



TEXAS WINDSTORM
INSURANCE ASSOCIATION

TWIA Actuarial & Underwriting Committee Meeting Public Comments

September 22, 2020

Public Comment

From: Todd Hunter <Todd.Hunter@house.texas.gov>
Sent: Friday, September 18, 2020 10:00 AM
To: chandra@aranfranklin.com; Debbie.king@amtrustgroup.com; John Polak;
PublicComment
Subject: TWIA Letter
Attachments: TWIA -- Rate Letter.pdf; ATT00001.htm

Please see attached letter.

Todd Hunter
State Representative - District 32

Public Comment

From: [REDACTED]
Sent: Friday, September 18, 2020 10:06 AM
To: PublicComment
Subject: TWIA -- Rate Letter.pdf
Attachments: TWIA -- Rate Letter.pdf

Sent from my iPhone



September 18, 2020

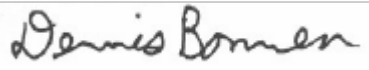
Dear Chairman Franklin-Womack, Chairman King and Mr. Polak,

As members of the Texas coastal legislative delegation, the undersigned legislators respectfully request that the Texas Windstorm Insurance Association (TWIA) Board do not consider any rate increase on coastal policyholders, residents, and businesses at this time.

A rate increase during an unprecedented season of economic distress caused by the global coronavirus pandemic would only cause an additional and cruel financial burden on coastal residents and business owners.

Once again, we respectfully reiterate that the coastal delegation firmly opposes any rate increase on TWIA policyholders.

Sincerely,



Dennis Bonnen
Texas House of Representatives
District 25



Todd Hunter
Texas House of Representatives
District 32



Dade Phelan
Texas House of Representatives
District 21



Abel Herrero
Texas House of Representatives
District 34



Judith Zaffirini
Texas Senate
District 21



James White
Texas House of Representatives
District 19



Terry Canales
Texas House of Representatives
District 40



Geanie Morrison
Texas House of Representatives
District 30



J.M. Lozano
Texas House of Representatives
District 43



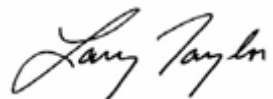
Juan "Chuy" Hinojosa
Texas Senate
District 20



Lois Kolkhorst
Texas Senate
District 18



Eddie Lucio, III
Texas House of Representatives
District 38



Larry Taylor
Texas Senate
District 11



Briscoe Cain
Texas House of Representatives
District 128



Mayes Middleton
Texas House of Representatives
District 23



Greg Bonnen
Texas House of Representatives
District 24



Ed Thompson
Texas House of Representatives
District 29



Eddie Lucio Jr.
Texas Senate
District 27



Alex Dominguez
Texas House of Representatives
District 37



Joan Huffman
Texas Senate
District 17



Dennis Paul
Texas House of Representatives
District 129

Public Comment

From: Tammy Embrey <TammyE@cctexas.com>
Sent: Wednesday, September 16, 2020 3:28 PM
To: PublicComment
Subject: Comments to Actuarial Committee from Mayor of Corpus Christi
Attachments: 091520 Mayor letter to Debbie King - Chair of Actuarial Underwriting Committee at TWIA.docx

Follow Up Flag: Follow up
Flag Status: Completed

Please find attached a letter to Chair Debbie King encouraging the actuarial committee to vote against raising TWIA rates for 2021.

Please let us know if we can provide any additional information.

Tammy

Tammy Kelch Embrey

Director, Intergovernmental Relations
City of Corpus Christi
1201 Leopard
P.O. Box 9277
Corpus Christi, TX 78469-9277
Office: 361.826.3622
Mobile: 361.695.9320
TammyE@cctexas.com



OFFICE OF THE MAYOR

Joe McComb
Joe.McComb@cctexas.com

Elizabeth Hardin
Chief of Staff
ElizabethH2@cctexas.com

1201 Leopard St., 78401
PO Box 9277
Corpus Christi
Texas 78469-9277
Phone (361) 826-3100
Fax (361) 826-3103
www.cctexas.com

September 15, 2020

Ms. Debbie King, Chair
Actuarial/Underwriting Committee
Texas Windstorm Insurance Association (TWIA)
PO Box 99090
Austin, TX 78709

Dear Chairwoman King,

As the Mayor of Corpus Christi and a concerned resident in the Coastal Bend, I am writing you today to express my concern with the Texas Windstorm Insurance Association (TWIA), which continues to operate in a manner that is detrimental to the economy of the Texas Coast.

The 86th Texas Legislature passed HB 1900 which created a Legislative Funding Oversight Committee to study TWIA's rate adequacy. It is premature for TWIA to be proposing rate increases for residential and commercial policies before TDI and the Legislature implements these important statutory changes. TWIA is jumping the gun to push for rate increases while facing additional legislative oversight into the rate-setting process.

TWIA continues to not follow the process set in law for setting windstorm insurance rates. By law, TWIA is required to consider new rates at the August board meeting. For the second year in a row, TWIA has been unable to finalize rates at that Board meeting. As TWIA began to set rates for 2021, they convened the actuarial committee to review the rate adequacy study before the study was complete. At the August board meeting, TWIA voted not to raise rates until the full rate adequacy study could be completed with a direction to revisit rates at that time. Rate uncertainty is unsettling at best for TWIA policy holders during this unprecedented COVID-19 pandemic.

The Coastal Bend is still recovering from Hurricane Harvey and more recent impacts from Hurricane Hanna. In addition, the region now faces an economic crisis driven by the COVID-19 pandemic along with the downturn of the oil and gas industry. Our small businesses have been greatly impacted by the recession and we have seen a loss of jobs in our communities. A TWIA rate increase on top of the economic recession would be devastating to our regional economy and the entire Texas Coast. The City of Corpus Christi was on record at the August board meeting opposing a TWIA rate increase and we will continue to advocate for our residents and our businesses to oppose any future rate increase for 2021. There are sufficient premiums, assessments and reinsurance to cover potential liabilities for 2021.

Please oppose all actions to increase windstorm insurance rates on the Texas Gulf Coast.

Sincerely,

Joe McComb

Joe McComb
Mayor

Public Comment

From: Pete Perkins <plperkins@cableone.net>
Sent: Friday, September 18, 2020 9:41 AM
To: PublicComment
Subject: Comments for TWIA Actuarial and Underwriting Committee Meeting 22 September 2020
Attachments: TWIA Ltr 091720.docx

Please see attached comment letter for the board.

Pete Perkins
Coastal Windstorm Task Force

September 17, 2020

The Board of Directors
Texas Windstorm Insurance Association
5700 South MoPac Expressway
Building A
Austin, TX 78749

Directors,

I write to urge you not to attempt to increase windstorm insurance rates at your September 22, 2020 TWIA Actuarial/Underwriting Committee Meeting of the TWIA Board of Directors Teleconference/Web Conference.

The Committee is meeting on September 17th, supposedly to review the Rate Adequacy Analysis recommendations. Previously, the Committee voted against a rate hike, however Item 5 on the agenda is asterisked and the asterisk states that the General Manager believes the TWIA Actuarial and Underwriting Committee is likely to take action. Anyone on the Committee can propose a rate hike and if history is any indicator, someone from the insurance industry representatives, will do that.

TWIA is not following the law, and using the full amount of assessments available from the insurance industry which, if used, would have allowed TWIA to take care of Hurricane Harvey victims. Instead we are three years out from Harvey and our citizens are still struggling to recover from it coupled with the effects of Hurricane Hanna this year and the Chinese COVID 19 pandemic that has kept people from working and earning a living wage. TWIA continues to propose a rate hikes which exacerbate our communities' overall economic situation rather than using available assessments to help reduce the burden on our citizens.

In the five year period prior to Harvey our community was beginning to prosper, with new industry and businesses moving into our area. New housing starts in our city had increased and people were moving into our community. However, the combined weight of a 71% increase in windstorm rates over an 11 year period coupled with ongoing natural disasters and man-made pandemics have greatly impacted the ability of our citizens to afford mortgages that require windstorm insurance, and earn wages that allow them to maintain a reasonable standard of living. Consequently, they are leaving the coast and businesses and industry that require workers are looking at other areas for new expansion.

In closing, we encourage you to look at other ways available under current legislation to achieve the goal of generating revenues to pay claims that will not put recovering communities at a disadvantage. And, to consider the option to spread the cost over all 254 counties in Texas that experience windstorm events: hail, fires, floods and thunderstorms, instead of just the 14 coastal counties that provide the lion's share to state commerce and the economic engine of Texas.

As I write this, we have another tropical storm/potential hurricane gathering strength in the western gulf and moving toward the lower Texas coast.

Respectfully,

Peter L. Perkins

Member

Coastal Windstorm Task Force

Public Comment

From: Triston Crossland <triston@unitedcccchamber.com>
Sent: Friday, September 18, 2020 9:52 AM
To: PublicComment
Subject: United Corpus Christi Chamber of Commerce - Public Comment
Attachments: TWIA Resolution.pdf; TWIA Independent Review Letter.pdf

Attached, you will find a resolution by the United Corpus Christi Chamber of Commerce opposing any rate hike recommendation as well as a letter from our CEO, John LaRue.

Best,

Triston Crossland
Program & Policy Specialist
United Corpus Christi Chamber of Commerce
(210) 677-4120 | triston@unitedcccchamber.com

Please allow this letter to serve as a formal declaration of opposition for any rate increase recommendation by the Texas Windstorm Association's Actuarial & Underwriting Committee during their September 22nd meeting. After reviewing the "independent" report conducted by Willis Towers Watson, there are a number of concerns that we have.

In Section 3 titled Reliances and Limitations, Page 5, the report states "Throughout this analysis, we have relied on quantitative and qualitative information supplied by TWIA. We have not independently audited or verified this information; however, we have reviewed it for reasonableness and internal consistency." We find it incredibly confusing that TWIA considers this an "independent" review when it is the only source of information for the entity conducting the review, and the entity itself did not independently audit or verify the information it received.

The text continues by saying "We have assumed that the information is complete and accurate, and that we have been provided with all information relevant to the development of the indicated rate changes. The accuracy of our results is dependent upon the accuracy and completeness of the underlying data; therefore, any material discrepancies discovered in this data should be reported to us and this report amended accordingly, if warranted."

How can we possibly accept the validity of this report when Willis Towers Watson openly acknowledges that they simply "assume" the information they were given by TWIA is complete and accurate and that they have been given all the relevant information? This was not an independent review. This was a review paid for by TWIA with data supplied by TWIA to support their own agenda.

We demand a truly independent review before any rate increase is considered.

Sincerely,

John P. LaRue
President & CEO
United Corpus Christi Chamber of Commerce



A RESOLUTION OPPOSING TEXAS WINDSTORM INSURANCE ASSOCIATION RATE INCREASE.

WHEREAS, THE COASTAL BEND HAS FACED SERIOUS ECONOMIC HARDSHIP DUE TO THE COVID-19 PANDEMIC; AND

WHEREAS, SMALL BUSINESSES HAVE BEEN GREATLY IMPACTED BY THE ECONOMIC SHUTDOWN JUST AS THEY WERE RECOVERING FROM HURRICANE HARVEY; AND

WHEREAS, HOMEOWNERS WHO HAVE LOST JOBS AND BUSINESS INCOME ARE STRUGGLING TO PAY THEIR MORTGAGES; AND

WHEREAS, HURRICANE HARVEY MADE LANDFALL AS A CATEGORY 4 HURRICANE ON THE TEXAS COAST ON FRIDAY, AUGUST 25, 2017, AND BATTERED AND DRENCHED TEXAS FOR DAYS BEFORE FINALLY MOVING OUT OF THE STATE. HARVEY WAS THE FIRST MAJOR HURRICANE TO MAKE LANDFALL ALONG THE MIDDLE TEXAS COAST SINCE HURRICANE CELIA IN 1970; AND

WHEREAS, GOVERNOR GREG ABBOTT FIRST ISSUED A DISASTER DECLARATION ON AUG. 23, 2017, FOR ARANSAS, AUSTIN, BEE, BRAZORIA, CALHOUN, CHAMBERS, COLORADO, DEWITT, FAYETTE, FORT BEND, GALVESTON, GOLIAD, GONZALES, HARRIS, JACKSON, JEFFERSON, JIM WELLS, KARNES, KLEBERG, LAVACA, LIBERTY, LIVE OAK, MATAGORDA, NUECES, REFUGIO, SAN PATRICIO, VICTORIA, WALLER, WHARTON, AND WILSON COUNTIES; AND

WHEREAS, ALMOST THREE YEARS AFTER THE STORM MANY OF THE HURRICANE HARVEY DISASTER DECLARED COMMUNITIES ARE STILL REBUILDING, AND NOT ALL TWIA CLAIMS HAVE BEEN RESOLVED, AND

WHEREAS, THE TEXAS WINDSTORM INSURANCE ASSOCIATION BOARD OF DIRECTORS VOTED 5-4 TO INCREASE RATES FOR 2019 BY 10 PERCENT AT THE JULY 31, 2018 QUARTERLY BOARD MEETING. THIS ACTION WAS FORESTALLED BY GOVERNOR GREG ABBOTT IN ORDER TO ALLOW THE TEXAS STATE LEGISLATURE TO ADDRESS TWIA'S ACTUARIAL DEFICIENCY, AND

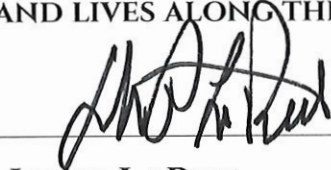
WHEREAS, THE 86TH TEXAS LEGISLATURE DID ACT BY PASSING HB 1900 WHICH CREATES A LEGISLATIVE FUNDING OVERSIGHT COMMITTEE TO STUDY TWIA'S RATE ADEQUACY, AND

WHEREAS, THE LEGISLATIVE OVERSIGHT COMMITTEE MUST BE APPOINTED AND GIVEN TIME TO ACT BEFORE TWIA ACTIVATES A NEW RATE INCREASE, AND

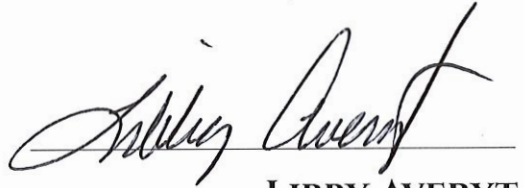
WHEREAS, THE TWIA BOARD OF DIRECTORS VOTED FOR NO RATE INCREASE AT THEIR JULY 2020 BOARD MEETING; AND

WHEREAS, THERE ARE SUFFICIENT PREMIUMS, ASSESSMENTS AND REINSURANCE TO COVER POTENTIAL TWIA LIABILITIES FOR 2020 AND 2021, AND

NOW THEREFORE BE IT RESOLVED, THE UNITED CORPUS CHRISTI CHAMBER OF COMMERCE ENCOURAGES THE TWIA BOARD OF DIRECTORS TO SHOW RESTRAINT AND ALLOW THE WILL OF THE LEGISLATURE TO BE FULLY IMPLEMENTED BEFORE TWIA VOTES FOR A RATE INCREASE THAT COULD SIGNIFICANTLY STIFLE REBUILDING AND REHABILITATING HOMES, BUSINESSES AND LIVES ALONG THE TEXAS COAST.



**JOHN LARUE
PRESIDENT & CEO**



**LIBBY AVERYT
CHAIRMAN OF THE BOARD**

9-2-20
DATE

Public Comment

From: Olivo, Nelda <NELDA@pocca.com>
Sent: Tuesday, September 15, 2020 2:56 PM
To: PublicComment
Cc: Zahn, Charles; Strawbridge, Sean
Subject: Resolution Opposing TWIA Rate Increase - Port of Corpus Christi Authority
Attachments: TWIA Resolution POCCA Dec 2019.pdf

Follow Up Flag: Follow up
Flag Status: Completed

To Whom It May Concern:

On behalf of the Port Commission of the Port of Corpus Christi Authority and Mr. Sean Strawbridge, CEO, please accept this resolution as written public comment regarding the TWIA Board of Directors meeting scheduled for September 22, 2020.

Port of Corpus Christi Authority continues to oppose any windstorm rate increases being considered that will negatively impact our residents and businesses. Thank you for your attention to this matter.

Nelda Olivo

Director of Government Affairs
Port of Corpus Christi
office 361-882-5633 direct 361-885-6113
cell 361-779-3952
nelda@pocca.com
www.portofcorpuschristi.com



PORTCORPUS CHRISTI

RESOLUTION OPPOSING TEXAS WINDSTORM INSURANCE ASSOCIATION RATE INCREASE

WHEREAS, the Port of Corpus Christi Authority of Nueces County, Texas (PCCA), and neighboring coastal cities were severely impacted by damages caused by Hurricane Harvey on August 25, 2017, and continue to be steadfast with efforts to rebuild more resilient communities; and

WHEREAS, Governor Greg Abbott first issued a disaster declaration on Aug. 23, 2017, for Aransas, Austin, Bee, Brazoria, Calhoun, Chambers, Colorado, DeWitt, Fayette, Fort Bend, Galveston, Goliad, Gonzales, Harris, Jackson, Jefferson, Jim Wells, Karnes, Kleberg, Lavaca, Liberty, Live Oak, Matagorda, Nueces, Refugio, San Patricio, Victoria, Waller, Wharton, and Wilson counties; and

WHEREAS, our Coastal Bend community is experiencing tremendous growth with over 50 billion dollars of announced industry investments; therefore, increased construction costs and higher premiums will make it difficult for new developments to commit to the area; and

WHEREAS, Texas Windstorm Insurance Association's (TWIA) rapidly rising rates are also creating a serious hindrance to economic development along the Texas Gulf Coast; and

WHEREAS, TWIA Board of Directors voted 5-4 to increase rates for 2019 by 10 percent at its July 31, 2018, quarterly Board meeting. This action was forestalled by Governor Greg Abbott in order to allow the Texas Legislature to address TWIA's actuarial deficiency; and

WHEREAS, the 86th Texas Legislature enacted House Bill 1900 which establishes a Legislative Oversight Board (Legislative Funding and Funding Structure Oversight Board) to prepare and deliver a sustainability report of TWIA to the Governor, Lieutenant Governor and Speaker of the House; and

WHEREAS, there are sufficient premiums, assessments, and reinsurance to cover potential TWIA liabilities for 2020;

NOW THEREFORE BE IT RESOLVED, that the Port Commission encourages the TWIA Board of Directors to show restraint and allow the will of the Texas Legislature to be fully implemented before TWIA votes for a rate increase that could significantly stifle rebuilding and rehabilitating homes, businesses, and lives along the Texas coast.

ADOPTED this the 10th day of December 2019, by the Port Commission of the Port of Corpus Christi Authority of Nueces County, Texas.



Charles W. Zahn, Jr.
Port Commission Chairman

Public Comment

From: Sally Bakko <SBakko@GalvestonTX.Gov>
Sent: Thursday, September 17, 2020 6:22 PM
To: PublicComment
Cc: Brian Maxwell; Daniel Buckley; Barbara Sanderson
Subject: City of Galveston Comment Letter to TWIA Actuarial/Underwriting Committee
Attachments: 9-18-2020_City of Galveston_TWIA Rate Increase Opposition Letter.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Please find attached a letter from Brian Maxwell, City Manager for the City of Galveston, to the Texas Windstorm Insurance Association (TWIA) Actuarial & Underwriting Committee conveying concerns and opposition to a premium rate increase recommendation to the TWIA Board.

If you have any questions or need additional information, please do not hesitate to contact me.

Best regards,
Sally Bakko



Sally Bakko, Director of Policy and Governmental Relations
Community Outreach Department

P.O. Box 779 Galveston, TX 77553 | 823 Rosenberg, Ste. 306 Galveston, TX 77550
D: 409.797.3582 | C: 409.502.4758 | F: 409.877.1553 | sbakko@galvestontx.gov

Get social! Follow @cityofgalveston On Facebook, Twitter, & Instagram

ATTENTION: The material in this e-mail is intended only for the use of the named recipient(s) only and may contain information that is confidential, privileged, and exempt from disclosure under applicable law. If you are not an intended recipient, or an agent responsible for delivering it to an intended recipient, you have received this email in error. If you are not the intended recipient, you are hereby notified that any review, use, dissemination, forwarding, printing, copying, disclosure or distribution of this communication is strictly prohibited and may be unlawful. If you believe this message has been sent to you in error, please notify the sender by replying to this transmission and immediately delete and/or destroy this email and its attachments and all copies thereof.



City of Galveston

OFFICE OF THE CITY MANAGER

PO Box 779 | Galveston, TX 77553-0779

citymanager@galvestontx.gov | 409-797-3520

September 18, 2020

Debbie King, Committee Chair
Actuarial/Underwriting Committee
Texas Windstorm Insurance Association Board
P.O. Box 99090
Austin, TX 78709-9090

RE: Opposition to Possible Rate Increase Recommendation by the TWIA Actuarial Committee

Dear Chairwoman King,

I am writing to express continued opposition to the Texas Windstorm Insurance Association (TWIA) Actuarial & Underwriting Committee approving a premium rate increase recommendation at the committee meeting on Tuesday, September 22, 2020.

During the December 2019 meeting, the TWIA Board directed the Committee to retain an actuarial consulting firm to conduct an independent study of TWIA's rate adequacy and the use of hurricane modeling in estimating potential losses in its rate-setting process. Willis Towers Watson (WTW) prepared a Residential and Commercial Rate Level Analysis Report that indicates TWIA current rates are inadequate by 32 percent for residential coverage and 41 percent for commercial coverage.

As the Committee reviews the WTW Report, please consider the adverse impacts of significant premium increases on coastal communities. Once again, I urge TWIA Actuarial & Underwriting Committee members to reject policyholder premium rate increases before crucial legislative reforms are implemented and the associated results can be fully assessed. Committee members should continue to endorse the 0 percent rate increase adopted by the TWIA Board during its meeting on August 4, 2020.

The City of Galveston strongly supports the critical TWIA legislation enacted by the 86th Legislature. H.B. 1900, authored by State Representative Greg Bonnen MD and sponsored by State Senator Larry Taylor, providing essential reforms to reduce the need for a premium rate increase. This legislation includes key procedures to strengthen transparency and facilitate cost-efficient replenishment of the Catastrophe Reserve Trust Fund. One such pivotal reform requires insurance companies to pay 100 percent of the reinsurance cost that is above the minimum statutory 100-year storm requirement.

Prior to the 2021 Legislative Session, HB 1900 directed two interim committees to: 1) review and provide recommendations on TWIA's funding and funding structure; and 2) evaluate merging TWIA and the Texas FAIR Plan Association, alternative property insurance for



underserved areas in Texas. However, the work of these two critical interim committees remains unfinished due to interruptions caused by the COVID-19 pandemic.

With a thorough assessment of TWIA's funding structure, further reforms will likely be identified to empower TWIA with alternative approaches that can avoid placing the heaviest burden on struggling consumers. Funding reforms previously enacted with more likely to come, will further empower TWIA with alternative approaches that can avoid placing the heaviest burden on struggling consumers. Accordingly, any premium increase would be premature at this time.

The ability of coastal residents and business owners to insure their property is a critical component to maintaining economic stability and quality of life not only for coastal areas, but the entire state of Texas. Maintaining affordable TWIA coverage is essential for the economic health of coastal communities. Windstorm insurance is not only necessary to protect real estate against losses, but it is also necessary to obtain financing for single-family homes, rental property, condominiums, and commercial buildings.

Severe economic repercussions from COVID-19 have added to the burdens placed on coastal residents and businesses owners while continuing recovery from Hurricanes Laura, Hanna, and Harvey. Premium increases will cripple homeowners and have a detrimental impact on already stressed coastal housing markets. Increased building costs and higher premiums present greater challenges for potential homebuyers and businesses to qualify for mortgages, thus further thwarting a struggling economic recovery.

As envisioned by the Legislature with enactment of HB 1900, Committee members should work collaboratively with legislators to identify positive alternatives that will not undermine the ability of coastal residents and business owners to insure their property. Affordable windstorm insurance is a critical component to maintaining economic stability and quality of life for coastal areas and the state of Texas.

I want to thank you and the TWIA Actuarial/Underwriting Committee members for your consideration.

Sincerely,



Brian A. Maxwell
City Manager

cc: The Honorable Larry Taylor, State Senator, District 11
The Honorable Mayes Middleton, State Representative, District 23
The Honorable Greg Bonnen, State Representative, District 24

Public Comment

From: Beaman floyd <beamanfloyd@earthlink.net>
Sent: Friday, September 18, 2020 9:07 AM
To: PublicComment
Subject: TCAIS Comments to the TWIA Actuarial Committee
Attachments: TCAIS Recommendation to the Actuarial Committee of the Texas Windstorm Insurance Association.docx

Attached please find comments from the Texas Coalition for Affordable Insurance Solutions to the TWIA Actuarial Committee, in reference to its September 22, 2020 meeting. As always, thank you for the opportunity to provide stakeholder input. Please let me know if you have any questions or other concerns.

Best regards,

Beaman Floyd
On behalf of
Texas Coalition for Affordable Insurance



Allstate • Farmers • Nationwide • State Farm • Texas Farm Bureau Insurance • USAA
www.tcais.org

September 18th, 2020

Recommendation to the Actuarial Committee of the Texas Windstorm Insurance Association

Thank you for the opportunity for the Texas Coalition for Affordable Insurance (“TCAIS”) to address the Actuarial Committee of the Texas Windstorm Insurance Association (“TWIA”). TCAIS appreciates the ongoing efforts of TWIA to communicate with all stakeholders on critical operational and public policy issues.

Up to this point in the TWIA deliberations, TCAIS has not offered an opinion regarding the TWIA adoption of a 2021 rate recommendation. We withheld comment out of respect for the thorough process of external review adopted by TWIA during its summer meetings, notwithstanding the fact that we generally view the internal work of TWIA’s actuarial staff as both professional and accurate. With the publication of the Residential and Commercial Rate Level Indication report by Willis Towers Watson on September 4, 2020, we now offer our comments

TCAIS recommends that the Actuarial Committee and the TWIA Board institute a minimum 5% rate increase for both commercial and residential policies for 2021, and further urges the board to consider a greater percentage increase guided by actuarial data, statutory requirements, and sound public policy. TCAIS’ recommendation is supported by the following:

- **All actuarial methods show a critical rate indication.** The Willis Towers Watson (“WTW”) report provided five different projection methods for rates, including a purely historical method (viewed as dangerously insufficient in the private market), blended historical and model methods, and pure model methods. The very lowest indications, achieved with the pure historical method, are 21% for residential and 34% for commercial. The highest indications (AIR Model alone) are 54% for both commercial and residential. WTW also removed or trimmed certain expense provisions from the TWIA recommendation. Every model, even the historical model that likely significantly underestimates risk, signals the need for an immediate rate increase.
- **Notwithstanding several years of substantial rate indications, TWIA has recently abandoned its program of incremental increases, resulting in a growing rate**

insufficiency. If the August action by the TWIA Board for a conditional 0% recommendation stands, TWIA will have recommended no rate change in 3 of the last four years, in the face of an increasing rate indication provided by staff. TCAIS believes that application of the WTW methodology to the preceding years would demonstrate a corresponding widening of the rate gap. The tension between actual risk and insufficient rate will only grow worse if action is not taken, and may result in either a financial disaster for TWIA or a significant rate shock for TWIA policyholders. Because TWIA is statutorily required to operate using sound insurance principals, including sound rating standards, the growing tension is both economic and statutory.

- **The widening rate gap is a threat to TWIA depopulation.** One of the public policy goals of any residual market program is to achieve the smallest possible size while still accomplishing its policy goal to make insurance available. The incremental depopulation of TWIA both through increased general insurance activity on the coast and the specific TWIA depopulation program has been a solid success so far, and should be encouraged to continue. TCAIS recognizes that an important part of this success was rooted in the incremental rate increases from 2011 to 2016 that, though never achieving rate sufficiency, narrowed the rating gap between TWIA and the private market. However, if TWIA's rates continue to fall further and further below what can be offered by the private market, TWIA will once again become by definition a predatory competitor. A resumption in the growth of TWIA would constitute a reversal of the recent improved public policy and market availability on the coast.

Again, TCAIS appreciates the opportunity to address the TWIA Actuarial Committee. Please let me know if you have any questions or comments.

Best Regards,

Beaman Floyd
On behalf of
Texas Coalition for Affordable Insurance Solutions
500 W 13th St
Austin, TX 78701

Public Comment

From: [REDACTED] >
Sent: Thursday, September 17, 2020 9:57 AM
To: PublicComment
Subject: Vote No

To Whom It May Concern,

A lot has been going on in this island and world the past year. With the economy in a very fragile state, along with covid and revenue concerns by all businesses and consumers, now is not the time for a rate hike.

Our family just moved here and it would create an undue hardship as we settle in to this state and region.

Sincerely,

[REDACTED]

[REDACTED]

Public Comment

From: [REDACTED] >
Sent: Friday, September 11, 2020 3:31 PM
To: PublicComment
Subject: Proposed Rate Increase

To whom it may concern:

As a long time resident and senior citizen of the City of Galveston, I am fed up with the continued rate increases by TWIA.

My home has stood since 1867!!!! Yet, my Windstorm Insurance is \$4,371 for 20/21; 70% of total insurance costs.

Not only is this criminal, but for coastal communities to pay for coverage for the entire state is reprehensible.

Residents complain of unaffordable housing - it is the TWIA rates that make housing unaffordable!!!

The entire State should fund TWIA, or dismantle TWIA and let free enterprise insure.

[REDACTED]
[REDACTED]
[REDACTED]

Public Comment

From: [REDACTED] >
Sent: Thursday, September 17, 2020 8:33 AM
To: PublicComment
Subject: TWIA

NO RATE HIKE.

--

[REDACTED]
[REDACTED]
[REDACTED]

Tel : [REDACTED]

Public Comment

From: [REDACTED] >
Sent: Wednesday, September 16, 2020 9:43 PM
To: PublicComment
Subject: No Rate Hike....please. Not good in the days of Covid.

[Sent from Yahoo Mail on Android](#)

Public Comment

From: [REDACTED] >
Sent: Wednesday, September 16, 2020 5:40 PM
To: PublicComment
Subject: No rate increase!!!

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 4:34 PM
To: PublicComment
Subject: TWIA RATE HIKE

ABSOLUTLEY NO RATE HIKE!!!

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Corpus Christi, TX 78418

[REDACTED]
[REDACTED]

Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 3:28 PM
To: PublicComment
Subject: No Rate Hike

No Rate Hike, please

Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 2:21 PM
To: PublicComment
Subject: NO to TWIA rate hike

We are requesting NO RATE HIKE to TWIA rates

[REDACTED]

[REDACTED]
Corpus Christi, TX 78418

Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 2:19 PM
To: PublicComment
Subject: No Rate Hike

No rate hike!

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 1:17 PM
To: PublicComment
Subject: TWIA RATE INCREASE

No TWIA rate increase!!!
[REDACTED]

Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 1:12 PM
To: PublicComment
Subject: No Rate Hike

No rate hike please

Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 12:59 PM
To: PublicComment
Subject: No TWIA rate hike

Please do not increase our rates.

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 12:29 PM
To: PublicComment
Subject: No rate hike

No rate hike

Sent from my Sprint Samsung Galaxy S20+ 5G.

Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 12:22 PM
To: PublicComment
Subject: NO RATE HIKE

PLEASE NO RATE HIKE!

Texas Real Estate Commission Information About Brokerage Services :
[REDACTED]

Take care,

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 11:58 AM
To: PublicComment
Subject: NO rate hike

I want to express my concern over a potential rate increase. My windstorm insurance cost right now is over \$7,000 and I will not be able to continue to afford this policy with any rate increase.

[REDACTED]

Public Comment

From: [REDACTED] >
Sent: Wednesday, September 16, 2020 11:27 AM
To: PublicComment
Subject: No TWIA increase

No, no Thank you.

[REDACTED]
Corpus Christi, TX 78418

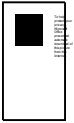
Sent from my iPhone

Public Comment

From: Merrily Piepho <merrily.piepho@coldwellbanker.com>
Sent: Wednesday, September 16, 2020 11:22 AM
To: PublicComment
Subject: "NO RATE HIKE"

"NO RATE HIKE"

[Texas Real Estate Commission Information About Brokerage Services](#)



Respectfully, Merrily Piepho

International Sterling Society designation for 2016

Coldwell Banker Pacesetter Steel, REALTORS®

5034 Holly Road

Corpus Christi, TX 78411

361-728-1495

merrily.piepho@coldwellbanker.com

www.MerrilySellsHouses.com

A licensed real estate agent in the State of Texas #386958

Member of Corpus Christi Association of REALTORS®

Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 11:16 AM
To: PublicComment
Subject: No Rate Hike



MAKE YOUR VOICE HEARD
LEAVE YOUR COMMENT AT
PUBLICCOMMENT@TWIA.ORG
BY FRIDAY, SEPTEMBER 18 AT
NOON



Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 10:53 AM
To: PublicComment
Subject: NO RATE HIKE

I strongly oppose a TWIA rate hike.

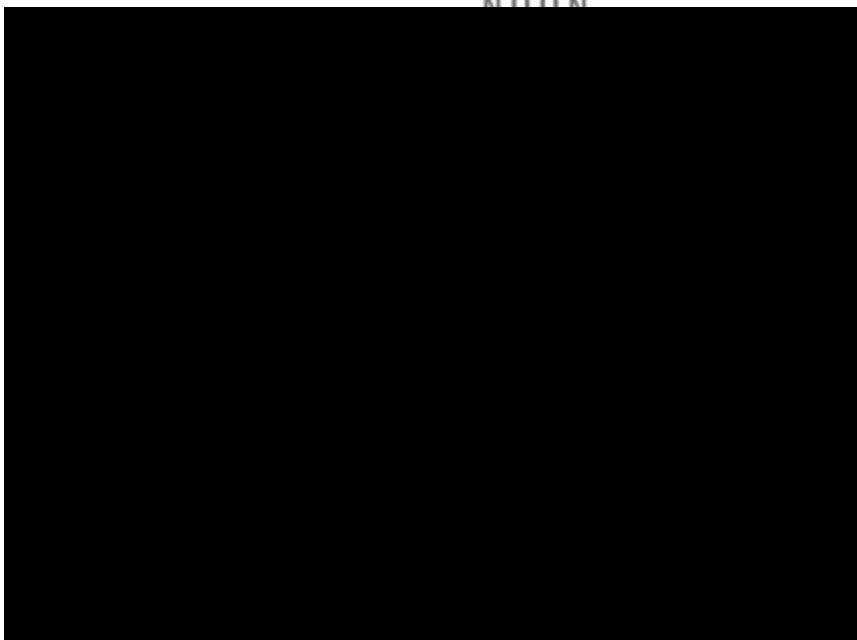
[REDACTED]
North Padre Island

Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 10:50 AM
To: PublicComment
Subject: No TWIA Rate Hike



MAKE YOUR VOICE HEARD
LEAVE YOUR COMMENT AT
PUBLICCOMMENT@TWIA.ORG
BY FRIDAY, SEPTEMBER 18 AT
NOON





Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 10:47 AM
To: PublicComment
Subject: TWIA

Please no TWIA rate increase. It is extremely expensive now.

[REDACTED]

Sent from my iPhone

Public Comment

From: Dan Suckley <dsuckley@americanbank.com>
Sent: Wednesday, September 16, 2020 10:36 AM
To: PublicComment
Subject: NO RATE HIKE

Our Coastal Bend area already pays extremely high insurance premiums, including a large share of it being for windstorm coverage.

Any additional rate hike for Windstorm coverage is going to be very difficult to absorb for many in South Texas, especially at the current time with so many adversely affected by the pandemic and the downturn in the oil & gas industry.

PLEASE NO RATE HIKE!

Dan Suckley
Senior Lending Officer

5120 S. Padre Island Dr. | Corpus Christi, TX 78411
P.O. Box 6469 | Corpus Christi, TX 78466-6469
361-653-5330 **Direct Office**
dsuckley@AmericanBank.com | www.AmericanBank.com



NOTICE: This email message is for the sole use of the intended recipient(s). This email may contain privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the message. When sending email via the Internet, please be sure NOT to include sensitive information such as account numbers, social security numbers, birthdates, etc.

Confidential information may be sent to us securely via our free online banking service available at www.AmericanBank.com. You may contact us with questions or concerns at (361) 992-9911 or email to info@AmericanBank.com.

Public Comment

From: [REDACTED]
Sent: Wednesday, September 16, 2020 10:13 AM
To: PublicComment
Subject: wind storm Insurance:

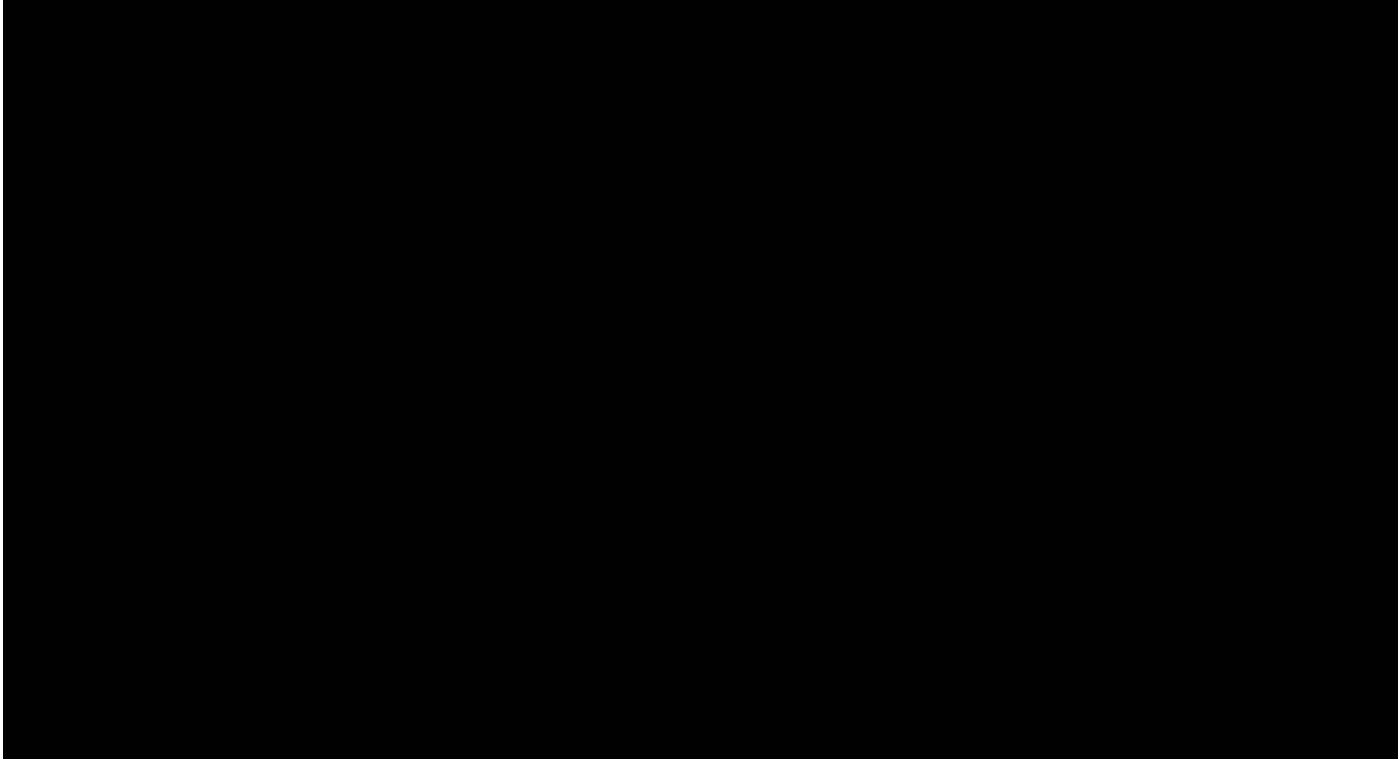
Is it possible to try again to let other Insurance Company come into the equation to give us a more flexible bargaining opportunity for the consumer?

Sent from [Mail](#) for Windows 10

Public Comment

From: [REDACTED] >
Sent: Thursday, September 17, 2020 8:37 PM
To: PublicComment
Subject: No rate hike

No Rate Increase



Public Comment

From: [REDACTED] >
Sent: Thursday, September 17, 2020 8:17 PM
To: PublicComment
Subject: No Rate Hike

No Rate Hike.

Thank you,

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 7:14 PM
To: PublicComment
Subject: NO RATE HIKE

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 5:51 PM
To: PublicComment
Subject: No TWIA Rate Hike

No TWIA Rate Hike!
It's bad enough we are still dealing with Covid-19. Give us a break!

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 5:48 PM
To: PublicComment
Subject: No Rate Hike

A lot of my friends and I are still recovering from Hurrican Harvey and increasing insurance rates should be avoided for a couple years.

Best,

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 5:44 PM
To: PublicComment
Subject: Proposed TWIA Rate Hike

No rate hike!

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 5:35 PM
To: PublicComment
Subject: Rate Hike

NO RATE HIKE!

[REDACTED]

[REDACTED]

[Corpus Christi, TX. 78414](#)

[REDACTED]

Public Comment

From: Krystal White <krystalw@carlisleins.com>
Sent: Thursday, September 17, 2020 5:31 PM
To: PublicComment
Subject: NO HATE RIKE

NO RATEW HIKE!!!!!!

Krystal White
BROKER



www.carlisleins.com
krystalw@carlisleins.com

C: (361) 319-2054 **O:** (361) 884-2775 **F:** (361) 884-3470
500 N. Water St, Suite 900, Corpus Christi, TX 78401-0234

NOTICE: Changes to coverage are not effective until confirmed by an authorized representative of Carlisle Insurance Agency, Inc. This email may contain confidential information and is intended solely for the use of the person(s) to whom it was intended to be addressed. If you received this material/information in error or are not the intended recipient, please contact the sender and permanently delete the material/information.

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 5:28 PM
To: PublicComment
Subject: No Rate Hike

No Rate Hike.

Thank you,

Corpus Christi, TX 78403-3067



Home of the free because of the Brave!

Notice: This e-mail is only intended for the person(s) to whom it is addressed and may contain confidential information that is privileged by law. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this message is prohibited. If you have received this message in error, please notify me by telephone at the number listed above or my internet address ([REDACTED]), refrain from making any copies, and delete it immediately from your computer system. Thank you for your cooperation.

Unless stated to the contrary, any opinions or comments are personal to the writer and do not represent the official view of the company.

Circular 230 Disclosure: Any advice contained in this e-mail (including any attachments unless expressly stated otherwise) is not intended or written to be used, and cannot be used, for purposes of avoiding tax penalties that may be imposed on any taxpayer.

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 5:27 PM
To: PublicComment
Subject: No rate hike

Absolutely unacceptable. By far my biggest bill is for Windstorm. This is not a choice to live on the coast. I was transferred here and work in industry supporting Texas as a whole! Continuing the drive to raise rates is unacceptable.

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 4:18 PM
To: PublicComment
Subject: TWIA

No TWIA rate hike!--
Sent from Gmail Mobile

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 2:30 PM
To: PublicComment
Subject: Please no TWIA hike Rate for Port Aransas

Please give out city time to recover from Harvey.

Thank you,

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 2:28 PM
To: PublicComment
Subject: NO RATE HIKE

As a homeowner and small business owner struggling through the painful process of Hurricane Harvey recovery, and now the COVID pandemic I can't financially survive a rate increase. It is time to overhaul TWIA.

[REDACTED]
Port Aransas, Texas

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 12:52 PM
To: PublicComment
Subject: NO RATE HIKE

Please register my dissatisfaction with your continued actions to raise our rates. NO RATE HIKES.

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 12:52 PM
To: PublicComment
Subject: NO RATE HIKE

Please register my dissatisfaction with your continued actions to raise our rates. NO RATE HIKES.

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 12:16 PM
To: PublicComment
Subject: NO Rate Hike!

We have paid for years and years. We actually use what little of the insurance that actually we are given for ONE storm and now you are going to hike our already outrageous rates? That is simply wrong! We take out loans, and businesses close just to recover and become stable again. Now, during a GLOBAL PANDEMIC you want to put even more of a burden on those of us who are hard working citizens, providing jobs to the community?
NO HIKE!!!

--

We appreciate your business!

[REDACTED]

Public Comment

From: Cheryl Floyd <cheryl@coastline-properties.com>
Sent: Thursday, September 17, 2020 11:06 AM
To: PublicComment
Subject: NO Rate Hike!

--

Texas Law requires all real estate licensees to give the following information about brokerage services:

[Texas law requires all license holders to provide the Information About Brokerage Services form to prospective clients](#)

[TREC Consumer Protection Notice](#)

Cheryl J. Floyd

Cheryl J. Floyd, Realtor

Coastline Properties
14717 South Padre Island Dr.
361-949-0101 office
361-563-0444-cell Cheryl
361-949-0192-fax
cheryljffloyd.com
cheryl@coastline-properties.com

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 10:58 AM
To: PublicComment
Subject: twia

The cost of our TWIA policy is way to much as it is.

I strongly urge y'all NOT to have another rate hike at your next meeting.

Please also consider alot of people are struggling with the Covid and wont be able to afford it.

In light of that I would like you to consider a one time cut in the rate for 1 year.....

[REDACTED]
[REDACTED]
Corpus Christi, Texas 78418

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 10:54 AM
To: PublicComment
Subject: Fw: NO RATE HIKE

The Residents of the Coastal area need to let you know, " **WE DO NOT WANT ANOTHER RATE HIKE!!**



----- Forwarded Message -----

From: [REDACTED]
To: publiccomment@twia.org <publiccomment@twia.org>; [REDACTED]
Sent: Thursday, September 17, 2020, 10:10:01 AM CDT
Subject: NO RATE HIKE

The residents of the Coastal area need to let you know that "**WE DO NOT WANT ANOTHER RATE HIKE"!!!**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Public Comment

From: [REDACTED] >
Sent: Thursday, September 17, 2020 9:59 AM
To: PublicComment
Subject: Sept. 22 committee meeting

No rate hike!!

[REDACTED]
Corpus Christi

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 9:05 AM
To: PublicComment
Subject: rate hike

No rate hike.

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 8:33 AM
To: PublicComment
Subject: TWIA

NO RATE HIKE.

--

[REDACTED]
[REDACTED]
[REDACTED]

Public Comment

From: [REDACTED]
Sent: Thursday, September 17, 2020 5:48 AM
To: PublicComment
Subject: TWIA

No Rate Hike

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Friday, September 18, 2020 11:46 AM
To: PublicComment
Subject: Tell TWIA No RATE HIKE

No RATE HIKE

Public Comment

From: [REDACTED]
Sent: Friday, September 18, 2020 11:00 AM
To: PublicComment
Subject: NO RATE HIKE

[REDACTED] NO RATE HIKE! Thanks!

[REDACTED] Sincerely,
[REDACTED]

[REDACTED] Corpus Christi, TX 78407
[REDACTED]

Public Comment

From: [REDACTED]
Sent: Friday, September 18, 2020 10:29 AM
To: PublicComment
Subject: *September 22nd meeting of the Actuarial Committee

No Rate Hike.

[REDACTED]

NOTICE: This message and any files transmitted with it are intended exclusively for the individual or entity to which it is addressed. The message, together with any attachment, may contain confidential and/or privileged information. Any unauthorized review, use, printing, saving, copying, disclosure or distribution is strictly prohibited. If you have received this message in error, please immediately advise the sender by reply email and delete all copies.

FYI:Encryption has been disabled for this message. While this makes it easier to receive without resorting to a secured portal, it is also easier for any criminals that intercept the message to steal identifying information that may be contained in the message.

Public Comment

From: [REDACTED]
Sent: Friday, September 18, 2020 9:52 AM
To: PublicComment
Subject: NO RATE HIKE

We are supporting NO RATE HIKE.

[REDACTED]

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Friday, September 18, 2020 8:50 AM
To: PublicComment
Subject: No Rate Hike

No Rate Hike

Respectfully,

Public Comment

From: [REDACTED]
Sent: Friday, September 18, 2020 8:44 AM
To: PublicComment
Subject: Rate hike

NO RATE HIKE!

Thank you,

[REDACTED]

Corpus Christi, TX 78410

[REDACTED]



[REDACTED]

This transmission may contain information that is privileged, confidential and or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of the information contained herein (including any reliance thereon) is STRICTLY PROHIBITED. If you received this transmission in error, please immediately contact the sender and destroy the material in its entirety, whether in electronic or hard copy format. Thank you.

Public Comment

From: [REDACTED]
Sent: Friday, September 18, 2020 8:39 AM
To: PublicComment
Subject: No Rate Hike!

No Rate Hike!

Sent from [Mail](#) for Windows 10

Public Comment

From: [REDACTED]
Sent: Friday, September 18, 2020 7:44 AM
To: PublicComment
Subject: No Rate Hike

No Rate Hike!

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Friday, September 18, 2020 7:33 AM
To: PublicComment
Subject: No Rate hike

Sent from my Verizon, Samsung Galaxy smartphone

Public Comment

From: [REDACTED]
Sent: Friday, September 18, 2020 7:20 AM
To: PublicComment
Subject: Public Comment

No Rake Hike.

Thank you,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

This message is for the named person's use only. It may contain confidential, proprietary or legally privileged information. No confidentiality or privilege is waived or lost by any mistransmission. If you receive this message in error, please immediately delete it and all copies of it from your system, destroy any hard copies of it and notify the sender. You must not, directly or indirectly, use, disclose, distribute, print, or copy any part of this message if you are not the intended recipient.

Public Comment

From: Diane Probst <president@1rockport.org>
Sent: Friday, September 18, 2020 4:00 AM
To: PublicComment
Subject: No Rate Hike

Please no rate hike at this time. Our residents and businesses are still recovering from Harvey and now COVID crisis issues.

Diane Probst, CCE

President/CEO

Rockport-Fulton Chamber of Commerce

361-729-6445 | www.rockport-fulton.org

[319 Broadway](#) | [Rockport, TX 78382](#)

[#FindYourselfInRockportFulton](#)



Confidentiality Notice | This email (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521, is confidential and may be legally privileged. If you are not the intended recipient, you are hereby notified that any retention, dissemination, distribution, or copying of this communication is strictly prohibited. Please reply to the sender that you have received this message in error, then delete it. Thank you for your cooperation.

Public Comment

From: [REDACTED]
Sent: Sunday, September 20, 2020 12:18 PM
To: PublicComment
Subject: NO RATE HIKE

NO RATE HIKE

[REDACTED]
Port Aransas, Texas

Public Comment

From: [REDACTED]
Sent: Friday, September 18, 2020 12:51 PM
To: PublicComment
Subject: No Rate Hike

Please do not raise our rates for insurance. We are struggling with the cost as it is.

Make it a GREAT day!

[REDACTED]
[REDACTED]
Port Aransas, TX 78373
[REDACTED]

Public Comment

From: [REDACTED]
Sent: Tuesday, September 22, 2020 8:45 AM
To: PublicComment

NO RATE HIKE.... we already pay an huge amount