



TEXAS WINDSTORM
INSURANCE ASSOCIATION

TWIA Board Meeting

Public Comments

March 23, 2021

From: [Alex Gamez](#)
To: [PublicComment](#)
Subject: Rep. Hunter - Public Comment
Date: Friday, March 19, 2021 12:00:23 PM
Attachments: [TWIA-Rate Letter.pdf](#)

Please see attached -

Alex Gamez
Legislative Director
Texas State Representative Todd Hunter
Capitol 1W.5
(512) 463-0672
Alex.Gamez@house.texas.gov



March 19, 2021,

The Honorable Greg Abbott
Office of the Governor
P.O. Box 12428
Austin, Texas 78711-2428

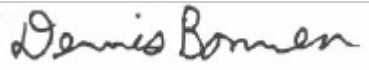
Dear Governor Abbott,

On December 8, 2020, the Texas Windstorm Insurance Association (TWIA) Board held a board of directors meeting. The TWIA Board voted to raise rates on coastal policyholders, residents and businesses. Attached is a letter signed by over 20 state senators and representatives requesting no rate increase at this time. Also, several state senators and representatives requested that the board not take any action and allow the legislature to review the rate issue when the legislature begins January 12, 2021 and thereafter. The TWIA Board ignored these legislators' requests.

In addition, we have attached the TWIA Board agenda where there is no mention of rate increase action to the public or the legislators. Under paragraph 8, the TWIA Actuarial and Underwriting Committee presented a report and reported that the committee did not vote to raise rates. This appears to be a lack of transparency to the public and legislators.

The undersigned respectfully request that you abate the rate increase action until the legislature has an opportunity to review and handle the rate issue. Previously, you have done so. During this uncertain time of COVID-19 and economic distress, especially on Coastal residents and businesses, we request that you abate this cruel and non-transparent increase.

Sincerely,



Dennis Bonnen
Texas House of Representatives
District 25



Todd Hunter
Texas House of Representatives
District 32



Dade Phelan
Texas House of Representatives
District 21



Abel Herrero
Texas House of Representatives
District 34



Judith Zaffirini
Texas Senate
District 21



James White
Texas House of Representatives
District 19



Terry Canales
Texas House of Representatives
District 40



Geanie Morrison
Texas House of Representatives
District 30



J.M. Lozano
Texas House of Representatives
District 43



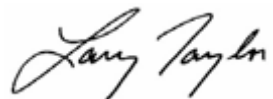
Juan "Chuy" Hinojosa
Texas Senate
District 20



Lois Kolkhorst
Texas Senate
District 18



Eddie Lucio, III
Texas House of Representatives
District 38



Larry Taylor
Texas Senate
District 11



Briscoe Cain
Texas House of Representatives
District 128



Mayes Middleton
Texas House of Representatives
District 23



Greg Bonnen
Texas House of Representatives
District 24

A stylized, cursive signature of Ed Thompson, featuring a large 'E' and 'T'.

Ed Thompson
Texas House of Representatives
District 29

A cursive signature of Joan Huffman, with a prominent 'J' and 'H'.

Joan Huffman
Texas Senate
District 17

A cursive signature of Alex Dominguez, with a large 'A' and 'D'.

Alex Dominguez
Texas House of Representatives
District 37

A cursive signature of Eddie Lucio, Jr., with a large 'E' and 'L'.

Eddie Lucio, Jr.
Texas Senate
District 27

A cursive signature of Dennis Paul, with a large 'D' and 'P'.

Dennis Paul
Texas House of Representatives
District 129

From: [Hunter Handel](#)
To: [PublicComment](#)
Subject: TWIA - Rep. Hunter.pdf
Date: Friday, March 19, 2021 6:50:51 AM
Attachments: [TWIA - Rep. Hunter.pdf](#)

Sent from my iPhone



December 10, 2020

The Honorable Greg Abbott
Office of the Governor
P.O. Box 12428
Austin, Texas 78711-2428

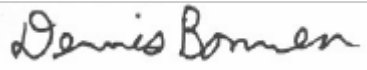
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Sincerely,



Dennis Bonnen
Texas House of Representatives
District 25



Todd Hunter
Texas House of Representatives
District 32



Dade Phelan
Texas House of Representatives
District 21



Abel Herrero
Texas House of Representatives
District 34



Judith Zaffirini
Texas Senate
District 21



James White
Texas House of Representatives
District 19



Terry Canales
Texas House of Representatives
District 40



Geanie Morrison
Texas House of Representatives
District 30



J.M. Lozano
Texas House of Representatives
District 43



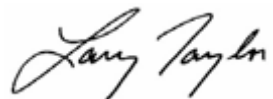
Juan "Chuy" Hinojosa
Texas Senate
District 20



Lois Kolkhorst
Texas Senate
District 18



Eddie Lucio, III
Texas House of Representatives
District 38



Larry Taylor
Texas Senate
District 11



Briscoe Cain
Texas House of Representatives
District 128



Mayes Middleton
Texas House of Representatives
District 23



Greg Bonnen
Texas House of Representatives
District 24

A stylized, handwritten signature in black ink, appearing to read 'Ed Thompson'.


Ed Thompson
Texas House of Representatives
District 29

A handwritten signature in black ink, appearing to read 'Joan Huffman'.

Joan Huffman
Texas Senate
District 17

A handwritten signature in black ink, appearing to read 'Alex Dominguez'.

Alex Dominguez
Texas House of Representatives
District 37

A handwritten signature in black ink, appearing to read 'Dennis Paul'.

Dennis Paul
Texas House of Representatives
District 129

From: [Luis Moreno](#)
To: [PublicComment](#)
Cc: [Anna Stafford](#); [Ryan Alter](#)
Subject: Letter from Senator Hinojosa
Date: Friday, March 19, 2021 11:27:10 AM
Attachments: [Letter from Senator Hinojosa to TWIA Board Opposing Rate Increase 3.19.21.pdf](#)

Attached is a letter from Senator Hinojosa opposing a rate increase. Please confirm receipt of this letter.

Sincerely,

Luis

Luis J. Moreno
Chief of Staff
Senator Juan “Chuy” Hinojosa
P.O. Box 12068
1400 Congress, Capitol 3E.6
Austin, TX 78711
Office: (512) 463-0120
Fax: (512) 463-0229
Cell: (512) 940-0127



COMMITTEES
REDISTRICTING, VICE CHAIR

NATURAL RESOURCES &
ECONOMIC DEVELOPMENT

TRANSPORTATION

THE SENATE OF TEXAS
JUAN "CHUY" HINOJOSA

DISTRICT 20

COMMITTEES
JURISPRUDENCE, VICE CHAIR

CRIMINAL JUSTICE

PORTS

March 19, 2021

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

Dear TWIA Board of Directors:

I respectfully request the Texas Windstorm Insurance Association (TWIA) Board to postpone or reject consideration of any proposed rate increase on residential and commercial policyholders at its board meeting on Tuesday, March 23, 2021.

Our coastal residents are recovering from Hurricane Harvey, Hurricane Hanna, the economic impact from the pandemic, and the most recent winter storm. Any rate increase only increases the economic hardship of many Texans struggling to provide meals for their families and small businesses fighting to keep their doors open.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Hinojosa", is written over the typed name and title.

Juan "Chuy" Hinojosa
State Senator, District 20

ABEL HERRERO



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

DISTRICT OFFICE:
101 EAST MAIN AVENUE
ROBSTOWN, TEXAS 78380
(361) 387-0457

STATE REPRESENTATIVE
DISTRICT 34

March 19, 2021

Texas Windstorm Insurance Association, Board of Directors
c/o Chandra Franklin-Womack, TWIA Board Chair
P.O. Box 99090
Austin, TX 78709

Dear TWIA Board of Directors:

I respectfully urge you NOT to increase rates on residential and commercial TWIA policyholders. Any rate increase would only hinder tireless ongoing efforts in the Coastal Bend to recover from numerous recent devastating natural disasters.

While our communities are strong and resilient, many residents and business owners are still recovering from Hurricanes Harvey and Hanna, as well as COVID-19 and the recent unprecedented winter storm. Instead of burdening our communities with higher rates, we should focus our attention on assisting those struggling to rebuild their lives.

For these reasons, I urge you to stand strong with Coastal communities and not impose any rate increases. Thank you for your consideration and attention to this matter.

Sincerely,

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

Abel Herrero
State Representative, District 34



DISTRICT 34 • NUECES (PART)
ABEL.HERRERO@HOUSE.TEXAS.GOV

From: [Shane Saum](#)
To: [PublicComment](#)
Subject: March 2021 Public Comment
Date: Thursday, March 18, 2021 1:41:29 PM
Attachments: [TWIA No Rate Hike March 2021.pdf](#)

Rep. Morrison would like the attached letter submitted as written comment to the Board of Directors for their March 23rd, Board Meeting.

Best regards,

Shane R. Saum

Chief of Staff

State Representative Geanie W. Morrison | District 30

512-463-0456

Texas Capitol, 1W.6

TEXAS HOUSE OF REPRESENTATIVES



GEANIE W. MORRISON

COMMITTEES:
APPROPRIATIONS
ENVIRONMENTAL REGULATION
REDISTRICTING

DISTRICT 30

COUNTIES:
ARANSAS
CALHOUN
DEWITT
GOLIAD
REFUGIO
VICTORIA

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

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

March 18, 2021

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

Honorable Members of the Texas Wind Insurance Association Board of Directors:

I am writing today to strongly stand against the Texas Windstorm Insurance Association's (TWIA) proposed rate hike, similar to the attempted rate hike on December 8th, 2020. Thankfully the Texas Department of Insurance blocked the rate hike after discovering TWIA had attempted to pass a rate hike without properly informing the public of their intentions.

In May of 2021, the Governor requested state agencies reduce their budgets by five percent and he stated "it is incumbent that state government continues to maintain mission critical services without placing a greater burden on taxpayers." TWIA does not appear to share that sentiment and is seeking to place a greater burden on our coastal taxpayers. Nearly 4 million Texans have applied for unemployment benefits since the beginning of the COVID-19 pandemic. Business owners have lost their business. Home owners are afraid of losing their homes and TWIA is requesting they increase their rates. In addition, Texans are now facing the financial burdens of the winter storm that left millions without electricity and water.

This proposed rate hike demonstrates a blatant disregard for the current struggles our constituents are facing and it should be vehemently rebuked. I urge you to not take action on a proposed rate hike at your upcoming Board meeting.

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

Sincerely,

A handwritten signature in cursive script that reads "Geanie W. Morrison".

Geanie W. Morrison



EMAIL: Geanie.Morrison@house.texas.gov

From: [Hunter Handel](#)
To: [PublicComment](#)
Subject: No Rate Increase
Date: Tuesday, March 16, 2021 12:05:55 PM

Sent from my iPhone

From: [Hunter Handel](#)
To: [PublicComment](#)
Subject: Mayor letter to TWIA Baord Chair 03 19 2021.pdf
Date: Thursday, March 18, 2021 8:15:53 PM
Attachments: [Mayor letter to TWIA Baord Chair 03 19 2021.pdf](#)

Sent from my iPhone

From: [Tammy Embrey](#)
To: [PublicComment](#)
Subject: Corpus Christi Mayor and Council opposes TWIA Rate Increase
Date: Thursday, March 18, 2021 5:44:05 PM
Attachments: [Mayor letter to TWIA Baord Chair 03 19 2021.pdf](#)
[CC Council Resolution Opposing TWIA Rate Hike 9 29 2020.pdf](#)

Please find attached a letter from Corpus Christi Mayor Paulette Guajardo and a resolution from the Corpus Christi City Council opposing a rate increase from TWIA.

The City of Corpus Christi has long been on record opposing unnecessary TWIA rate increases. In the attached resolution passed by the City Council in September, we continue to advocate for our residents and our businesses to oppose any future rate increase for 2021. There are sufficient premiums, assessments and reinsurance to cover potential liabilities for 2021.

VOTE NO to rate increases.

Tammy Embrey

Tammy Kelch Embrey

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



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

March 19, 2021

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

Dear Chairwoman Franklin-Womack,

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

The 86th Texas Legislature passed HB 1900 which created a Legislative Funding Oversight Committee to study TWIA's rate adequacy. The COVID-19 pandemic has prohibited the gathering of the Oversight Committee to accomplish the intent of HB 1900. There have been multiple bills filed in the 87th Legislature with further reforms proposed. It is premature for TWIA to be proposing rate increases for residential and commercial policies before TDI and the Legislature implements these important statutory changes. TWIA is jumping the gun to push for rate increases while facing additional legislative oversight into the rate-setting process.

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

The December Board meeting published agenda contained no action item to be considered on rates, but the board voted for a 5% rate increase anyway. This complete lack of transparency by a public agency is unacceptable. That rate increase was ultimately denied by the Texas Department of Insurance.


The Coastal Bend is still recovering from Hurricane Harvey and more recent impacts from Hurricane Hanna. In addition, the region now faces an economic crisis driven by the COVID-19 pandemic along with the downturn of the oil and gas industry. Our small businesses have been greatly impacted by the recession and we have seen a loss of jobs in our communities. A TWIA rate increase on top of the economic recession would be devastating to our regional economy and the entire Texas Coast.

The City of Corpus Christi has long been on record opposing unnecessary TWIA rate increases. In the attached resolution passed by the City Council in September, we

continue to advocate for our residents and our businesses to oppose any future rate increase for 2021. There are sufficient premiums, assessments and reinsurance to cover potential liabilities for 2021.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Paulette M. Guajardo". The signature is fluid and cursive, with a large initial "P" and a stylized "G".

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

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

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

WHEREAS, the City of Corpus Christi faces an economic crisis driven by the COVID-19 pandemic along with the downturn of the oil and gas industry. Our small businesses have been greatly impacted by the recession and we have seen a loss of jobs in our communities;

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

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

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

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

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

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

Joe McComb

Aye

Roland Barrera

Aye

Rudy Garza

Aye

Paulette M. Guajardo

Aye

Gil Hernandez

Aye

Michael Hunter

Aye

Ben Molina

Aye

Everett Roy

Aye

Greg Smith

Aye

ATTEST:

CITY OF CORPUS CHRISTI

Rebecca Huerta

Rebecca Huerta
City Secretary

Joe McComb
Joe McComb
Mayor

From: [Ginny Cross](#)
To: [PublicComment](#)
Subject: No Rate Hike
Date: Thursday, March 18, 2021 3:06:35 PM

The members of the United Corpus Christi Chamber of Commerce do not support a rate increase.

A RESOLUTION opposing Texas Windstorm Insurance Association rate increase.

WHEREAS, the Coastal Bend has faced serious economic hardship due to the COVID-19 Pandemic; and

WHEREAS, small businesses have been greatly impacted by the economic shutdown just as they were recovering from Hurricane Harvey; and

WHEREAS, homeowners who have lost jobs and business income are struggling to pay their mortgages; and

WHEREAS, Hurricane Harvey made landfall as a Category 4 hurricane on the Texas coast on Friday, August 25, 2017, and battered and drenched Texas for days before finally moving out of the state. Harvey was the first major hurricane to make landfall along the Middle Texas Coast since Hurricane Celia in 1970; and

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

WHEREAS, almost three years after the storm many of the Hurricane Harvey disaster declared communities are still rebuilding, and not all TWIA claims have been resolved, and

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

WHEREAS, the 86th Texas Legislature did act by passing HB 1900 which creates a Legislative Funding Oversight Committee to study TWIA's rate adequacy, and

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

WHEREAS, the TWIA Board of Directors voted for no rate increase at their July 2020 board meeting; and

WHEREAS, there are sufficient premiums, assessments and reinsurance to cover potential TWIA liabilities for 2020 and 2021, and

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



GINNY CROSS

VP, GOVERNMENT & COMMUNITY RELATIONS

O: 361 881 1800 M: 202 246 5540

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

GINNY@UNITEDCORPUSCHRISTICHAMBER.COM

From: [Sally Bakko](#)
To: [PublicComment](#)
Cc: [Brian Maxwell](#); [Daniel Buckley](#); [Jennifer Armstrong](#)
Subject: City of Galveston Comment Letter to TWIA Board of Directors
Date: Friday, March 19, 2021 11:07:55 AM
Attachments: [City3Color_60p_3c9c6c84-a89b-4a38-bddf-450e68d5cc3b.png](#)
[City of Galveston TWIA Rate Increase Opposition Letter 3-19-2021.pdf](#)

Good morning,

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

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

Best regards,

Sally Bakko



Sally Bakko, Director of Policy and Governmental Relations

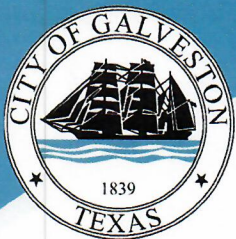
Community Outreach Department

P.O. Box 779 Galveston, TX 77553 | 823 Rosenberg, Ste. 306 Galveston, TX 77550

D: 409.797.3582 | C: 409.502.4758 | F: 409.877.1553 | sbakko@galvestontx.gov

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City of Galveston

OFFICE OF THE CITY MANAGER

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

March 19, 2021

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

Dear Chairwoman Franklin-Womack,

I am writing to express continued opposition to the Texas Windstorm Insurance Association (TWIA) Board of Directors (the "Board") approving a premium rate increase at the Board meeting on Tuesday, March 23, 2021.

On December 1, 2020, the Actuarial/Underwriting Committee (the "Committee") voted to make no further rate recommendation to the TWIA Board at this time. Discussion during the Committee's meeting on December 1st, revealed work produced by Willis Towers Watson (WTW), an actuarial consulting firm retained to conduct an independent study of TWIA's rate adequacy and the use of hurricane modeling, requires additional assessment of data impacting TWIA's funding structure.

In 2019, with passage of H.B. 1900 by the 86th Legislature, state legislators sent a clear message on TWIA - greater transparency and closer funding structure examination. H.B. 1900, authored by State Representative Greg Bonnen MD and sponsored by State Senator Larry Taylor, provided essential reforms to reduce the need for premium rate increases. Prior to the 2021 Legislative Session, H.B. 1900 directed two interim committees to: 1) review and provide recommendations on TWIA's funding and funding structure; and 2) evaluate merging TWIA and the Texas FAIR Plan Association, alternative property insurance for underserved areas in Texas. The critical work of these two interim committees remains unfinished due to interruptions caused by the COVID-19 pandemic.

Such views remain consistent with recent actions during the 87th Legislature currently in session. Extending the timeframe for work envisioned in H.B. 1900 remains a focus for legislators with S.B. 1448 filed by State Senator Taylor and the companion bill, H.B. 3684, filed by State Representative Bonnen. With a thorough assessment of TWIA's funding structure, further reforms will likely be identified to empower TWIA with alternative approaches that can avoid placing the heaviest burden on struggling consumers.



The 87th Legislature should enact the legislation authored by State Senator Taylor and State Representative Bonnen to extend the timeframe necessary for the interim committees to complete their work as intended by the 86th Legislature. Accordingly, any premium increase would be inappropriate and extremely premature at this time.

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

Severe economic repercussions from COVID-19 have added to the burdens placed on coastal residents and businesses owners while continuing recovery from Hurricanes Laura, Hanna, and Harvey. Moreover, while not directly hit by Hurricanes Laura or Delta, Galveston homeowners are facing damage caused by high tides and related surge. Premium increases will cripple homeowners and have a detrimental impact on already stressed coastal housing markets. Increased building costs and higher premiums present greater challenges for potential homebuyers and businesses to qualify for mortgages, thus further thwarting a struggling economic recovery.

As envisioned with enactment of H.B. 1900, and now introduction of S.B. 1448 and H.B. 3684, the expectation of Board members should be to work collaboratively with legislators to identify alternatives that will not undermine the ability of coastal residents and business owners to insure their property. Affordable windstorm insurance is a critical component to maintaining economic stability and quality of life for coastal areas and the state of Texas.

I want to thank you and the Board members for your consideration.

Sincerely,



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

From: [Ryan Brannan](#)
To: [PublicComment](#)
Subject: CWIC Comments for March 23rd TWIA board meeting
Date: Friday, March 19, 2021 9:30:13 AM
Attachments: [CWIC Comments - TWIA Board Meeting 3.23.21.pdf](#)

Good morning,

Please see the attached comments from the Coastal Windstorm Insurance Coalition regarding the upcoming TWIA board meeting on Tuesday, March 23rd.

Let me know if you have any questions or would like additional information.

- Ryan

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





COASTAL WINDSTORM INSURANCE COALITION

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

March 17th, 2021

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

Dear Ms. Franklin-Womack:

Thank you for the opportunity to submit written comments. The Coastal Windstorm Insurance Coalition [CWIC] appreciates working with you, the rest of the TWIA board, and TWIA staff to find solutions for Texas coastal homeowners who have recently been experiencing significant economic challenges due to the ongoing pandemic. However, we are concerned with the myopic focus of this board to ignore legislative guidance, and the guidance of the independent actuarial firm, for the singular purpose of raising rates, regardless of the current unprecedented economic challenges and significant actuarial evidence to the contrary.

The actuarial and underwriting committee met late last year, and after reviewing the report of Willis Towers Watson [WTW], the independent actuarial firm, voted to not recommend a rate increase. Instead, the committee voted to send the WTW report to the board for review.

The WTW report recommended a modeling approach of 25/75 for AIR and RMS, respectively. Nevertheless, the board continues to use a 50/50 approach, which unnecessarily inflates total hurricane costs, the 100-year PML and reinsurance costs thereby exaggerating needed rate increases. The TWIA board needs to explain to its policyholders why it spent policyholder money on the independent actuarial firm only to completely ignore its findings.

Additionally, and inexplicably, the board asked Guy Carpenter, to run the same models and found similar results. Even so, it still used the 50/50 approach. What's worse, Guy Carpenter's obvious conflicts of interest – being the independent contractor that not only models how much reinsurance TWIA needs to purchase, but then also sells them that reinsurance – is completely ignored by the TWIA board.

TWIA has no justification for continuing to move forward with this conflict of interest. In fact, the legislature passed TWIA Sunset legislation last session to look at remedying this, which the TWIA board continues to ignore.



COASTAL WINDSTORM INSURANCE COALITION

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

Worse, TWIA's contract with Guy Carpenter is an annual contract, yet the last time TWIA put out an RFP for reinsurance was in fiscal year 2016-2017, years before the legislature passed its reforms. This is another example of TWIA clearly ignoring the intent of the Texas Legislature.

In February, this board attempted to skirt the public and its policyholders by ignoring public transparency laws. TWIA did not post on its website that the possibility of raising rates was on the agenda for the board meeting and then voted to raise rates anyway. Even the Texas Department of Insurance [TDI] – currently without a Commissioner – was aware of the law enough to slap down the rate increase as a violation of law.

It is disheartening to see these attempts by the TWIA board to ignore the law and repeatedly work to punish its policyholders. So, because the board could not meet in February, it called a new meeting in March to again try to raise rates in the midst of the ongoing pandemic and historic economic uncertainty.

The Legislature passed legislation last session to create an interim committee to look at the funding structure of TWIA. That committee never met due to Covid restrictions – restrictions we all suffered through. Rather than wait for the Covid fog to clear, it seems like this committee is trying to rush through rate increases before it even looks at the clear and inherent problems with its current structure.

Furthermore, WTW has exposed that TWIA has not even been including secondary modifiers, such as shutters, impact resistant glass or reinforced roofs in its hurricane modeling, which further unnecessarily inflates its 100-year PML, reinsurance costs and rates. In other words, instead of ensuring that its rates are reasonable as statutorily required, TWIA would rather just raise rates on its customers into perpetuity.

This meeting and the agenda are an insult to coastal Texans. The fact that after years of repeatedly being told it needs reform, TWIA, astoundingly, continues to thumb its nose at not only the Texas Legislature but also the independent actuarial firm it hired. The CWIC asks you to please reconsider this effort and work with us and the other stakeholders and legislature to find meaningful real reform.

Sincerely,

A handwritten signature in black ink, appearing to read 'Henry Freudenburg', is written over a horizontal line. The signature is stylized and cursive.

Chairman

Coastal Windstorm Insurance Coalition

Public Comment

From: [REDACTED]
Sent: Friday, March 19, 2021 11:21 AM
To: PublicComment
Subject: No Rate Hike

I oppose any TWIA rate hike without complete and current actuarial data / analysis, and a thorough rate setting policy review. Thank you.

[REDACTED]
[REDACTED]
Corpus Christi, TX 78418

[REDACTED]

Public Comment

From:

Sent:

To:

Subject:

[REDACTED]
Friday, March 19, 2021 8:35 AM

PublicComment

Proposed TWIA rate increase is not acceptable. Texas citizens do NOT need further hardship!

Public Comment

From: [REDACTED]
Sent: Thursday, March 18, 2021 9:37 PM
To: PublicComment
Subject: 5% intended increase on insurance

To Whom It May Concern,

I have been a home owner for 45 years. Incremental raises on insurance cost is as predictable as a raise in taxes on our home. If it weren't so, I would have never invested in my first home. I expect it's market value to appreciate at a modest amount yearly as well. TWIA needs to keep in mind that the previous year has not been typical. In my entire life I, along with many in my age group, and everyone who has been financially affected by the pandemic, have not before found ourselves in these tight financial straits. Another year of insurance rates, taxes, and even the value of our homes staying the same, and not suffering any increases would help those who still see to you to safeguard our homes. Please let the economy get stronger before you ask us to absorb another increase.

Thank you.

[REDACTED]
Policy Holder

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Thursday, March 18, 2021 5:34 PM
To: PublicComment
Subject: Oppose 5% Rate Increase

Dear TWIA Board,

Having moved to the Coastal Bend from Austin, windstorm fees were a shock to my system. Increasing them by another 5% is not the solution to keep our Coastal areas on track to economic recovery.

You were already denied this increase once and it feels like this unnecessary hike could not come at a worse time.

I am asking you not to increase TWIA rates by another 5%.

Best,

[REDACTED]

[REDACTED]

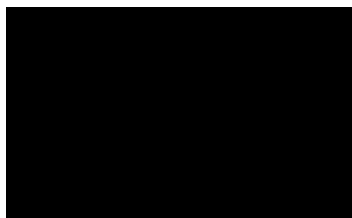
Public Comment

From: [REDACTED]
Sent: Wednesday, March 17, 2021 9:39 AM
To: PublicComment
Subject: Rate Increase

With all of the issues that we are all dealing with at this time, we do not need any additional expenses by doing a rate increase.

Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 6:11 PM
To: PublicComment
Subject: No Rate Hike for the Coastal Bend



Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 3:48 PM
To: PublicComment
Subject: Rate Increase

I "OPPOSE: any rate increase on the Wind Insurance. We have had enough expense and problems this year, we do not need to add any additional. Please this situation into account.

[REDACTED]



Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 2:55 PM
To: PublicComment
Subject: Oppose!

I oppose any rate increase.

Thank you

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 2:55 PM
To: PublicComment
Subject: TWIA 5% Rate Increase

I strongly oppose of the proposed 5% rate increase.

Thanks,

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 2:38 PM
To: PublicComment
Subject: Vote NO on 2021 Proposed Rate Hike by the TWIA Board
Attachments: jroach.vcf

To Whom it May Concern -

Please accept this communication opposed to the TWIA Board's proposed rate hike. Thank you.

[REDACTED]

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 2:03 PM
To: PublicComment
Subject: Rate Increase

We do not need or want a rate increase at this time. We have enough issues to deal with at this time without adding another issue.

Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 2:00 PM
To: PublicComment
Subject: Opposed to the 5% rate increase

I am opposed to the 5% rate increase being considered at the upcoming meeting on March 23. The lack of transparency and dishonesty has not made your case appealing as well.

Thank you!

[REDACTED]

This email and any attachments are confidential and are intended solely for the use of the named addressee. If you have received this email in error please contact the [REDACTED]

Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 1:44 PM
To: PublicComment
Subject: No rate hike!

Sent from my iPhone

Public Comment

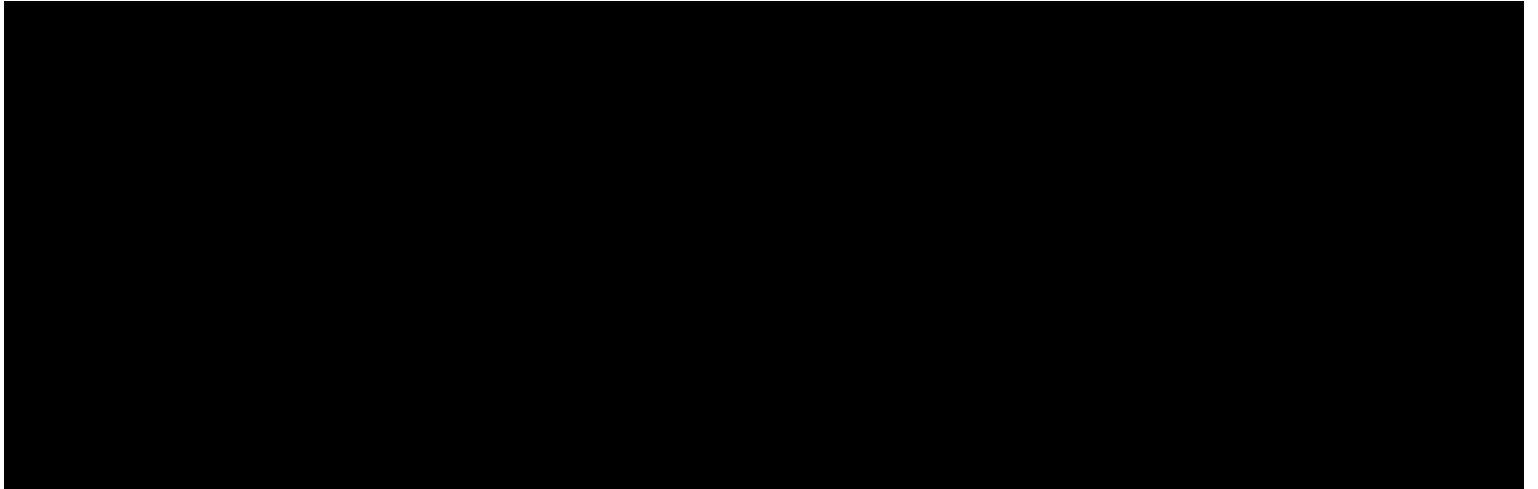
From: [REDACTED]
Sent: Tuesday, March 16, 2021 1:17 PM
To: PublicComment
Subject: Rate Increase

I oppose any rate increase by TWIA . I believe it unfair that only Coastal communities are required to pay insurance against Hurricanes when all of Texas is subject to them along with Hail and Tornadoes which do the same amount or more of damage. This insurance should be an all Texas insurance covering damage due to any type of weather.

Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 1:14 PM
To: PublicComment
Subject: No rate increase

Please do not increase insurance rates for our coastal citizens. Spread the risk around to the entire state.



Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 12:54 PM
To: PublicComment
Subject: Absurd

Do what business do across the country everyday.
Figure out how to make it work with what you have.
Our costs are disproportionate.
No rate increase.

Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 12:38 PM
To: PublicComment
Subject: No rate hikes!

I cannot believe TWIA would do such an outlandish thing after this shutdown which has caused hardships to the people on the coast. Many people have not only lost their jobs but are still reeling from this last weather attack and will be paying higher rates on their electricity, gas and their ability to feed their families. If, you can't be fair to the people who already pay astronomical rates for this insurance plan, then it's time for TWIA to disband and let someone else take the helm who will be fair to all who are FORCED to carry this protection on their homes!

Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 12:28 PM
To: PublicComment
Subject: Disapproval for Rate Increase

To Whom It May Concern:

We are NOT in favor of a TWIA rate increase. With all that is going on in the lives of many people, why put added undue stress on homeowners? We are first time buyers and this issue have been a thorn for many years.

We respectfully request that the board do not raise the rates of TWIA. Please find another way to fund your program without affecting us, as homeowners.

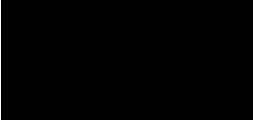
[REDACTED]

[Sent from Yahoo Mail on Android](#)

Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 12:28 PM
To: PublicComment
Subject: No TWIA Rate Increase

No rate increases for windstorm insurance



Sent from my iPhone

Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 12:19 PM
To: PublicComment
Subject: NO TWIA Rate Increase

Sirs:

As a citizen of Corpus Christi, I totally reject any increase in our TWIA rates. Our area is depressed due to COVID and the recent Deep Freeze. Our rates are high and other parts of TEXAS do not share the load of hazard insurance. It is an unfair increase. Vote NO increase!

Sincerely,

[REDACTED]

[REDACTED]

Public Comment

From: [REDACTED]
Sent: Tuesday, March 16, 2021 12:11 PM
To: PublicComment
Subject: Oppose Rate Increase

I oppose any rate increase.

Thank you,

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

Public Comment

From: Peter Dottolo <pdottolo@psaisafety.com>
Sent: Tuesday, March 16, 2021 12:10 PM
To: PublicComment
Subject: Oppose Rate Hike Increase

PSAI opposes any rate hike increase.

Thank you,

Peter Dottolo

Professional Safety Associates, Inc.

PO Box 260333

Corpus Christi, TX 78426

361-241-9423 Office

713-513-5337 Direct Fax

pdottolo@psaisafety.com

As for Me and my House, We will serve the Lord.

-Joshua 24:15

Public Comment

From: [REDACTED]
Sent: Monday, March 15, 2021 5:57 PM
To: PublicComment
Subject: Your upcoming meeting on the 23rd

Before you decide to raise the rates please remember us retired people. Our incomes are fixed and the more we pay you the less we have for food and other necessities. We live on the island in a very inexpensive house, **NOT on the Water** and have no choice but to purchase your insurance. Look us all up at:

[REDACTED]
We'll be the ones with the over age 65 homestead exemptions.
Thank you,

[REDACTED]
P.S. My home is also shown as over 65 on Nueces county CAD.

--
[REDACTED]

Public Comment

From: [REDACTED]
Sent: Saturday, February 20, 2021 12:01 AM
To: PublicComment
Subject: NO RATE HIKE

With the economy in such a downturn, there should be

NO RATE HIKE

[REDACTED]

Sent from my iPhone