



TEXAS WINDSTORM
INSURANCE ASSOCIATION

TWIA Board Meeting

Public Comments

December 8, 2020

Public Comment

From: Todd Hunter <Todd@toddhunterlaw.com>
Sent: Thursday, December 3, 2020 11:01 AM
To: PublicComment
Subject: TWIA -- Rate Letter.pdf
Attachments: TWIA -- Rate Letter.pdf

Sent from my iPhone



September 18, 2020

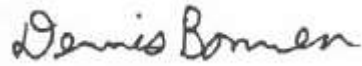
Dear Chairman Franklin-Womack, Chairman King and Mr. Polak,

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: Luis Moreno <Luis.Moreno@senate.texas.gov>
Sent: Friday, December 4, 2020 11:58 AM
To: PublicComment
Cc: Jennifer Armstrong; [REDACTED]
Subject: Written Comments from Senator Juan "Chuy" Hinojosa
Attachments: Scan_2020_12_04_11_55_21_977.pdf

Attached is a letter from Senator Hinojosa for the TWIA Board of Director's meeting on Tuesday, December 8th.

Please confirm receipt of this letter and do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

Luis J. Moreno
Chief of Staff
Senator Juan "Chuy" Hinojosa



COMMITTEES
FINANCE *Vice Chair*

TRANSPORTATION

THE SENATE OF TEXAS
JUAN "CHUY" HINOJOSA

DISTRICT 20

COMMITTEES
NATURAL RESOURCES &
ECONOMIC DEVELOPMENT

AGRICULTURE
PROPERTY TAX

December 4, 2020

Texas Windstorm Insurance Association, Board of Directors
c/o John Polak, General Manager
P.O. Box 99090
Austin, Texas 78709

Dear TWIA Board of Directors:

I respectfully request the Texas Windstorm Insurance Association (TWIA) Board to postpone or reject consideration of any proposed rate increase on residential and commercial policyholders at its board meeting on Tuesday, December 8th, as the board considers the study by the actuarial consulting firm Willis Towers Watson. I appreciate TWIA's Actuarial & Underwriting Committee's decision to make no recommendation to the TWIA Board regarding action on rates. Further, no action should be taken by the TWIA Board on any rate increase without full transparency and giving the public ample time to provide input on any proposed rate increase.

What's more, the Windstorm Insurance Legislative Funding and Funding Structure Oversight Board (Oversight Board) has not had the opportunity to meet due to the ongoing Coronavirus pandemic. This Oversight Board was to hold public meetings to hear testimony from experts, stakeholders, and other interested parties regarding TWIA. Additionally, with many along the coast still recovering from Hurricane Harvey, Hurricane Hanna, and the economic impact from the pandemic, any rate increase only increases the economic hardship of many Texans struggling to provide meals for their families and small businesses fighting to keep their doors open.

Please postpone or reject any proposed windstorm insurance rate increase on policyholders on the Texas Gulf Coast.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Hinojosa", with a stylized flourish at the end.

Juan "Chuy" Hinojosa
State Senator, District 20

Public Comment

From: Cari Christman <cari.christman@senate.texas.gov>

Date: December 4, 2020 at 5:33:24 PM CST

To: Jennifer Armstrong <jarmstrong@twia.org>

Subject: Sen. Larry Taylor Public Comment - TWIA Board Meeting 12/10/20

CAUTION: This email originated from outside of the organization. Do not reply with sensitive information or click links or open attachments unless you recognize the sender and know the content is safe.

Jennifer,

Can you please share the following comments with the TWIA Board of Directors; TWIA Actuary and Underwriting Committee; and the appropriate TWIA administrative staff prior to the next board of directors meeting scheduled for Tuesday, December 8, 2020?

Please let me know if you have any questions.

Thank you.

Senator Larry Taylor: Public Comments to the TWIA Board of Directors – Meeting on Tuesday, December 8, 2020

In light of the economic downturn brought on unexpectedly by the Corona Virus pandemic this year, I strongly encourage the TWIA Board of Directors to suspend any consideration of a rate increase on policyholders at this time. While I applaud the recent research effort completed by Willis Towers Watson, contracted by the association to provide greater transparency to the rate filing process, now is not the time to impose additional financial hardship on policyholders. Given the \$4.2 billion in available funding for the 2020 storm season, the association is well positioned to meet its financial obligations and should postpone any proposal to raise rates.

Cari Christman
Chief of Staff

Senator Larry Taylor | Senate District 11
(512) 463-0111 | Office
Cari.Christman@Senate.Texas.Gov | Email

Public Comment

From: Chris Willuhn <Chris.Willuhn@senate.texas.gov>
Sent: Friday, December 4, 2020 2:45 PM
To: PublicComment
Subject: Sen. Zaffirini Public Comment
Attachments: Public Comment. TWIA. Rate Increase. FINAL. 120420.pdf

Good afternoon,

Senator Zaffirini's public comment opposing any consideration of rate increases is attached. Please let me know if you require anything else.

Best,

Chris Willuhn, MPAff
Legislative Aide and Communication Coordinator
Office of Senator Judith Zaffirini
Senate District 21
Capitol 1E.14
P.O. Box 12068
Austin, TX 78711
512/463-0121
Toll Free: 800/851-1568
Fax: 512/463-0695

Vice Chair, Mass Violence Prevention
and Community Safety
Vice Chair, Natural Resources and
Economic Development
Texas Judicial Council
Chair, Eagle Ford Shale
Legislative Caucus



Judith Zaffirini
State Senator, District 21
President Pro Tempore, 1997

Committees
Administration
Business and Commerce
Education
Higher Education
State Affairs

December 4, 2020

Chandra Franklin-Womack, Chair
Texas Windstorm Insurance Association
P.O. Box 99090
Austin, TX 78749

Dear Chair Franklin-Womack:

This is to express my strong opposition to any consideration of a rate increase for Texas Windstorm Insurance Association policyholders. Having discussed this issue regularly with other Coastal Bend legislators, I am confident they agree with my expression. What's more, I am pleased the State Representative Todd Hunter will address you on our behalf.

Given the calamitous and ongoing health and economic effects of the COVID-19 pandemic, a rate increase at this time would be not only callous, but also counterproductive to the region's economic recovery. While its long-term effects will not be known for some time, the COVID-19 pandemic has been disastrous for the economic well-being of families, businesses, and communities, including along the Texas coast. Unemployment remains well above pre-pandemic levels, countless persons are at-risk for eviction or foreclosure, and many businesses have closed or otherwise face significant disruptions to their operations. A rate increase at this time could prove devastating to these persons and do lasting damage to the region's economic vibrancy and stability.

What's more, given the Legislature's efforts in 2019 via Senate Bill 615 and House Bill 1900 to review TWIA's funding structure and transparency regarding rate adequacy, approving a rate increase a month prior to a legislative session—one in which these findings will be scrutinized carefully and acted upon, if necessary—is ill-advised and contrary to our intent. I strongly urge you to forego consideration of any rate increases until the worst of the COVID-19 pandemic subsides and the Legislature has time to do its work.

My prayer is that the Lord will bless you and inspire you to agree with my perspective. Feel free to contact me if you require any additional information regarding my position.

Very truly yours,

A handwritten signature in cursive script that reads "Judith Zaffirini".

Judith Zaffirini

XC: Coastal Bend Legislators
Board of Directors, Texas Windstorm Insurance Association

Public Comment

From: Andrew Herrell <Andrew.Herrell@house.texas.gov>
Sent: Friday, December 4, 2020 11:53 AM
To: PublicComment
Cc: Jennifer Armstrong; Anna Stafford
Subject: Rep. Middleton Written Comment
Attachments: TWIABoard_12.3.20.pdf

Attached is Representative Middleton's written public comment for the December 8th TWIA Board meeting.

Thank you,

Andrew Herrell
Legislative Director
Rep. Mayes Middleton (HD-23)
O: (512) 463-0502



MAYES MIDDLETON



STATE REPRESENTATIVE • DISTRICT 23

December 3, 2020

Chandra Franklin-Womack
Chair, Board of Directors
Texas Windstorm Insurance Association
PO Box 99090
Austin, TX 78709-9090

Chair Franklin-Womack:

As you prepare for the upcoming meeting of the Board of Directors on December 8th, I write to you in opposition to any rate increase on TWIA policyholders.

Earlier this month, the TWIA Actuarial & Underwriting Committee met to discuss the rate adequacy analysis. At that meeting, the Committee did not recommend a rate increase and instructed Willis Towers Watson to conduct further studies on the rate adequacy analysis to get more accurate results.

This meeting of the Board of Directors comes during a tumultuous time for all Texans. Many coastal Texans are currently struggling financially from the ongoing pandemic and economic shutdowns. A rate increase would serve an especially devastating blow to coastal Texas families and businesses.

When the Board of Directors meet next week, I urge you to not raise rates on any TWIA policyholders and vote NO on any proposed rate increases.

Very Truly Yours,

A handwritten signature in black ink that reads "Mayes Middleton".

Mayes Middleton
Texas State Representative
House District 23

Public Comment

From: Shane Saum <Shane.Saum@house.texas.gov>
Sent: Friday, December 4, 2020 11:33 AM
To: PublicComment
Subject: No Rate Hike Letter from Rep. Geanie W. Morrison
Attachments: No Rate Hike.pdf

Please accept the attached letter from Rep. Geanie W. Morrison as public comment regarding rates during the upcoming Dec. 8th Board meeting.

Shane R. Saum

Chief of Staff
State Representative Geanie W. Morrison | District 30
512-463-0456
Texas Capitol, 1W.6

TEXAS HOUSE OF REPRESENTATIVES

CAPITOL OFFICE:
P.O. BOX 2910
AUSTIN, TEXAS 78768-2910
(512) 463-0456
(512) 463-0158 *fax*

DISTRICT OFFICE:
P.O. BOX 4642
VICTORIA, TEXAS 77903
(361) 572-0196
fax (361) 576-0747



GEANIE W. MORRISON

COMMITTEES:
LOCAL & CONSENT CALENDARS – CHAIR
ENVIRONMENTAL REGULATION
CULTURE, RECREATION & TOURISM

DISTRICT 30

COUNTIES:
ARANSAS
CALHOUN
DEWITT
GOLIAD
REFUGIO
VICTORIA

December 4, 2020

TWIA Board of Directors
P.O. Box 99090
Austin, Texas 78709-9090

Dear Board of Directors:

During this difficult time, please do not vote for a rate hike at your upcoming Board meeting.

Should you have any questions regarding this issue, please feel free to contact me at any time.

Sincerely,

Geanie W. Morrison



EMAIL: Geanie.Morrison@house.texas.gov

Public Comment

From: Shane Saum <Shane.Saum@house.texas.gov> on behalf of Geanie Morrison
<Geanie.Morrison@house.texas.gov>
Sent: Friday, December 4, 2020 11:27 AM
To: PublicComment
Subject: Public Comment on Rates

During this difficult time, please do not vote for a rate hike at your upcoming Board meeting.

Geanie W. Morrison
State Representative
District 30
Texas House of Representatives

Public Comment

From: Abel Herrero <Abel.Herrero@house.texas.gov>
Sent: Friday, December 4, 2020 1:02 PM
To: PublicComment
Subject: Dec. 8th TWIA Board Meeting Public Comment
Attachments: Rep. Herrero TWIA Public Comment_12.08.2020.pdf

ABEL HERRERO



CAPITOL OFFICE:
P.O. Box 2910
AUSTIN, TEXAS 78768-2910
(512) 463-0462
(512) 463-1705 (FAX)

DISTRICT OFFICE:
606 N. CARANCAHUA, STE 103A
CORPUS CHRISTI, TEXAS 78401-0690
(361) 884-2277
(361) 884-6706 (FAX)

STATE REPRESENTATIVE
DISTRICT 34

December 4, 2020

Texas Windstorm Insurance Association, Board of Directors
c/o John Polak, General Manager
P.O. Box 99090
Austin, Texas 78709

Dear TWIA Board of Directors:

I respectfully urge you to reject or postpone any proposed rate increases on residential and commercial TWIA policyholders. Any rate increase would only hinder tireless ongoing efforts in the Coastal Bend to recover from Hurricane Harvey, Hurricane Hanna, and the economic impact from the COVID-19 pandemic.

While our communities are strong and resilient, many of those whose lives have been disrupted by recent storms and the pandemic are still struggling to recover. Any rate increases would further burden residents and businesses during these difficult times.

For these reasons, I urge you to stand with Coastal communities and reject any proposed rate increases. Thank you for your consideration and attention to this matter.

Respectfully,

A handwritten signature in black ink that reads "Abel Herrero".

Abel Herrero
State Representative, District 34



DISTRICT 34 • NUECES (PART)

ABEL.HERRERO@HOUSE.TEXAS.GOV

Public Comment

From: JM Lozano <JM.Lozano@house.texas.gov>
Sent: Friday, December 4, 2020 11:52 AM
To: PublicComment
Subject: Rep. J.M. Lozano opposes rate hike

Dear Members of the Board,

In this time of rapidly increasing pandemic illness and deaths, in this time of economic uncertainty, I respectfully ask that you oppose any efforts to raise TWIA rates.

Our people are disproportionately suffering from the deadly health consequences of COVID-19 and our regions dependence on the oil and gas economy has taken a harder hit than other regions with more diversified economies.

Our market cannot withstand any further shock or uncertainty. The Willis Towers Watson report is silent on the adverse economic impact rates hikes will cause nor does it look at the impact in light of the global pandemic. Financial assessments cannot be made in a vacuum. Present day conditions must be cross applied in any assessment.

I strongly and respectfully urge you to oppose any TWIA rate hikes. My colleagues and I will be addressing TWIA legislatively in the coming months.

Respectfully,
J.M. Lozano
Chairman-Environmental Regulation Committee Texas House of Representatives

Sent from my iPhone

Public Comment

From: Tara C. Corwin <Tara.Corwin@nuecesco.com>
Sent: Friday, December 4, 2020 11:33 AM
To: Communications; PublicComment
Subject: Comment for 12/8/20 Meeting; Letter from Nueces County Judge Barbara Canales in Opposition to Rate Increase
Attachments: TWIA_Letter in Opposition to Rate Increase.pdf

Attached please find a letter from Nueces County Judge Barbara Canales stating her opposition to the possibility of the TWIA Board of Directors recommending any premium increase on residential and commercial policies during their upcoming meeting on December 8, 2020.

If you have any questions please feel free to contact me at any time.

Sincerely,

Tara Corwin

Executive Secretary

Commissioners Court Administration

901 Leopard St. Suite #302.03

Corpus Christi, TX 78401

p. 361-888-0878

f. 361-888-0376

tara.corwin@nuecesco.com



BARBARA CANALES

COUNTY JUDGE

Maggie Turner

Chief Executive to County Judge
maggie.turner@nuecesco.com
(361) 888-0264

Monica Perez

Executive Secretary
monica.perez1@nuecesco.com
(361) 888-0444

Melissa Munguia

Emergency Management Coordinator
melissa.munguia@nuecesco.com
(361) 888-0513

December 4, 2020

Chandra Franklin-Womack
Chair
Texas Windstorm Insurance Association (TWIA)

Submitted Via Email: CommunicationsMail@TWIA.org

On behalf of the thousands of Texas Windstorm Insurance Association (TWIA) policyholders in Nueces County, I am writing to express my opposition to the possibility of the TWIA Board of Directors recommending a any premium increase on residential and commercial policies during their upcoming December 1st meeting.

As the 87th Texas Legislature convenes in January 2021, it is premature for TWIA to propose significant premium increases for residential and commercial policies not only after such a challenging hurricane season but also we must keep in mind the economic challenges our coastal communities are facing as a result of the current pandemic. Now is not the time to propose premium increases on coastal residents – I encourage you to work with our legislative delegation and state leaders to identify new solutions as you implement HB 1900 from the 86th Regular Session.

Please encourage your fellow Board members to show restraint and allow the will of the Legislature to be fully implemented before TWIA implements a rate increase that could significantly stifle rebuilding and rehabilitating homes, businesses and lives along the Texas coast.

Sincerely,

A handwritten signature in cursive script that reads "Barbara Canales".

Barbara Canales
Nueces County Judge

Public Comment

From: Tammy Embrey <TammyE@cctexas.com>
Sent: Friday, December 4, 2020 11:49 AM
To: PublicComment
Subject: Public Comment from the City of Corpus Christi for December 8th board meeting
Attachments: 12 4 2020 Mayor letter to TWIA Board opposing TWIA rate increase.pdf; CC Council Resolution Opposing TWIA Rate Hike 9 29 2020.pdf

Please find attached a letter from Mayor Joe McComb and a Council Resolution passed by the Corpus Christi City Council opposing a rate increase for TWIA policy holders.

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

Thank you for your consideration of our comments.

Tammy Embrey

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

December 4, 2020

Ms. Chandra Franklin-Womack, Board Chair
Texas Windstorm Insurance Association (TWIA)
PO Box 99090
Austin, TX 78709

Dear Chairwoman Franklin-Womack,

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. The COVID-19 pandemic has prohibited the gathering of the Oversight Committee to accomplish the intent of HB 1900. 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.

At the most recent meeting of the actuarial committee, public comment was due on Sunday, November 29th and the updated rate adequacy study was not released by TWIA until the afternoon of November 30th which prevented the public from filing substantive comment on the report before the committee for consideration. The actuarial committee has now requested Willis Towers Watson to gather additional information to before the board meeting on December 8th. The written public comment period will again close before the updated information that will be presented to the board is released to the public for review. This complete lack of transparency by a public agency is unacceptable.

The Coastal Bend is still recovering from Hurricane Harvey and more recent impacts from Hurricane Hanna. In addition, the region 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 has long been on record opposing unnecessary TWIA rate increases. In the attached resolution passed by the City Council in September, we 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,

A handwritten signature in black ink, appearing to read "Joe McComb". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Joe McComb
Mayor

Resolution Opposing Texas Windstorm Insurance Association Rate Increase

WHEREAS, the City of Corpus Christi strives to encourage economic development and improve the quality of life for residents and businesses in the City;

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. Hurricane Harvey was the first major hurricane to make landfall along the Middle Texas Coast since Hurricane Celia in 1970;

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;

WHEREAS, more than three years after the storm, many of the Hurricane Harvey disaster declared communities are struggling to rebuild;

WHEREAS, Hurricane Hanna made landfall on the south Texas Coast on Saturday July 25, 2020;

WHEREAS, the City of Corpus Christi 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;

WHEREAS, the 86th Texas Legislature did act by passing HB1900, which creates a Legislative Funding Oversight Committee to study TWIA's rate adequacy;

WHEREAS, the Legislative Oversight Committee must be appointed and given time to act before TWIA activates a new rate increase;

WHEREAS, the TWIA Board of Directors voted for no rate increase at its August 2020 meeting; and

WHEREAS, there are sufficient premiums, assessments, and reinsurance to cover potential TWIA liabilities for 2021;

NOW THEREFORE BE IT RESOLVED, THAT THE CITY OF CORPUS CHRISTI continues its opposition to proposed increases in windstorm insurance rates and encourages the TWIA Board of Directors to recognize that a TWIA rate increase on top of the economic recession caused by the COVID-19 pandemic would be devastating to our regional economy and the entire Texas Coast. Vote NO RATE HIKE for 2021.

PASSED AND APPROVED on the 29th day of September 2020:

Joe McComb

Aye

Roland Barrera

Aye

Rudy Garza

Aye

Paulette M. Guajardo

Aye

Gil Hernandez

Aye

Michael Hunter

Aye

Ben Molina

Aye

Everett Roy

Aye

Greg Smith

Aye

ATTEST:

CITY OF CORPUS CHRISTI

Rebecca Huerta

Rebecca Huerta
City Secretary

Joe McComb

Joe McComb
Mayor

Public Comment

From: greg@pioneerresorts.com
Sent: Friday, December 4, 2020 10:32 AM
To: PublicComment
Subject: public comment DEcember 2020 Board meeting

Dear TWIA

Due to the uncertainties of the actuarial indications, the legislature starting session in 36 days, and current economic uncertainty I ask the Board to not change the current rates.

Sincerely yours,

Greg Smith

Corpus Christi District Four Council-member

Public Comment

From: David Parsons <davidparsons@cityofportaransas.org>
Sent: Friday, December 4, 2020 10:44 AM
To: PublicComment
Subject: City of Port Aransas comments
Attachments: TWIA Oppositin Letter and Resolution.pdf

TWIA –

Please see attached public comments from the City of Port Aransas City Council.

The City opposes: Any and all rate hikes.

We propose: Let the state legislation handle this issue, as there is much needed public comment to gather.

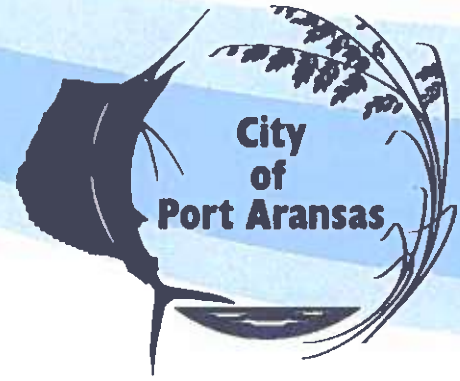
Thanks,

David

David Parsons
City Manager
City of Port Aransas
361-749-4111



City of Port Aransas



September 18, 2020

Chandra Franklin-Womack
Chair, Board of Directors
Texas Windstorm Insurance Association
PO Box 99090
Austin, TX 78709-9090

Dear Chair Franklin-Womack:

The City of Port Aransas respectfully requests that the Texas Windstorm Association (TWIA) Board accepts the attached resolution opposing any rate increase on coastal policyholders, residents, and businesses at this time.

This meeting of the Board of Directors comes during a tumultuous time for all Texans. Many coastal Texans are currently struggling financially from the ongoing pandemic and economic shutdowns. A rate increase would serve an especially devastating blow to coastal Texas families and businesses.

Once again, I respectfully reiterate that the City Port Aransas firmly opposes any rate increase on TWIA policyholders.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Parsons", is written over a light blue horizontal line.

David Parsons
City Manager

Enclosure (1)



RESOLUTION NO. 2020-R51

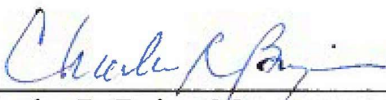
A RESOLUTION OF THE PORT ARANSAS CITY COUNCIL URGING THE COMMISSIONER OF INSURANCE TO OPPOSE AN INCREASE IN WINDSTORM INSURANCE RATES BEING CONSIDERED BY THE TEXAS WINDSTORM INSURANCE ASSOCIATION.

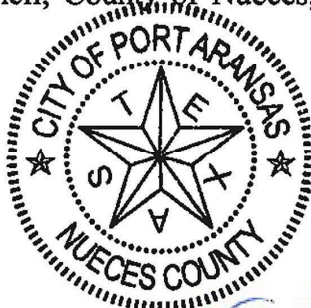

- WHEREAS,** the City of Port Aransas City Council, is charged with leading efforts to enhance and preserve the economic development and vitality of the City; and
- WHEREAS,** the Port Aransas City Council passed a resolution opposing Texas Windstorm Insurance Association (TWIA) increase to windstorm insurance rates for the Coastal Texas Communities; and
- WHEREAS,** the city and the coastal bend region are currently suffering from adverse economic conditions related to the impacts of COVID-19 on the local economy, as well and detrimental impacts on the tourism market which is vital to the City of Port Aransas.
- WHEREAS,** The Texas Insurance Code (Chapter 2210) requires TWIA rates be “reasonable, adequate, not unfairly discriminatory, and non-confiscatory as to any class of insurer.” Rates must also be based upon sound actuarial principles and sufficient to sustain projected Association losses and expenses.

NOW, THEREFORE, BE IT RESOLVED THAT, The City Council of The City of Port Aransas continues opposition to proposed increases in windstorm insurance rates currently being considered by the Texas Windstorm Insurance Association in 2020, proposed premium rate increase.

PASSED and APPROVED by the Port Aransas City Council, County of Nueces, State of Texas, on this 17th day of SEPTEMBER, 2020.

CITY OF PORT ARANSAS, TEXAS


Charles R. Bujan, Mayor



Wendy Moore, Mayor Pro-Tem

ATTEST:

A handwritten signature in blue ink, reading "Francisca Nixon", is written over a horizontal line.

Francisca Nixon, City Secretary

Public Comment

From: Sally Bakko <SBakko@GalvestonTX.Gov>
Sent: Friday, December 4, 2020 8:54 AM
To: PublicComment
Cc: Brian Maxwell; Daniel Buckley; Barbara Sanderson; Jennifer Armstrong
Subject: City of Galveston Comment Letter to TWIA Board of Directors
Attachments: 12-4-2020_City of Galveston _TWIA Board_Premium Rate Comment Letter.pdf

Good morning,

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

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

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City of Galveston

OFFICE OF THE CITY MANAGER

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December 4, 2020

Chandra Franklin-Womack
Chairwoman
Texas Windstorm Insurance Association Board
P.O. Box 99090
Austin, TX 78709-9090

Dear Chairwoman Franklin-Womack,

I am writing to express continued opposition to the Texas Windstorm Insurance Association (TWIA) Board of Directors (the "Board") approving a premium rate increase at the Board meeting on Tuesday, December 8, 2020.

Further, I want to express appreciation to the Actuarial/Underwriting Committee (the "Committee") for action taken on December 1, 2020, to make no further rate recommendation to the TWIA Board at this time. Work produced by Willis Towers Watson (WTW), an actuarial consulting firm retained to conduct an independent study of TWIA's rate adequacy and the use of hurricane modeling, indicates additional data and modeling is needed to clearly understand the implications for reinsurance and premium rate adequacy.

The initial WTW Residential and Commercial Rate Level Analysis Report presented to the Committee on September 22, 2020, indicated TWIA current rates were inadequate by 32 percent for residential coverage and 41 percent for commercial coverage. However, the Committee directed WTW and TWIA staff to work together to incorporate additional data into the report to include: 1) commercial business occupancy data; 2) secondary risk characteristics; and 3) details from inspection reports. An updated report presented by WTW to the Committee during the meeting on December 1, 2020, showed adequacy rate estimates adjusted to 26 percent for residential coverage and 44 percent for commercial coverage. Following lengthy discussion, TWIA staff was directed to work with WTW on additional modeling output for Board consideration.

The City of Galveston (the "City") expressed concerns to the Committee about the updated WTW report not being available for public review until noon on November 30, 2020 – less than 24 hours prior to the scheduled Committee meeting on December 1st. The City remains very concerned that insufficient time will be available for public review of this latest round of



modeling output prior to TWIA Board consideration on December 8th. Nonetheless, discussion during the Committee meeting on December 1st, clearly revealed additional assessment of data impacting TWIA's funding structure is needed before any premium rate increase should be considered. Such a view is consistent with action taken by the 86th Legislature in 2019.

With the passage of HB 1900 state legislators sent a clear message on TWIA - greater transparency and closer funding structure examination. H.B. 1900, authored by State Representative Greg Bonnen MD and sponsored by State Senator Larry Taylor, provides essential reforms to reduce the need for premium rate increases. 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. The critical work of these two 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. The 87th Legislature should enact legislation to extend the timeframe necessary for the interim committees to complete their work as intended by the 86th Legislature. Accordingly, any premium increase would be premature at this time.

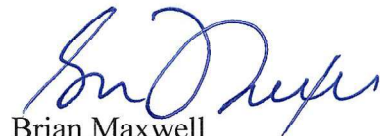
The ability of coastal residents and business owners to insure their property is a critical component to maintaining economic stability and quality of life not only for coastal areas, but the entire state of Texas. Maintaining affordable TWIA coverage is essential for the economic health of coastal communities. 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. Moreover, while not directly hit by Hurricanes Laura or Delta, Galveston homeowners are facing damage caused by high tides and related surge. 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 with enactment of HB 1900, Board members should work collaboratively with legislators to identify 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 Board members for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian Maxwell".

Brian Maxwell
City Manager

cc: The Honorable Larry Taylor, State Senator, District 11
 The Honorable Brandon Creighton, State Senator, District 4
 The Honorable Mayes Middleton, State Representative, District 23
 The Honorable Greg Bonnen, State Representative, District 24

Public Comment

From: Olivo, Nelda <NELDA@pocca.com>
Sent: Friday, December 4, 2020 11:27 AM
To: PublicComment
Subject: TWIA Board of Directors Meeting - Dec 8 - Port of Corpus Christi Resolution
Attachments: TWIA Resolution POCCA Dec 2019.pdf

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 December 8, 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: Ginny Cross <ginny@unitedcccchamber.com>
Sent: Friday, December 4, 2020 10:39 AM
To: PublicComment
Cc: John LaRue
Subject: No Rate Hike
Attachments: TWIA comment 12.04.2020.pdf

Please accept the attached letter as our public comment.

The United Corpus Christi Chamber of Commerce continues to oppose a rate increase of any kind.



GINNY CROSS

VP, GOVERNMENT & COMMUNITY RELATIONS

O: 361 881 1800 **M:** 202 246 5540

602 N. STAPLES STREET, STE. 150
CORPUS CHRISTI, TX 78401

GINNY@UNITEDCORPUSCHRISTICHAMBER.COM



December 4, 2020

Ms. Chandra Franklin-Womack, Board Chair
Texas Windstorm Insurance Association (TWIA)
PO Box 99090
Austin, TX 78709

Dear Chairwoman Franklin-Womack,

On behalf of the business community of the Coastal Bend, I am writing you 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. The COVID-19 pandemic has prohibited the gathering of the Oversight Committee to accomplish the intent of HB 1900. 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. It appears TWIA is circumventing the will of the Legislature by pushing for rate increases before they can act in their oversight capacity.

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.

At the December 1 meeting of the actuarial committee, public comment was due on Sunday, November 29th and the updated rate adequacy study was not released by TWIA until the afternoon of November 30th which prevented the public from filing substantive comment on the report before the committee for consideration. The actuarial committee has now requested Willis Towers Watson to gather additional information to before the board meeting on December 8th. The written public comment period will again close before the updated information that will be presented to the board is released to the public for review. This complete lack of transparency by a public agency is unacceptable.

The Coastal Bend is still recovering from Hurricane Harvey and more recent impacts from Hurricane Hanna. In addition, the region 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 United Corpus Christi Chamber of Commerce has long been on record opposing unnecessary TWIA rate increases. We 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.

Respectfully,



John LaRue
President & CEO

Public Comment

From: Bill Allen <ballen@bmtcoc.org>
Sent: Friday, December 4, 2020 1:19 PM
To: PublicComment
Subject: comment for december 2020 meeting
Attachments: SKM_C65920120413130.pdf

Bill Allen

President/CEO
Greater Beaumont Chamber of Commerce
1110 Park Street
Beaumont, TX 77701
C: 248.709.2128
O: 409.838.6581
F: 409.833.6718
www.bmtcoc.org





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Tyler Thomas

David Thornhill

Pam Williams

President/CEO

Bill Allen

December 4, 2020

Ms. Chandra Franklin-Womack
5700 South MoPac Expressway
Building A
Austin, TX 78749

Dear Ms. Franklin-Womack:

On behalf of the Greater Beaumont Chamber of Commerce, please include this letter as a part of public comment for your board meeting scheduled for December 8, 2020.

We are not in favor of any increase in rates – residential or commercial - at this time for the following reasons:

- Our area still has not fully recovered from Hurricane Harvey or TS Imelda and now we are dealing with this year's storms
- The COVID-19 pandemic has had detrimental effects on our business community which has also impacted our residential community

I realize that the pandemic has also resulted in the postponement of meetings of the committee created as a part of HB 1900 during the last legislative session. With the new session only a few months away, it would seem ill-timed to raise rates now.

Thank you for allowing me the chance to provide this public comment.

Sincerely,

Bill Allen
President & CEO
Greater Beaumont Chamber of Commerce



Public Comment

From: Pat Avery <president@portarthurtexas.com>
Sent: Friday, December 4, 2020 12:29 PM
To: Communications <communicationsmail@TWIA.ORG>
Subject: Letter to the TWIA Board

CAUTION: This email originated from outside of the organization. Do not reply with sensitive information or click links or open attachments unless you recognize the sender and know the content is safe.

Please consider my attached letter to the TWIA Board.

Thanks,
Pat Avery

Pat Avery, President/CEO
Greater Port Arthur Chamber of Commerce
(409)963-1107 Work | (409)454-3016 Mobile | (409)962-1997 Fax
501 Procter Street Ste. 300, Port Arthur TX 77642
president@portarthurtexas.com

From: GPACC <gpacc@portarthurtexas.com>
Sent: Friday, December 04, 2020 1:34 PM
To: Pat Avery <president@portarthurtexas.com>
Subject: Message from KM_C258

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Ron Arceneaux ~ Chairperson Elect
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*Bonne Vie
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Tonya Moses
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Mary Ann Reid
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*Port of Port Arthur
Art Thomas ~ Member at Large
*Texas Gas Company
Travis Woods



December 4, 2020

Ms. Chandra Franklin-Womack
5700 South MoPac Expressway
Building A
Austin, Texas 78749

Dear Ms. Franklin-Womack:

My name is Pat Avery and I represent the citizens in South Jefferson County, Texas.

First, know how much we appreciate what you and the TWIA board do for our State.

Please at this time, do not raise the TWIA rates. Our area has faced two hurricanes and the pandemic this year. The economy and citizens are in a horrible state at this moment.

The Willis Towers Watson study and the TWIA Actuarial Committee report has only been made public for an extremely short period of time.

I employ you to reconsider a rate increase at this time.

Sincerely,

Pat Avery

A handwritten signature in blue ink that reads "Pat Avery". The signature is fluid and cursive, with a long horizontal stroke at the end.

President/CEO

Great Port Arthur Chamber of Commerce
501 Procter Street, Suite 300
Port Arthur Texas 77640

Public Comment

From: Beaman Floyd <beamanfloyd@earthlink.net>
Sent: Thursday, December 3, 2020 11:11 AM
To: PublicComment
Subject: TWIA Rate Consideration
Attachments: TCAIS TWIA Rec2 to the Actuarial Committee of the Texas Windstorm Insurance Association.pdf

Dear TWIA Board,

Attached please find written comments from the Texas Coalition for Affordable Insurance Solutions ("TCAIS") regarding TWIA's consideration of 2021 rates scheduled for your December 8th board meeting. As always, TCAIS appreciates your work as board members, and your willingness to consider stakeholder input. Please let me know if you have any questions or comments.

Best Regards,

Beaman Floyd
On behalf of
Texas Coalition for
Affordable Insurance Solutions



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

December 2, 2020

Recommendation to the Board of Directors of the Texas Windstorm Insurance Association

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

On September 18th, TCAIS offered and opinion regarding the TWIA adoption of a 2021 rate recommendation to the TWIA Actuarial Committee. Up to that point, we had 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 original Residential and Commercial Rate Level Indication report by Willis Towers Watson on September 4, 2020, we offered comments in support of a 5% or more rate increase for TWIA policies.

In its September meeting, the Actuarial Committee directed staff and Willis Towers Watson to perform additional research on various risk factors associated with TWIA’s book of business after questions were raised by members of the committee. Willis Towers Watson and staff performed the requested work, and presented updated findings to the Actuarial Committee on December 1. TCAIS was gratified, as all stakeholders should be, that the research yielded significant positive findings related to the TWIA book of business that indicate lower risk levels in the TWIA book of business and may produce real savings in anticipated losses and reinsurance that can be applied to paying down bond debt or other revenue saving measures.

However, the fact remains that even with the revisions TWIA still shows a significant rate indication that needs to be addressed. TCAIS’ very low, incremental minimum suggestion does not come near to the current recommendation. We observed staff, Willis Towers Watson, and the Actuarial Committee discussing the possibility of lowering the indication further with more research. TCAIS concludes from careful review of that discussion, the current magnitude of the rate indication, and the general inflationary increase in expenses associated with claims, that a

5%-10% increase has virtually no chance of producing an excessive or even adequate rate relative to a future indication that may result from the additional work.

After careful review, TCAIS reiterates its original recommendation from September. We recommend that the TWIA Board institute a minimum 5% rate increase for both commercial and residential policies for 2021, and further urge 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, including the latest revision of the Willis Towers Watson Report, show a critical rate indication.** The original 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, were 21% for residential and 34% for commercial. The highest indications (AIR Model alone) are 54% for both commercial and residential. The most recent revision of the WTW report, presented to the Actuarial Committee on December 1, trimmed the overall indication by 6% for residential while actually increasing the commercial indication slightly. Even with the application of new data, every model signals the need for an immediate rate increase. Further, the indication is so significant that there is virtually no possibility that additional research will eliminate the need for a substantial 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. Again, though the updated WTW report shows significant improvement in the risk profile of the TWIA book, it does not alleviate this tension. 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.

TCAIS recognizes that this year has been a difficult one for all Texans, and is sensitive to the broader economic and health challenges facing citizens and businesses as we work to emerge from the effects of the Covid pandemic. TCAIS also thinks that we need to look to the future where we can to maintain sound system for life after Covid. This tension between responding to current crisis and maintaining sound systems is present across our state and country in both the public and private sectors.

With this in mind, TCAIS believes the TWIA Board should carefully consider costs to its policyholders against the need to maintain a stable system. TCAIS observes that the average TWIA premium is \$1,600 per year, and that the average 5% rate increase would therefore be \$80 per year, or less than \$7 per month. We believe that, though a 5% increase does not close the rate adequacy gap, as discussed above, it does provide some much needed relief to that gap that has been widening, and is at least a sign post pointing toward TWIA sustainability and statutory compliance.

Again, TCAIS appreciates the opportunity to address the TWIA Board. 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: Ryan Brannan <ryan@brannanllc.com>
Sent: Friday, December 4, 2020 11:18 AM
To: PublicComment
Subject: CWIC Comments re: TWIA Board meeting on 132/8/20
Attachments: CWIC Comments to TWIA board 12.4.20.signed.pdf

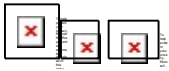
All,

Please see the attached comments from the Coastal Windstorm Insurance Coalition to the TWIA Board for its upcoming meeting on December 8th.

Thanks and please let me know if you have any questions, etc.

- Ryan

Ryan Brannan, JD, MBA
Principal
THE BRANNAN FIRM
512.575.3005 (o)
469.348.1206 (c)
Ryan@Brannanllc.com
1701 Nueces St.
Austin Tx, 78701





COASTAL WINDSTORM INSURANCE COALITION

2302 Postoffice Street • Galveston, TX, 77550 • (409) 682-0948
hfreudenburg@hotmail.com

December 4th, 2020

Ms. Chandra Franklin-Womack
5700 South MoPac Expressway
Building A
Austin, TX 78749

Dear Ms. Franklin-Womack:

Thank you and the rest of the board for your service to Texas on the Texas Windstorm Insurance Association [TWIA] board of directors. On behalf of the Coastal Windstorm Insurance Coalition [CWIC], I appreciate the opportunity to comment to you ahead of the board meeting on Tuesday, December 8th.

I would like to urge this board to not approve any rate increases at this time. The current pandemic has left many in our community struggling to just get by. We still have not recovered from Harvey, let alone everything that has happened since then. At this point, a rate increase would be devastating to thousands of Texans. Let your voice be heard.

In addition, the Willis Towers Watson information that the TWIA actuarial and underwriting committee requested was not available to the public until just before that committee hearing, and consisted of more than 100 pages of information. It has still only been a few days and there has not been enough time to properly digest the information, let alone comment on the information with any level of sophistication. We applaud the actuarial committee for seemingly understanding that the timing of the release of information along with other factors by choosing not to vote for a recommendation of a rate increase.

Last session, the Texas legislature passes HB 1900. Part of that legislation created a committee to review TWIA's funding structure. Unfortunately, due to Covid, that committee has not had a chance to meet at all. TWIA's board of directors has been working well with coastal legislative members over the last several years but any action regarding rates at this board meeting, a month before the Texas legislature reconvenes, would be premature. TWIA should not use Covid as an excuse to preempt legislative action on TWIA rates.

Thank you again for the opportunity to comment, and please do not hesitate to reach out if I can answer any questions or provide additional information.

Sincerely,

A handwritten signature in black ink that reads 'Henry Freudenburg'. The signature is stylized with a large 'H' and a long, sweeping underline that ends in a small cross-like mark.

Henry Freudenburg
Chairman

Coastal Windstorm Insurance Coalition

Public Comment

From: Thompson, Jay <JThompson@thompsoncoe.com>
Sent: Monday, December 7, 2020 12:55 PM
To: PublicComment
Cc: 'albert betts'
Subject: Comments from ICT and AFACT
Attachments: 8775815_1.pdf

Please provide these comments to the Board of Directors. Thank you.

Jay Thompson

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THOMPSON COE

Thompson, Coe, Cousins & Irons, L.L.P.
Attorneys and Counselors

Jay Thompson
Direct Dial: 512-703-5060
jthompson@thompsoncoe.com

Austin
Dallas
Houston
New Orleans
Saint Paul

December 7, 2020

Board of Directors
Texas Windstorm Insurance Association
Austin, Texas

via email: PublicComment@twia.org

Re: December Board Meeting-Rate Adequacy of TWIA for 2021

Dear Board Members:

These comments are submitted on behalf of our clients, the Insurance Council of Texas (ICT), a property and casualty insurance trade association representing the interests of over 400 insurers who do business in Texas and the Association of Fire and Casualty Companies of Texas (AFACT), a trade association comprised of over 30 insurers primarily domesticated in the State of Texas.

Many of our member companies write wind coverage along the coast and are part of the private market which writes more than half the wind coverage on the coast, in addition to the homeowners, auto, and commercial coverage Texas insurers provide to support the coastal economy. Additionally, our members are subject to up to \$1 billion in assessments if needed to help pay TWIA claims losses. Most recently, after Hurricane Harvey, private insurers paid \$363 million in TWIA assessments to pay TWIA policyholders. Insurers also paid approximately \$7 billion for auto, residential, and commercial losses for non-TWIA related claims. In short, our members play a major role in covering the risks faced by coastal residents and businesses when Texas suffers a major storm.

We are providing these comments to urge the TWIA board to consider at least a 5% rate increase when deliberating any potential rate filing during the upcoming December 8th board meeting. As background, in August, the TWIA board of directors voted for no increase in rates for its 2021 annual rate filing with TDI. This was in part due to the board's desire to review the independent actuarial review of TWIA rates being performed by Willis Towers Watson (WTW) which was not complete as of the time of the August meeting. Subsequently, WTW held a meeting in September and again on December 1st with the TWIA Actuarial and Underwriting Committee to review their actuarial analysis and recommendations.

In September, WTW reported to the Actuarial and Underwriting Committee recommended rate indications of 32% for homeowners and 42% for commercial risks. During that meeting the

committee discussed WTW's recommendations and certain data and information regarding TWIA risks. The committee asked WTW to work with TWIA staff and review additional data to further modify their recommendation. On December 1, WTW reported their additional analysis resulted in an updated rate indication of 26% homeowners and 44% commercial. Again, some committee members raised questions about certain assumptions for TWIA risks and requested further analysis based on certain data assumptions. WTW is expected to report an updated rate indication, with certain assumptions about TWIA risks, to the board prior to its December 8 meeting.

Despite multiple reviews by WTW, and many requests to consider additional data and assumptions made, the result has been the same, TWIA's rates are inadequate for the risks they insure. As a reminder, in July TWIA staff reported their actuarial analysis showed rate indications of 44% for residential and 49% for commercial.

For your reference, here's a summary of the current 2021 rate indications from TWIA and WTW:

	Residential	Commercial
TWIA's 2020 Rate Adequacy Analysis (July 2020)	44%	49%
WTW Report (September 2020)	32%	42%
Revised WTW Report (December 2020)	26%	44%

During the August board discussion and committee meeting discussions, some board members and commenters have argued against any rate increase due to the ongoing COVID-19 pandemic and its economic impact on TWIA insureds. While we are sensitive to this issue for TWIA policyholders, as well as for all Texans, we urge the TWIA board to consider a modest increase of at least 5% for 2021.

If this board again votes for no rate increase, it will continue a concerning trend of no rate actions despite significant rate indications. Before this year, TWIA has not increased its rates in three of the last four years. Continued inaction on rates, however well intentioned, will likely lead to further increases in future indicated rates. Although a 5% increase for 2021 would not resolve the rate inadequacies, it at least helps alleviate future pressures on rates and helps create a path toward more adequate rates for TWIA risks.

Generally, in years in which TWIA's board approved modest 5% increases, this has helped to minimize, and in some years, reduce the rate indications. For example, between 2012 and 2016, with 5% rate increases each year, the rate indications for commercial decreased from 35% to 21%. By comparison, for residential, for that same period, rate indications remained steady decreasing slightly from 28% to 26%. However, the significant rate indication increases began after multiple

years of no rate increases and as TWIA dealt with the aftermath of \$1.6 billion in Hurricane Harvey losses, outstanding TWIA debt, and other operating expenses.

As this board is well aware, TWIA is required by law to maintain adequate rates and rate adequacy is an important part of TWIA's overall funding structure. TWIA, for the benefit of its policyholders and member insurers, needs to be financially sound in order to pay claims after covered events. Texas Insurance Code §2210.355(c) requires that TWIA rates be:

(c) reasonable, adequate, not unfairly discriminatory, and non-confiscatory as to any class of insurer

Our comments will focus on two elements of the rate requirements, an adequate rate and a rate that is "not unfairly discriminatory". Per Insurance Code §2251.052(c), a rate is inadequate if:

- (1) the rate is insufficient to sustain projected losses and expenses to which the rate applies; and
- (2) continued use of the rate: (A) endangers the solvency of an insurer using the rate: or (B) has the effect of substantially lessening competition or creating a monopoly in a market.

Continued failure to take appropriate actions on rates, given the evidence of rate inadequacy, and TWIA's revenue and debt/expense issues, ensures that TWIA remains noncompliant with statutory requirements for rates.

In addition, the board must consider whether its actions are compliant with requirements that TWIA's rates be "not unfairly discriminatory". Under the Insurance Code §2251.051, a rate is unfairly discriminatory if:

- (1) the rate is not based on sound actuarial principles;
- (2) the rate does not bear a reasonable relationship to the expected loss and expense experience among risks; or
- (3) the rate is based wholly or partly on the race, creed, color, ethnicity, or national origin of the policyholder or an insured.

No action on rates, given the actuarial analysis presented to the committee by WTW and TWIA's actuaries, runs afoul of the concept of a rate based on sound actuarial principles.

This does not ignore the reality that TWIA should consider the financial situation of its policyholders, but as the insurer of its policyholders' homes and businesses, TWIA needs to balance that consideration against its overriding obligation to ensure the financial health of the organization; and maintain its ability to pay policyholder claims in the event of future losses without incurring additional debt.

Beyond legal considerations, another year of no rate action further exacerbates TWIA's financial issues. Based on estimated policy holder premiums for 2020, TWIA will collect approximately \$350 million in premiums. However, according to TWIA's rate adequacy analysis, TWIA's fixed expenses for 2020 are 47.7% and variable expenses are 22.9%, meaning approximately 70% of premium revenue is already accounted for, leaving roughly \$105 million for the CRTF. Thankfully, this year's record-breaking hurricane season spared the Texas coast from any large storms and losses and the CRTF was not further depleted. As of June 30, 2020, the reported CRTF balance was \$177 million, and a small hurricane would have depleted the CRTF and likely required TWIA to incur additional debt to repay losses. TWIA's current funding structure includes \$1 billion funded through public securities, which when utilized, adds long-term repayment debt to TWIA in subsequent years.

Although a 5% rate increase cannot be expected to solve TWIA's revenue issues, it creates additional revenue for TWIA and reduces reliance on public securities to repay claims. This rate increase does not create an undue financial burden on TWIA policyholders. For perspective, we note that the individual impact of a 5% increase, based on the average TWIA policyholder premium, would be approximately \$70-80 annually or \$6-7 per month.

Overall, continued rate inadequacy and failure to address the issue will negatively impact future policyholders of TWIA, policyholders on the Texas coast, and property policyholders statewide. If inadequate rates are further exacerbated by four out of five years of failure to act on rates, TWIA may have insufficient CRTF to pay for losses in excess of 30% of premium in 2021 which places TWIA policyholders at greater reliance on debt as a repayment tool. In addition, other Texas property policyholders are more likely to have their insurers being subject to member assessments of up to \$1 billion, a cost in which non-coastal Texans ultimately share.

For the reasons outlined above, we hope this board will decide based on sound insurance principles and recommend at least a 5% rate increase. We appreciate the opportunity to provide these comments and are available to answer any questions you may have.

Sincerely,

/s/ Jay Thompson

Jay Thompson

Cc: Albert Betts, Exec. Director, ICT
AFACT Members

Public Comment

From: Ware V. Wendell <wwendell@texaswatch.org>
Sent: Friday, December 4, 2020 11:21 AM
To: PublicComment
Subject: No rate hike, protect coastal homeowners

To Whom It May Concern:

I lead Texas Watch, a statewide non-profit that has advocated for the rights of policyholders for over 20 years. We write today to register our opposition to any rate hike by TWIA at this time.

Our economy is suffering greatly right now due to this once-in-a-hundred year pandemic. Lines are growing at food banks. Evictions are on the rise. This tragic toll is taking place through no fault of the families who are affected. We must do everything within our power to keep people in their homes. Maintaining current insurance rates would help Coastal Bend families at a time when they desperately need it. On the other hand, raising rates would undoubtedly create a man-made economic and humanitarian disaster by pushing many out of their homes or forcing them to choose between necessities.

Please pursue the wise and humane policy choice and oppose any rate hikes. I ask you to put people first.

Respectfully submitted,

Ware V. Wendell
Executive Director
Texas Watch
512-381-1111
wwendell@texaswatch.org
2121 East 6th Street, Suite 201
Austin, Texas 78702
[Web](#)[Facebook](#)[Instagram](#)[Twitter](#)[YouTube](#)

Public Comment

From: Mallory Diosdado <mallory@sulcotx.com>
Sent: Friday, December 4, 2020 10:48 AM
To: PublicComment
Subject: Opposition to rate increase
Attachments: 2020_12_04_10_34_07.pdf

Please see attached opposing the TWIA rate increase.

Thank you,

Mallory Diosdado
Sullivan Companies
Office: 409.740.4200
Fax: 409.740.4228
mallory@sulcotx.com



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

December 2, 2020

Re: Opposition to rate increase

As a citizen of Galveston, TX I respectfully request that the Texas Windstorm Insurance Association (TWIA) Board does not consider any rate increase on coastal policyholders, residents, and business 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. I 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 coastal communities at a disadvantage.

Once again, I respectfully reiterate that the TWIA Board opposes any rate increase on TWIA policyholders.

Sincerely,



John R. "Rocky" Sullivan
Vice President

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 10:12 AM
To: PublicComment
Subject: Please don't raise rates

We are in our 70s and retired. Our biggest annual expense is already Texas Windstorm insurance, even though we're not anywhere near the coast in Galveston County.

Please don't add to the burden on old people and poor people by raising rates now. It's unnecessary. Also, so many of my neighbors have lose jobs and are in ill health after the Covid hit to our community's finances.

So, I beg you all NOT to raise Windstorm Rates. The rates were SO much less costly and SO much more affordable when we just had our private insurance with USAA. When TWIA took over, our rates just zoomed, and we've struggled to pay it ever since.

I urge you not to raise rates – in fact, perhaps you can lower them for seniors like us – over 65, on a fixed income and NOT rich.

Galveston County long-time residents –

[REDACTED]
Dickinson, Texas
77539

Sent from [Mail](#) for Windows 10

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 10:11 AM
To: PublicComment
Subject: TWIA Insurance rates

Please do not raise the TWIA insurance rates. As a semi-retired senior citizen, Social Security increases are small and made smaller by increases in the fees for Medicare insurance. Interest rates on savings which were expected to support our retirement are almost non-existent. COVID restrictions are making part-time employment more difficult to obtain. We cannot afford increased rates.

[REDACTED]
Galveston, TX 77551

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 10:23 AM
To: PublicComment
Subject: TWIA rate increase

I strongly object to raising Texas Windstorm rates at this time. Many people are strapped for money right now because of the Pandemic. And I don't remember that many storms hitting TExas this Year. Please reconsider this because of the financial burden it will put on the people of Texas

[REDACTED]
San Leon, Tx

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 10:28 AM
To: PublicComment
Subject: Twia tax increase

Don't increase tax! Times are too hard!

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 10:33 AM
To: PublicComment
Subject: Rate increase

Please do not raise rates. Too many people hurting in too many ways right now!

Sent from my iPhone

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 10:46 AM
To: PublicComment
Subject: Don't Raise the Rates on Windstorm Insurance

Hello TWIA:

We do not support any rate increases especially at the time of Covid when so many people are just struggling to get buy. Thank you for recommending that there be no rate increase. Please carry-on with this excellent plan of leaving the rates as they are.

Respectfully,

[REDACTED]
League City, Texas
[REDACTED]

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 10:49 AM
To: PublicComment
Subject: Request for 0% Rate Increase TWIA Wind Storm Insurance

Per an email I received from Mayes Middleton, State Representative, I am requesting TWIA consider a 0% rate increase.

Thank you,

[REDACTED]

Public Comment

From: Tom LaRue (59) <Tom.LaRue@prosperitybankusa.com>
Sent: Wednesday, December 2, 2020 11:13 AM
To: PublicComment
Cc: Mayes Middleton
Subject: Written Public Comment to TWIA Board meeting on December 8th

Ladies & Gentlemen,

Texas windstorm insurance rates are too high and rates should be lowered.

Properties located anywhere within the State of Texas are subject to natural disasters, including tornados, fires, floods, hail storms and of course hurricanes.

Every Texas resident should be required to have special disaster insurance covering the risks of the aforementioned natural disasters.

By doing so, the risk pool would be increased to a sustainable level and insurance premiums would be lowered.

The Texas coastal exclusion zone in which property owners are required to obtain separate TWIA Windstorm Insurance coverage is too shallow and should be extended further inland.

The coastal exclusion zone extends just over 50 miles from the coast and significant storm damage occurs beyond the "Coastal Zone".

The coastal exclusion zone should be extended from 50 miles to 150 miles inland.

This move would significantly expand the risk pool and allow for premium reductions for everyone.

During Hurricane Rita, severe damage was experienced beyond Lufkin Texas and many who had evacuated coastal areas became stranded in the Lufkin area for weeks, due to severe storm damage in that area.

Both are viable options.

Require the entire state to participate in a special natural disaster insurance coverage pool, or expand the coastal exclusion zone.

One example of the difference in impact of current TWIA requirements upon coastal property owners.

A home in central Houston outside the coastal exclusion zone with \$239,000 in coverage pays a premium of \$1,200 which includes windstorm coverage.

A home in League City with \$205,000 in coverage pays \$614 for their homeowners coverage, plus \$1,165 for windstorm coverage.

These homes are only 30 miles apart, yet the premium paid for the Houston home is 32% less than the combined premiums paid for the League City home.

A home in Galveston, outside of a flood hazard area pays \$815 for \$200,000 homeowners coverage, plus \$1,823 for \$200,000 windstorm coverage.

The Galveston and Houston homes are only 57 miles apart, yet the combined premium paid for the Galveston home is 54% higher.

Please take action to improve the Texas windstorm insurance system.

Thank you for your time.

Tom C. LaRue - President
Prosperity Bank - Galveston
2424 Market Street
Galveston, Texas 77550
409-762-8387 dir / 409-789-7800 cell

Tom C. LaRue - President
Prosperity Bank - Galveston
2424 Market Street
Galveston, Texas 77550
409-762-8387 dir / 409-789-7800 cell
NMLS#584121

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Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 11:49 AM
To: PublicComment
Subject: Please vote against rate increase

Hello,

As a Gulf Coast homeowner, I appreciate that TWIA is available to all of us as a benefit in case of a major cyclonic event. I understand that insurance rate adjustments need to be implemented at times, but it seems that the entirety of Texas gets a rate spike rather than adjusting for those areas that are more prone to incur claims on a more frequent basis. Before asking for a rate freeze this year I will ask that TWIA look at restructuring their rates based on claim frequency rather than assessing a blanket increase.

That being stated, I ask that TWIA freeze rates this year so as to focus on a restructuring of rates that will offer a tiered rate program for those areas more commonly prone to claims. Once rates have been reformed, I ask that those heavily burdened areas be incrementally transitioned into their new rates over a period of time allowing the insured the opportunity to recover from any claims without any further immediate financial hardship.

As for those areas that are predominately claim free, I ask that rates continue to be frozen until we have officially "recovered" from the economic impact COVID19 has had on many of us.

Thank you for taking the above into consideration before your vote on rate increases. I hope that your decisions will be of great help and relief to those you serve.

Respectfully,

[REDACTED]
Galveston, TX

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 11:53 AM
To: PublicComment
Subject: no rate increase

Here in our coastal region bordering Houston we already pay a substantial amount for TWIA insurance.

Most people that work around here have not had jobs for most of the year.

It could be financially devastating to this region to add more burden to these people.

We do not need an increase in rates at this time.

Thank you for listening, [REDACTED]

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 11:58 AM
To: PublicComment
Cc: Mayes Middleton
Subject: TWIA Rate Increase Opposition

I agree with my State Rep. Mayes Middleton and oppose all rate increase recommendations. I encourage the TWIA Board to adopt a 0% increase on December 8th. Thank you.

[REDACTED]
[REDACTED]
Galveston, TX 77554

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Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 12:25 PM
To: PublicComment
Subject: Regarding TWIA board meeting

I'm a home owner in Galveston Texas. Please support the \$0 increase of premium, at the meeting next week with the TWIA board.

[REDACTED]
Galveston, Tx 77554

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 12:33 PM
To: PublicComment
Subject: Petition to reform

Hello

TWIA needs to reform their rate structure rather than continue to penalize the majority for the sake of a few. This is a petition from a Galveston County resident and tax payer with a family of 4.

Please treat this as the formal petition to reform the rates to not penalize the majority.

Truly,

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 1:01 PM
To: PublicComment
Cc: Mayes Middleton
Subject: FW: Please DO NOT raise the TWIA insurance rates for 2021

My stance has not changed as indicated in my email dated July 29, 2020. It is "Do Not Raise Windstorm Insurance Rates for the year 2021 in the State of Texas". There many citizens in the State of Texas and the USA who are unemployed due to the virus and they will be unable to pay the existing or the raised TWIA taxes. We are tax poor as the saying goes.

From: Donald Smith [REDACTED]
Sent: Wednesday, July 29, 2020 11:57 PM
To: 'PublicComment@TWIA.org'
Cc: Mayes Middleton
Subject: Please DO NOT raise the TWIA insurance rates for 2021

I urge the TWIA Board of Directors "to not raise" the rates for windstorm insurance for the year 2021. I and my wife are retired and we are struggling to pay for all our medical, home and vehicle insurance rates. I have lived in my house located in Chambers County since 1978. I have submitted only one claim to date for storm damage on my roof. The neighbors tree fell on the end of my roof and State Farm paid between \$1500 & \$1800 dollars for repairs only. They dropped my homeowners insurance the next year and I had to go to USAA to get insurance. I had to also pay for the removal of tree. I am a veteran and USAA is the first insurance company that has treated me fairly. Hurricane Ike was the hurricane that caused the damage on the roof that I mentoned. Your attention to this matter will be greatly appreciated.

[REDACTED] & wife(citizens of Chambers County Texas since 1933 & 1943 respectively)

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 1:43 PM
To: PublicComment
Cc: [REDACTED]
Subject: Vote No for TWIA Rate Increase

TWIA Board,

I urge you to vote no for any rate increase.

With the current pandemic, many a citizen is struggling to just get by. At this point a rate increase would be devastating to thousands of Texas.

The TWIA Board must vote against any rate increase.

[REDACTED]
[REDACTED]
Anahuac, TX 77514
[REDACTED]

"The tyranny of experts" Present day

"Success is not final, failure is not fatal: it is the courage to continue that counts." Winston Churchill

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 1:58 PM
To: PublicComment
Subject: No rate increases in the Time of COVID-19

I totally support the idea of no rate increases during the Time of CoViD.
Thank you!

[REDACTED]
Teacher
[REDACTED]

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 3:55 PM
To: PublicComment
Subject: NO RATE HIKE

TWIA must have a better understanding and grasp of the gravity of economic conditions in recent hurricane impacted communities before considering a rate increase.

Many Texans have lost jobs and others are struggling to pay their bills. Federal, state and local authorities are trying to help through stimulus packages, tax and eviction deferrals, and relaxing or removing regulations, but a rate increase now would be devastating.

Please don't raise the rates!

[REDACTED]
[REDACTED]
Crystal Beach, TX 77650

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 4:08 PM
To: PublicComment
Subject: TWIA Rate Increase

With the current issue of Covid 19, lots of people are struggling just to make ends meet, worried about their jobs or have already lost their job. It would be devastating to so many Gulf Coast Residents to incur any additional financial burden. Thank you and hope you take these comments into consideration when making your decision and NOT raise our TWIA rates.

[REDACTED]
Crystal Beach, TX

Sent from my iPad

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 5:23 PM
To: PublicComment
Subject: Windstorm Rates

Dear TWIA,

Thank you so much for not increasing insurance rates. We are all in an economic crisis. One way for us to get through this together is to make sacrifices. As one of your customers I am asking that insurance rates not be increased in the near future. We have been through enough. Please give the incoming leadership an opportunity to work out all of the necessary adjustments to our economy. Once it's been determined that the economy is heading in the right direction I trust that you will gather the pertinent information to determine whether or not a rate increase is warranted.

Thank you for your consideration,

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 5:52 PM
To: PublicComment
Subject: Proposed TWIA Rate Increase

To whom it may concern

Under NO circumstances should TWIA raise any rates.

My TWIA rates are more than double what I pay for Flood and Homeowners Insurance - combined!
13 Texas Coastal Counties are the ONLY counties which pay into TWIA - this is unacceptable.

We are adamantly against future rate increases. The entire state should pay into the fund as living on the coast has become unaffordable to many.

[REDACTED]
[REDACTED]
Galveston, Texas 77550
[REDACTED]

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 6:11 PM
To: PublicComment
Subject: NO TWIA Increase

I would like my voice to be heard that windstorm insurance rates are far too high. This is unfair treatment of the 13 coastal counties and I hereby want it to be known that the people of the 13 counties do not believe this is FAIR at ALL! I know of people moving out of our county to avoid these ridiculous rates which is hurting industry and residents of the coastal counties. The rates should be shared across the state since EVERYONE knows that a hurricane does NOT stop at a county border.

Please DO NOT raise rates at this time!!

Thank you,

[REDACTED]

[REDACTED]

Email: [REDACTED]

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 6:44 PM
To: PublicComment
Subject: TWIA rates

To whom it may concern:

I sincerely believe it would be a disservice to increase the already high TWIA rates. Many of us are having a hard time paying bills due to Covid and other circumstances. Please do not increase the rates as so many families are already having a hard time financially.

[REDACTED]

Sent from my iPad

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 7:14 PM
To: PublicComment
Subject: Opposition to Rate Increase

In light of current circumstances whereas unemployment is high, and in the face of further economic uncertainty, a windstorm insurance rate increase would be totally inadvisable. Please give some consideration to the fact that paying basic household bills is suddenly overwhelming for a substantial portion of the coastal community population. Thanks.
[Sent from Yahoo Mail on Android](#)

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 8:46 PM
To: PublicComment
Subject: Please don't raise rates;

We have dealt with so very much in our area this past year, hurricane after hurricane in addition to the economic effects of the pandemic. Please don't add to our economic woes by increasing the rates for our windstorm coverage! That could be a blow to our area that could actually cost YOU money due to people's inability to pay the increased amount!

Public Comment

From: [REDACTED]
Sent: Wednesday, December 2, 2020 9:16 PM
To: PublicComment
Subject: Rate increase

A TWIA rate increase would be devastating to the Texas Gulf Coast. Many of our citizens are suffering from the COVID crisis either physically or financially, and in some cases, it is both. Although we have had tropical storms with massive amounts of water, we have not had a wind issue in many years. Consequently, there is not any reason for an increase. As a retired Texas teacher, I can tell you that I would have difficulty paying any more money. I know that I am not the only person living on a very fixed income yet trying to protect my home from storms.

I also realize that not all wind storms are on the Gulf Coast. However, I also know that most Texans are like me and are struggling to pay their bills and an increase would cause a hardship on them.

Sincerely,

[REDACTED]

Sent from XFINITY Connect Mobile App

Public Comment

From: [REDACTED]
Sent: Thursday, December 3, 2020 4:48 PM
To: PublicComment
Subject: No increase

There is no time for rate increase when people are not working, are on unemployment and can't afford to pay their mortgage, or buy food during this Covid 19 issue. Let's be smart. Let's give people a break.

Get [Outlook for Android](#)

Public Comment

From: [REDACTED]
Sent: Thursday, December 3, 2020 3:47 PM
To: PublicComment
Subject: Rate Increase - NO!

Please do not raise our TWIA rates. In fact, since more money is needed, have other counties who collect from the insurance pool pay into the pool. Why just us?

#LoveGalveston

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Thursday, December 3, 2020 3:00 PM
To: PublicComment
Subject: Rates

I oppose any raising of rates. TWIA buys too much reinsurance and attempts to pass that cost to homeowners. You do not take into account our higher building standards on the coast properly when buying reinsurance. You are still carrying excessively high 8% interest debt that is driving up rates. You're only getting about .25% interest in the large CRTF. You have the ability to lay down the bonds more quickly and should do so.

Perhaps making these changes would eliminate any need for rate hikes.

[REDACTED]
Galveston 77550

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Thursday, December 3, 2020 12:41 PM
To: PublicComment
Subject: TWIA PRICE INCREASE PROPOSAL

To Whom it May Concern at TWIA:

With people reeling from unemployment, COVID and what appears a soon to be an oppressive Government; I submit that your proposal to increase rates was/is insensitive and brazen. The committee voted to not increase rates and I/we expect the Board to vote NO as well.

Respectfully,

[REDACTED]

Mont Belvieu, Tx 77580

Public Comment

From: Rhonda Devillier (62) <Rhonda.Devillier@prosperitybankusa.com>
Sent: Thursday, December 3, 2020 11:50 AM
To: PublicComment
Subject: Texas Windstorm Insurance Rates

It is my understanding that your board will meet soon to review rates for Texas Windstorm Insurance. Please consider a 0% rate increase. It is very important to the survival of this area for our customers to be able to afford their windstorm insurance and I am on the frontline to see the struggles that local residents are facing with this financial crisis that is upon us. We cannot stand a rate increase at this time. Thanks so much for your consideration.

Rhonda G. Devillier

President - Winnie Banking Center - 62
146 Spur 5
Winnie, Texas 77665
409-296-3000 (shoreTel 36301)
Fax #409-296-4585
M#409-656-5546
NMLS#584028
rhonda.devillier@prosperitybankusa.com



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Public Comment

From: [REDACTED]
Sent: Thursday, December 3, 2020 11:00 AM
To: PublicComment
Subject: No rate increases

Sent from my iPhone

Public Comment

From: Jason Keeling <jkeel16@aol.com>
Sent: Thursday, December 3, 2020 9:48 AM
To: PublicComment
Subject: windstorm insurance

TWIA

I dont understand why just the coastal counties have to bear the brunt of the windstorm insurance. The counties inside of the coastal counties are just as subject to wind damage. Take Harris county for example. They suffered more loss than Galveston county during most every hurricane. Every storm comes inland. Other areas of the state are subject to wind damage from both straight line winds and tornadoes. If the cost was distributed properly and insurance companies were required to spread the expense across the whole state the rate increase state wide would only be a few dollars. There should be no rate increase and the "windstorm" insurance should go away for coastal counties.

Jason Keeling
BROKER
jason@rysonhomes.com

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Hours: Monday - Friday: 8 am - 5 pm CST (UTC/GMT)

Public Comment

From: [REDACTED]
Sent: Thursday, December 3, 2020 8:01 AM
To: PublicComment
Subject: Rate Increase on Windstorm Policies - December 8, 2020 meeting

TWIA Board members-

I oppose all rate increase recommendations. I encourage the TWIA Board to approve and adopt the recommendation from the TWIA Actuarial Committee of a 0% rate increase.

A rate increase is bad for Gulf Coast ratepayers as it has been a huge struggle just to continue to pay mortgages in the 2020 year due to the pandemic. I consider myself lucky to have a job that has continued to pay my salary as I work from home. There are many others not as fortunate. This money from increases could be used to put food on the tables of so many gulf coast residents.

In conclusion, the TWIA Board must vote against any rate increase at this time considering the pandemic.

Thanks for your consideration,

[REDACTED]

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Friday, December 4, 2020 8:28 AM
To: PublicComment
Subject: Windstorm Premium

My name is [REDACTED] I live in San Leon and have a good view of Galveston Bay . I find it calming and relaxing and I love it here . However , if my Windstorm premium goes up I may have to sell and move away from the coast . I'm semi retired and would like to be able to retire completely and live here the rest of my life . Before Hurricane Ike my premium was \$750 . After Ike it doubled. Ok fair enough- this community and the Bolivar Peninsula were devastated. Since that time several other hurricanes and tropical storms have impacted several areas on the Texas coast including here . However , my only claim was Ike and it was mostly flood damage . That was 2008 . Fast forward and my premium is now \$3,200 . That's more than quadrupled in 12 years. Absolutely nothing else I pay for has done that . I find that to be ludicrous. Please do not raise our rates again!

Sent from my iPhone

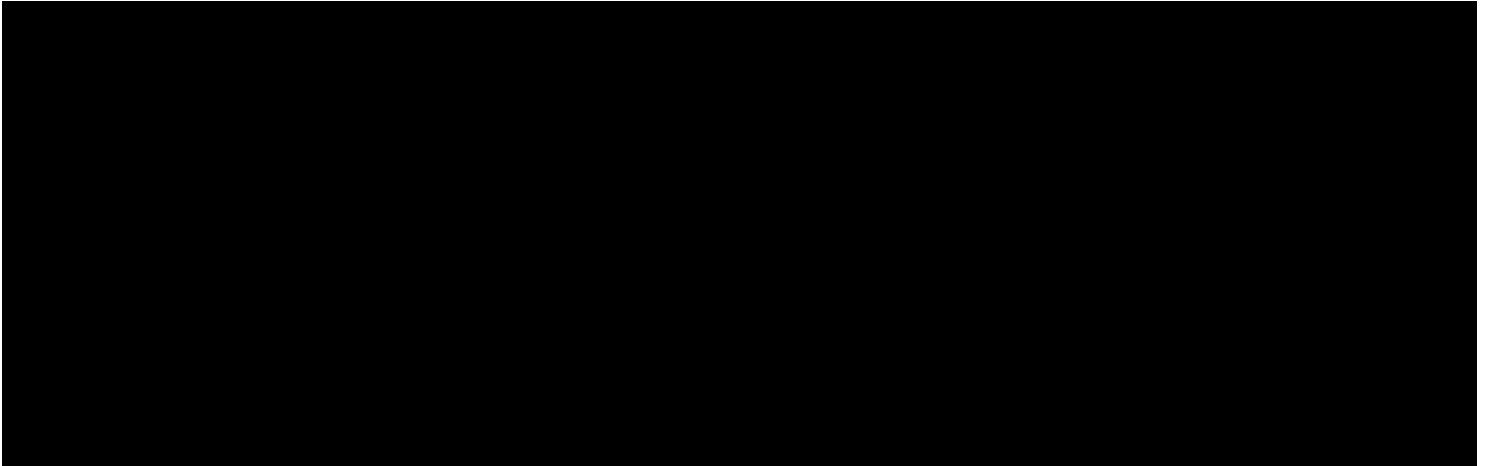
Public Comment

From: [REDACTED]
Sent: Friday, December 4, 2020 8:44 AM
To: PublicComment
Subject: Public Comment addressing Rate discussion

Thank you for the opportunity to comment!

We all know that many have suffered financially through the actions taken during the COVID 19 outbreak. The entire year has been difficult for most of us mentally as well as financially. Please consider that this is not over yet and many will not have recovered financially in the coming months.

Please consider NO rate increases for the coming year! Thank you!



Public Comment

From: [REDACTED]
Sent: Friday, December 4, 2020 10:01 AM
To: PublicComment
Subject: windstorm insurance

DO NOT INCREASE WINDSTORM INSURANCE. WE HAVE ENOUGH TO DEAL WITH IN GALVESTON WITH COVID 19.

[REDACTED]
[REDACTED]

Public Comment

From: Charlotte Hutchinson <Charlotte@toddhunterlaw.com>
Sent: Friday, December 4, 2020 10:12 AM
To: PublicComment
Subject: No Rate Hike

Charlotte Hutchinson

Public Comment

From: [REDACTED]
Sent: Friday, December 4, 2020 10:12 AM
To: PublicComment
Subject: No rate hike!

No rate hike!!

[REDACTED]
Corpus Christi

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Friday, December 4, 2020 10:13 AM
To: PublicComment
Subject: No rate hike

No rate hike!
Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Friday, December 4, 2020 10:13 AM
To: PublicComment
Subject: No rate hike!

No rate hike!

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Friday, December 4, 2020 10:14 AM
To: PublicComment
Subject: No rate hike!

No rate hike!

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Friday, December 4, 2020 10:19 AM
To: PublicComment
Subject: TWIA rate ike

No rate hike!

[REDACTED]

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Friday, December 4, 2020 10:23 AM
To: PublicComment
Subject: No rate hike

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Friday, December 4, 2020 10:39 AM
To: PublicComment
Subject: TUESDAY'S TWIA BOD MEETING

PLEASE, NO RATE HIKE!

THANKS!

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Friday, December 4, 2020 10:54 AM
To: PublicComment
Subject: Oppose any TWIA Rate Increase

Dear Sirs:

I am writing to you today due to my overwhelming concern about TWIA's intent to consider a premium rate increase at their upcoming board meeting on December 8th. This potential increase comes at a time when windstorm insurance rates have already increased 71% in the last eleven years. Rate increases of this magnitude are unsustainable and could drive businesses and the homeowners they employ up and down the Texas Gulf Coast away from their communities, as TWIA ratepayers simply cannot afford compounding these increases.

Any TWIA action at this time to raise rates would preempt legislative intent. Governor Abbott has signed into law HB 1900, by Senator Larry Taylor and Representative Greg Bonnen which is historical legislation to help coastal businesses and residents struggling to pay for ever-increasing TWIA rates. HB 1900 prohibits TWIA from forcing coastal policy holders to pay for previous years' losses and excessive reinsurance. HB 1900 also created an interim legislative committee to study and recommend changes to the TWIA funding structure. I understand a large reason TWIA believes rates are inadequate is because much of the money Texas businesses and residents pay to TWIA isn't going to build reserves – it's paying down old bond debt and purchasing billions in excessive amounts of reinsurance. HB 1900 now prevents premium dollars from paying for either.

I stand in steadfast opposition to any proposed increase. It clearly subverts the will of the 2019 legislative session. The legislature clearly intended to control and reduce TWIA rates through the passage of both the rate study provision, as well as new legislation that makes insurance companies in the TWIA assessment pool absorb more of the costs associated with windstorm coverage (and to pass the savings along to ratepayers).

Any action by TWIA to raise rates now would be premature and contradictory to public policy.

I urge you to not take any action at this time on a proposed TWIA rate increase at the next Board meeting on December 8th. It is too early to approve raising TWIA rates while significant funding reforms passed during the 2019 Legislative session are just now becoming law and the likelihood of the next legislature enacting additional reforms is high. It would be a great detriment to the well-being of a huge segment of the citizens who live and work along the Texas Gulf Coast if TWIA enacted a rate increase at this time.

With regards,

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Friday, December 4, 2020 7:08 PM
To: PublicComment
Subject: Rate Increases

We absolutely can not afford another rate increase from TWIA. The Covid shut downs on top of the already burdensome insurance mandates and laws that make it so expensive to operate are unacceptable. Every individual and business in the nation are cutting back and finding ways to operate more efficiently and with less income – TWIA needs to do the same.

Thank you for your consideration.

[REDACTED]
[REDACTED]
[REDACTED]

Galveston, TX 77551

Sent from [Mail](#) for Windows 10

Public Comment

From: [REDACTED]
Sent: Saturday, December 5, 2020 8:30 PM
To: PublicComment
Subject: Dont increase TWIA rates

I dont increase TWIA rates.

I retired 7 years ago and bought a small home to live on the coast of Galveston. Im on a fixed income.

My home is protected by the galveston seawall has been elevated to 12 feet above basic flood elevation. The bottom of my floor 30 feet above sea level.

I renovated this home to meet National FORTIFIED construction certification standards. This not only makes my home stronger and more secure. It allows me to feel safer. Its protected up to a Category 3 hurricane or EF-2 tornado. The problem with all this extra cost for me is Texas Wind Storm or any other Insurance carrier for Texas wont recognize the certification. These are construction standards for Florida and should be required for the Texas coast. TWIA should be required to consider this when issuing the insurance and estimating the costs. All insurance companies should be required to lower costs for homes build to this standard.

There is no consideration for the extra construction materials or engineering required to meet the FORTIFIED certification.

Because FEMA wanted extra money last year. My home is now required to carry flood insurance too. Really. My house is 30 feet above sea level. If my home floods. Galveston island east end is gone/ destroyed.

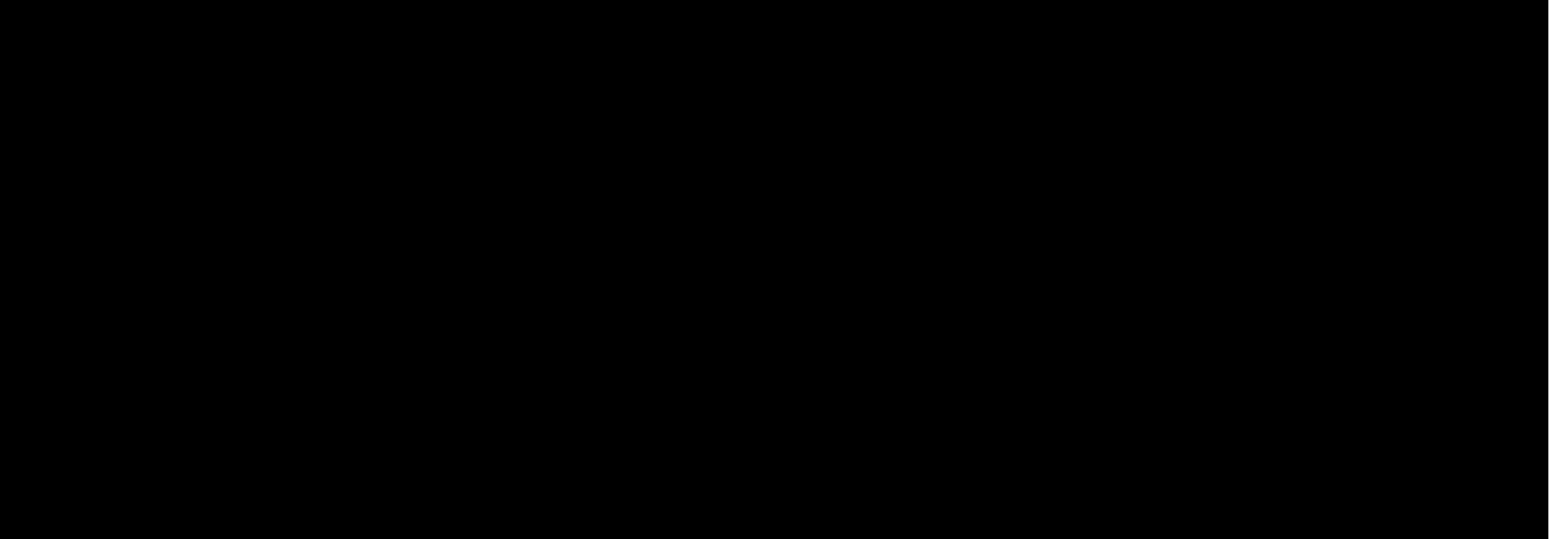
Nothing would be left east end exception the American National Insurance Building.

Dont raise rate unless you are prepared to reduce rates for stronger better engineered homes.

Thank you,

[REDACTED]

Sent from my phone iPhone



Public Comment

From: Agent Services
Sent: Wednesday, December 9, 2020 7:59 AM
To: Communications
Subject: FW: New TWIA submission from TWIA-Contact

From: notify@noreply.twia.org <notify@noreply.twia.org>
Sent: Wednesday, December 9, 2020 7:40 AM
To: Agent Services <agentservices@TWIA.ORG>
Subject: New TWIA submission from TWIA-Contact

First Name
██████
Last Name
██████
Email
██████████████████
Phone
██████████
Best Time to Call
Evening (5pm-8pm)
Subject
WPI-8-C Questions
Message
PLEASE - dont raise rate by 5% i am a retired teacher & a widow i simply cant afford this i have never required help from this insurance maybe raise by 2%?? PLEASE