



TEXAS WINDSTORM  
INSURANCE ASSOCIATION

# Public Comments

## February 25, 2025

### TWIA Board Meeting

**February 25, 2025**

*Written comments submitted to TWIA are subject to the Texas Public Information Act. TWIA will post public comments received, with personally identifiable information redacted, to its website*

## Public Comment

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**From:** Todd Hunter <Todd@toddhunterlaw.com>  
**Sent:** Friday, February 14, 2025 9:28 PM  
**To:** PublicComment

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# SENATOR MAYES MIDDLETON

DISTRICT 11

February 24, 2025

Board of Directors  
Texas Windstorm Insurance Association  
4801 Southwest Parkway  
Building 1, Suite 200  
Austin, TX 78735

Board of Directors,

I write to encourage you to adopt the lowest modeled probable maximum loss (PML). Last storm season, the Board adopted an increase in the PML of nearly \$2 billion. As a result, the Texas Windstorm Insurance Association (TWIA) significantly increased its spending on reinsurance rather than building up the Catastrophe Reserve Trust Fund (CRTF). After Hurricane Beryl, the CRTF has been nearly entirely depleted.

Should you, the Board of Directors, increase the PML at this time, you will leave TWIA unable to build the CRTF, all but ensuring that the Association has to issue public securities and possibly assessments. It would be prudent of the Board of Directors to select the PML as modeled by Impact Forecasting v18 (IF v18). This model would represent a significant decrease in the PML, resulting in a reduced reliance on reinsurance, saving TWIA millions of dollars. This would allow the Association to build the CRTF as the first line of defense in the event of a storm.

As a reminder, the PML is a floor, not a ceiling. The Board choosing to set a floor that is so high it appears to be a ceiling is irresponsible. The legislature has provided tools for the Board to use in determining the probable maximum loss and has allowed the Board to purchase any amount of reinsurance at any point in time. I urge the Board to adopt the lowest PML, IF v18, and consider purchasing reinsurance in excess of the PML at a later date.

Sincerely,

A handwritten signature in black ink that reads "Mayes Middleton". The signature is fluid and cursive, with the first and last names clearly legible.

Mayes Middleton  
Texas State Senator  
Senate District 11