Indicated Rate Change Adjusted for Off-Balance	Selected All Groups Combined Rate Change	Current Group Ins. Plan Relativity	Proposed Group Ins. Plan Relativity	Proposed Change in Group Relativity	Total Proposed Rate Change by Group
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
All Group Insurance Plan Coverages Combined*	Specialized Professionals	127,989,604	385,582,266	61.4%	39,181			-5.5%	-0.5%	-0.7%		0.960	0.960	0.0%	8.0%
	Standard	2,173,336,290	6,522,756,248	76.7%	737,454			17.6%	17.6%	17.3%		1.000	1.000	0.0%	7.8%
	COMBINED	2,301,325,894	6,908,338,513	75.9%	776,635		16.3%	16.3%	16.6%	16.3%	7.8%	0.998	0.998	0.0%	7.8%
								Off-balance:	0.9976				Off-balance:	1.0000	
Bodily Injury	Specialized Professionals	25,194,371	75,817,809	92.8%	1,638	73.9%		36.3%	42.7%	42.4%		0.960	0.960	0.0%	25.0%
	Standard	454,460,330	1,371,584,341	110.4%	38,405	100.0%		62.2%	62.2%	61.8%		1.000	1.000	0.0%	25.0%
	COMBINED	479,654,701	1,447,402,151	109.5%	40,043		60.8%	60.8%	61.2%	60.8%	25.0%	0.998	0.998	0.0%	25.0%
								Off-balance:	0.9979				Off-balance:	1.0000	
Property Damage	Specialized Professionals	25,733,376	77,619,823	40.1%	7,560	100.0%		-38.3%	-38.3%	-38.3%		0.960	0.960	0.0%	-34.0%
	Standard	458,294,241	1,380,808,228	45.9%	149,116	100.0%		-29.3%	-29.3%	-29.3%		1.000	1.000	0.0%	-34.0%
	COMBINED	484,027,617	1,458,428,052	45.6%	156,676		-29.8%	-29.8%	-29.8%	-29.8%	-34.0%	0.998	0.998	0.0%	-34.0%
								Off-balance:	1.0000				Off-balance:	1.0000	
Medical Payments	Specialized Professionals	1,477,176	4,552,756	39.2%	642	46.26%		-43.1%	-38.1%	-38.3%		0.960	0.960	0.0%	-37.0%
	Standard	29,901,349	93,396,860	46.0%	15,060	100.00%		-33.3%	-33.3%	-33.5%		1.000	1.000	0.0%	-37.0%
	COMBINED	31,378,525	97,949,616	45.7%	15,702		-33.8%	-33.8%	-33.5%	-33.8%	-37.0%	0.998	0.998	0.0%	-37.0%
								Off-balance:	0.9965				Off-balance:	1.0000	
Uninsured / Underinsured Motorists	Specialized Professionals	11,166,915	33,758,321	104.8%	634	46.0%		50.5%	93.6%	91.5%		0.960	0.960	0.0%	85.0%
	Standard	184,016,123	557,982,930	163.7%	16,669	100.0%		135.1%	135.1%	132.6%		1.000	1.000	0.0%	85.0%
	COMBINED	195,183,038	591,741,251	160.3%	17,303		130.2%	130.2%	132.7%	130.2%	85.0%	0.998	0.998	0.0%	85.0%
								Off-balance:	0.9894				Off-balance:	1.0000	
Collision	Specialized Professionals	53,642,515	161,374,796	42.1%	12,894	100.0%		-29.7%	-29.7%	-29.7%		0.960	0.960	0.0%	0.0%
	Standard	856,029,806	2,551,940,865	51.7%	251,681	100.0%		-13.7%	-13.7%	-13.7%		1.000	1.000	0.0%	0.0%
	COMBINED	909,672,321	2,713,315,662	51.1%	264,575		-14.6%	-14.6%	-14.6%	-14.6%	0.0%	0.998	0.998	0.0%	0.0%
								Off-balance:	1.0000				Off-balance:	1.0000	
Comprehensive	Specialized Professionals	10,775,252	32,458,760	93.1%	15,813	100.0%		42.2%	42.2%	42.2%		0.960	0.960	0.0%	35.0%
	Standard	190,634,441	567,043,023	104.0%	266,523	100.0%		58.8%	58.8%	58.8%		1.000	1.000	0.0%	35.0%
	COMBINED	201,409,693	599,501,782	103.4%	282,336		58.0%	58.0%	58.0%	58.0%	35.0%	0.998	0.998	0.0%	35.0%
								Off-balance:	1.0000						

*Only includes coverages that vary by Program

(1) Premium data used for weighting totals

(2) 2Q19 - 1Q22 trended on-level earned premium

(3) All loss ratios are developed and trended and include ALAE, BI and UM/UIM coverages use incurred development, while other coverages use paid development.

(4) The number of incurred claims (reported claims less claims closed without payment)

(5) Credibility is calculated according to CCR §2644.23

(7) Combined, (8) Combined, and (9) Combined are premium-weighted averages of the respective column.

(7) = [(3) / (3)Combined] / [1 + (6)Combined] - 1

(8) = (5) * (7) + [1 - (5)] * (6)Combined

(9) = [1 + (8)] * Off-balance - 1

Off-balance = [1 + (7)Combined] / [1 + (8)Combined]

(10)Combined and (14)Combined are always equal

(13) = [(12) / (11)] - 1

(14) = [1 + (10)Combined] * [1 + (13)] * Off-balance - 1

Off-balance = 1 / [1 + (13)Combined]

Note: Allstate Programs data must be obtained from a different source than that used for the data supporting the indicated rate level by coverage. As a result, there may be slight differences in premium and/or loss data at the coverage level. Also note that loss ratios include ALAE as DCCE figures are not available by program.

EXHIBIT B

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8 **BEFORE THE INSURANCE COMMISSIONER**
9 **OF THE STATE OF CALIFORNIA**
10

11 In the Matter of the Rate Applications of

12 Farmers Insurance Exchange, Mid-
13 Century Insurance Company, and
14 Truck Insurance Exchange,

15 Applicants.

File No. PA-2019-00004

16 **DECISION DENYING PETITIONER'S**
17 **PETITION FOR HEARING**

18 The Commissioner has considered Consumer Watchdog's ("Petitioner") Petition for
19 Hearing. The Commissioner granted the Petition to Intervene on May 6, 2019. As set forth more
20 fully below, one of Petitioner's allegations concerns the use of group plans under Insurance Code
21 section 1861.12. , On December 23, 2019 the Commissioner published an Invitation to Prenotice
22 Public Discussion to explore a possible rulemaking to address the use of group plans under
23 section 1861.12. The Commissioner finds that during the pendency of the public discussions and
24 possible rulemaking it would be inefficient for the Department to adjudicate individual insurers'
25 existing group plans in individual rate applications, and that such piecemeal adjudication may
26 create further inequities in the market. Therefore, the Commissioner declines to individually
27 address Petitioner's challenge to the Applicants' existing group plans here and, as forth below,
28 denies the Petition for Hearing ("Petition"). Proceeding by rulemaking rather than case-by-case
adjudication here is also consistent with the Commissioner's past practices.

I

FACTUAL SUMMARY

On February 11, 2019, Farmers Insurance Exchange, Mid-Century Insurance Company, and Truck Insurance Exchange (collectively, "Applicants") submitted the following rate applications ("Applications") to the Department of Insurance ("Department").

<u>RFB File No(s).</u>	<u>Line(s) of Insurance</u>
19-689	PPA Regular
19-689-A	PPA Regular
19-689-B	PPA Regular
19-716	PPA Business and Professional Group I
19-716-A	PPA Business and Professional Group I
19-716-B	PPA Business and Professional Group I
19-717	PPA Business and Professional Group II
19-717-A	PPA Business and Professional Group II
19-717-B	PPA Business and Professional Group II

The Applications are subject to California Insurance Code §1861.05.

On March 1, 2019, pursuant to §1861.05, the Department notified the public of the Applications.

On April 15, 2019, the Commissioner received Petitioner's timely Petition.

Applicants submitted an Answer to the Petition on April 25, 2019, generally denying the allegations in the Petition.

The statutory sixty-day "deemed approved" date for the Applications, set forth in §1861.05(c), was April 30, 2019. On April 18, 2019, the Department received correspondence from Applicants, waiving the "deemed approved" date in §1861.05(c).

This decision is based on the Applications, the Petition, and officially noticeable information set forth herein.

II
ANALYSIS

“While companies remain free to formulate their rates under any methodology, the Commissioner’s review of those rates must use a single, consistent methodology.” (Cal. Code Regs, tit. 10, §2643.1.) The consistent methodology that the Commissioner applies to rate applications is the formula set forth in Title 10, California Code of Regulations,¹ §§2642.1 *et seq.*

Petitioner's allegations, followed by the Department’s response to each allegation, are set forth below:

Petitioner’s Allegation: At the requested public hearing, Consumer Watchdog will present and elicit evidence to show that Applicants’ use of education and occupation to create three separate base rate tiers for its Regular program and Business and Professional Groups I and II violates sections 1861.05(a) and 1861.02(a), and 10 CCR § 2632.5(d). Insurance Code section 1861.02(a) provides that “[r]ates and premiums for an automobile insurance policy . . . shall be determined by application of the following [rating] factors in decreasing order of importance,” and that any optional rating factors must be adopted by the Commissioner by regulation and have a substantial relationship to risk of loss or else will constitute unfair discrimination. (Ins. Code § 1861.02(a)(4).) The authorized optional rating factors that have been adopted by the Commissioner are set forth in 10 CCR § 2632.5(d). Applicants offer lower base rates based on education and occupational status, which are not authorized rating factors. Use of these different base rates to charge rates and premiums based on education and occupational status results in excessive and/or unfairly discriminatory rates in violation of sections 1861.02(a)(4) and 1861.05(a), and the application of unauthorized rating factors in violation of section 1861.02(a)(1)–(3) and the auto rating factor regulations at 10 CCR §§ 2632.4 and 2632.5. Moreover, while Farmers claims to offer a “discount” to its Business and Professional Groups, its Business and Professional Groups II (including firefighters and nurses) actually has higher base rates for all coverages combined than its Regular program base rates.

¹ All regulatory references in this decision are to Title 10, California Code of Regulations. Regulations are referred to as “Regulation” or “Reg.”

1 **Department Response:** Insurance Code section 1861.12 authorizes group plans. It
2 provides, "Any insurer may issue any insurance coverage on a group plan, without restriction as
3 to the purpose of the group, occupation or type of group. Group insurance rates shall not be
4 considered to be unfairly discriminatory, if they are averaged broadly among persons insured
5 under the group plan." The Commissioner approved Applicants' existing group plans in prior
6 rate applications. Applicants propose in the Applications no new group plans and no substantive
7 changes to their existing group plans. Recently, the Commissioner conducted an investigatory
8 hearing regarding the use and impact of such group plans. During the investigatory hearing the
9 Commissioner received evidence that the use of group plans based on education and occupation
10 factors may have an unfairly discriminatory rating impact for certain California consumers, which
11 is prohibited by Insurance Code section 1861.05, subdivision (a). So on December 23, 2019, the
12 Commissioner published an Invitation to Prenotice Public Discussion to explore a possible
13 rulemaking to address any possible unfairly discriminatory rating impact that may result from the
14 use of group plans.

15 As explained above, the Commissioner has chosen to address on an industry-wide basis
16 concerns about potentially unfairly discriminatory rates due to use of group plans. Proceeding by
17 rulemaking "offers the agency an opportunity to research and develop all relevant arguments from
18 the affected stakeholders and address a problem in a comprehensive way that treats regulated
19 entities in a like manner." (*Association of California Ins. Companies v. Jones* (2017) 2 Cal.5th
20 376, 393-394.) The process commenced with the above-mentioned prenotice public discussion
21 will likely lead to an industry-wide regulatory solution to Petitioner's allegations regarding
22 Applicants' use of group rating plans. The Commissioner finds that during the pendency of the
23 public discussions and possible rulemaking it would be inefficient for the Department to
24 adjudicate individual insurers' existing group plans in individual rate applications, and that such
25 piecemeal adjudication may create further inequities in the market. Therefore, the Commissioner
26 declines to individually address Petitioner's challenge to Applicants' existing group plans here.
27 Proceeding by rulemaking rather than case-by-case adjudication here is also consistent with the
28 Commissioner's past practices. For example, former Commissioner Low chose to address

1 concerns regarding the use of persistency as an optional factor in personal auto rating by way of
2 rulemaking rather than case-by-case adjudication. (See, e.g., *In the Matter of the Rates, Rating*
3 *Plans, or Rating Systems of State Farm Mutual Automobile Insurance Company*, NC-01-01-7149;
4 *In the Matter of the Rates, Rating Plans, or Rating Systems of Mercury Insurance Company*, NC-
5 01-01-7150.)

6 With respect to Petitioner's allegation that Applicant's Business and Professional Groups
7 II (including firefighters and nurses) actually have higher base rates for all coverages combined
8 than its Regular program base rates, the Department has calculated the base rates and concludes
9 that Petitioner's allegation is incorrect.

11 III

12 CONCLUSION

13 The Department has considered all of the factors and issues which Petitioner raised and
14 has thoroughly reviewed the Applications. The Department concluded that the Applicants'
15 proposed rate changes of 6.9% overall in their Private Passenger Auto rates for their Regular
16 Program, Business and Professional Group I, and Business and Professional Group II, are
17 approvable under the currently applicable laws, are generally consistent with other approved
18 automobile group plans currently in effect in this State and will result in rates which are not
19 excessive, inadequate, or unfairly discriminatory, as required by section 1861.05. However, as
20 set forth above, the Commissioner has commenced a process that may lead to regulatory changes
21 regarding the use of group plans under Insurance Code section 1861.12 when harmonized with
22 other relevant provisions of Proposition 103. If and when the Commissioner makes such
23 regulatory changes, the Applicants along with other California insurers will be expected to
24 promptly determine whether their group rating plans conform with the new regulations. All
25 insurers impacted by such regulatory changes shall not delay the submission and proper
26 implementation of a new prior approval application or applications as necessary.

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IV
ORDER

The Commissioner finds that the Department's methodology for review has appropriately considered each of the variables Petitioner raised. Therefore, the Commissioner DENIES the Petition for Hearing.

IT IS SO ORDERED this 23rd day of December, 2019.

RICARDO LARA
Insurance Commissioner

By 
Kenneth Allen
Deputy Commissioner

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PROOF OF SERVICE
In the Matter of the Rate Applications of:
Farmers Insurance Exchange, Mid-Century Insurance Company and
Truck Insurance Exchange, Applicants.
CDI File No. PA-2019-00004

I am over the age of eighteen years and am not a party to the within action. I am an employee of the Department of Insurance, State of California, employed at 45 Fremont Street, 19th Floor, San Francisco, California 94105. On December 23, 2019, I served the following document(s):

DECISION DENYING PETITIONER'S PETITION FOR HEARING
- Rate Filing Application(s) Nos. 19-689, 19-689-A, 19-689-B, 19-716
19-716-A, 19-716-B, 19-717, 19-717-A and 19-717-B.

on all persons named on the attached Service List, by the method of service indicated, as follows:

If **U.S. MAIL** is indicated, by placing on this date, true copies in sealed envelopes, addressed to each person indicated, in this office's facility for collection of outgoing items to be sent by mail, pursuant to Code of Civil Procedure Section 1013. I am familiar with this office's practice of collecting and processing documents placed for mailing by U.S. Mail. Under that practice, outgoing items are deposited, in the ordinary course of business, with the U.S. Postal Service on that same day, with postage fully prepaid, in the city and county of San Francisco, California.

If **OVERNIGHT SERVICE** is indicated, by placing on this date, true copies in sealed envelopes, addressed to each person indicated, in this office's facility for collection of outgoing items for overnight delivery, pursuant to Code of Civil Procedure Section 1013. I am familiar with this office's practice of collecting and processing documents placed for overnight delivery. Under that practice, outgoing items are deposited, in the ordinary course of business, with an authorized courier or a facility regularly maintained by one of the following overnight services in the city and county of San Francisco, California: Express Mail, UPS, Federal Express, or Golden State overnight service, with an active account number shown for payment.


If **FAX SERVICE** is indicated, by facsimile transmission this date to fax number stated for the person(s) so marked.

If **PERSONAL SERVICE** is indicated, by hand delivery this date.

If **INTRA-AGENCY MAIL** is indicated, by placing this date in a place designated for collection for delivery by Department of Insurance intra-agency mail.

If **EMAIL** is indicated, by electronic mail transmission this date to the email address(es) listed.

Executed this date at San Francisco, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


Cecilia Padua

SERVICE LIST
In the Matter of the Rate Applications of:
Farmers Insurance Exchange, Mid-Century Insurance Company and
Truck Insurance Exchange, Applicants.
CDI File No. PA-2019-00004

<u>Name/Address</u>	<u>Phone/Fax Numbers</u>	<u>Method of Service</u>
----------------------------	---------------------------------	---------------------------------

Harvey Rosenfield, Esq.	Tel: (310) 392-0522	Via EMAIL
Pamela Pressley, Esq.	Fax: (310) 392-8874	

Benjamin Powell, Esq.

CONSUMER WATCHDOG

6330 San Vicente Blvd., Suite 250

Los Angeles, CA 90048

harvey@consumerwatchdog.org

pam@consumerwatchdog.org

ben@consumerwatchdog.org

Richard G. De La Mora, Esq.

Tel: (818) 965-0529

Via EMAIL

FARMERS INSURANCE GROUP

Fax: (818) 965-0340

6301 Owensmouth Ave., 3rd Floor

Woodland Hills, CA 91367

Richard.delamora@farmersinsurance.com

NON PARTY

Edward Wu, Esq.

Tel: (213) 346-6635

Via EMAIL

Staff Counsel IV & Public Advisor

Fax: (213) 897-9241

Office of the Public Advisor

CALIFORNIA DEP'T. OF INSURANCE

300 South Spring Street, 12th Floor

Los Angeles, CA 90013

Edward.wu@insurance.ca.gov