



July 28, 2021

Dear Chairman Franklin-Womack,

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

A rate increase during an unprecedented season of economic distress 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,



Dade Phelan
Texas House of Representatives
District 21

Jadie Jucio Je.

Eddie Lucio, Jr. Texas Senate District 27

Sudith Efficine

Judith Zaffirini Texas Senate District 21

Terry Canales
Texas House of Representatives
District 40

J.M. Lozano Texas House of Representatives District 43

> Lois Kolkhorst Texas Senate District 18

Larry Taylor Texas Senate District 11

Mayes Middleton Texas House of Representatives District 23 Doya Hir

Todd Hunter
Texas House of Representatives
District 32

allel Herrero

Abel Herrero Texas House of Representatives District 34

James White
Texas House of Representatives

District 19

Deanie Dr. Monison

Geanie Morrison Texas House of Representatives District 30

> Juan "Chuy" Hinojosa Texas Senate District 20

Eddie Lucio, III Texas House of Representatives District 38

Briscoe Cain Texas House of Representatives District 128

Areg Bonnen, MD

Greg Bonnen
Texas House of Representatives
District 24

Ellm_

Ed Thompson Texas House of Representatives District 29

Cody Vasut
Texas House of Representatives
District 25

Alex Dominguez
Texas House of Representatives
District 37

Dennis Paul

Texas House of Representatives

District 129

Joseph Deshotel Texas House of Representatives District 22

Brandon Creighton Texas Senate District 4





STATE REPRESENTATIVE • DISTRICT 23

July 27, 2021

Chandra Franklin-Womack, Chair Texas Windstorm Insurance Association 5700 South MoPac Expressway Building A Austin, TX 78749

Chair Franklin-Womack,

Earlier this year, the TWIA Actuarial & Underwriting Committee ignored the actuarial advice from Willis Towers Watson regarding the blend of the AIR and RMS models to determine the appropriate amount of reinsurance to purchase. The TWIA Actuarial & Underwriting Committee's recommendation on a rate filing should be disregarded because they have continuously ignored the actuarial advice from an independent, third-party actuarial firm.

We went to great lengths and expense to ensure that an independent actuarial firm reviewed and made recommendations on the blend of models to use in determining the probable maximum loss. While I disagree with their recommendation of 25% AIR and 75% RMS, that recommendation was made on actuarial principles after a third-party review. However, TWIA continues to blatantly ignore that recommendation by determining the probable maximum loss with a 50/50 model split. This inflates the probable maximum loss, exaggerates the amount of reinsurance required to purchase, and passes on the increased costs to ratepayers. This is unacceptable.

There are many issues with TWIA's rate calculations that need to be addressed and analyzed by the legislative funding and oversight board, including the fact that the AIR model does not adequately give credit for windborne debris protections that are mandated by TWIA's own standards. The TWIA Board should suspend taking any action on rates until the legislative funding and oversight board has met and delivered a report on their findings. I adamantly oppose any rate changes.

Very truly yours,

Mayes Middleton

Texas State Representative

House District 23



City of Galveston

OFFICE OF THE CITY MANAGER

PO Box 779 | Galveston, TX 77553-0779 citymanager@galvestontx.gov | 409-797-3520

July 29, 2021

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

Dear Chairwoman Franklin-Womack,

I am writing to express strong opposition to the Texas Windstorm Insurance Association (TWIA) Board of Directors (the "TWIA Board") approving the five (5) percent premium rate increase as recommended in action taken by Actuarial/Underwriting Committee (the "Committee") on July 21, 2021. Further, I want to express concerns that such action taken by the Committee appears to be a preemptive attempt to circumvent the intent of the 87th Texas Legislature to conduct a thorough examination of TWIA funding structure.

The City of Galveston supports the critical TWIA legislation enacted by the 87th Legislature relating to TWIA administration and funding structure. Effective September 1, 2021, S.B. 1448, authored by State Senator Larry Taylor and sponsored by State Representative Greg Bonnen MD, directs: 1) a Legislative Funding and Funding Structure Oversight Board to review and provide recommendations on TWIA's funding and funding structure and merging TWIA with the Texas FAIR Plan Association, alternative property insurance for underserved areas in Texas; and 2) requires a two-third vote of the TWIA Board to approve a premium rate increase.

Provisions of H.B. 769, authored by State Representative Mayes Middleton and sponsored by State Senator Larry Taylor, sets forth requirements that also hold implications for setting premium rates. Effective September 1, 2021. H.B. 769 places rate action restrictions that: 1) prevent TWIA Board action when a board member vacancy exists for more than 60 days; and 2) prohibits the purchase of reinsurance from an insurer or broker involved in the catastrophe modeling used to determine probable maximum losses or adopting rates.

Through current statutory authority, TWIA is empowered to take a different approach that doesn't place the heaviest burden on struggling consumers. TWIA may draw upon a more balanced approach through member insurance company assessments, bonds, and premiums to offset losses. 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.

Since 1971, the TWIA role has been "the insurer of last resort" as a primary retail insurance provider in the fourteen (14) counties along the Texas coastline. Over the past 47 years, the Texas Legislature has attempted to correct a myriad of financial, adjudication, and policy problems, with the most recent major TWIA reforms occurring in 2011 and 2015. Rather than taking on another band-aid approach to correct a dysfunctional system, the TWIA Board should work with the Legislative Funding and Funding Structure Oversight Board to evaluate approaches that transition TWIA's role from primary retail insurer towards a reinsurance provider that effectively partners with the private insurance market. Part of this work includes examining how the catastrophic risk pools of other states operate to close the insurance protection gap.

Recently, the Reinsurance Association of America (RAA) identified the role of risk transfer as a solution used by the public and private sector including reinsurers, financial institutions, and government programs. During a hearing on "21st Century Communities: Climate Change, Resilience, and Reinsurance" before the U.S. Senate Committee on Banking, Housing, and Urban Affairs, pointed to the Florida Hurricane Catastrophe Fund (FHCF) and Florida Citizens Property Insurance Corporation (FCPIC) as examples where risk transfer has been used effectively by state programs.

Created in 1993, FHCF provides reimbursements to insurers for a portion of their hurricane losses. Reimbursement premiums paid by participating insurers are a primary source for the FHCF along with other sources including: investment income, pre-event bonding proceeds, reinsurance and other risk-transfer transactions, and post-event revenue proceeds). Except for certain de minimis exemptions, all insurers with a certificate of authority to write residential property insurance are required by Florida law to obtain FHCF reimbursement coverage. Insurer's coverage percentages are established at 90 percent, 75 percent, or 45 percent, as selected by the insurer when an FHCF reimbursement contract is executed.

In 2002, FCPIC was created to provide property insurance to residential and commercial property owners unable to obtain coverage in the private market. FCPIC is required to obtain the 90 percent FHCF reimbursement coverage level. Citizens went from a high policy count of nearly 1.5 million 2011 down to just over 540,000 in 2020.

Closer examination is needed to understand the benefits of how these two Florida entities interact with each other and the private market to reduce insurance costs. Historically, FHCF has generated significant premium savings for Florida policyholders by making FHCF protection available to insurers. FHCF provides coverage to insurers at a lower cost than private market reinsurance prices because it does not include a profit factor or risk load in its rates and because it is exempt from federal taxes.

Florida's approach provides beneficial evidence of a coordinated public and private sector approach. Most homeowners, having the option of staying with FCPIC, accepted private insurance. Private insurers, applying their underwriting standards, chose policies across the risk spectrum, including those in "high risk" coastal zones.

Restructuring TWIA as a reinsurance provider is an option that would incentivize the private insurance market to provide more affordable windstorm insurance along the Texas coast. The funding structure review to ensue with enactment of S.B. 1448 presents an opportunity to closely examine methods and benefits to policyholders and the state by transitioning TWIA towards a

reinsurer role. A method for further consideration might include the following structure and benefits of TWIA in a reinsurance role:

As a reinsurer, TWIA could sell low cost attachments to private market insurance companies.

- A significant number of windstorm claims processed by TWIA involve smaller claim amounts.
- A low-cost attachment could restrict TWIA coverage to claims above \$25,000.
- Such an arrangement would reduce the risk for the private insurance company. Moreover, TWIA could market the low-cost attachment statewide to induce greater private sector participation as well as further spread and reduce risk.
- In addition, such an arrangement could allow private insurance companies to bundle policies (i.e. homeowners, automobile, life, and windstorm), thus providing an even more lucrative incentive.
- By reducing risk and expanding private insurance market involvement, premiums can become more affordable for policyholders.

Coastal counties represent nearly 34 percent of Texas' real gross product, over 23 percent of the state's population, and 25 percent of Texas jobs. 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. Preserving affordable windstorm coverage is essential for sustaining a workforce on the Texas coast that provide services critical industries for Texas.

I urge the TWIA Board to reject the proposed premium rate increase. Instead, work with stakeholders and legislators to identify meaningful restructuring improvements for TWIA that will provide long-term solutions that achieve affordable quality windstorm insurance for property owners in Texas.

I want to thank you for this opportunity to provide written comments. The City of Galveston stands ready to assist the TWIA Board as you evaluate and weigh alternatives and recommendations to improve TWIA and provide sustainable, affordable windstorm protection.

Sincerely,

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



Maggie Turner

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

Monica Perez

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

Melissa Munguia

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

BARBARA CANALES

COUNTY JUDGE

July 28, 2021

Texas Windstorm Insurance Association Via: email

Re: Opposition to TWIA Rate Increases

Ladies and Gentlemen:

Please be advised that the Nueces County Commissioners Court unanimously approved the attached resolution on June 23, 2021, in opposition to any Texas Windstorm Insurance Association rate increases.

We stress that coastal residents are still attempting to recover from economic distress caused by the COVID-19 pandemic as well as continuing to rebuild after Hurricane Harvey and Hurricane Hanna.

This is not the proper time to even consider such increases while there are sufficient premiums, assessments, and reinsurance to cover TWIA liabilities for both 2021 and 2022.

We respectfully request that you put off consideration of such rate increases while as we continue our economic recovery.

Sincerely,

Barbara Canales

Nueces County Judge

County of Nueces

ROBERT HERNANDEZ

Commissioner Precinct 1

JOE A. GONZALEZ

Commissioner Precinct 2



BARBARA CANALES

County Judge Nueces County Courthouse, Room 303 901 Leopard Street Corpus Christi, Texas 78401-3697

JOHN MAREZ

Commissioner Precinct 3

BRENT CHESNEY

Commissioner Precinct 4

COMMISSIONERS COURT RESOLUTION (IN OPPOSITION TO TWIA RATE INCREASE)

WHEREAS, on December 8, 2020, the Texas Windstorm Insurance Association (TWIA) Board held a board of directors meeting and voted to raise rates on coastal policyholders, residents and businesses;

WHEREAS, on January 6, 2021 the Nueces County Commissioners Court adopted a resolution opposing any windstorm insurance rate increase and requesting any such increase be abated;

WHEREAS, on January 8, 2021 the Texas Department of Insurance notified TWIA that rate filing for a five percent increase in both commercial and residential rates was rejected as it lacked sufficient notice to the public;

WHEREAS, TWIA's next quarterly meeting is scheduled for August 2021;

WHEREAS, coastal residents and businesses are still attempting to recover from the economic distress caused by the COVID-19 pandemic, as well as continuing to re-build after Hurricane Harvey;

WHEREAS, the Legislative Oversight Committee, renewed in the 87th Texas Legislative session, must still be appointed and given time to evaluate TWIA's rate adequacy; and

WHEREAS, there are sufficient premiums, assessments and reinsurance to cover potential TWIA liabilities for 2021 and 2022.

NOW, THEREFORE, BE IT RESOLVED, THAT THE COMMISSIONERS COURT OF NUECES COUNTY,

TEXAS, is hereby opposed to any windstorm insurance rate increase and encourages the TWIA Board of Directors to show restraint and allow the will of the Legislature to be fully implemented before voting for a rate increase that could frustrate the rebuilding and recovery efforts of those living and working along the Texas coast.

DULY ADOPTED BY VOTE OF THE COMMISSIONERS COURT OF NUECES COUNTY, TEXAS, ON THIS

THE 23rd DAY OF JUNE 2021.

Commissioner, Precinct 1

JOE A. GONZALEZ Commissioner, Precinct 2 BARBARA CANALES

County

ATTEST:

KARA SANDS, County Clerk

JOHN MAREZ Commissioner, Precinct 3

BRENT CHESNEY
Commissioner, Precinct 4

Public Comment

From: Paulette Guajardo <Paulette.Guajardo@cctexas.com>

Sent: Friday, July 30, 2021 12:04 PM

To: PublicComment
Subject: TWIA Public Comment

Follow Up Flag: Follow up Flag Status: Completed

July 30, 2021

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

Dear Chairwoman 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 proposed rate increase that will be considered on August 3, 2021 by the board of the Texas Windstorm Insurance Association (TWIA) and urge you all to vote NO RATE INCREASE.

The 86th Texas Legislature passed HB 1900 which created a Legislative Funding Oversight Committee to study TWIA's rate adequacy. The Legislative Oversight Committee was appointed but unable to complete its oversight work due to the COVID-19 pandemic restrictions.

The 87 Legislature passed legislation to extend the work of the Legislative Oversight Committee to this biennium and passed other vital reforms to improve TWIA rate setting process and reinsurance forecasting. 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.

The Coastal Bend is still recovering from Hurricane Harvey and more recent impacts from Hurricane Hanna and Winter Storm Uri. In addition, the region is still recovering from an economic crisis driven by the COVID-19 pandemic. 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.

There are sufficient premiums, assessments, and reinsurance to cover potential liabilities for 2022. The City of Corpus Christi has been on record for many years opposing unnecessaryTWIA rate increases and we will continue to advocate for our residents and our businesses to oppose any future rate increase for 2022.

I urge all board members to vote NO RATE INCREASE at the August board meeting and oppose all actions to increase windstorm insurance rates on the Texas Gulf Coast.

Sincerely,

Paulette Guajardo Mayor

City of Corpus Christi 1201 Leopard Street | Corpus Christi, Tx | 78401 361.826.2489 Office 361.834-4125 Cellular Paulette.Guajardo@cctexas.com www.cctexas.com

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City of Corpus Christi

OFFICE OF THE MAYOR

Paulette M. Guajardo

P.O. Box 9277 Corpus Christi Texas 78469-9277 Phone 361-826-3100 Fax 361-826-3103 www.cctexas.com July 19, 2021

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

Dear Chairwoman King,

As the Mayor of Corpus Christi and a concerned resident in the Coastal Bend, I am writing you today to express my concern with the Texas Windstorm Insurance Association(TWIA), and urge the Actuarial/Underwriting Committee to recommend a zero rate increase to the TWIA Board.

The 86th Texas Legislature passed HB 1900 which created a Legislative Funding Oversight Committee to study TWIA's rate adequacy. The Legislative Oversight Committee was appointed but unable to complete its oversight work due to the COVID-19 pandemic restrictions.

The 87th Legislature passed legislation to extend the work of the Legislative Oversight Committee to this biennium and passed other vital reforms to improve TWIA rate setting process and reinsurance forecasting. This reform legislation should be implemented before consideration of new TWIA rate increases.

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.

The Coastal Bend is still recovering from Hurricane Harvey and more recent impacts from Hurricane Hanna and Winter Storm Uri. In addition, the region is still recovering from an economic crisis driven by the COVID-19 pandemic. 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 been on record for many years opposing unnecessary TWIA rate increases and we will continue to advocate for our residents and our businesses to oppose any future rate increase for 2022. There are sufficient premiums, assessments, and reinsurance to cover potential liabilities for 2022.

I urge you to recommend NO RATE INCREASE to the full TWIA board for the August board meeting and oppose all actions to increase windstorm insurance rates on the Texas Gulf Coast.

Sincerely,

Paulette Guajardo

Paulette Guajardo

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, 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; the Legislative Oversight Committee was appointed but unable to complete its oversight work due to the COVID-19 pandemic restrictions.

WHEREAS, the 87th Legislature passed legislation to extend the work of the Legislative Oversight Committee to this biennium and passed other vital reforms to improve TWIA rate setting process and reinsurance forecasting.

WHEREAS, this reform legislation should be implemented before consideration of new TWIA rate increases.

WHEREAS, there are sufficient premiums, assessments, and reinsurance to cover potential TWIA liabilities for 2022.

NOW THEREFORE BE IT RESOLVED, THAT THE CITY OF CORPUS CHRISTI continues its opposition to unnecessary increases in windstorm insurance rates and encourages the TWIA Board to implement the reform legislation passed in the 87th Legislative Session. A TWIA rate increase on top of the economic challenges caused by the COVID-19 pandemic would be devastating to our regional economy and the entire Texas Coast. VOTE NO RATE HIKE FOR 2022.



PASSED AND APPROVED	on the $_204$ da	ay of <u>JY</u>	, 2021:	
Paulette M. Guajardo	Aye		/	
Roland Barrera	absint			
Gil Hernandez	Age			
Michael Hunter	Aye			
Billy Lerma	Aye			
John Martinez	Age			
Ben Molina	Aye			
Mike Pusley	Aje			
Greg Smith	Aje			
	ð			
ATTEST:		CITY OF	CORPUS CHF	RISTI
Rebecca Huerta City Secretary	ta	Paulette Mayor	HMGN M. Guajardo	azardo



A RESOLUTION OPPOSING TEXAS WINDSTORM INSURANCE ASSOCIATION RATE INCREASE.

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

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

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

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

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

WHEREAS, ALMOST FOUR YEARS AFTER THE STORM MANY OF THE HURRICANE HARVEY DISASTER DECLARED COMMUNITIES ARE STILL REBUILDING; AND

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

WHEREAS, THE 86TH TEXAS LEGISLATURE DID ACT BY PASSING HB 1900 WHICH CREATES A LEGISLATIVE FUNDING OVERSIGHT COMMITTEE TO STUDY TWIA'S RATE ADEQUACY AND DUE TO THE PANDEMIC, THE OVERSIGHT COMMITTEE WAS NEVER CONVENED, AND

WHEREAS, THE 87TH TEXAS LEGISLATURE RENEWED THE LEGISLATIVE OVERSIGHT COMMITTEE IN SB 1448 AND MUST BE APPOINTED AND GIVEN TIME TO ACT BEFORE TWIA ACTIVATES A NEW RATE INCREASE, AND

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

WHEREAS, THERE ARE SUFFICIENT PREMIUMS, ASSESSMENTS AND REINSURANCE TO COVER POTENTIAL TWIA LIABILITIES FOR 2021 AND 2022, AND

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

JOHN LARUE PRESIDENT & CEO ERIC VILLARREAL, P.E. CHAIRMAN OF THE BOARD

06-16-2021 Date



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 continues to struggle with the Covid-19 pandemic; and

WHEREAS, Governor Greg Abbott first issued a disaster declaration on March 13, 2020, and renewed the declaration on August 8, 2020, for all counties in the state; and

WHEREAS, our Coastal Bend community is experiencing economic distress during the pandemic; therefore, prospective industry investment to the region will be affected by increased construction costs and higher premiums making 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, the TWIA Board of Directors appointed an Actuarial Committee to conduct a thorough examination of rates and make a recommendation to the full TWIA Board concerning rates and the Actuarial Committee voted on December 1, 2020, to make no changes to current rates and requested additional studies should be conducted before a rate increase is considered;

WHEREAS, the TWIA Board on December 8, 2020, voted to increase TWIA rates by five percent despite the board agenda containing no specific agenda item relating to such a vote;

NOW THEREFORE BE IT RESOLVED, that the Port Commission respectfully requests that the Governor of the State of Texas, Greg Abbott use his authority under his disaster declaration to abate any rate increase on TWIA policyholders until the Legislature has the opportunity to examine needed reforms during the 87th Texas Legislative Session.

ADOPTED this the 15th day of December 2020, by the Port Commission of the Port of Corpus Christi Authority of Nueces County, Texas.

Charles W. Zahn, Jr.

Port Commission Chairman



Chair Ann Scoggin

July 31, 2021

Past Chair Gary Chalk

Dear: TWIA Board of Directors

Vice Chair Josh Smith

Board of Directors

Dr. Shannon Allen

Pat Anderson Kayla Bishop

Kevin Bohm Paula Bothe

Camille Briggs

Nakisha Burns

Dean Conwell

Craig Escamilla

Lori Higgins

Dennis Isaacs

Paul Koester Dee Lane Chad Mason

Rebekah Maxwell
Jennifer Nichols
Mary Poole
Terri Potter
Tyler Thomas

Sade' Chick Mandy Clayton Thank you for the opportunity to submit comments prior to your August 3rd board meeting. My request, on behalf of the Greater Beaumont Chamber of Commerce, is largely the same as previous pieces of correspondence! have sent, with perhaps one additional point.

Please do not vote to increase rates at this time.

In addition, in the spirit of transparency why would you consider this action given the legislative changes which go into effect on September 1st? I believe that this is the second time in two years where it appears there is an effort to proceed contrary to the spirit of a new ruling.

In summary, I ask again that you do not move forward with any rate increase, regardless of the amount. Doing so will further impact the small businesses and residents that work so hard to support their families in our area following multiple tropical storms, a winter freeze, a pandemic and now what looks like a second round of the COVID-19 virus set to impact us. We cannot afford it.

Thank you again for the opportunity to comment.

Sincerely,

Bill Allen

President & CEO

Greater Beaumont Chamber of Commerce

President/CEO Bill Allen

David Thornhill

Pam Williams



EXECUTIVE COMMITTEE

Ron Arceneaux ~ Chairperson * Arceneaux Wilson & Cole LLC Stuart Salter ~ Chairperson Elect *Julian Salter Insurance Co. Randy Sonnier ~ Vice Chairperson *Total Energies Art Thomas ~ Treasurer *Texas Gas Service Carol Hebert ~ Member at Large *Valero Tonya Moses ~ Member at Large *CRTSM Enterprises Ron Fletcher ~ Past Chairperson

* Entergy Texas **BOARD OF DIRECTORS** Tomara Anderson *Kelly Education Staffing/ Kelly Services Kenny Blanda *Bonne Vie Eric Callarman *Gulf Copper and Manufacturing Corp. Vicki Derese *Chevron Phillips Chemical Company LP Luis Figueroa *Figueroa's Welding Wear Kaprina Frank *BBVA Compass Jeff Haves *Haves Real Estate Stephen Hemelt *Port Arthur News Claire Jackson *Motiva Port Arthur Manufacturing Complex John Johnson *Griffith, Moseley, Johnson Anya McInnis *Sempra LNG **Amy Miller** *Cheniere Energy **Gregg Parker** *Edward Jones Tonya Petix *Petix Properties Mary Ann Reid *Golden Pass LNG Dr. Betty Reynard *Lamar State College-Port Arthur **Nathan Rivers** *SETEX Construction Verna Rutherford **Anthony Theriot** *Port of Port Arthur

Daylyn Turner
*Jk Chevrolet Subaru



TWIA 5700 South MoPac Expressway Building A Austin, TX 78749

TWIA, please no rate hike!

TWIA is considering raising our rates by 5% at your board meeting on August 3rd. Let me remind the TWIA board that you are not aligned with the actions by the Texas Legislature that TWIA rely on the independent actuarial analysis and listen to the voices of the coastal rate payers. It is time, again to - once again - let TWIA know that raising rates at this time is unwise and detrimental to livelihoods of Texans that live on the coast.

Two legislative sessions ago, the Texas Legislature passed HB 1900 which created an interim study for the Legislature to review the funding and funding structure of TWIA. Because of Covid, that committee did not have a chance to meet. The legislature has extended the time for that committee to meet through this interim. Unfortunately, TWIA did not initially raise rates to allow legislative review, it appears, you've decided waited long enough. Covid should not be an excuse to raise rates prior to a thorough review of TWIA's funding structure by the Texas Legislature.

Perhaps TWIA's consideration of rate increases, is based on its own internal rate analysis and ignores independent review. HB 1900 also required TWIA to contract with an independent actuarial firm to do a rate analysis. That firm recommended a change to how TWIA conducts its hurricane modeling because TWIA's analysis artificially inflates losses, creating a false appearance that rates are severely inadequate. TWIA seems to not want to completely considers the advice of the independent reviewer, and still claims rates are too low based on its this flawed modeling.

The timing for TWIA considering raising rates is also questionable. This past session, the Texas Legislature passed two significant bills passed by our elected representatives- SB 1448 by Senator Taylor and HB 769 by Representative Middleton - both of which go into effect on September 1st. Both bills make it more difficult for TWIA to raise rates on coastal Texans. It is not lost on us that these changes go into effect less than a month after the TWIA board meeting next week. Raising rates at this board meeting would be especially punitive as our region is still recovering from the economic downturn due to Covid and can't afford arbitrary rate increases.

We thank you for continued service to our State and ask that you will listen to our sound reasoning.

Sincerely,

Pat Avery
President/CEO

Greater Port Arthur Chamber of Commerce

July 30, 2021



July 30, 2021

Texas Windstorm Insurance Association 5700 S. Mopac Expressway Austin, TX 78749

Re: Public Comment – Opposition to Rate Increase

Dear TWIA Board Members:

On behalf of the Texas City-La Marque Chamber of Commerce Board of Directors and membership, we are writing to express our **opposition to a rate increase.**

We OPPOSE rate increases for TWIA policy holders and support requiring replacement cost determination at the purchase point of the policy.

High rates of windstorm insurance disproportionately affect not only businesses in our region, but also our community colleges and school systems. It is unfair to increase this burden on them.

This Texas City-La Marque Chamber represents *over 750 businesses and organizations* in Galveston County. The economic impact of coastal counties is significant to the entire State of Texas as well as the nation. Please do not increase rates that are already damaging to the economy.

Sincerely,

Page Michel
President & CEO

page@texascitychamber.com

ge Michel



14015 FORTUNA BAY DRIVE • CORPUS CHRISTI, TX 78418-6327 • (361) 949-7025 • FAX (361) 949-7026 • EMAIL padreisles@pipoa.net

July 28, 2021

Chandra Womack, Chair
Texas Windstorm Insurance Association (TWIA)
publiccomment@TWIA.org

Dear Chair Womack,

The Padre Isles Property Owners Association consisting of 5,408 properties oppose a premium rate increase for windstorm insurance provided by TWIA. We, the PIPOA Board of Directors, speak for over 10,000 members in our community on North Padre Island, Corpus Christi, TX. A premium increase will have a detrimental effect on our property values. In that, the cost of windstorm insurance is prohibitively expensive and will inhibit the sale of our properties.

Furthermore, the insurance increases the cost of living while residing along the Texas Gulf Coast. Many of our residents are retired military and civilians that live on fixed incomes. An increase will put a further financial strain on these people and perhaps force them to sell their homes and move elsewhere.

It is our understanding that the Texas Legislature has recently initiated measures to monitor and analyze the need for potential rate increases. The Legislature's program should be allowed to proceed prior to any rate increase. We believe it to be in the best interest of the residents of the Coast Bend and in particular the property owners of the Padre Isles Property Owners Association, Inc. that a rate increase shall not be enacted at this time.

Please give this request your full consideration.

Best Regards,

Marvin Jones, President of the PIPOA
Drew Diggins, Vice President of the PIPOA
Ray Singleton, Treasurer of the PIPOA
Vicki McGinley, Secretary of the PIPOA
Sandy Graves, Board Member of the PIPOA
Dan Brown, Board Member of the PIPOA
Tommy Kurtz, Board Member of the PIPOA

TWIA Letter 07/29/2021

Dear TWIA Board Members;

Your process of selecting a tier of counties along the coast for exclusion of windstorm coverage in our homeowners insurance policies and the need to obtain TWIA Coverage is elementary and ludicrous. For you to presume that storm damage from a hurricane stops at the northern border of Harris County is a ridiculous assumption, not to mention that your presumption that damage in the coastal counties is in excess of inland damage is inherently flawed.

You place an economic burden upon property owners in the coastal exclusion zone that is grossly unfair. Any increased risk of being in the coastal exclusion zone is offset by the risks of other catastrophic losses that occurs in inland areas as a result of hail, fire, tornados or other catastrophe's; not to mention the damage that inland counties experience when hurricanes move across our state.

You are considerably out of touch if you cannot recall the blue tarps that occur north of the windstorm exclusion zone during our more recent disasters or the fact that many those fleeing hurricane Rita, were stranded in LUFKIN Texas as a result of severe storm damage that shut off electricity and closed roads in this area for weeks.

Is the TWIA board run by out of state liberals, like ERCOT before recent changes. Wake up, get a backbone and do something worthwhile for a change. Make the entire state of Texas subject to a Catastrophic Loss Exclusion and change your name to the Texas Catastrophic Insurance Association (TCIA).

Make all Texas property owners pay for catastrophic loss coverage and spread the cost of this coverage among all property insurance holders within the state of TEXAS.

Sometimes strong language is called for and this is one of those times.





August 3, 2021

To: Board of Directors
Texas Windstorm Insurance Association
TWIA Board of Directors Meeting
5700 S Mopac Expressway, Building A
Austin, TX 78749

Re: Comments of the Texas Coalition for Affordable Insurance Solutions Related to Consideration by the Board of a Recommendation for 2022.

Dear Board Members,

The Texas Coalition for Affordable Insurance Solutions ("TCAIS") submits the following comments related to your statutorily mandated consideration of 2022 rates at your August 3, 2021 board meeting. We have monitored the activities of the Actuarial Committee and reviewed the additional information relevant to TWIA rates and market rates overall.

TCAIS supports the Actuarial Committee's recommended increase in rates of 5% across the board for 2022. In our view, the thorough review of the Actuarial Committee and various parties justifies this position

As TCAIS has stated before, we recognize the TWIA board's need to balance your rate indication, your statutory requirements, and your general policy considerations. This recognition is consistent with TCAIS' long held policy principle of careful incrementalism and attention to the tension between dangers of rate shock and the potential of financial inadequacy for TWIA and its policyholders.

In our view, the TWIA staff conclusion rate indications of 38.8% for residential and 45.9% for commercial are consistent with our actuarial expertise and long-term observations of TWIA rate inadequacy. These alarmingly high indications are not surprising to TCAIS member companies. Not only has our membership since our founding in 2002 engaged in analysis of TWIA as a matter of both public and market policy, our companies also engage in rating their own products individually, and have enormous expertise and experience in the costs of the difficult Texas windstorm environment. As we have continually expressed in the last few years, we understand TWIA's unusual expense load related to bond debt, but also recognize and have experience as individual companies with general increases in costs related to frequency of loss and expenses associated with repairs covered under policies. In particular, the dramatic increase in the cost of building materials and labor, along with severe volatility in those costs, creates both direct increases in claims cost and increased financial risk for insurers. Every homeowners' insurer in Texas and the United States is grappling with this specific acute financial reality. TWIA should certainly do the same.

TCAIS is particularly concerned with the trend in recent years of the rejection of recommended rate increases for a myriad of reasons, including the desire for further study, worries about rate increases with regard to external economic factors such as COVID 19 and catastrophes, delays related to potential legislative action, and rate disapprovals based on issues with statutory process. Though we are sympathetic to many of these individual circumstances, the cumulative effect of the serial disapprovals is a dangerous slide deeper into rate inadequacy. We urge the board to review pages 13 and 14 of the staff presentation to the Actuarial Committee of July 21. These charts undeniably illustrate the serious trend in the wrong direction for TWIA rates. We also observe that the TWIA staff went beyond presentation of their own actuarial recommendation by including calculations of rate adequacy based on Willis Towers Watson's use of factors not agreed with by TWIA (pp. 17-18 of the July 21 presentation). Even employing the competing factors, TWIA is rate inadequate by 33.1% in residential and 41.7% in commercial.

Many companies in Texas have had to increase the windstorm portions of their rates significantly in the past four years, in many cases by double digits cumulatively over the period, to comply with regulatory and business requirements for adequate rates. In the same four-year period, TWIA rates have increased 5%, with the last 5% increase approved in 2018. TWIA is not only losing ground in the context of the market and direct risk analysis, but is not even keeping up with the inflation rate for all goods and specifically for shelter costs. Though the TWIA board does not have an obligation to consider either inflation or the rates in the market, we observe these factors as evidence that, by any measure, TWIA is losing ground quickly. The growing rate inadequacy creates serious financial peril not only for coastal Texas, but for all homeowners policyholders in Texas who would bear the cost of TWIA's inadequate funding or insolvency.

As we have observed in the past, the TWIA board of directors collectively and individually has statutory duties related to sound insurance and rating standards. The first three primary objectives set for the board by statute read as follows:

Sec. 2210.107. PRIMARY BOARD OBJECTIVES; REPORT. (a) The primary objectives of the board of directors are to ensure that the board and the association:

- (1) operate in accordance with this chapter, the plan of operation, and commissioner rules;
- (2) comply with sound insurance principles;
- (3) meet all standards imposed under this chapter;

The sound insurance principles and standards for the chapter are further illuminated in the specific rate making provisions of Section 2210.355:

Sec. 2210.355. GENERAL RATE REQUIREMENTS; RATE STANDARDS. (a) Rates for coverage under this chapter must be made in accordance with this section.

- (b) In adopting rates under this chapter, the following must be considered:
- (1) the past and prospective loss experience within and outside this state of hazards for which insurance is made available through the plan of operation, if any;
- (2) expenses of operation, including acquisition costs;
- (3) a reasonable margin for profit and contingencies;

- (4) payment of public security obligations issued under this chapter, including the additional amount of any debt service coverage determined by the association to be required for the issuance of marketable public securities; and
- (5) all other relevant factors, within and outside this state.
- (c) Rates must be reasonable, adequate, not unfairly discriminatory, and nonconfiscatory as to any class of insurer.

Though there are certain limits imposed by the statute on TWIA rate increases, those limits do not apply to the recommendation made by the board, and may be set aside by the commissioner under certain circumstances:

Sec. 2210.359. LIMITATION ON CERTAIN RATE CHANGES. (a) Except as otherwise provided by this subsection, a rate approved by the commissioner under this subchapter may not reflect an average rate change that is more than 10 percent higher or lower than the rate for commercial windstorm and hail insurance or 10 percent higher or lower than the rate for noncommercial windstorm and hail insurance in effect on the date the filing is made. The rate may not reflect a rate change for an individual rating class that is 15 percent higher or lower than the rate for that individual rating class in effect on the date the filing is made. This subsection does not apply to a rate filed under Sections 2210.351(a)-(d).

- (b) The commissioner may, after notice and hearing, suspend this section on a finding that a catastrophe loss or series of occurrences resulting in losses in the catastrophe area justify a need to ensure:
- (1) rate adequacy in the catastrophe area; and
- (2) availability of insurance outside the catastrophe area.

The statute requires TWIA rates to be adequate, and instructs the board to comply with both sound insurance principles generally and the specific provisions of the chapter. A strict interpretation of these sections could be seen as compelling the board to raise rates in the amount of the whole indication.

However, TCAIS again recognizes that the statute also generally references the welfare of the TWIA territory as vital to the state:

Sec. 2210.001. PURPOSE. The primary purpose of the Texas Windstorm Insurance Association is the provision of an adequate market for windstorm and hail insurance in the seacoast territory of this state. The legislature finds that the provision of adequate windstorm and hail insurance is necessary to the economic welfare of this state, and without that insurance, the orderly growth and development of this state would be severely impeded. This chapter provides a method by which adequate windstorm and hail insurance may be obtained in certain designated portions of the seacoast territory of this state. The association is intended to serve as a residual insurer of last resort for windstorm and hail insurance in the seacoast territory.

Though the purpose section of the statute in no way abrogates the other duties in the statute listed above, it does in some measure illuminate the practical policy tension of the necessity of providing insurance in the difficult, high risk coastal areas of Texas.

As a practical matter, and in the context of this policy tension, TCAIS supports the recommended rate increase of 5% as the bare minimum to avoid further increased rate inadequacy. Given the approximate average TWIA annual premium of \$1600, such an increase would average \$80 per year, with more

modest homes seeing lower annual increases. TCAIS believes that long term public policy improvements are possible to help alleviate some of TWIA's rating issues, especially its bond expenses, and look forward to working with the board and legislators on such solutions. However, we think the current trend in rate inadequacy is so dire that, if unchecked, it could result in undercutting future public policy initiatives, resulting in a financially bankrupt TWIA regardless of improvement.

As always, TCAIS appreciates the opportunity to voice our opinion, and the critical work of you and your staff in the policy and operations of TWIA. We look forward to continued study and work with you and other stakeholders. Please let me know if you have any questions or comments related to this recommendation or other matters.

Best Regards,

Beaman Floyd On behalf of

Texas Coalition for Affordable Insurance Solutions

CC:

Representative Tom Oliverson, Chair, House Insurance Committee Senator Charles Schwertner, Chair, Senate Business and Commerce Committee Senator Joan Huffman, Chair, Senate Judiciary Committee













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 Los Angeles New Orleans Saint Paul

July 30, 2021

Board of Directors Texas Windstorm Insurance Association

Re: TWIA Rate Adequacy and Annual Rate Recommendations, August 2021 Board

Meeting

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.

The Private Market Protects the Coast

Many of our member companies write wind coverage along the coast and are part of the private market which protects the Texas coast and provides the majority of insurance coverage and takes the most risk for wind coverage on the coast. As discussed during the July 21 meeting of the TWIA Actuarial and Underwriting Committee ("Committee"), the private market

- Provides 63% of the wind coverage in Tier 1, and
- Provides coverage for \$82.7 billion in residential wind v. \$48.7 billion for TWIA

In addition to providing the majority of coverage for the coast, our members are ready to provide up to \$1 billion in assessments if needed to help pay TWIA claims losses after a storm. As a reminder, in 2017, after Hurricane Harvey, private insurers paid \$363 million in TWIA assessments, in addition to approximately \$7 billion for auto, residential, and commercial losses. Our members play a significant role in insuring the risks, whether TWIA policyholders or our members' policyholders, faced by coastal residents and businesses when Texas suffers from a major storm.

TWIA Rate Analysis – Rates Remain Inadequate

For the last few years, the debate over TWIA rates and discussions on potential rate increases has become contentious and politically charged. As a result, despite repeated actuarial analysis showing TWIA rates are inadequate, TWIA has not had a rate change since 2017 and only once in the last five years! During the last five years, rate inadequacy has ranged between 26% and 44% for residential and between 21% and 50% for commercial.

According to TWIA staff, TWIA's current rates are inadequate by 39 percent for residential coverage and 46 percent for commercial coverage. In addition, TWIA staff reported that if they used certain assumptions about TWIA risks and catastrophe modeling from Willis Towers Watson, who performed an independent actuarial analysis in 2020, the rate inadequacy would be 33.1% residential and 41.7% commercial. Regardless of which number is used, these are substantial rate inadequacies.

The Committee, after much discussion, recommended a five percent rate action to the TWIA board. We support the Committee's recommendation and urge the TWIA board to approve a modest five percent increase for 2022.

Recent Legislation Does Not Prevent the Board from Taking Action

During the meeting, some commenters stated that the TWIA board could not or should not consider any rate action because of recently passed legislation which would change the process for TDI review of TWIA rate filings. We note that Senate Bill 1448, 87th Legislature, changes the rate review process by requiring all TWIA rate changes to be subject to prior approval and requires a two-thirds vote by the board. The new law does not prohibit the TWIA board from considering any rate change. However, this law takes effect September 1, 2021, and applies to "a rate filed by the Texas Windstorm Insurance Association with the Texas Department of Insurance on or after the effective date of this Act." See SB 1448, Section 5, 87th Legislature.

TWIA is required by Texas Insurance Code §2210.352 to make its annual filing with TDI by August 15 of each year. At its August 3, 2021, meeting, the TWIA board will be considering its statutory required filing for the August 15 deadline. That filing is subject to the current laws regarding rate filings and is not prohibited by any change in the law. Under current law, if a majority of the board approves a 5% rate change, that rate change is not subject to prior approval by TDI. See Texas Insurance Code §2210.352 (a-1).

In addition, while Senate Bill 1448 directed the TWIA Legislative Oversight Board to review, among other items, TWIA's funding structure, the bill does not contain any language prohibiting TWIA from considering and approving any needed rate action. Nonetheless, we believe it is important to have a comprehensive and open discussion on solutions to TWIA's funding and we welcome the opportunity to offer input on potential long-term solutions for funding and funding structure.

TWIA Is Required to Maintain Adequate Rates

We also remind this board that TWIA is required by law to maintain adequate rates and rate adequacy is important as part of TWIA's overall funding scheme to enable TWIA 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 nonconfiscatory 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 Texas 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.

If this board ignores the committee's recommendation, given the significant rate indications, and TWIA's revenue and debt/expense issues, as will be discussed later, it places TWIA in jeopardy of being noncompliant with statutory requirements for rates.

In addition, TWIA's rates must be based on sound actuarial principles, not subject to rate decisions based on public pressure or threats. The Texas Insurance Code requires TWIA rates to be "not unfairly discriminatory". Under Texas 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.

The Committee acted upon the actuarial analysis presented by staff. The board should consider the same in making its decision and base its rate filing on sound actuarial principles. No insurance company would, after receiving the actuarial analysis presented by TWIA staff, continue the recent trend of no action on rates.

TWIA Must Protect Its Financial Health

We understand the desire of many on the coast that TWIA consider the financial situation of

its policyholders, it is also true that TWIA owes its policyholders a duty to protect the financial well-being of TWIA. We have been lucky to avoid any major storms since 2017, but TWIA needs to be prepared and ensure the financial health of the organization and ability to pay its policyholder claims in the event of future losses.

Some commenters voiced concerns that a rate increase would be unreasonable given the economic impact of the COVID-19 pandemic on the coastal region. It is undeniable that the pandemic caused economic hardship for Texans across the state, but recent economic indicators show decreasing unemployment and a return to normal economic activity along the coast and throughout the state.

Further, during the Committee's discussion, a Committee member asked for information on the average premium and cost per policyholder if TWIA increased rates by 5%. According to TWIA staff, the individual policyholder <u>impact of a 5% increase</u>, based on the average TWIA <u>policyholder premium</u>, would be approximately \$80 annually. This amount does not indicate the level of economic ruin and harm for the coast that some witnesses predict would be caused by a 5% increase.

Further, TWIA staff presented information demonstrating that a 5% rate increase barely keeps pace with rising building costs. The steady increase in construction costs has been well documented and according to information provided by TWIA staff, building costs have increased 21.2% from 2013 to 2021 (based on information provided to TWIA by Marshall & Swift/BOECKH). In the past year we've had numerous reports of rapidly increasing lumber costs and the impact on construction costs which leads to higher replacement costs after a storm. The inflationary changes cannot be ignored and artificially suppressing TWIA rates further strains TWIA's available reserve funds. At a minimum, the increased construction costs necessitate modest adjustments in rates to pay for the cost of rebuilding homes after a storm.

Admittedly, the rate increase by itself does not solve TWIA's financial issues. Based on estimated policy holder premiums for 2021, TWIA will collect approximately \$381 million in premiums. However, according to TWIA's residential rate adequacy analysis, TWIA's fixed expenses for 2021 are 45.3% and variable expenses are 22.9%, meaning approximately 68% of premium revenue is already accounted for, leaving roughly \$115 million for the CRTF (assuming no losses in 2021). In addition, TWIA must also account for non-hurricane losses, and has factored in a 14.6% loss provision for these types of losses.

The current reported CRTF balance, as of March 2021, was \$179.8 million, and 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. The recommended 5% rate increase creates additional revenue for TWIA and reduces reliance on public securities to repay claims.

Regardless, while helpful, and needed, a 5% increase does not resolve TWIA's financial issues. Even with a 5% increase for 2022, the TWIA actuarial analysis still shows that TWIA rates will remain inadequate but the rate indications would decrease from 39% to 32% for residential and

July 30, 2021 Page 5

from 46% to 39% for commercial. These are still significant rate indications for a program that provides coverage for many homeowners and businesses along the coast.

Overall, continued rate inadequacy will negatively impact future policyholders of TWIA, policyholders on the Texas coast, and property policyholders statewide. The problem will only be exacerbated if this board follows the recommendations of coastal officials and groups, and disregards the need for action on rates. If TWIA brings in less premium, TWIA is at risk of having insufficient funds in the CRTF to pay for losses in excess of its net premium collections for 2022. This places TWIA and its policyholders in a position where they are more reliant on debt as a means to pay for losses. 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 they will ultimately share.

In closing, we urge this board to follow the recommendation of the Committee. TWIA cannot afford to continue to disregard the actuarial information and legal requirements which support the need for action on rates.

We appreciate the opportunity to provide these comments and are available to answer any questions you may have.

Sincerely,

Jay Thompson

Jay Thompson

Cc: Albert Betts, Exec. Director

ICT Board of Directors

Public Comment

From:

Friday, July 23, 2021 3:45 PM PublicComment Sent:

To: Subject:

No Rate Increase

Sent from my iPhone

Public Comment

From:

Sent: Thursday, July 29, 2021 3:29 PM

To: PublicComment **Subject:** No rate increase!

Sent from my iPhone

From:

Sent: Friday, July 30, 2021 9:50 AM

To: PublicComment Subject: NO RATE INCREASE

Please do not increase our rates.



From:

Friday, July 30, 2021 12:28 PM Sent:

To: **PublicComment** Subject: Rate increase

I can't believe TWIA is, once again, asking for Another rate increase, particularly an increased based on flawed and faulty analysis. Raising rates, particularly at this time, on the heels of the Covid pandemic with people out of jobs and businesses closing, is obscene and unwarranted. Since Ike in 2008, TWIA has continued to raise rates yearly in an attempt to continue "making up" for losses incurred during Ike, 13 years ago! Are you that intent on ruining coastal businesses and taxpayers with continued increases?? It certainly appears that way! When we moved here in 2004 and had to use TWIA, our premium was approximately \$1,800 yearly for a 1% deductible. The premium began to slowly creep up and was approximately \$2,000 prior to Ike. After Ike, coastal inhabitants were hit with a YEARLY 5% increase! Do you get 5% increases in your yearly salary? We don't and are now retired, using our retirement and Social Security to live. There are no 5% cola increases for retired seniors. I am now a widow. My premium for a 2% deductible is approximately \$3,000.

Stop it! NO rate increase! Enough is enough!











Sent from my iPhone

From:

Sent: Friday, July 3

To: Subject: Friday, July 30, 2021 11:59 AM

PublicComment no rate increase

Please no rate increase



From:

Sent: Friday, July 30, 2021 11:53 AM

To:

PublicComment

Subject: Rate Increase proposal

This is definitely not the time to be considering a rate increase to the Texas Windstorm Insurance rates. It can only have a negative impact on the economy that is trying to recover from Covid imposed affects to the coastal areas. Please reevaluate your basis for an increase at this time and the unintended consequences that it can cause.

Sincerely,

property owner, Galveston, Tx

From:	
Sent:	Friday, July 30, 2021 11:48 AM
То:	PublicComment
Subject:	No Rate Hike

As a property owner in the coastal area we are opposed to a rate hike.

Thank you.

From:

Sent: Friday, July 30, 2021 11:45 AM

To: PublicComment Subject: Rate Increase

Please no rate increases. Retired: Can't Stand Another Rate Increase



Sent from my iPad

From:

Sent: Friday, July 30, 2021 11:44 AM

To: PublicComment Subject: Rate increase

Ya, uh, I heard about this shit from my family. And this is fucking ridiculous.

Sent from my Verizon, Samsung Galaxy smartphone

From:

Sent: Friday, July 30, 2021 11:44 AN

To: Subject: Friday, July 30, 2021 11:44 AM PublicComment

NO RATE INCREASE

From:

Sent: Friday, July 30, 2021 11:42 AM

To: PublicComment **Subject:** Rate increases

No rate increases please. You are killing us already in the coast.

Sent from my iPhone

From:

Sent: Friday, July 30, 2021 11:40 AM

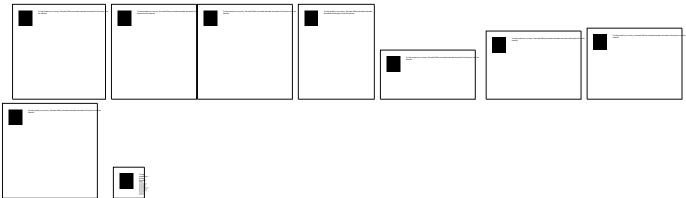
To: PublicComment Subject: NO RATE HIKE!!!!

NO RATE HIKE!!!!--

--

Texas law requires all license holders to provide the <u>TREC Information About Brokerage Services (IABS)</u> and <u>TREC Consumer Notice</u> forms to all prospective clients.

Sincerely,





From:

Sent: Friday, July 30, 2021 11:39 AM

To: PublicComment **Subject:** NO RATE INCREASE

NO RATE INCREASE

Sent from Yahoo Mail for iPhone

From:

Sent: Friday, July 30, 2021 11:30 AM

To: PublicComment **Subject:** No Rate Hike

Pls no rate hike on coastal residents!

From:

Sent:

To: Subject: Friday, July 30, 2021 11:26 AM PublicComment

no rate increase

no rate increase

From:

Friday, July 30, 2021 11:20 AM PublicComment Sent:

To: Subject:

No Rate Increase!

From:

Friday, July 30, 2021 11:19 AM PublicComment Sent:

To: Subject: No Rate Increase!

Have a great day

From:

Friday, July 30, 2021 11:18 AM PublicComment Sent:

To: Subject: No Rate Increase!

From:

Friday, July 30, 2021 11:18 AM PublicComment Sent:

To: Subject: No Rate Increase!

From:

Sent: Friday, July 30, 2021 11:17 AM

To: PublicComment Subject: Public Comment

[&]quot;No Rate Increase Please"

[&]quot;I can do all things through Christ who strengthens me"

From: Gina Spagnola <GSpagnola@galvestonchamber.com>

Sent: Friday, July 30, 2021 11:16 AM

To: Theresa Elliott

Cc: PublicComment; HENRY FREUDENBURG; Mayes

Middleton;

Subject: Re: TWIA Rate Increases - opposition letter

Great letter, T!!

Mayes,

We are sending one on behalf of the chamber, as well. Is there any additional information we need to add? We will incorporate Theresa's verbiage, as well.

Gina

Sent from my iPhone

On Jul 30, 2021, at 9:49 AM, Theresa Elliott <te@casadelmartx.com> wrote:

I am writing to oppose TWIA increasing their insurance rates for Texas Coastal customers. There are multiple reasons, but first, TWIA has not complied with the interim study requirements of HB1900. TWIA must conduct an independent and thorough review their rates and funding structure prior to any rate increases. Until this independent study is contracted and thoroughly reviewed, any rate increase is unjustified. Texans cannot afford a rate increase at this time and TWIA owes it to its customers to thoroughly justify any increases with an independent study as required by HB1900. Thank you for your consideration.

Theresa Elliott General Manager Casa del Mar Beachfront Suites Galveston Island, Texas 77551 409-572-1010 Direct 409-740-2431 Main 409-744-8896 Fax www.casadelmartx.com

From:

Sent: Friday, July 30, 2021 11:15 AM

To: PublicComment Subject: No Rate Increase

Subject: No Rate Increase

Please do not raise our rates! Times are difficult and any and all help is needed. Thank you.



Sent from my iPhone

From:

Sent: Friday, July 30, 2021 11:05 AM

To: PublicComment Subject: No Rate Hike

No More Unfair Rates on Coastal residents and businesses.

Why do you keep trying?

From:

Sent:

To: Subject: Friday, July 30, 2021 10:43 AM

PublicComment NO RATE INCREASE

"NO RATE INCREASE, PERIOD!"

Sent from my iPhone

From: Joel Romo < Joel.Romo@texanapublicaffairs.com>

Sent: Friday, July 30, 2021 10:41 AM

To:PublicCommentSubject:No Rate Hike!

Good morning-

I would like to register my opposition to the proposed 5% rate increase for commercial and residential coastal residents. I strongly suggest the full TWIA Board vote NO on the rate hike and await implementation of recently passed TWIA reform proposals before adopting such a detrimental rate hike.

Thank you -

Joel Romo
Texana Public Affairs
2720 Bluebonnet Blvd.
Brenham, Texas 77833
512-423-1598 (cell)
979-421-6353 (office)
www.texanapublicaffairs.com

From:

Sent: Friday, July 30, 2021 10:38 AM

To: PublicComment **Subject:** No rate increase

No rate increase! Coastal strong!

Sent from my iPhone

From:		
Sent:		

Friday, July 30, 2021 10:35 AM

To: PublicComment

I oppose any TWIA rate hikes.

Thanks,

Sent from Yahoo Mail for iPhone

From:

Sent: Friday, July 30, 2021 10:34 AM

To: PublicComment Subject: NO RATE HIKE!!!

I am opposed to a TWIA rate increase.



From:

Sent: Friday, July 30, 2021 10:24 AM

To: Subject: PublicComment NO RATE INCREASE

NO RATE INCREASE

__

From:

Sent:

To:

Subject:	Raising Rates
Please do not raise our rates f Texas Windstorm.	or
We are buried under the expe the Arctic Storm, just five mor	
My home had to replace ever	y single pipe in the soffit, 27 feet in the air.
All our landscaping was destro	oyed with only a third trying to make a comeback.
My clients endured a scary, fir devastating event, and many had their homes repaired still.	have not
To add a rate hike at this time their repairs and save enough	, would push many of my elderly clients into a terrible state. They are trying to complete money to live on
	ve both taken a toll on their mental health and well-being. sisland are retirees and on a fixed, limited income.
Thank you,	
Realtor.	
Sent from my iPhone	

Friday, July 30, 2021 10:17 AM

PublicComment

From:

Sent: Friday, July 30, 2021 10:10 AM

To:

PublicComment

NO RATE INCREASE!!

From:

Sent: Friday, July 30, 2021 9:58 AM

To:

PublicComment

Subject:

Rate increase opposition

Dear chairperson,

I agree with Mayes Middletons analysis opposing the proposed rate increase.

Thank you

Home owner Galveston TX

Sent from my iPhone

From:

Sent: Friday, July 30, 2021 9:56 AM

To: PublicComment **Subject:** NO RATE INCREASE

We do not need a Rate Increase.

From:

Sent: Friday, July 30, 2021 9:55 AM

To: PublicComment **Subject:** Rate hike opposition

I do not agree with a rate hike on coastal areas and shouldn't be done just because it hasn't been done for a while. North Texas has a large amount of the claims due to hail damage, yet has lower rates than coastal. Please do not raise rates at this time. THANKS

Get Outlook for iOS

From:

Sent: Friday, July 30, 2021 9:55 AM

To: Subject: PublicComment NO RATE INCREASE

NO RATE INCREASE



From:

Sent: Friday, July 30, 2021 9:55 AM

To: PublicComment

Subject: I oppose any TWIA rate hikes

I oppose any TWIA rate hikes

Thank you,



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From:

Sent: Friday, July 30, 2021 9:54 AM

To:

PublicComment

Subject:

Public Comment on Proposed Rate Increase

Dear TWIA Board of Directors:

I oppose any TWIA rate hikes at this time.

At present, there are sufficient premiums, assessments, and reinsurance to cover potential TWIA liabilities for 2021 and 2022.

Additionally, the State Legislature recently passed important legislation addressing TWIA's process for determining rates, and to consider increasing rates before the new laws go into effect is rushed and inconsistent with the intent of the legislature. In particular, the law reauthorizes an interim study of TWIA's funding mechanism (which unfortunately was put off due to the COVID-19 pandemic).

This study needs to be completed as soon as possible and NO rate increase should be considered until its results have been received and considered.

Thank you for the opportunity to comment.

Sincerely,



From: Sent:

Friday, July 30, 2021 9:52 AM

To: Subject: PublicComment No rate increase

No more unfair rate increases on Coastal residents and businesses. no rate increase!



Get Outlook for iOS

From:

Friday, July 30, 2021 9:49 AM PublicComment Sent:

To: Subject:

NO RATE INCREASE

NO RATE INCREASE

From:

Sent:

To: Subject: Friday, July 30, 2021 9:49 AM PublicComment

PublicComment No Rate Hike

No Rate Hike Please

Sent from my iPhone

From: Theresa Elliott <te@casadelmartx.com>

Sent: Friday, July 30, 2021 9:49 AM

To: PublicComment

Cc: Terrilyn@InsuranceJunction.com; HENRY FREUDENBURG; Gina Spagnola; Mayes

Middleton

Subject: TWIA Rate Increases - opposition letter

I am writing to oppose TWIA increasing their insurance rates for Texas Coastal customers. There are multiple reasons, but first, TWIA has not complied with the interim study requirements of HB1900. TWIA must conduct an independent and thorough review their rates and funding structure prior to any rate increases. Until this independent study is contracted and thoroughly reviewed, any rate increase is unjustified. Texans cannot afford a rate increase at this time and TWIA owes it to its customers to thoroughly justify any increases with an independent study as required by HB1900. Thank you for your consideration.

Theresa Elliott General Manager Casa del Mar Beachfront Suites Galveston Island, Texas 77551 409-572-1010 Direct 409-740-2431 Main 409-744-8896 Fax www.casadelmartx.com

From:

Sent: Friday, July 30, 2021 9:46 AM

To: Subject: PublicComment NO RATE INCREASE!

No rate increase, please!

Sent from my iPhone

From:

Sent: Friday, July 30, 2021 9:45 AM

To: PublicComment **Subject:** TWIA: No Rate Hike

At present, the Galveston region (and the U.S. population in general) is faced with run-away inflation costs of living. The last thing needed is a TWIA rate hike at this time. I oppose any such rate hike. Regards,

From:

Sent: Friday, July 30, 2021 9:43 AM

To: PublicComment Subject: Really??!!!

Covid should not be an excuse to raise rates prior to a thorough review of TWIA's funding structure by the Texas Legislature.

From:

Sent: Friday, July 30, 2021 9:40 AM

To: PublicComment **Subject:** No Rate Increase

To whom it may concern,

I am not in favor of a rate increase.

Thank you,



From:

Friday, July 30, 2021 9:40 AM PublicComment Sent:

To:

Subject:

NO RATE INCREASE!!!!!

Sent from my iPhone

From:	
Sent:	Friday, July 30, 2021 9:39 AM

To:PublicCommentSubject:NO RATE INCREASE

To whom it may concern,

No more unfair rate increases!

Have a good day!

From:	
-------	--

To: Subject:

Sent:

Friday, July 30, 2021 9:38 AM

PublicComment No rate increase

NO RATE INCREASE

Sent from my iPhone

Sent from my iPhone

From:

Sent: Friday, July 30, 2021 9:36 AM

To: PublicComment **Subject:** NO RATE INCREASE

Attachments: image-30-07-21-09-35.jpeg

Stop increasing rates. It's unfair.

From:

Sent: Friday, July 30, 2021 9:32 AM

PublicComment

To:

Subject: ☐ NO RATE INCREASE ☐

I'm Nueces County resident and I OPPOSE rate increase. Thank you,

Sent from Yahoo Mail for iPhone

From:

Sent:

Friday, July 30, 2021 9:31 AM PublicComment

To: Subject:

NO RATE INCREASE

Sent from my iPad



From:

Sent: Friday, July 30, 2021 9:30 AM

To: PublicComment

NO RATE INCREASE

From:

Sent: Friday, July 30, 2021 9:29 AM

To: PublicComment Subject: Rate increase

Dear chairman,

I wholeheartedly agree with the letter sent by Mayes Middleton and disagree with the proposed rate increase.



STATE REPRESENTATIVE • DISTRICT 23

July 27, 2021

Chandra Franklin-Womack, Chair Texas Windstorm Insurance Association 5700 South MoPac Expressway Building A Austin, TX 78749

Chair Franklin-Womack,

Earlier this year, the TWIA Actuarial & Underwriting Committee ignored the actuarial advice from Willis Towers Watson regarding the blend of the AIR and RMS models to determine the appropriate amount of reinsurance to purchase. The TWIA Actuarial & Underwriting Committee's recommendation on a rate filing should be disregarded because they have continuously ignored the actuarial advice from an independent, thirdparty actuarial firm.

We went to great lengths and expense to ensure that an independent actuarial firm reviewed and made recommendations on the blend of models to use in determining the probable maximum loss. While I disagree with their recommendation of 25% AIR and 75% RMS, that recommendation was made on actuarial principles after a third-party review. However, TWIA continues to blatantly ignore that recommendation by determining the probable maximum loss with a 50/50 model split. This inflates the probable maximum loss, exaggerates the amount of reinsurance required to purchase, and passes on the increased costs to ratepayers. This is unacceptable.

There are many issues with TWIA's rate calculations that need to be addressed and analyzed by the legislative funding and oversight board, including the fact that the AIR model does not adequately give credit for windborne debris protections that are mandated by TWIA's own standards. The TWIA Board should suspend taking any action on rates until the legislative funding and oversight board has met and delivered a report on their findings. I adamantly oppose any rate changes.

Very truly yours,

Mayes Middleton

Texas State Representative

House District 23

CAPITOL OFFICE: P.O. BOX 2910 • AUSTIN, TEXAS 78768-2910 • (512) 463-0502 • FAX (512) 936-4260 GALVESTON: 2101 MECHANIC STREET, SUITE 245 • GALVESTON, TEXAS 77550 WALLISVILLE: 20136 B I-10, WALLISVILLE, TEXAS 77597 • (MAIL) P.O. BOX 15, WALLISVILLE, TEXAS 77597 MAYES.MIDDLETON@HOUSE.TEXAS.GOV



From:

Friday, July 30, 2021 9:27 AM PublicComment Sent:

To:

Subject: Rate hike

NO RATE INCREASE!

Sent from my iPhone

From:

Friday, July 30, 2021 9:27 AM PublicComment Sent:

To: Subject:

Windstorm

No rate increase

From:

Sent: Friday, July 30, 2021 9:26 AM

To: PublicComment **Subject:** NO RATE INCREASE

We don't need RATE INCREASE

Sent from Yahoo Mail for iPhone

From:

Friday, July 30, 2021 9:26 AM PublicComment Sent:

To: Subject:

NO RATE INCREASE

Importance:

High

NO RATE INCREASE



From:

Sent: Friday, July 30, 2021 9:23 AM

To: PublicComment **Subject:** NO RATE INCREASE

Concerned resident in Coastal Bend area

Sent from my iPhone

From:

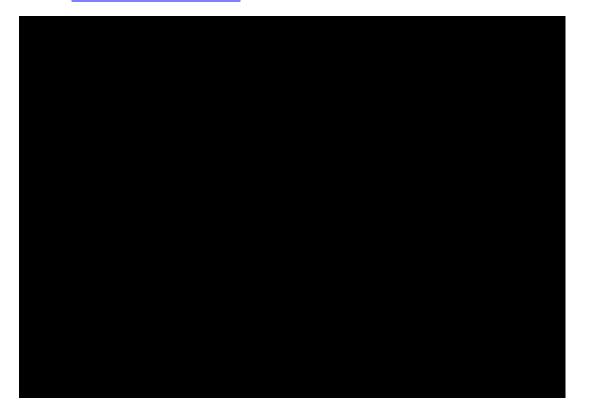
Sent: Friday, July 30, 2021 9:11 AM

To: PublicComment

Subject: PLEASE NO RATE HIKES

--

Texas law requires all license holders to provide <u>Information About Brokerage Services</u> to potential clients, as well as the <u>Consumer Protection Notice</u>.



From:

Sent: Friday, July 30, 2021 9:08 AM

To: PublicComment Subject: No rate hike!!!

Twia Board, your attempts to sneak an unnecessary rate hike through, just weeks before legislation goes into effect that would make it more difficult for you to do so, would be shocking, if that kind of behavior wasn't so typical of this organization.

STOP RAISING RATES USING A FLAWED MODEL!!!

In whose best interests are you acting on? Certainly not the best interests of the citizens of the state of Texas.

NO MORE RATE HIKES!! FIX THE BROKEN SYSTEM!



Sent from my mobile device

From:

Sent: Friday, July 30, 2021 9:08 AM

To: PublicComment

Sent from my mobile.

No Rate Hike

From:

Sent: Friday, July 30, 2021 8:57 AM

To: PublicComment Subject: PublicComment

"I oppose any TWIA rate hikes."



From:

Sent: Friday, July 30, 2021 8:36 AM

To: PublicComment

Subject: Opposition to TWIA rartes

I oppose the proposed rate increase. Currently TWIA rates are higher than my home owners policy and flood policy combined. The rates are ridicules.



From:

Sent: Friday, July 30, 2021 8:20 AM

To:PublicCommentSubject:Rate increase

To whom it may concern,

I would like to voice my agreement with Representative Middleton in regards to the Proposed rate increase. It is seen that the TWIA committee has failed to acknowledge the advice of a third party and instead has chosen to unjustly propose a rate increase. Please follow the recommendation of the Representatives and colleagues and postpone a decision until adequate investigation can be performed. I oppose the rate increase.

Sent from Yahoo Mail for iPhone

From:

Friday, July 30, 2021 8:18 AM PublicComment Sent:

To: Subject: No rate hike

Please do not impose a rate increase on us.

From:

Friday, July 30, 2021 8:17 AM PublicComment Sent:

To: Subject: Please no rate hike!

Sent from my iPhone

From:

Sent: Friday, July 30, 2021 8:15 AM
To: PublicComment

To: PublicComment **Subject:** No rate hike

Please do not impose a rate increase on us.

From:

Sent: Friday, July 30, 2021 8:14 AM

To: PublicComment **Subject:** TWIA insurance rates

As a homeowner in Galveston, TX, I strongly urge you to not increase our TWIA insurance rates. We already pay a substantially higher amount for our TWIA policy than for our dwelling or flood policies, and the financial burden is disheartening, especially considering the times we are in. Paired with the increased upkeep of owning a home along the coast, high tax rates, inflation, the threat of the effects of Covid, and general economic turbulence, it could be a debilitating result if our rates were to increase. I'm sure I speak for my fellow coastal residents as well - please do not raise our rates!! Thank you for your time and understanding.

Respectfully,

From:

Sent: Friday, July 30, 2021 8:11 AM
To: PublicComment

To: PublicComment **Subject:** No rate hike

Please don't raise our rates for the same coverage.

From:

Friday, July 30, 2021 8:08 AM PublicComment Sent:

To: Subject: No rate hike

Please, do not increase our rates.

From:

Sent: Friday, July 30, 2021 8:02 AM

To: PublicComment **Subject:** Rate Hikes

I oppose the TWIA rate hike.--

"Success consists of going failure to failure without the loss of enthusiasm"

From:

Sent: Friday, July 30, 2021 8:02 AM

To: PublicComment

Subject: Rate hike

Please wait until the State legislature finishes its review before you institute any rate hikes. Coastal Bend customers cannot afford any more charges at this time.

Choose to be safer online.

Opt-in to Cyber Safety with NortonLifeLock. Plans starting as low as \$6.95 per month.*

NetZero.com/NortonLifeLock

Sent: Friday, July 30, 2021 7:32 AM

To: PublicComment **Subject:** No rate hikes!

Hello,

I'm a property owner in Port Aransas Texas. I am asking for no rate hikes. With the cost of insurance (Homeowners, Flood, Wind&Hail)

along with outrageous property taxes, the expense to own property along the coast is limiting to primary homeowners as well as secondary homeowners, especially with the pandemic.

Thank you.

From:

Sent: Friday, July 30, 2021 7:29 AM

To: PublicComment Subject: NO RATE HIKE

Importance: High



Virus-free. www.avast.com

From:

Friday, July 30, 2021 7:03 AM PublicComment Sent:

To: Subject: No Rate Increase!

From:

Sent: Friday, July 30, 2021 4:24 AM
To: PublicComment

To:PublicCommeCc:Todd HunterSubject:No Rate Hike

No Rate Hike



From:

Sent: Friday, July 30, 2021 1:05 AM

To: PublicComment

Subject: I oppose any rate hikes

I am against any rate hikes until the remainder of the states' citizens are included in the TWIA group. Why should the coastal counties have to cover any type of wind storm in the state. There are things like tornados and wind storms that do devastating damage in other parts of the state.

From:

Sent: Thursday, July 29, 2021 11:26 PM

To: PublicComment **Subject:** Rate increase

As residential property owners in Jamaica Beach we firmly oppose a rate increase at this time. The past 18 months have been economically difficult and a rate increase would exacerbate the problems.

Sent from Yahoo Mail for iPad

From:

Sent: Thursday, July 29, 2021 10:34 PM

To: PublicComment **Subject:** No rate increase

Rates are high enough as they are

E	ro	m·
•	ıv	

Sent:

Thursday, July 29, 2021 10:30 PM

To:

Public Comment

Subject:

Rate hike

No rate hike!!!

From:

Sent: Thursday, July 29, 2021 10:19 PM

To: PublicComment Subject: No Rate Increase

No Rate Increase!!

From:

Sent: Thursday, July 29, 2021 10:12 PM

To: PublicComment

Subject: TWIA

Sent via the Samsung Galaxy Tab E, an AT&T 4G LTE tablet

[&]quot;I oppose any TWIA rate hikes."

ᆮ	r	^	n	٠.
•	•	v	•••	•

Sent: Thursday, July 29, 2021 9:57 PM

To: PublicComment Subject: TWIA Rates

I respectfully request that the Texas Windstorm Insurance Association Board not consider any rate increase on coastal policyholders, residents, and businesses at this time. A rate increase during this unprecedented season of economic distress would only cause an additional and injurious financial burden on coastal residents and business owners.

Thank you,

Galveston, Texas

From:

Sent: Thursday, July 29, 2021 9:42 PM

To: Subject: PublicComment NO RATE HIKE

NO RATE HIKE

From:			
_			

Sent: Thursday, July 29, 2021 9:04 PM

To: PublicComment Subject: Rate Increase

I strongly DISAGREE to a rate increase!!!

Any questions, feel free to contact me at

From:

Sent: Thursday, July 29, 2021 9:00 PM

To: PublicComment

Subject: TE

From:

Sent: Thursday, July 29, 2021 8:53 PM

To: PublicComment

Subject: Rate increase on our windstorm insurance.

Sent from Mail for Windows 10

The math does not add up for such an increase. We, as property owners, are suffering from too higher taxes as it is. Stop the madness of greed.

From:

Sent:

To: Subject: Thursday, July 29, 2021 8:48 PM

PublicComment NO RATE INCREASE

NO RATE INCREASE



From:

Sent: Thursday, July 29, 2021 8:27 PM

To: PublicComment

Subject: Opposition to Rate Increase

It is not appropriate, if unethical, that rates would go up just before new legislative rules go into effect September 1. Fortunately, my home in a Texas City never floods, and received minimal exterior damage during lke, and none from Harvey or the recent winter freeze/power outage.

Residents are dealing with outrageous property tax increases already, and now continuing outrageous rate increases for windstorm insurance. If this continues, residents, while not wise, will simply stop insuring their homes and just walk away from their homes if it comes to that. It also discourages/prevents people from moving into the area.

That is no way to preserve/promote a community covered by TWIA. It is bad for the affected cities and it's residential and economic growth.

Thank you,

Texas City, Texas

Sent from my iPad

From:

Sent:

Thursday, July 29, 2021 7:32 PM

To: Subject: PublicComment NO RATE INCREASE

No Rate Increase!

Rockport

Sent from my iPad

From:

Sent: Thursday, July 29, 2021 6:31 PM

To: PublicComment

Subject: Windstorm Rate Increase

We hope you will reconsider the 5% increase on windstorm ins.

There are many home owners that have still not recovered from financial difficulties as a result of the Pandemic.

My husband and I are retired and as prices for food, etc. have increased it is increasingly difficult to make ends meet.

We love living in Galveston but we can ill afford this increase.

Sincerely,

From:	
Sent:	Thursday, July 29, 2021 5:32 PM
To:	PublicComment
Subject:	Comment on TWIA Rate Increase
My name is increase.	My husband and I own 2 homes in Galveston. We do not agree with any TWIA rate
get caught up on over	eve been exceptionally difficult on everyone. Many struggle to pay their current bills, much less to due bills, due to the pandemic and the effect it has had on our economy. Now is not the time to me to reflect on the hardships most are going through and to be compassionate enough to keep
Thank you,	

From:

Thursday, July 29, 2021 4:44 PM PublicComment Sent:

To:

Subject: rate hike

I oppose any TWIA rate hikes.



From:

Sent: Thursday, July 29, 2021 4:31 PM

To:

PublicComment

Subject:

TAKE ACTION: Register you opposition to any TWIA Rate Hikes

Importance:

High

"I oppose any TWIA rate hikes."

From:

Sent:Thursday, July 29, 2021 4:26 PMTo:PublicComment; Dawn Kana

Subject: NO RATE HIKE

We own a second home in Jamaica Beach and our rates are high already. We ask that there is no rate hike! Thanks for your consideration!

Thanks,



From:

Sent: Thursday, July 29, 2021 3:57 PM

To: PublicComment **Subject:** No rate hikes

TWIA Board Members,

I am a tax payer in Nueces County and I say NO MORE RATE HIKES!!! Enough is enough! If you need more money then have the rest of the state contribute but you CANNOT keep imposing higher taxes on one group of tax payersNO MORE!

Thank you

From	:

Sent: Thursday, July 29, 2021 3:38 PM

To: PublicComment

Subject: Object to increase in TWIA rates

If a bank makes a loan on a home or business that is in a hurricane, tornado, flood, or natural disaster prone area, It should be their responsibility to cover risk or not make the loan. The same thought goes with the person making the purchase. If you buy a home the maintenance and risk of ownership should be yours.

Insurance is fine as long as it is not for profit. There are too many people taking too much of the pie that should be going to fund the loss of property due to natural disasters. The lack of oversight on the money collected and invested for the purpose of relief and rebuilding is irresponsible and not transparent.

You show me the bottom line: money collected, money made from investing, and money spent. Otherwise it is another money laundering scheme by people who are not interested in the well being of those they are supposed to serve.

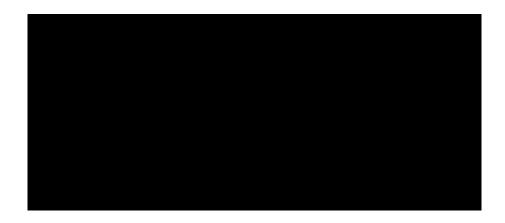
I oppose any rate hike.

Galveston

From:

Sent: Thursday, July 29, 2021 3:34 PM

To: PublicComment Subject: PublicComment



From:

Sent: Thursday, July 29, 2021 3:14 PM

To: PublicComment

Subject: Please don't raise rates on old people!

My husband and I are senior on social security, and Windstorm Insurance is our biggest expense.

Please don't raise rates.

We did a lot better on rates when the state of Texas was NOT involved, and we just bought our insurance through USAA.

- 1) Please don't raise rate.
- 2) Or if you do raise rates, exempt seniors over 65 from paying any additional higher rates.

 Our county taxes capped our school and land taxes when we turned 65, and even gave us a discount. Perhaps Windstorm Insurance can do the same.

Respectfully,



Sent from Mail for Windows 10

From:	
Sent:	Thursday, July 29, 2021 2:55 PM
То:	PublicComment
Subject:	No Rate Hike!

No Rate Hike!

Sent from my iPhone

F	rom	•
•		•

Sent: Thursday, July 29, 2021 2:54 PM

To: PublicComment **Subject:** No Rate Hike!

No Rate Hike!

From	:
	•

Subject:

Sent: To: Thursday, July 29, 2021 2:53 PM

PublicComment No Rate Hike

No Rate Hike!

From:

Sent: Thursday, July 29, 2021 2:52 PM

To: PublicComment **Subject:** No Rate Hike

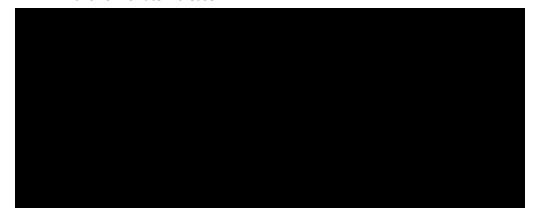
No Rate Hike

From:

Sent: Thursday, July 29, 2021 2:32 PM

To: PublicComment Subject: Rate Increase

I'm in favor of no rate increase.



From:

Thursday, July 29, 2021 2:26 PM Sent:

To: Subject:

PublicComment NO RATE INCREASE

From:

Sent: Thursday, July 29, 2021 2:18 PM

To: Subject: PublicComment NO RATE INCREASE

NO RATE INCREASE

From:

Sent: Thursday, July 29, 2021 2:02 PM

To: PublicComment **Subject:** Do Not raise rates

When you consider the property taxes and the homeowner insurance rates and the flood policy rates, Galveston county residents cannot afford for you to increase your rates. We need relief! Find ways to cut excess waste out of your budget before asking for another dime.

From:

Sent: Thursday, July 29, 2021 1:51 PM

To: Subject: PublicComment NO RATE INCREASE!

From:

Sent: Thursday, July 29, 2021 1:46 PM

To:PublicCommentSubject:NO RATE INCREASE.

NO RATE INCREASE.



From:

Sent: Thursday, July 29, 2021 1:43 PM

To: PublicComment **Subject:** No Rate Hike

This is to add my voice to the public comments.

NO RATE HIKE!!

No one can afford higher rates - still recovering economically and probably going to get worse due to COVID ramping up again. So many struggling.

Thank you,

Santa Fe, TX

Sent from my iPhone

From:

Sent: Thursday, July 29, 2021 1:39 PM

To: PublicComment Subject: PublicComment

NO TWIA RATE HIKE! We pay enough already!!

Sent from Mail for Windows 10

From:

Thursday, July 29, 2021 1:29 PM Sent:

To: Subject:

PublicComment NO RATE INCREASE

From:

To: Subject:

Sent:

Thursday, July 29, 2021 1:30 PM

PublicComment NO RATE INCREASE

Aransas County homeowner.

Rockport Tx 78382

From:

Sent: Thursday, July 29, 2021 1:19 PM

To: PublicComment

Subject: TWIA

We oppose any Twia rates!

We have 4 properties and they are all covered with Twia. The cost of insurance is making it difficult to live of that income. We are both senior citizens.

From:

Sent: Thursday, July 29, 2021 1:01 PM

To: PublicComment **Subject:** No rate hike!!

There doesn't need to be rate hike....costs too much as it is!!

From:

Sent: Thursday, July 29, 2021 12:59 PM

To:

Subject: Windstorm rate increase. No rate hike!

PublicComment

Please do not allow rate increases for windstorm insurance. I am already paying \$2363 annually for twia, with no claims! I'm retired and insurance is making it very hard for Me to keep my house. There is no reason for the rates to be this extravagant.

Santa Fe, TX

Sent from my iPhone

From:

Sent: Thursday, July 29, 2021 12:43 PM

To:

PublicComment

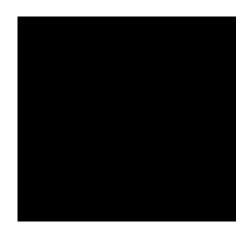
Subject:

Opposition to the "Proposed TWIA Rate Hikes"

Importance:

High

Having lived & worked along the Texas Gulf Coast all of my life, and on behalf of our as well as the Petro-Chemical Industry—I FERVENTLY OPPOSE THE TWIA RATE HIKES!



From:	
Sent:	Thursday, July 29, 2021 12:16 PM

To: PublicComment Subject: PublicComment

Hello.

I oppose any rate hikes. This is not the time.

Thank you.

US Navy Disable Vet

From:

Sent: Thursday, July 29, 2021 12:12 PM

To: PublicComment Subject: PublicComment

I am opposed to any TWIA rate hike.

Taft, TX 78390

From:

Sent: Thursday, July 29, 2021 12:06 PM

To: PublicComment

Subject: Oppose insurance rate hikes

I oppose any storm related rate hikes.

Regards

Sent from my iPhone

From:

Sent: Thursday, July 29, 2021 12:04 PM

To: PublicComment

Subject: TWIA RATE SETTING MEETING ON AUGUST 3RD

To whom it may concern;

I object to any increase in the TWIA rates we are currently paying. I believe we pay more than enough.

I would support a rate cut as I know all of my fellow homeowners would as well.

I hope you do not further increase the burden on Texans and their families and businesses. You have done too much in this regard already.

Sincerely,



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From:

Sent: Thursday, July 29, 2021 11:53 AM

To: PublicComment

Cc: Mayes Middleton

Subject: TWIA

Dear TWIA

It has come to our attention as new residents that two items exist within the sturcture of ${\tt TWIA.}$

1: you will need to bird dog your claim or it will fall through cracks

2: you will be paid 25% of damage

LaMarque, TX

From:

Sent: Thursday, July 29, 2021 11:50 AM

To: PublicComment

Subject: Hwy 87

What are the future plans for hwy87, we all know the work performed has been a slight help but not a fix, the first storm we have will probably take the road out leaving the only exit being the Galveston ferry, that doesn't sound like a good plan, there's been a lot of money spent on a useless project, constant maintenance and wasted tax dollars

Sent from my iPhone

From: Sent:

Thursday, July 29, 2021 11:35 AM

To: PublicComment Subject: Rate increase

I am extremely opposed to ANY rate increase proposed by the Commission.



Galveston Co.

From:

Sent: Thursday, July 29, 2021 11:19 AM

To: PublicComment Subject: PublicComment

I oppose any TWIA rate hikes.

From:	
-------	--

Sent: Thursday, July 29, 2021 11:15 AM

To: PublicComment

Subject: rate hike

We oppose any new rate hikes by TWIA. There is no need for this in this area.

Portland TX

From:

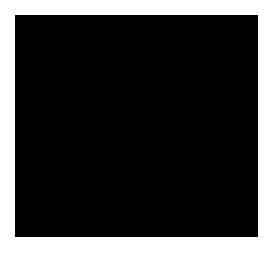
Sent: Thursday, July 29, 2021 11:05 AM

To: PublicComment **Subject:** TWIA rate hike

I oppose any TWIA rate hike.

Texas Real Estate Commission Information About Brokerage Services

Texas Real Estate Commission Consumer Protection Notice



From:

Sent: Thursday, July 29, 2021 11:05 AM

To: PublicComment Subject: Rate Increase

No increase! The whole state should be covered not just the coast!

Corpus Christi, TX

From:

Sent: Thursday, July 29, 2021 11:01 AM

To: PublicComment Subject: RE: Rate Increase

YOU WANT TO INCREASE OUR RATES!? Well tell those Californians to go back to California! Why are they even on the board???? REALLY! Our home was damaged all my plants and some of our trees were damaged my power was cut off for long periods and we were freezing!!! Our pipes burst! And you want to increase our rates??????? We say NO!!!!! Get rid of those wind turbines they are useless! there are other, better, easier more reliable sources! NO!! Do Not raise our rates.

Very Sincerely,

From:

Sent: Thursday, July 29, 2021 10:58 AM

To:

PublicComment

Subject:

I oppose any TWIA rate hikes. We are just coming out of pandemic and no sense adding to economic hardship people are experiencing.

Sent via the Samsung Galaxy S9, an AT&T 5G Evolution capable smartphone

From:

Sent: Thursday, July 29, 2021 10:46 AM

To: Subject: PublicComment
Possible rate increase

I strongly oppose any rate increase TWIA is considering. The rates need to be calculated correctly and TWIA needs to stop inflating the amount of reinsurance they purchase.

Regards,



From:

Sent: Thursday, July 29, 2021 10:43 AM

To: PublicComment

Subject: I oppose any TWIA rate hikes!

I oppose any TWIA rate hikes.

From:

Sent: Thursday, July 29, 2021 10:33 AM

To:PublicCommentSubject:Rate Increase

I emailed twice before and have not received any sort of response. I disagree with your proposed rate increase and as stated before, our buildings that were devastated during Hurricane Harvey are now much better being built back to hurricane standards.

Sent from Mail for Windows 10

From:

Sent: Thursday, July 29, 2021 10:25 AM

To: PublicComment Subject: No Rate Increase

No Rate Increase.

Sent from $\underline{\text{Mail}}$ for Windows 10

From:

Sent: To:

Subject:

Thursday, July 29, 2021 10:23 AM

PublicComment

" I oppose any TWIA rate hikes."

--

Thank you,

From:

Sent: Thursday, July 29, 2021 10:16 AM

To: PublicComment **Subject:** TWIA Increase

I oppose to any increases in TWIA for commercial and residential policies.

These are trying times for many people in our communities.

Thank you



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From:

Sent:	Thursday, July 29, 2021 10:04 AM
To:	PublicComment
Subject:	oppose rate increase
•	
Now is not the time to increase r	rates on us costal residents, we're all trying to recover from this pandemic.
	nd remains at a high vs other areas of the state and country
onemployment in the coustar se	The remains at a might vision of the state and country

From: James Pope <JPope@GalvestonTX.Gov>

Sent: Thursday, July 29, 2021 9:55 AM

To: PublicComment Subject: No Rate Increase

I'm a first responder and live in Galveston for several reasons. I enjoy living need the coast. It allows me to live and work in the same community that I help, and it enables me to respond more quickly when we have a Hurricane. We all know those are inevitable. Insurance rate increases will force me to relocate off the island. When that happens and your first responders can't be in place to aid to respond. It will low the response and arrival for these essential personnel. It will affect all the citizens living in the area that would require help. This isn't a summer rental house; this is my home. Insurance costs seem like a little thing, but public servants' salaries are a little thing. Most of us work from paycheck to paycheck and do it because we love helping others.

Please evaluate the properties individually. New construction is built to current International Building Code, but many properties like my own have been renovated and meet the

IBHS, FEMA "Fortified Home "standard. These standards are used in Florida and here in Galveston like the community of Beachtown on the east end of the island. Beachtown community is an example

Of what better construction will provide. Beachtown received NO damage from Hurricanes Rita, Katerina, and Ike. Better construction will save lives and cut down on insurance claims and with any luck reduce our TWIA rates. Consider the construction or the renovations of each property. Adopt "Fortified" style building standard for the Texas Gulf Coast. I ask you to please don't raise the insurance rates.

Thank you,
James
Galveston, Texas
I can provide my address and contact number on request.



James Pope, Chief Deputy
City Marshal's Office
3002 Ball St. Galveston, TX 77550
O: 409.797.3647 | D: 409.797.3613 | C: 409.771.1602 | jpope@galvestontx.gov

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From:

Sent: Thursday, July 29, 2021 9:48 AM

To: PublicComment

Subject: I oppose any TWIA RATE HIKES

Many of us can't afford it, why do we have to go through this, we live in the coastal bend because we were born and raised here, so it's not like we can just pack and go where windstorm is not required.

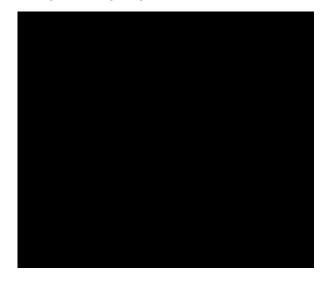


From:

Sent: Thursday, July 29, 2021 9:47 AM

To: Subject: PublicComment NO RATE INCREASE

NO RATE INCREASE



From:

Sent: Thursday, July 29, 2021 9:38 AM

To: PublicComment

Subject: I oppose any TWIA rate hikes.

I oppose any TWIA rate hikes at this time.

Regards,



From:

Sent: Thursday, July 29, 2021 9:37 AM

To: PublicComment

Subject: I oppose any TWIA rate hikes

I oppose any TWIA rate hikes.

Thank you,

Peter Dottolo

As for Me and my House, We will serve the Lord. -Joshua 24:15

From:

Sent: Thursday, July 29, 2021 9:30 AM

To: PublicComment

Subject: Rate Hike

It is totally unconscionable that TWIA would even CONSIDER a rate hike at this time when we Americans are suffering such hardships from Covid, Harvey a few years back, and increases in price in every area of our lives PLEASE Now is no time to raise rates.

Sent from my iPhone

From:	
-------	--

Sent: Thursday, July 29, 2021 9:23 AM

To: PublicComment Subject: Rate increase

I am opposed to a TWIA rate increase at the current time.

Thanks,

From:

Sent: Thursday, July 29, 2021 9:22 AM

To: PublicComment Subject: No Rate Increase

No Rate Increase Please.

Very respectfully,



From:	
-------	--

Sent: Thursday, July 29, 2021 9:22 AM

To: PublicComment Subject: Rate increase

I oppose any current TWIA rate hike.

Thanks,

From:

Sent: Thursday, July 29, 2021 9:14 AM

To: PublicComment

Subject: Public Comment: Oppose any TWIA Rate Hikes

Public Comment: I'm writing to express my opposition any TWIA rate hikes. I request a Forensic Audit of the Board's Actuarial & Underwriting Committee's Rate Adequacy Data/Analysis.

From:

Sent:

Thursday, July 29, 2021 9:15 AM

To: Subject: PublicComment NO RATE INCREASE

NO RATE INCREASE

Sent from my iPhone

From:

Sent: Thursday, July 29, 2021 9:14 AM

To: PublicComment

Subject: Opposition to Rate Increases

I oppose any TWIA rate hikes.

From:

Sent: Thursday, July 29, 2021 9:14 AM

To: PublicComment

Subject: Opposition to Rate Increases

I oppose any TWIA rate Hikes.



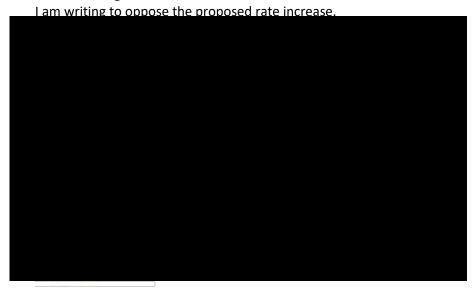
"The will to win, the desire to succeed, the urge to reach your full potential... these are the keys that unlock the door to personal excellence."

From:

Sent: Thursday, July 29, 2021 9:10 AM

To: PublicComment **Subject:** NO RATE INCREASE

Good morning,



From:

Sent: Thursday, July 29, 2021 9:10 AM

To: Subject: PublicComment NO RATE INCREASSE

Sincerely,



From:

Sent: Thursday, July 29, 2021 9:06 AM

То:

PublicComment

Cc:

Info@GregAbbott.com

Subject:

Gregory Texas Resident and Homeowner

Importance:

High

I oppose any TWIA rate hikes because I can NOT afford it! This is theft at its highest and the payout is usually disappointing low!



From:

Sent: Thursday, July 29, 2021 9:05 AM

To: PublicComment **Subject:** NO RATE INCREASE

NO RATE INCREASE



From:

Sent: Thursday, July 29, 2021 9:03 AM

To: PublicComment

Subject: TWIA rate hikes: opposition

I oppose any TWIA rate hikes.

Regards,



From:

Sent: Thursday, July 29, 2021 9:02 AM

To: PublicComment

Subject: TWIA

I oppose any RATE HIKES!



From:

Sent: Thursday, July 29, 2021 9:00 AM

To: PublicComment

Subject: NO NO NO NO NO NO NO TOTWIA Rate Hikess

I whole heartedly OPPOSEy RATE HIKE to my TWIA RATES. I can barely hang on to my home in the current situation of the world and definitely could not afford any more in Insurance payments!

Thank you for your cconsideration!

From:

To:

Sent:

Thursday, July 29, 2021 8:53 AM

PublicComment

Subject: I oppose any TWIA rate increase!!!!

Powered by Cricket Wireless

From:

Sent: Thursday, July 29, 2021 8:51 AM

To: PublicComment **Subject:** TWIA rate increase

I am against any rate hike from TWIA. The economic impact that Covid 19 made has a long-term impact on people and businesses. It is unreasonable for any insurance company to consider any type of rate change in the near future.

From:

Sent: Thursday, July 29, 2021 8:47 AM

To: PublicComment

Subject: I oppose any TWIA rate hikes.

I oppose any TWIA rate hikes.

From:

Sent: Thursday, July 29, 2021 8:42 AM

To: Subject: PublicComment TWIA RATE INCREASES

"I oppose any TWIA rate hikes."

Sent from Mail for Windows 10 Regards,

Port Aransas, Texas

From:

Sent: Thursday, July 29, 2021 8:40 AM

To: PublicComment Subject: TWIA RATE HIKE

I strongly oppose any TWI rate hike.

Respectfully,

Rockport, TX

From:

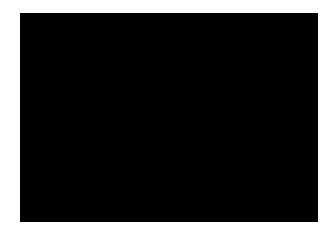
Thursday, July 29, 2021 8:39 AM PublicComment Sent:

To:

Subject: Rate hike

I oppose and current TWIA rate hikes.

Respectfully,



From:

Sent: Thursday, July 29, 2021 8:38 AM

To: PublicComment **Subject:** No Rate Hike

TWIA -

No 5% hike, no hike at all. The need has not been sufficiently demonstrated.

Thank you for your consideration.

Galveston County resident

From:

Sent: Thursday, July 29, 2021 8:35 AM

To: PublicComment **Subject:** TWIA Rate Hikes

I oppose any TWIA rate hikes.

Sent from my iPhone

From:

Sent: Thursday, July 29, 2021 8:31 AM

To: PublicComment Subject: Rate Increase

I do NOT support a TWIA rate increase at this time.

From:

Sent: Thursday, July 29, 2021 8:29 AM

To: PublicComment **Subject:** Rate increases

I oppose any TWIA rate hikes,

From:

Sent: Thursday, July 29, 2021 8:23 AM

To: PublicComment **Subject:** TWIA Rate Hikes

I oppose any TWIA rate hikes. Please, don't increase them.

--

From:

Sent: Thursday, July 29, 2021 8:19 AM

To:

PublicComment

Cc:

Mayes Middleton; ryan.caruso@house.texas.gov; larry.taylor@senate.texas.gov

Subject:

Oppose TWIA Rate Increase

I strongly oppose any TWIA rate changes and oppose taking any action on rates until the legislative funding and oversight board has met and delivered their report.

As a retiree, I find the rates for insurance under TWIA make it almost impossible for me to maintain the insurance that would be needed in a disaster. With constantly increasing rates, there will come a time when I just can't afford this insurance. Sincerely,

Galveston, TX

From:

Subject:

Sent: Thursday, July 29, 2021 8:18 AM

To:

PublicComment
I oppose any TWIA rate hikes

I oppose any TWIA rate hikes.

Best Regards,



From:

Thursday, July 29, 2021 8:17 AM PublicComment Sent:

To: Subject: TWIA Policy

I oppose any TWIA rate hikes.



From:		
Sent:	Thursday, July 29, 2021 8:16 AM	
То:	PublicComment	
Subject:	Oppose TWIA Rate increases	
Hello,		
I oppose any TWIA rate increases currently being considered.		

Thank you, Insured -

From:

Sent: Thursday, July 29, 2021 8:14 AM

To: PublicComment

Subject: We oppose any TWIA rate hikes

We oppose any TWIA rate hikes.



From:

Sent: Thursday, July 29, 2021 7:59 AM

To: PublicComment Subject: Rate Hikes

I oppose the TWIA rate hike!!!

Most individuals choose a higher deductible to afford current windstorm coverage. With the higher deductible less funds are available for actual repairs. Should TWIA make the wrong decision and increase; TWIA needs to incorporate monthly, quarterly, semi-annual payment plans.

Furthermore, TWIA needs to provide details of how our premiums are utilized. I have been paying premiums for greater than 20 years. The one time I needed assistance and filed a claim; I received a check for just over \$1,000.00. This was partly due to the higher deductible. This is true for so many others, not just myself.

I oppose the TWIA rate hike!!!!

Coastal Bend Resident

Sent from Mail for Windows 10

From:

Sent: Thursday, July 29, 2021 7:59 AM

To: PublicComment Subject: TWIA RATE HIKES

I oppose the TWIA Rate Hikes.

Everyone is going through hardship with Covid and this is a bad time to raise the rates.

Sincerely,

CC, Tx 72418

From:

Sent: Thursday, July 29, 2021 7:50 AM

To: PublicComment

Subject: NO RATE HIKES FOR TWIA

NO TWIA RATE HIKES - especially now when many are still suffering from the ramifications of job loss, inability to pay mortgages, illness both natural and COVID related, unpaid expenses from funeral costs.

Communities are still rebuilding four years after the landfall of Hurricane Harvey. Furthermore, there are sufficient premiums, assessments, and reinsurance to cover potential TWIA liabilities for 2021 and 2022. Lastly, the State Legislature passed important legislation addressing TWIA's process for determining rates. To consider increasing rates before the new laws go into effect on September 1, seems rushed and out of step with the will of the legislature. Additionally, the law reauthorizes an interim study of TWIA's funding mechanism. This study was put off due to COVID-19, but needs to take place as soon as possible. No rate increase should be considered until the study results have been considered.

Corpus Christi Texas

From:

Sent:

Thursday, July 29, 2021 7:49 AM

To: Subject: PublicComment Rate Hikes

I oppose TWIA rate hikes.

Aransas Pass, TX

Sent from my iPad

From:

Sent: Thursday, July 29, 2021 7:45 AM

To: PublicComment **Subject:** Rate Increase.

Twenty years ago, the entire Texas coast began building homes designed to be windstorm compliant. Now that we have a sufficient population of homes that are compliant with windstorm code, we continue to see increases.

This simply makes no sense as risk to loss has been reduced per new construction techniques and inspections. The windstorm insurance "system" in Texas is broken and needs a complete overhaul. Government should be out of the business of insurance and until that happens these unfounded increases should cease.

I urge no increase in TWIA rates. Housing affordability is out of reach for many Texans. When you add ridiculous and unfounded TWIA rate increases to the mix, many Texans simply will not be able to afford home ownership.



Sent by I Pad

From:

Sent: Thursday, July 29, 2021 7:44 AM

To: PublicComment Subject: Rate hikes

I oppose any TWIA rate hikes. It is prejudicial to Coastal residents. There should be insurance for all of Texas which includes TORNADO's, Wind, Hail etc. to be shared by all residential groups.

Corpus Christi, TX

From:

Thursday, July 29, 2021 7:41 AM PublicComment Sent:

To:

Subject: Rate hike

I oppose any TWIA rate hike.

Rockport, TX

From:

Sent: Thursday, Ju

To: Subject: Thursday, July 29, 2021 7:38 AM

PublicComment

I oppose to any TWIA rate hikes

I oppose to any TWIA rate hikes.



Sent from my iPhone

From:

Sent: Thursday, July 29, 2021 7:06 AM

To: PublicComment

Subject: Texas Windstorm Insurance Increase

To Whom It May Concern,

This e-mail is in regards to the associations board meeting to raise insurance rates on Tuesday. As a home owner and windstorm insurance payer that lives on the coast I am in objection to raise insurance rates.

I believe the association should do as the independent actuarial firm suggested. That is to change the associations current hurricane modeling for analysis.

This has been an extremely hard time economically because of the COVID epidemic. Such increases in rates will lead to home owners having to drop their insurance coverages. Which will be detrimental for all. Please reconsider this insurance rate increase.

Thank you,



From:

Sent: Wednesday, July 28, 2021 8:14 PM

To: PublicComment Subject: NO RATE HIKE

Sent from my iPhone

From:

Sent: Wednesday, July 28, 2021 5:45 PM

To: PublicComment Subject: TWIA Rates

Dear TWIA and TWIA Board,

I understand that on Aug 3, the TWIA Board will be hosting a public meeting to consider a TWIA rate hike and that soon afterwards, the Board will consider taking possible action on increasing windstorm rates. I urge you to vote "no" to any rate hikes. In addition, I'm especially against any rate hikes that are unfairly imposed on or that unequally impact Texas Coastal residents and businesses.

Thank you,

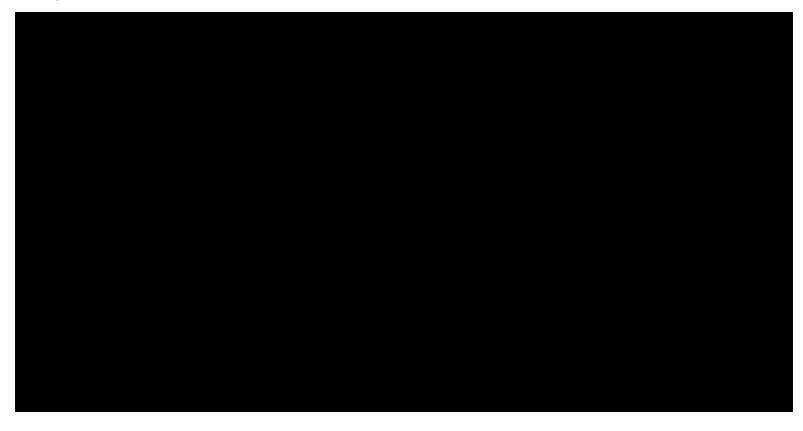


From:

Sent: Wednesday, July 28, 2021 4:00 PM

To: PublicComment Subject: PublicComment

NO RATE HIKE.



From:

Sent: Wednesday, July 28, 2021 3:46 PM

To: PublicComment

Subject: TWIA VIRTUAL MEETING 9AM TUESDAY AUGUST 3RD

NO RATE HIKE!!!



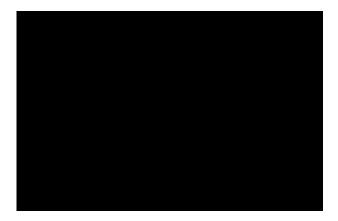
Sent from Mail for Windows 10

From:

Sent: Wednesday, July 28, 2021 3:35 PM

To: PublicComment Subject: NO RATE HIKE

!!!



From:

Sent:

To: Subject: Wednesday, July 28, 2021 3:34 PM

PublicComment No Rate Hike

No Rate Hike--

From:

Sent: Wednesday, July 28, 2021 3:15 PM

To: PublicComment

Subject: Rate Increase - Board meeting

No rate increase.

Sent from my iPhone

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From: Elke Gonzalez <elke@ccarmail.com>
Sent: Wednesday, July 28, 2021 3:15 PM

To: PublicComment Subject: No Rate Increase



Elke R. Gonzalez

Chief Executive Officer
Office: 361-991-8221
Direct: 361-434-0590
4825 Everhart Road Ste 1
Corpus Christi, TX 78411

www.ccaronline.com

From:

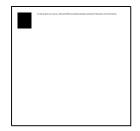
Sent: Wednesday, July 28, 2021 3:09 PM

To: PublicComment **Subject:** No Rate Hike

From: Brett Stawar <bstawar@visitportaransas.com>

Sent: Wednesday, July 28, 2021 3:09 PM

To: PublicComment Subject: NO RATE INCREASE



BRETT STAWAR PRESIDENT & CEO

Port Aransas Tourism Bureau & Chamber of Commerce bstawar@visitportaransas.com visitportaransas.com 361.749.5919 ext. 808 c. 618.696.6477

From:

Sent: Wednesday, July 28, 2021 12:03 PM

To:PublicCommentSubject:Rate Increase

<u>Sent from AT&T Yahoo Mail for iPad</u> In regards to your rate increase. I am an 84 year old widow women trying my best to live on Social Security. Do you have any idea how much this rate increase will effect our Senior Citizens? HAVE MERCY PLEASE!!!

From:

Sent: Wednesday, July 28, 2021 7:21 AM

To: PublicComment

lam against this proposed increase in wind storm insurance. I just got reassessed for property taxes. lam on a fixed budget this increase for wind storm insurance will truly hurt me. Please consider the elderly on fixed budgets.

From:

Sent: Monday, July 26, 2021 6:26 PM

To: Subject: PublicComment NO RATE INCREASE

NO RATE INCREASE

From:

Sent: Monday, July 26, 2021 10:07 AM

To: PublicComment Subject: No Rate Increase

From:

Sent: Monday, July 26, 2021 9:43 AM

To:PublicCommentSubject:Rate increase

Considering our current economic problem is your board needs to reconsider a 5% increase. There are thousands of people who have had this insurance for 20 years never had had to make a claim we consider those people why should they have a 5% increase you all need to study specific areas they have never had catastrophic damage. Sent from my iPhone

Sent: Saturday, July 24, 2021 7:34 PM

To: PublicComment **Subject:** no rate increase

Sent from Mail for Windows 10

From:

Sent: Friday, July 30, 2021 2:12 PM

To: PublicComment **Subject:** No Rate Hike

Hi there--

We would like to urge the TWIA board to NOT to increase our TWIA rates--we are just now recovering from the pandemic economically and don't need to deal with increased rates!

From:

Sent: Friday, July 30, 2021 2:11 PM

To: PublicComment
Subject: TWIA Rate Increase

I strongly encourage you not to increase Windstorm Rates at this time. It is been a while since Galveston has had any windstorms that caused much damage. Last major storm was Hurricane Ike and I believe there was not a whole lot of Windstorm Claims in Galveston with that storm, it was all primarily flood claims.

I think any rate increase would be detrimental to the citizens of Galveston at this time, especially with what the Central Appraisal District has done to our appraised values of our homes. This combined with any TWIA rate increase will make it almost impossible for the Citizens of Galveston to live on the Island

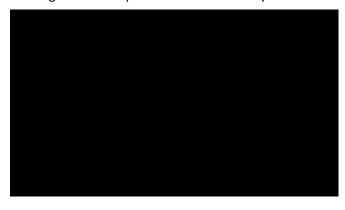


From:

Sent: Friday, July 30, 2021 2:09 PM

To: PublicComment **Subject:** No Rate Hike

Having lived in Corpus Christi for over 30 years I know I speak for all our community NO RATE HIKE.



From:

Friday, July 30, 2021 2:05 PM PublicComment Sent:

To:

Subject: WS rates.

Please do not raise our windstorm rates.

Thank you.



Monday, August 2, 2021 7:57 AM Sent:

To: Subject:

PublicComment NO Rate increase!!!!!!

No more unfair rate increases on Coastal residents and businesses. COASTAL STRONG!!!

Texas Law requires all Real Estate License holders to provide Information About Brokerage Services notice to

prospective clients.

From:

Sent: Monday, August 2, 2021 12:17 AM

To: PublicComment **Subject:** Re: Rate increases

I am opposed to further rate increases due to hardships from Covid.

Thank you,

Sent from Yahoo Mail on Android

From:

Sent: Saturday, July 31, 2021 7:34 PM

To: Subject: PublicComment NO RATE HIKE

NO RATE HIKE

From:

Sent: Saturday, July 31, 2021 2:07 PM

To: PublicComment **Subject:** TWIA Rate hikes

I oppose any TWIA rate hikes, enough already!!! Ya'll collect too much from everyone!!!!

78418

Sent from Yvonne's iPad

From:

Sent: Friday, July 30, 2021 8:42 PM

To: PublicComment **Subject:** No rate increase

Please do not increase our rate for windstorm insurance

Sent from my iPhone

From:

Sent: To:

Subject:

Friday, July 30, 2021 6:11 PM PublicComment; Mayes Middleton

TWIA RATE INCREASE REALLY ??

As a long time resident of Galventon County living along the coast, I must say I am very sad that I am unable to invest smart money into TWIA!

Why because your rate are out of reach, when filing a complaint or claim you never will pay for anything !! Unless the house completely gone but then it's become flood versus wind, shame on you TWIA!! Texas should open the market so all other companies can offer windstorm insurance, instead of one TWIA whom just loves higher rate, this has become a very common problem with TWIA claims do not pay get paid! Why ?? TWIA always says same thing TWIA will not pay for rain driven by wind ?? Really then please explain how a homeowner would get paid for roof damage!! When heavy tremendous amount of rain and wind occur?? All I can say, it smarter to put the money in a saving account instead of windstorm insurance and say an pray at night MotherNature stay clam.

Sent from AOL Mobile Mail

From:

Sent: Friday, July 30, 2021 4:08 PM

To: PublicComment **Subject:** No rate raise

Please, for the sake of retired people like us who are retired and have been living by the gulf coast, don't raise your rates. We will not be able to live in our homes if you keep on raising rates and we can't afford to live elsewhere.

Sent from my iPad

From:

Sent:

Friday, July 30, 2021 3:45 PM PublicComment

To: Subject:

PublicComment

No rate hike



Sent from my iPhone

From:

Sent: Friday, July 30, 2021 3:31 PM

To: PublicComment Subject: NO RATE HIKES

The already high rates are fast turning the Coastal Bend into a playground for **ONLY the wealthy!** Very few long-time working class residents can afford to stay. Please help the middle-class Texans: If you were born in Texas, NO RATE HIKES!!! Let's be responsible here

Sent from Mail for Windows 10

From:

Sent: Friday, July 30, 2021 3:02 PM

To: PublicComment Subject: Rate Hike

Good afternoon,

I'm writing to **STRONGLY OPPOSE** any rate hike. As a realtor and homeowner who lives on the coast, I can tell you it would be detrimental to the economy of the Bolivar Peninsula.

Thank you for your time,



Consumer Protection Notice:

https://www.trec.texas.gov/sites/default/files/pdf-forms/CN%201-2.pdf

<u>Texas Real Estate Commission Information About Brokerage Services</u>

From:

Sent: Tuesday, August 3, 2021 11:50 AM

To: PublicComment

Subject: CC2 ACC

NO RATE HIKE

From:

Sent: Tuesday, August 3, 2021 8:25 AM

To:PublicCommentSubject:NO RATE HIKE!

I am a retired Galveston resident and do not appreciate the refusal of a recommendation from an independent review that prevents artificially inflating losses and raising Texans rates based on a flawed system. Do the right thing!



From:

Sent: Tuesday, August 3, 2021 7:58 AM

To: PublicComment **Subject:** No rate increase!

I'm NOT for any rate increase.

Mont Belvueu , TX

Sent from my iPhone

From:

Sent: Monday, August 2, 2021 11:06 PM

To: PublicComment **Subject:** No rate hike!

Please, do not increase my Windstorm Insurance rates again. If anything, they should reduce by 50%.

I specifically decided to move to our current location for renowned Bob Perry homes that have a strong structural reputation. As well as the increased ground elevation. We installed \$26,000 worth of new 1" overall thickness laminated 1/8" double pane "storm breaker" windows all around the house.

I truly hate that peoples house have been totally wiped out, but shouldn't non-filers get a preferred rate much lower than the average cost.

Raising rates at this time is unwise and detrimental to livelihoods of Texans that live on the coast. The association's consideration of rate increases is based on its own internal rate analysis and ignores independent review. HB 1900 also required the association to contract with an independent actuarial firm to do a rate analysis. That firm recommended a change to how the association conducts its hurricane modeling because the association's analysis artificially inflates losses, creating a false appearance that rates are severely inadequate.

The timing for the association considering raising rates is also questionable. This past session, the Texas Legislature passed two significant bills passed by our elected representatives — SB 1448 by Sen. Larry Taylor and HB 769 by state Rep. Mayes Middleton — both of which go into effect Sept. 1. Both bills make it more difficult for the association to raise rates on coastal Texans. It's not lost on us that these changes go into effect less than a month after the association's board meeting next week. Raising rates at this board meeting would be especially punitive as our region is still recovering from the economic downturn because of COVID and can't afford arbitrary rate increases.



