



# Texas Windstorm Insurance Association

## Clearinghouse Feasibility Study

December 2013

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Between the years of 2005 and 2012, TWIA's loss exposures increased by approximately 319% and the policy in force count grew by approximately 243%. TWIA's ability to cover claim-related costs at its current exposure and funding levels, along with its long-term financial viability, has recently been a topic of concern. This is in large part due to the ongoing litigation expenses from Hurricane Ike. As a result of these concerns, several stakeholders have broached the topic of different depopulation methods, including but not limited to a clearinghouse. Such stakeholders include bill sponsors in both the Texas House of Representatives and the Senate, and the Texas Department of Insurance via Alvarez & Marsal.

Conducting a feasibility study for developing a clearinghouse was discussed during the TWIA Board Meeting in August 2013. This study started as a look at different alternatives for implementing a clearinghouse or portal that would assist in depopulation of TWIA's book of business. Because the success of a clearinghouse depends on the market's willingness to participate, the analysis evolved to include market segment, premium, and commission analyses. The study also includes analysis of other methods that would support the clearinghouse in the depopulation efforts, including but not limited to modifying the formula for the post-catastrophe bond assessment credit.

The primary purpose of this study is to evaluate different alternatives and make specific recommendations for TWIA in the near term. Other information presented in the study is purely for informational purposes at this time, and may be referenced when making future or subsequent supporting decisions to further TWIA's loss exposure reduction efforts.

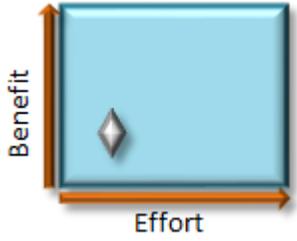
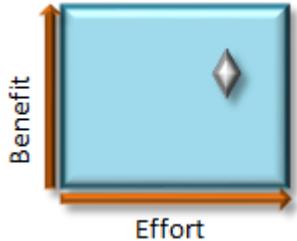
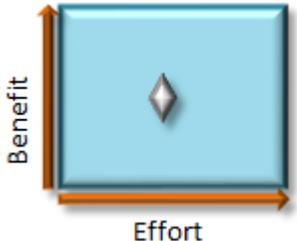
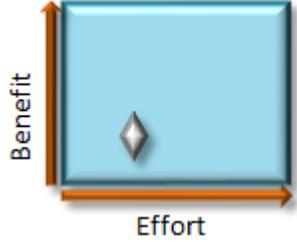
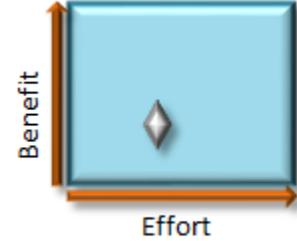
The following approaches were evaluated as part of this study:

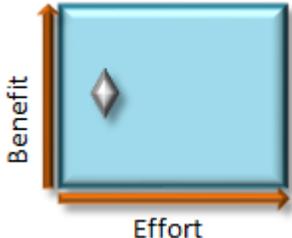
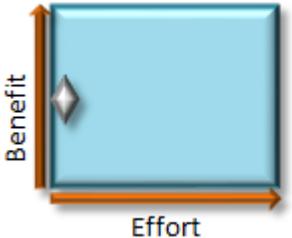
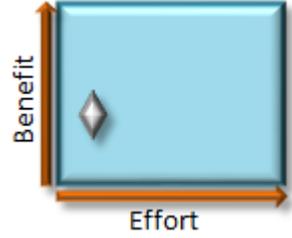
- Ø Different approaches for an online portal or clearinghouse
  - Voluntary Coastal Wind Insurance Portal with access to TWIA's Policy-in-Force list
  - Florida Citizens' clearinghouse approach
  - A depopulation portal, clearinghouse, or database as envisioned during the 2013 Texas legislative session
  - Louisiana Citizens' portal approach
- Ø Other depopulation components from the 2013 Texas legislative session
  - TWIA as a reinsurance facility
  - Risk assignment program
- Ø Other supporting measures
  - Utilizing carriers as reinsurance facilities
  - Modifying the assessment formula: provide greater credits to companies that write more exposed risks
  - Actuarially sound rates

For each approach, a feasibility 'At a Glance' matrix was completed and is intended to convey the more significant decision-making factors in a quick, easy-to-read format. All information deemed 'projected' is composed of estimates and attempts to approximate unknowns based on certain known factors.

## 'At a Glance' Summary

A summary of the critical information from each 'At a Glance' matrix is compiled into the below chart:

Approach	Legislative Change?	Plan of Ops Change?	TDI Rules Change?	Implementation Time in Quarters	Projected Impact
Voluntary Coastal Wind Insurance Portal with access to TWIA's Policy-in-Force list	X	X	X		
Policy Clearinghouse with full policy quoting capabilities (Florida Citizens Post-2013 and last Texas legislative session)	✓	✓	✓	> 	
Portal with Take-out Request /Approval capabilities (Louisiana Citizens)	✓	✓	✓	> 	
TWIA as a Reinsurance Facility	X	X	X		
Risk Assignment Program	✓	✓	✓		

Carriers as Reinsurance Facilities	X	X	X		
Modify the assessment credit formula	X	✓	✓		
Move toward more actuarially sound rates	X	X	X	Gradual	

## SUMMARY OF OPTIONS

### Voluntary Coastal Wind Insurance Portal with access to TWIA's Policy-in-Force list

This solution would entail a basic password-protected web-retrieval page where authorized users can access a list of TWIA's policies in force. This essentially implements a solution for both new and renewal policies at one time. Due to the complexities in processes needed to facilitate a policy keep-out program while staying within the bounds of the current statute, new policies will be written with TWIA and then be made available for take-out once they are on the TWIA book of business. One component of this program, the pre-implementation phase, involves a period of time where agents and existing carriers can look for take-out opportunities for policies that they currently place with TWIA.

There are four significant approaches or variations to the take-out process detailed in the report. More details on these options are explored in the subsequent section on recommendations.

- § Option 1: Carrier writes the full policy, agent maintains ownership of the expiration
- § Option 2: Carrier writes the wind only, agent maintains ownership of the expiration
- § Option 3: Carrier writes the full policy, policy takeout occurs without existing agent intervention
- § Option 4: Carrier writes the wind only, policy takeout occurs without existing agent intervention

A key component of this section includes analysis on premiums for certain counties in order to predict the market's willingness to participate. The analysis shows that when carriers exclude the wind from their homeowner's policies and use TWIA to cover the wind, that the premiums are lower, on average, than if the carrier writes the entire policy

including the wind. This means that TWIA's rates are less than the wind credits that the carriers are providing and leads to a conclusion that TWIA's rates aren't consistent with what would be considered adequate for this type of coverage.

This makes the likelihood that an insured would find comparable coverage in the standard market relatively low, particularly if they have poor credit. Despite this, this approach is recommended primarily because it is a low cost approach to bringing any market deficiencies to light. It is also recommended because of the likelihood of premium variations in the voluntary market within a county. In some cases, particularly for those risks that are farther from the coast, there is a better chance that TWIA's rates are higher than standard market rates. More details on this and other recommended approaches are in the following Recommendations section.

### **Other State's Solutions - Florida Citizens**

Florida has several past efforts from which to draw information. They have had the Florida Market Assistance Plan since 1985, which is a separate entity from Florida Citizens that attempts to match people looking for coverage with carriers that are looking to write coverage. This is similar to what was in place as a precursor to Texas' FAIR plan. Although this is an old idea, there are certain aspects of it that could be leveraged for TWIA's depopulation purposes. For example, the core services of a call center and online tool that is available to policyholders could be a key component of a keep-out program. Policyholders provide key information that is then matched with pre-screened carriers. Since it is not considered a true clearinghouse or depopulation portal, the detailed assessment of this potential was not performed at this time. However, it is something to keep in mind for the future and could be a good stepping-stone before implementing a fully integrated clearinghouse.

Depopulation before the 2013 legislative session involved the Florida office of Insurance Regulation defining a certain number of policies for take-out by pre-approved carriers. There are certain solvency requirements that must be met before a carrier can be approved. Florida Citizens also encourages the take-out carriers to execute limited service agreements, which facilitate the existing agency's continued administration of the policy. These limited service agreements vary by take-out carrier and dictate the extent of the ownership that each servicing agency has on subsequent expirations. This process resulted in about 60% of the approved policies actually being taken out. The legislature stepped in in 2013 to improve these numbers and mitigate the continued increase of over 8,000 new policies a week.

Depopulation after the 2013 legislative session established an electronic policy clearinghouse. Florida Citizens is utilizing a 3<sup>rd</sup> party development firm for this implementation, and is starting with new business policies in 2014. Renewals will follow at a later date. The new statute limits renders policyholders ineligible for coverage through Citizens if there is a comparable policy available through the clearinghouse that is within 15% of the Citizen's premium.

The scope of Florida Citizens' clearinghouse differs from anything that TWIA could provide in that it only pertains to coverage for the entire policy, whereas TWIA's would pertain to the wind only. A clearinghouse that quotes full policies will be used by more carriers than one for wind-only policies. A clearinghouse like Florida's is very expensive and resource intensive and, in the absence of supporting legislation to ensure participation and effectiveness, is not recommended at this time.

## **Other State's Solutions – Louisiana Citizens**

Louisiana Citizens has several depopulation components written into their statute, including an intentionally high rate structure. Additionally, Louisiana statute requires that a group of policies must be offered for take-out at least once a year. A certain number of policies are approved for takeout and then the approved take-out carriers request assumption of policies through a depopulation portal. The agent then either chooses whether they want to authorize the assumption or not.

Louisiana Citizens partly credits their depopulation program's success to their commission structure, which is a flat 10% for new business and renewals. If the agent approves takeout of a policy for a carrier that has a higher commission rate but a lower or comparable premium, both they and the policyholder can benefit financially.

Like Florida, most of Louisiana's take-out initiatives have been directed at full policies, not wind-only policies. However, last year Louisiana was able to decrease their wind-only policy county by 4900 due to partnerships with carriers interested in writing just the wind peril.

The cost and effort for this approach is somewhere in between that of the online policy in force list and a fully integrated policy clearinghouse. Without legislative changes, TWIA's ability to implement this approach would be limited to the technical aspects. Since the market conditions and expected participation for this approach are the same as the market conditions and expected participation for the policy in force list, and the cost to implement is higher, this approach is not recommended at this time.

## **Past Legislative Proposals**

A few past Texas legislative proposals are included in the analysis, including an electronic portal or clearinghouse, TWIA as a reinsurance facility, a risk assignment program, and a potential component of a depopulation program that establishes the agent's ownership of expirations during the search for alternative coverage. Implementing each of these solutions as proposed in the legislation requires legislative changes and isn't recommended at this time.

## **Carriers as Reinsurance Facilities**

Utilizing carriers as reinsurance facilities would be a relatively easy add-on once the policy-in-force list is implemented. The main feature of this approach is that the policy doesn't change hands so neither the agent or the insured needs to be involved. While this approach doesn't reduce the policy in force count, it does reduce TWIA's potential for loss exposures, so this approach is recommended.

## **Other supporting measures**

Modifying the assessment formula would in theory mean providing greater credits to companies that voluntarily write more exposed risks, or risks that are closer to the coast, and providing less credit to companies voluntarily writing risks that are more inland. This approach is recommended.

Bringing TWIA's rates up gradually to a more actuarially sound level is recommended in general and would better enable the voluntary market to be more competitive with TWIA. If TWIA were to bring rates more quickly to the actuarially sound rate, the expected benefit would increase along with the effort.

## RECOMMENDATIONS

### Recommendation #1:

The primary recommendation is to move forward with implementing an online, password protected portal where registered parties can access the complete TWIA policy-in-force list. The reasoning for this recommendation is as follows:

- Ø The process is entirely voluntary for carriers, agents, and policyholders
- Ø Policy take-outs can occur with limited involvement from TWIA
- Ø The process would require a minor changes to TWIA's current business processes
- Ø The solution would require less than 18 weeks to implement
- Ø The technical implementation portion is relatively inexpensive, at less than \$20,000. The most expensive part is the postage necessary to make residential policyholders aware of our updated privacy policy and provide them a mechanism to opt-out per the Gramm-Leach-Bliley Act. The estimated cost for this is \$140,000. The total cost will be under \$160,000.
- Ø The solution doesn't require legislation

Although the expected participation and benefit of implementing the process is relatively low, implementing a low-cost mechanism for depopulation sooner rather than later will help us get an indicator of the market's current willingness to depopulate. The mechanism should be evaluated regularly and adjusted as needed to support the depopulation effort.

TWIA can't mandate or control external processes, particularly whether the wind only or the whole policy is assumed by the takeout carrier, and whether the carrier contacts the insured directly or goes through the existing agent. The process followed should depend on the capabilities of the participants. If a carrier is willing and able to write the wind only, then they may attempt to do so. If they are only interested in (or capable of) writing the full policy, then they may attempt to do that. If they and the existing agent are able to execute a Limited Servicing Agreement, then they may do so as well. TWIA should make the information and tools available for each approach to be as successful and streamlined as possible, including but not limited to providing a sample Limited Servicing Agreement.

TWIA should send several communications before, during and after the takeout process. These communications are intended to:

- Ø Give policyholders time to opt out and inform them of the benefits of participation
- Ø Give agents and existing carriers time to take out policies from TWIA that they currently write
- Ø Inform people of the upcoming new process and address questions and concerns in advance

TWIA should begin pursuing interested carriers and drafting legal documents immediately, pending process approval. The program should be piloted to carriers first, then to agents, when TWIA has established more controls to ensure that the list isn't used for broker of records transfers by agents. To mitigate the risk that some agents would use the list as an opportunity to change the broker of record, but not take the policy out of TWIA, TWIA should require that all users sign a 'terms of use and confidentiality' agreement before they are granted access to the password-protected list. Compliance with the agreements should be regularly monitored.

The current list of available data is in the [appendix](#). TWIA should reach out to carriers to determine what additional information will help them with the risk assessment and take-out process, and incorporate what is deemed most beneficial within existing budget constraints.

**Recommendation #2:**

Successful depopulation will result in fewer attractive risks on TWIA's books, and leave TWIA with the less attractive ones, therefore worsening the association's long-run financial viability. To provide incentives to carriers to write the less attractive risks, TWIA should adjust the post-catastrophe bond assessment credit structure to provide greater credits for carriers that voluntarily write risks closer to the coast. There is a potential that this could discourage carriers from writing the more inland risks, but in reality, that would effectively balance out TWIA's loss exposures. A balanced book is not typically a desired characteristic of a residual market, though it would be helpful for continued financial viability of the association in absence of other supporting mechanisms.

**Recommendation #3:**

Once TWIA has implemented the policy in force list and the assessment credit, TWIA should consider implementing the carriers as reinsurance facilities solution for groups of TWIA policies. This approach doesn't require legislation and could be implemented relatively quickly, and its effectiveness primarily depends on TWIA's ability to find interested carriers.

**Recommendation #4:**

If there is a lack of market participation after the above recommendations are implemented, then other incentives should be considered. Some examples of potential incentives: providing direct credits for taking and keeping policies out, increasing the number of required declinations, adjusting policy premiums, modifying rules to not write non-essential coverages, including extending HB3 claim protections granted to TWIA to any voluntary carriers writing wind coverage in TWIA territory, and adjusting commission structures. Legislation could also be considered to help make the market more conducive for depopulation. Some past examples: render the policyholder ineligible for coverage with TWIA if comparable coverage is available, and require certain percentage of carrier participation in the voluntary coastal market before providing any post-catastrophe bond assessment credits.

TWIA should continually monitor the effectiveness of these approaches and consistently keep stakeholders informed of the progress. In conjunction with other stakeholders, TWIA should regularly adapt the approaches and solutions to improve effectiveness and participation.

## GENERAL INFORMATION

### HISTORICAL CONTEXT

#### RESIDUAL MARKETS & TWIA

Residual market structures are created by legislatures to address issues arising out of the unwillingness of voluntary markets to fully meet the needs of all potential policyholders. These structures are based upon a public policy premise that insurance should be available to everyone. As long as these residual markets are viewed as moderate in size and operating efficiently, little attention is paid to them beyond normal regulation. When these markets are viewed as too large, however, they generate greater attention from multiple quarters based upon a concern that the growth of the residual market reflects underlying issues with the voluntary market mechanism. Historically, the reaction to these situations is to try and develop ways to encourage the voluntary market mechanism to take on more residual market risk so that the residual market will shrink, or depopulate, to what is viewed as a more acceptable size.

These concerns have been expressed with respect to many residual market plans in various states over the past several years, including TWIA, and depopulation has been a topic of both proposed and passed legislation in these markets.

Important statistics describing TWIA's recent growth:

- TWIA's total exposure increased approximately 319% in the period from 2005 to 2012, from \$23.26 Billion to \$74.17 Billion.
- TWIA's policies in force almost doubled between the years of 2005 and 2007, from 109,693 to 216,008. TWIA's policy in force count in 2012 was 266,726, an increase of 243% in the 7-year period.
- TWIA's growth has now flattened and, barring additional carrier action, we would not expect significant changes in the future.

#### PURPOSE

Several current indicators, from past policy in force and exposure growth to projected future coastal population growth, point to elevated liability exposures for the foreseeable future. There are genuine concerns that certain events could cause TWIA to be unable to cover claim-related costs at its current exposure level and funding model.

One of the proposed solutions, encompassed in both proposed legislation and a TWIA restructuring report performed by Alvarez & Marsal, is the creation of a Clearinghouse that would provide the opportunity for the voluntary market carriers to select and voluntarily write TWIA risks. The underlying premise of a Clearinghouse is that there are risks within TWIA that the voluntary market would be willing to write, except that, due to the imperfections of the market, potential policyholders and carriers may not be aware of one another. In theory, a Clearinghouse addresses this imperfection by creating a central facility that allows all carriers to see other potential customers that they might not see through their normal distribution channel.

While a Clearinghouse is one tool to facilitate the goal of depopulation, it is not the only one, since depopulation requires a far broader scope and likely a larger arsenal of tools. The previously referenced report from Alvarez & Marsal,

as well as the most recent report from the Legislative and External Affairs Committee Report, both encouraged TWIA to develop these tools (A&M, P. 33, LEA, P. 33).

Depopulation may represent a wide variety of options to be considered, but generally the concept or goal is to reduce or lessen the exposure of TWIA from potential losses. Depopulation options may include assumption, or allowing an insurance company to assume or “take on” a policy currently written by TWIA. Depopulation may also include reducing coverage amounts or not writing non-essential coverages. It could also include increasing the number of private market declinations required or even rendering a policyholder ineligible for coverage in the residual market if they’ve received any comparable policy offer.

Criteria for a successful depopulation plan:

- Implementation of a depopulation plan should result in the overall reduction of risk exposure by TWIA.
- Depopulation would allow for an orderly limitation on possible growth by reducing or preventing the continual pattern of growth experienced by TWIA between 2005 and 2012.
- An overall reduction in exposure due to depopulation should have a direct fiscal impact on related business costs including reduction of probable maximum loss (PML), lower costs of reinsurance due to less exposure, and possible reduction in staff and contractors who service TWIA policyholders.

## SCOPE

To create a structure that will facilitate a more perfect awareness of policyholders and carriers to one another, TWIA staff in cooperation with TDI and other stakeholders have researched and evaluated the feasibility of different forms of a policy clearinghouse. This includes identifying advantages and disadvantages as well as impediments to be addressed. Since a clearinghouse is not the only available tool to help depopulate, we have evaluated other more traditional depopulation methods as well.

We have evaluated the following approaches as part of this study:

- Ø Different approaches for an online portal or clearinghouse
  - Voluntary Coastal Wind Insurance Portal with access to TWIA’s policy-in-force list
  - Florida Citizens’ clearinghouse approach
  - Louisiana Citizens’ portal approach
  - A depopulation portal, clearinghouse, or database as envisioned during the 2013 Texas legislative session
- Ø Other depopulation components from the 2013 Texas legislative session
  - TWIA as a reinsurance facility
  - Risk assignment program
- Ø Other supporting measures
  - Utilizing carriers as reinsurance facilities
  - Modifying the assessment formula: provide greater credits to companies that write more exposed risks
  - Actuarially sound rates

For each approach, we have developed a feasibility 'At a Glance' matrix that is intended to convey the most significant decision-making factors in a quick, easy-to-read format. All projected information is composed of estimates and attempts to approximate unknowns based on certain known factors.

## STAKEHOLDERS

The following stakeholders were considered and/or consulted during the research phase of this study:

- Ø Policyholders
- Ø TDI
- Ø Legislature: Inland & Coastal; Senate & House
- Ø Agencies & Independent Agents
- Ø Carriers
- Ø TWIA

## EVALUATION OF ALTERNATIVES

There are multiple different ways to effect a clearinghouse. Each option has been evaluated based on the same criteria, including whether legislative changes are required, whether agents/carriers will be inclined to participate, whether policyholders will be inclined to participate, what the impacts on various stakeholder groups are, and what the potential impact on depopulation is, either through a reduced number of policies in force or a reduced loss exposure.

In all cases that involve publishing policyholder information, we have an option to start with new or renewal business, or to roll out everything at once. For a list-based approach, providing all policies at once is a simpler and more straightforward approach. For a portal-type solution, it could be more beneficial to phase the implementation. This would need to be evaluated in more detail based on the extent of regulatory support and expected market interest at the time, given the significant financial investment required to implement a more complex clearinghouse system.

Another potential add-on to the clearinghouse / take-out approaches is the take-out of the Fair Plan companion policy, if it exists. Once an overall direction is determined, this can be incorporated as needed.

While several of these approaches don't require legislative changes or changes from TDI, long-term positive impacts will most likely depend on legislative support, particularly if the market is unwilling to participate within the current regulatory and market environment.

The Texas Department of Insurance has received several responses from different technology vendors to an RFI regarding an electronic portal. The responses will be beneficial in the event that TWIA needs additional technical assistance at the point that a more complex clearinghouse solution is necessary or desired.

## OVERVIEW

For several years, TWIA sent an expiration list to TDI that was then made available for purchase to any interested party. The list was created and provided as a means to depopulate, but was underutilized and was an unsuccessful depopulation method. The lack of success of the approach is evidenced by both the number of people who requested it (3 known recipients) and the exponential growth in TWIA policies and liabilities while it was available. This practice of creating and making the list available stopped in April 2012 due to privacy concerns because policyholders were not given the ability to opt-out of inclusion in the list.

One option for a basic clearinghouse-type depopulation solution is to revive and retool the expiration list and include the required capability for policyholders to opt out. The proposed solution expands the expiration list concept to include all policies-in-force and contains a much larger, more comprehensive set of data points than the 'legacy' list. For a sample of the list as well as a list of all data points, refer to [Sample TWIA Policy List](#) in the appendix.

An assessment from Alvarez & Marsal estimated that an online list of renewals could reduce the residential book by 10-15% based on rate adequacy indications.<sup>1</sup> One notable component of this assessment is that the estimation is based on rate adequacy alone while there are other factors that will affect the outcome as well. Some of those are outlined in the success factors section.

Below are proposed processes that operate within the current statute and minimize negative impacts to stakeholders. Two goals of the processes as outlined is to protect policyholder's confidential information and to encourage the actual depopulation of TWIA policies rather than agent of record transfers. To achieve these goals, carriers will sign confidentiality and terms of use agreements. Once the proper controls are in place to ensure that the list isn't used for broker-of-record transfers, agents will become eligible for access to the list as well. The different facets of the approach are outlined below.

### Existing Policies, Phase 1: Pre-Implementation

- ü TWIA notifies all parties of the upcoming process change and sends an updated privacy notice with an opt-out form to all residential and manufactured home policyholders per Gramm-Leach-Bliley rules. This is the most expensive part of the process and will cost around \$140,000.
- ü TWIA allows policyholders 6 weeks to opt-out of the process initially
- ü TWIA encourages agents to place their current TWIA policies elsewhere

### Existing Policies, Phase 2: Carrier Take-Out

When the portal goes live with the list of available policies, a registered user can retrieve the list of policies-in-force and then evaluate risks to determine which ones they're interested in taking out. Once the potential policies are identified, there are four basic processes that could be followed, with the main variations arising from whether the existing agent facilitates the process and whether the take-out carrier wishes to write the full policy or the wind only. Each process is detailed on the following pages, and summarized below:

<sup>1</sup> <http://www.tdi.texas.gov/reports/documents/twiarestructure.pdf>, p. 36

- Option 1: Carrier writes the full policy, agent maintains ownership of the expiration
- Option 2: Carrier writes the wind only, agent maintains ownership of the expiration
- Option 3: Carrier writes the full policy, policy takeout occurs without existing agent intervention
- Option 4: Carrier writes the wind only, policy takeout occurs without existing agent intervention

For options 1 and 2, if the agent is eligible (or can become eligible through a Limited Service Agreement) to write business through the carrier that is offering coverage, then they can maintain administrative ownership of the policy and it preserves the ability of the policyholder to choose their intermediary when the policy is placed with a carrier other than TWIA. This agreement would be up to the carrier and agent to facilitate. At any time, existing carriers can use the list to evaluate their own policies for take-out. Note that participation in the take-out process for all parties, including policyholders, is voluntary.

Alternatively, if the agent isn't eligible to write business through the carrier that is offering coverage, and the administrative ownership and policyholder's choice of intermediary must be maintained, then the takeout process stops. While this would be an issue in the short term, there are other solutions that could be implemented longer term including the creation of an MGA within TWIA that would allow carriers to do business with a single entity (the MGA) while preserving the ability of the policyholder to choose to retain their existing intermediary. Operationally this would facilitate depopulation from the vast majority of agencies that individually write limited numbers of TWIA policies and therefore have limited experience with the forms and the process. TWIA is already providing additional policyholder support for these agencies and their policyholders and the creation of the MGA would help improve the overall operational efficiency of the entire end to end process as well as lowering total operating costs to provide these services.

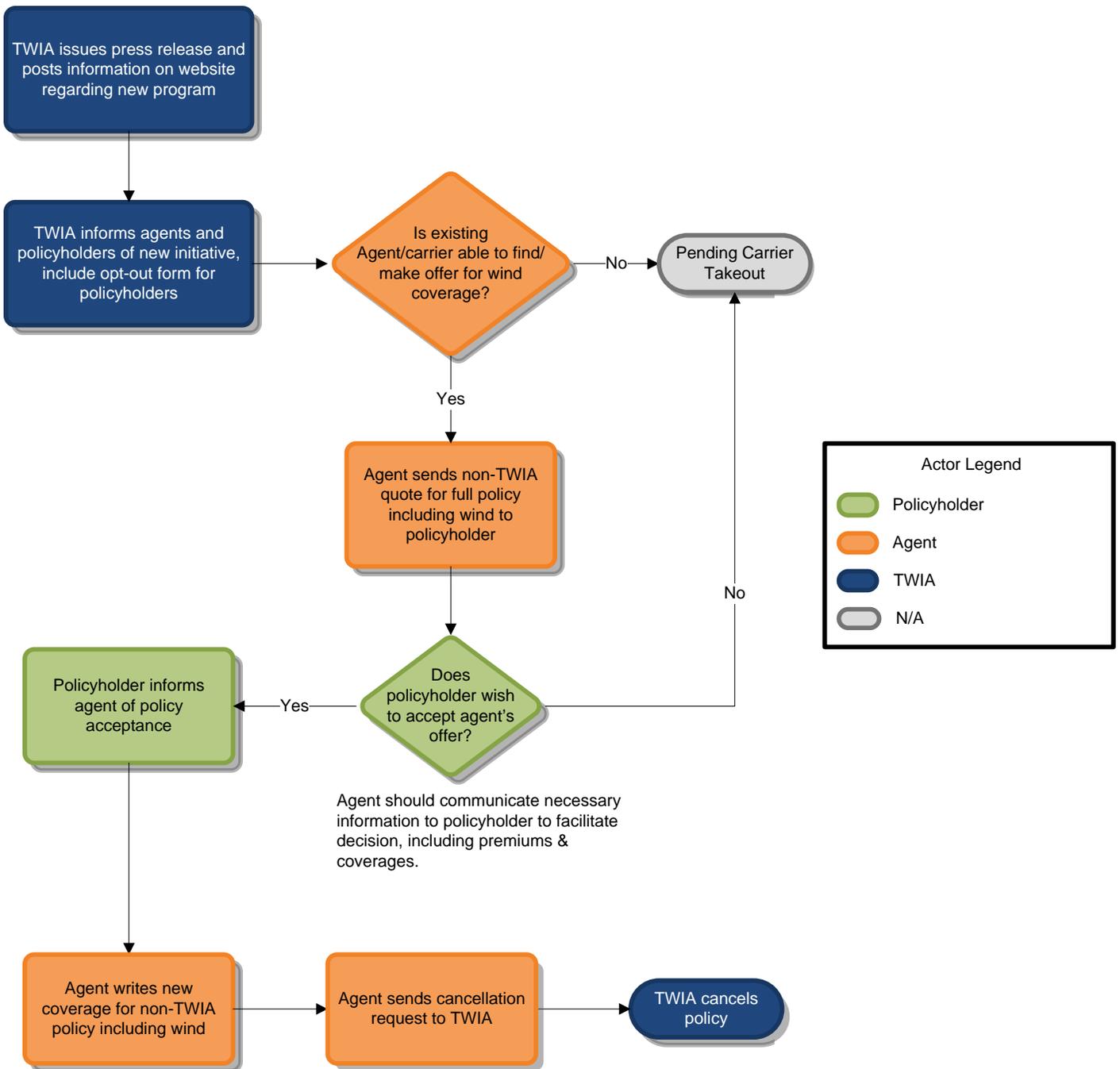
To accommodate the varying approaches that could potentially be utilized by the external parties, TWIA's cancellation procedures should be modified to accept an additional form as a cancellation request. For detailed information on TWIA's cancellation process, see [Cancellation Policy](#) in the appendix.

### **New Policies: Carrier Take-Out**

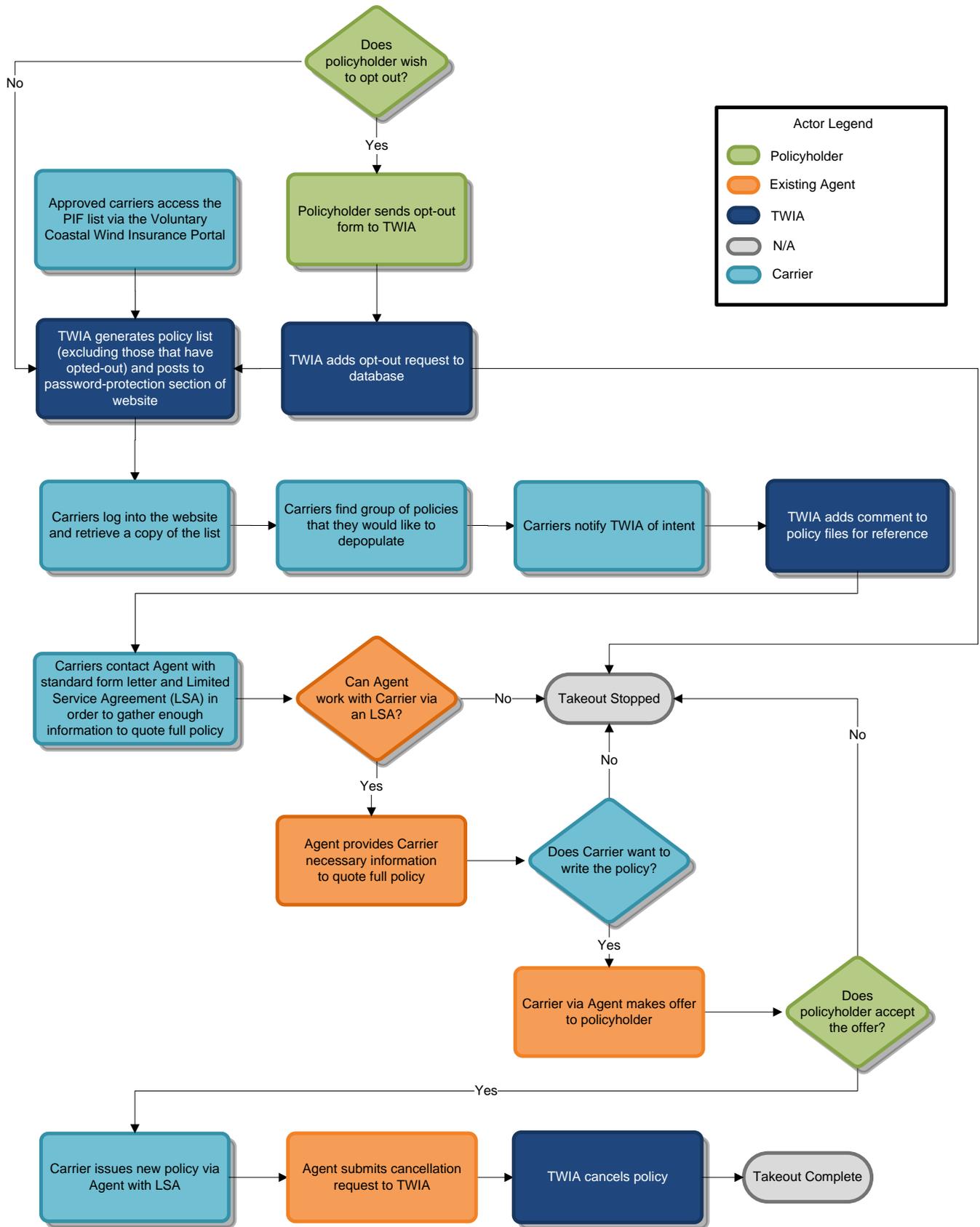
This process is similar to the existing policy processes outlined above. The policy is issued as usual and the privacy notice and opt-out form is included in the new business policy package. The newly issued policy wouldn't be included in the policy in force list until 35 days after it is issued, which gives the policyholder time to opt-out if desired. Per current statute, potential policyholders must provide payment with their submitted application to TWIA, so if the coverage is ultimately written through another carrier, either a) policyholders would have to wait on return premium from TWIA and then forward that to their carrier, or b) TWIA would forward the premium directly to the carrier. This solution assumes TWIA will return full payment directly to the carrier because that is what would happen under current operating procedures.

An alternative process is for TWIA to put the new business application on hold and give take-out carriers a window to assume the business. One benefit of a waiting period is that TWIA would not have to go through the entire policy administration process for policies that are subsequently taken out. This is not ideal for the policyholder, though, because they could be placed in an uninsured position while the coverage is on hold. It would also cause more significant changes in TWIA's standard operating procedures to facilitate the holds while operating within the current statute. For these reasons, this process is not recommended at this time.

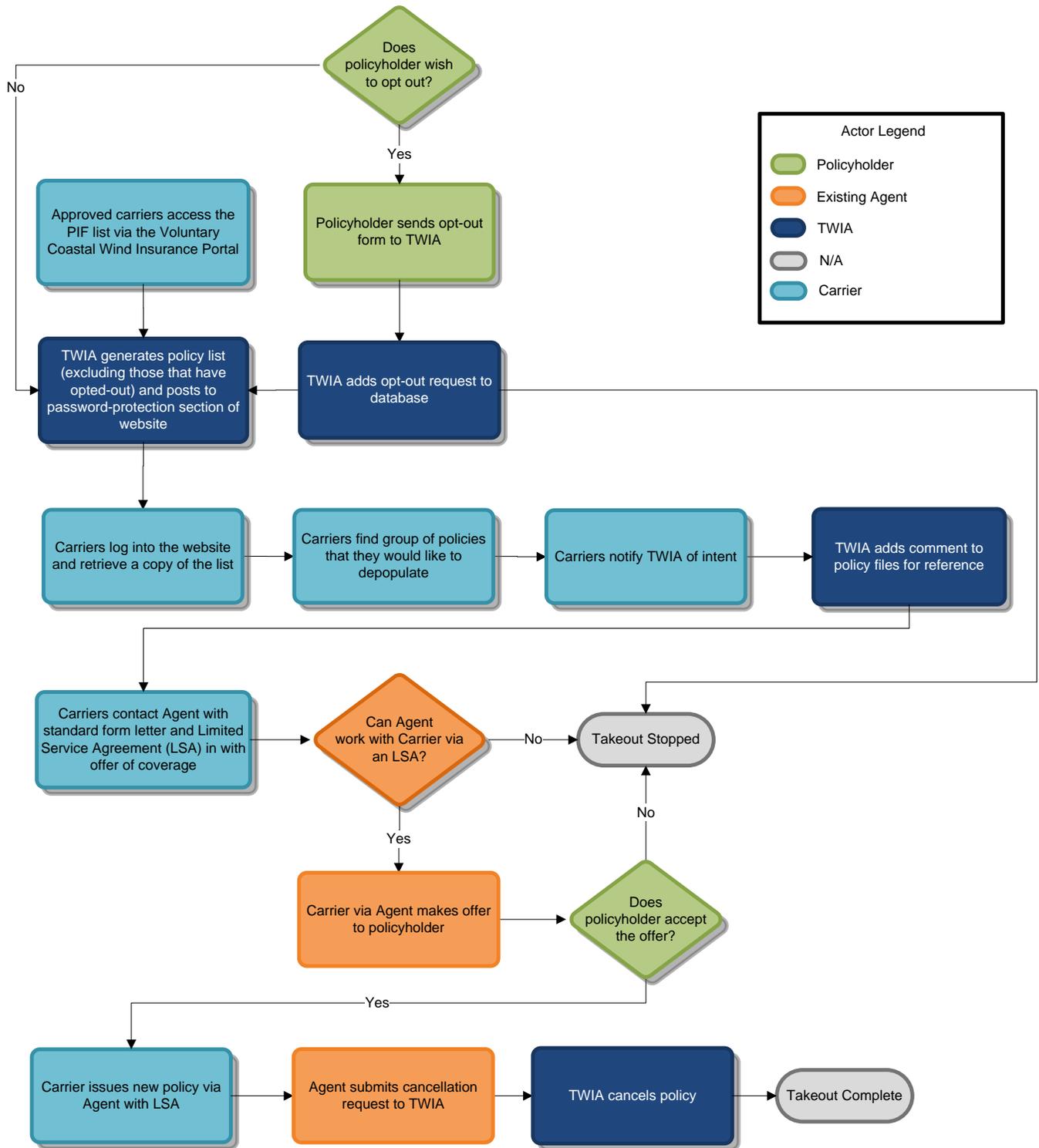
## Existing Policies, Phase 1: Pre-Implementation



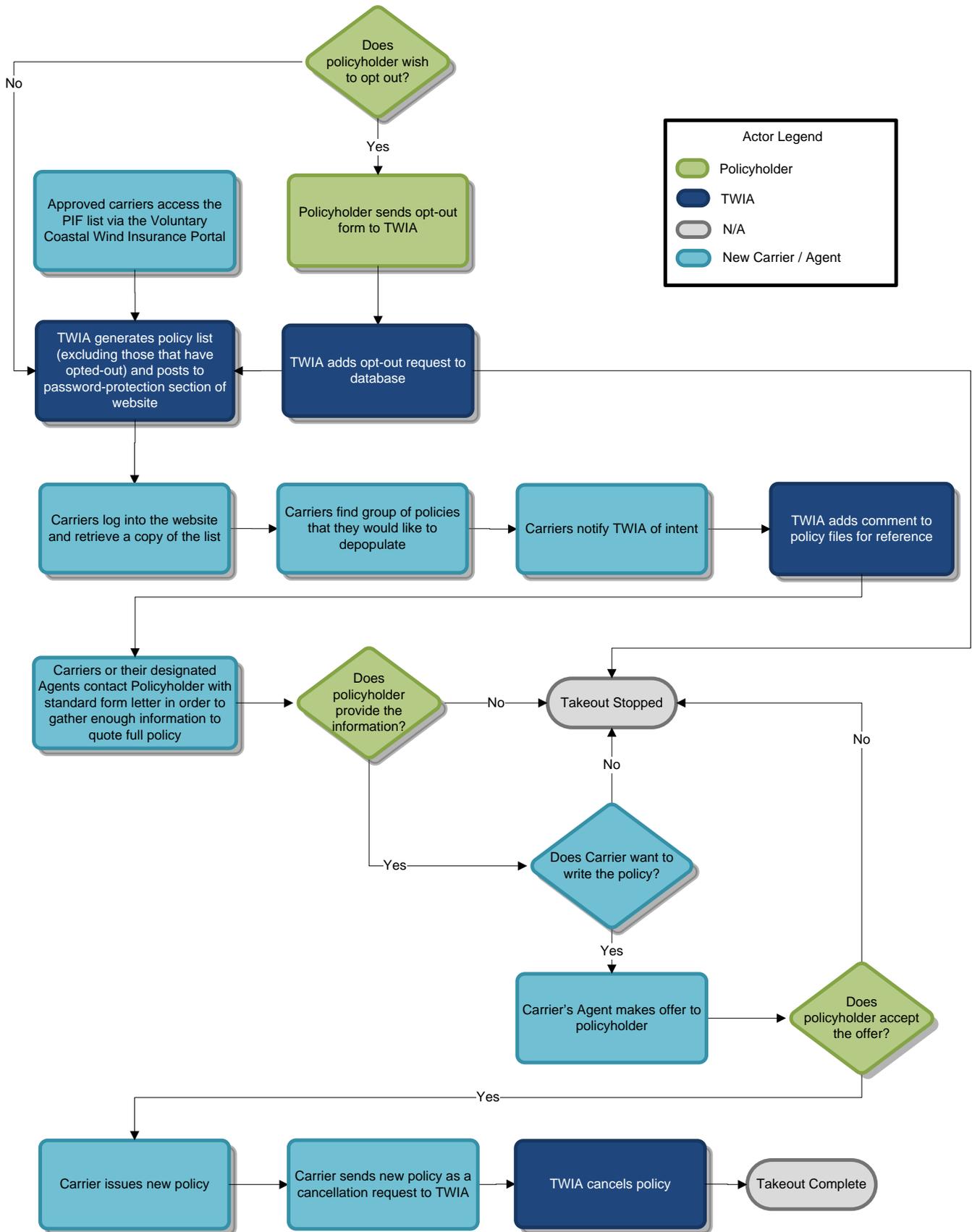
Existing Policies, Phase 2: Carrier Takeout; Carrier writes full policy, agent maintains ownership of the expiration



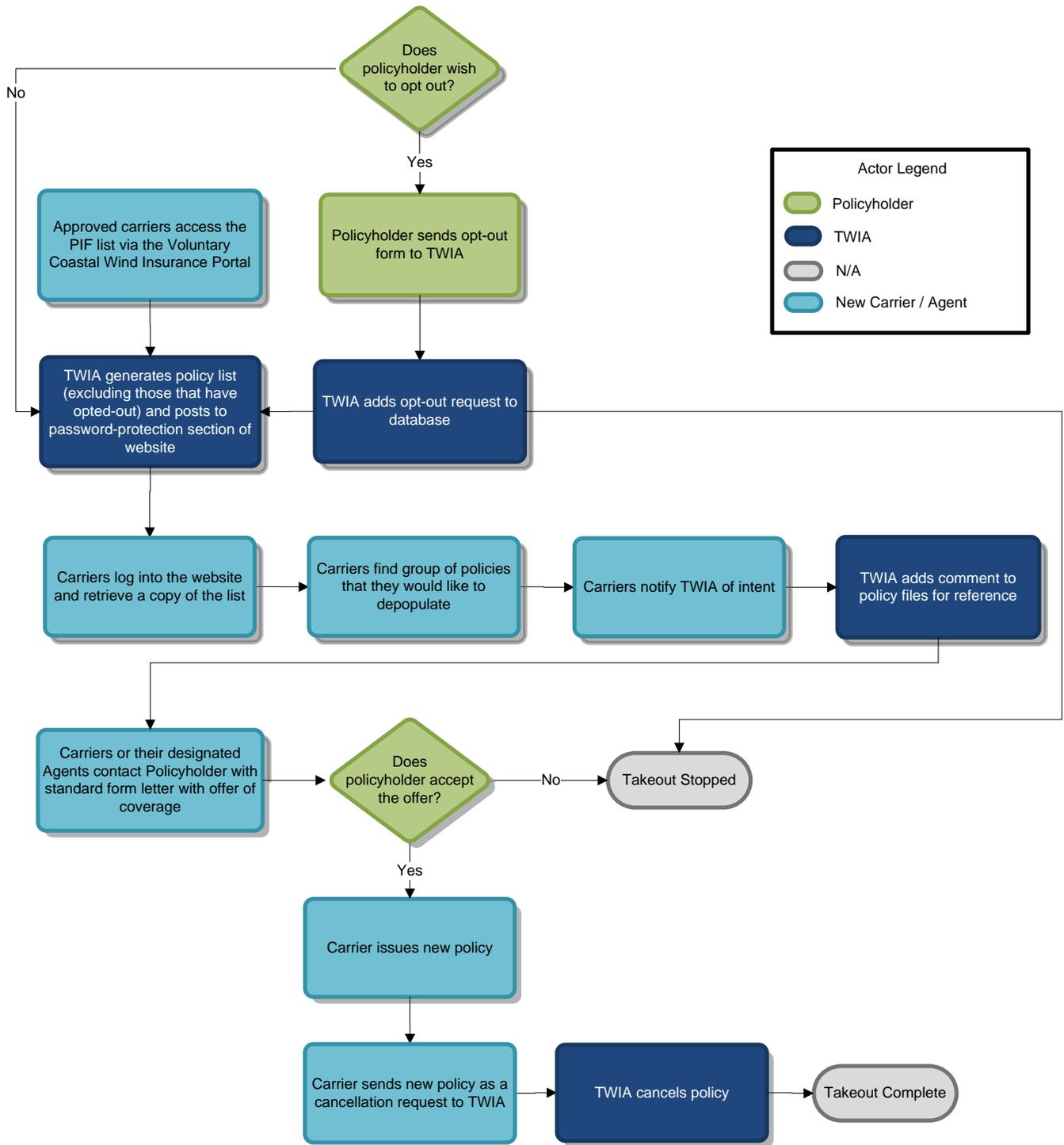
Existing Policies, Phase 2: Carrier Takeout; Carrier writes wind only, agent maintains ownership of the expiration



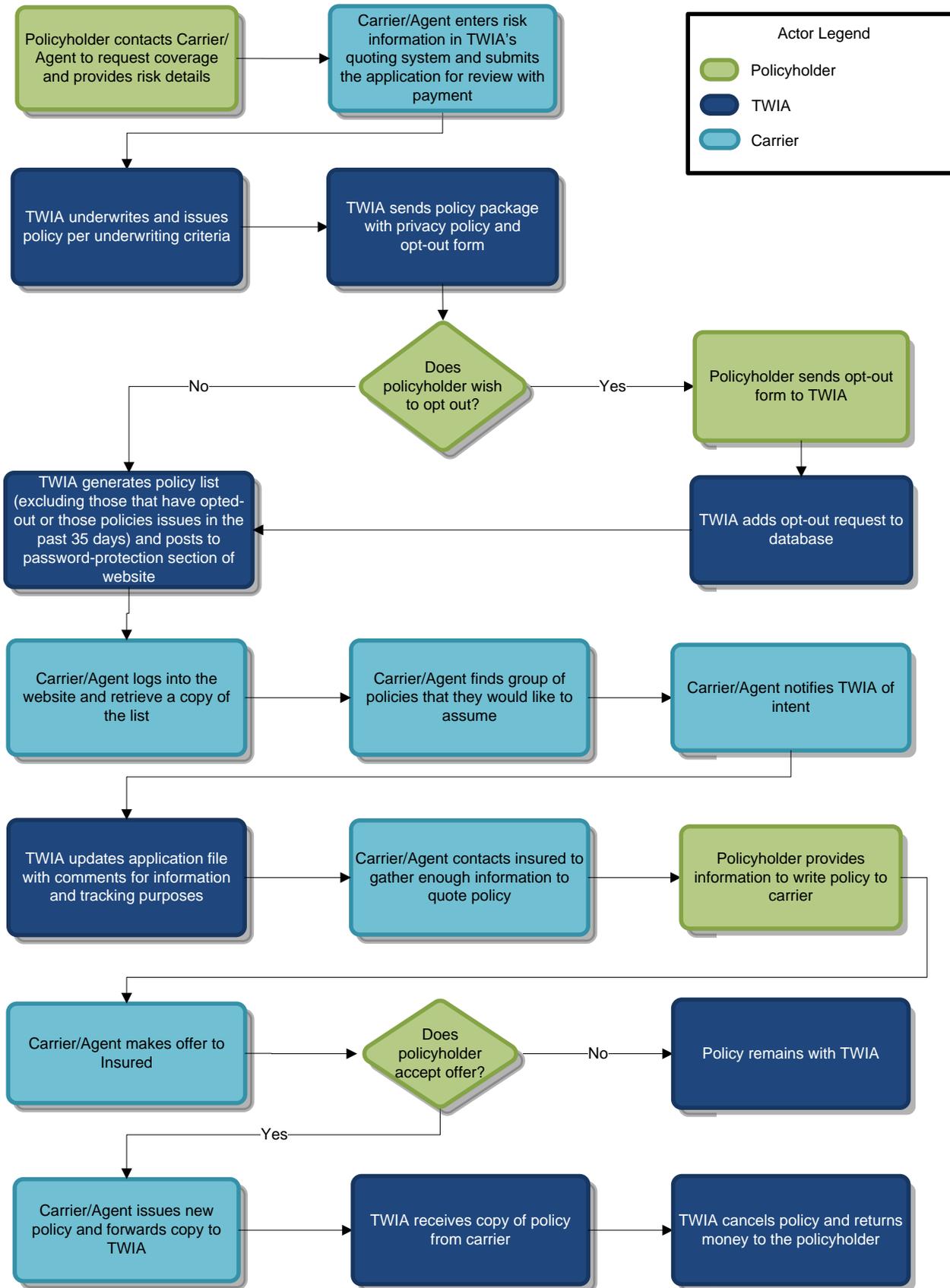
Existing Policies, Phase 2: Carrier Takeout; Carrier writes full policy, takeout without existing agent intervention



Existing Policies, Phase 2: Carrier Takeout; Carrier writes wind only, takeout without existing agent intervention



## New Policies – Carrier Takeout

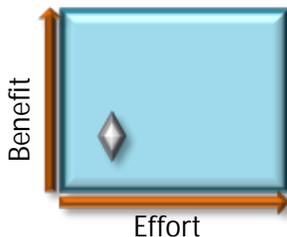


FEASIBILITY

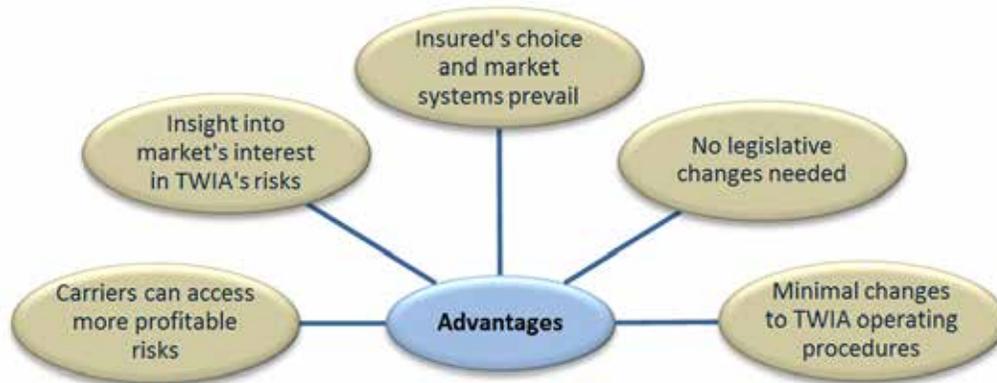
AT A GLANCE

Legislative Change(s) Required?	X	No / Not Applicable
Plan of Operations Change(s) Required?	X	
TDI Rules Change(s) Required?	X	
TWIA Underwriting Guidelines Change(s) Required?	✓	Yes
Projected Carrier/Agent Participation	████████████████████	Medium-Low Positive
Implementation Time (Estimated # Quarters)	📅 📅 2 Quarters	
Proposed Implementation Start	Immediately pending approval	
Projected Policyholder Participation	████████████████████	
Implementation Complexity	████████████████████	
Implementation Cost	████████████████████	
Stakeholder Impact	████████████████████	████████████████████ Low Negative
Policy in Force Impact	████████████████████	
Impact to Loss Exposure	████████████████████	

Impact Summary



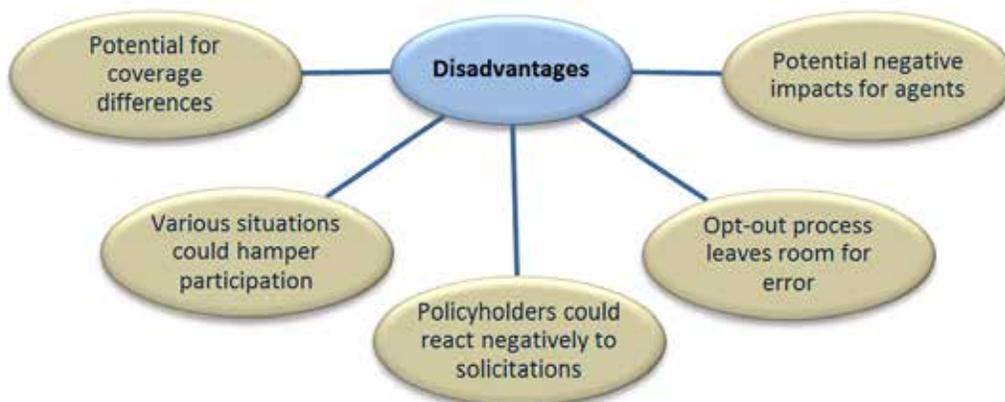
## POTENTIAL ADVANTAGES



### Detailed Advantages:

- Carriers will have access to potentially profitable risks – makes carriers and policyholders more aware of each other and facilitates mechanism for higher profits in the voluntary market
- Insight into market's interest in depopulating TWIA – this approach will demonstrate how willing the market is to depopulate given the current regulatory, market, and organizational environments
- Insured's choice and market systems prevail – consumers have the final say as to who provides their coverage, whether is it TWIA or a carrier in the voluntary market. Information like rates, coverages, company reputation, and customer service experience will contribute to the insured's decision.
- No legislative changes needed – making a list available and facilitating the process as outlined does not require any legislative changes
- Minimal changes to TWIA's operating procedures – this process can easily fit into TWIA's current operating procedures and can be implemented using the current staffing model

## POTENTIAL DISADVANTAGES



#### Detailed Disadvantages:

- Potential for coverage differences
  - Coverage differences between existing policies and proposed policies could lead to large disparities in premiums and confusion for policyholders
- Several potential reasons participation could be limited
  - New Carriers are unsure of whether the new premium is higher or lower than current full policy premium (TWIA premium plus the homeowners premium), so it's difficult to gauge whether they're presenting a competitive offer to the Insured
  - There are multiple different points where the process can break down, and it will be difficult to gain insight into the reasons and opportunities for improvement, examples:
    - § Does the policyholder want to take the policy offer? If not, why?
    - § Does the carrier want to write the policy? If not, why?
- Policyholders could react negatively to solicitations
  - Potential carriers will have to contact policyholders for more information before they are able to quote, this could come across as invasive and cause frustration and negative feelings
- Opt-out process leaves room for error
  - Policyholder needs to opt-out for every policy written with TWIA due to current data constructs
  - Opting out is paper-driven which inherently leaves room for more errors, lost forms, data entry errors, etc.
- Negative impacts for agents
  - Can exclude them from the process if they don't act participate in step 1 and can ultimately lose out on the commission if it is assumed by another carrier that they don't work with

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## MARKET SHARE AND PREMIUM COMPARISON FOR SELECTED COUNTIES\*

One way to predict the policyholder's willingness to participate is to evaluate the likelihood of policyholders finding policies with rates that are either comparable to or better than TWIA's. Therefore, a market evaluation including premium comparisons was performed. The analysis included market share by total insured value for TWIA and the Voluntary Market for three out of the top five counties by policy count: Galveston, Nueces, and Cameron. The top five counties represent approximately 86 % of both policies in force and total insured values.

The premium analysis data was pulled from TDI's Help Insure website ([www.helpinsure.com](http://www.helpinsure.com)) and reflects average rates for the following attributes in each county specified: insured with average credit, 10 year old home, no losses in the past 5 years, \$200,000 coverage, and brick veneer exterior walls. Reporting companies are listed out in detail in the appendix. In order to be included in this analysis, rating data must exist for policies both with and without wind coverage.

The analysis shows that when carriers exclude the wind from their homeowner's policies and use TWIA to cover the wind, that the premiums are lower, on average, than if the carrier writes the entire policy including the wind. This means that TWIA's rates are less than the wind credits that the carriers are providing and leads to a conclusion that TWIA's rates aren't consistent with what would be considered adequate for this type of coverage.

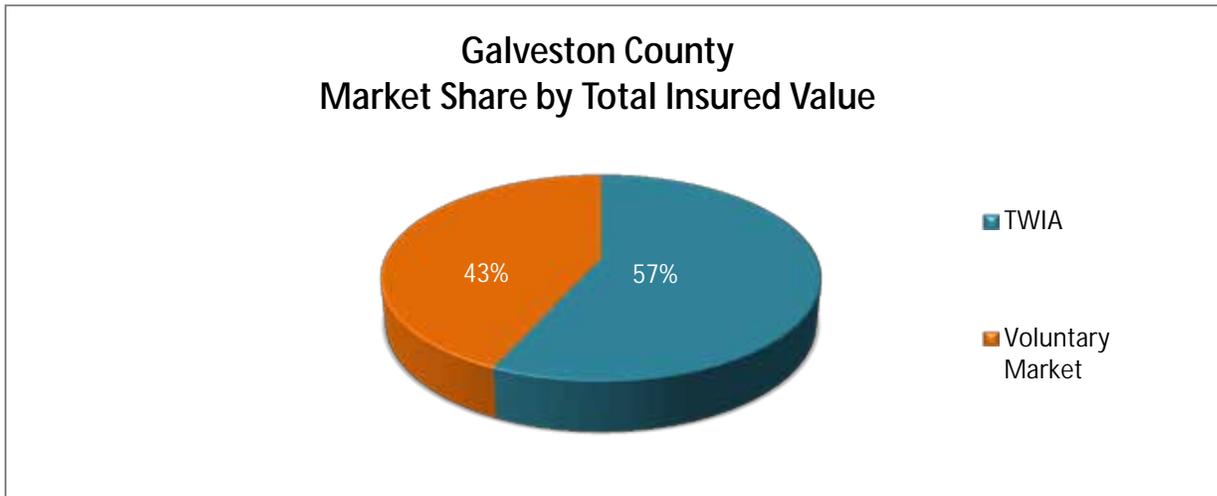
An additional point to consider when making a premium comparison such as this is that the premiums in the standard market are partly based on an insured's creditworthiness. TWIA does not assess creditworthiness of the individuals it insures, and therefore does not adjust premiums based on this factor.

This makes the likelihood that an insured would find comparable coverage in the standard market relatively low, particularly if they have poor credit. Despite this, this approach is recommended primarily because it is a low cost approach to bringing any market deficiencies to light. It is also recommended because of the likelihood of premium variations in the voluntary market within a county. In some cases, particularly for those risks that are farther from the coast, there is a better chance that TWIA's rates are higher than standard market rates.

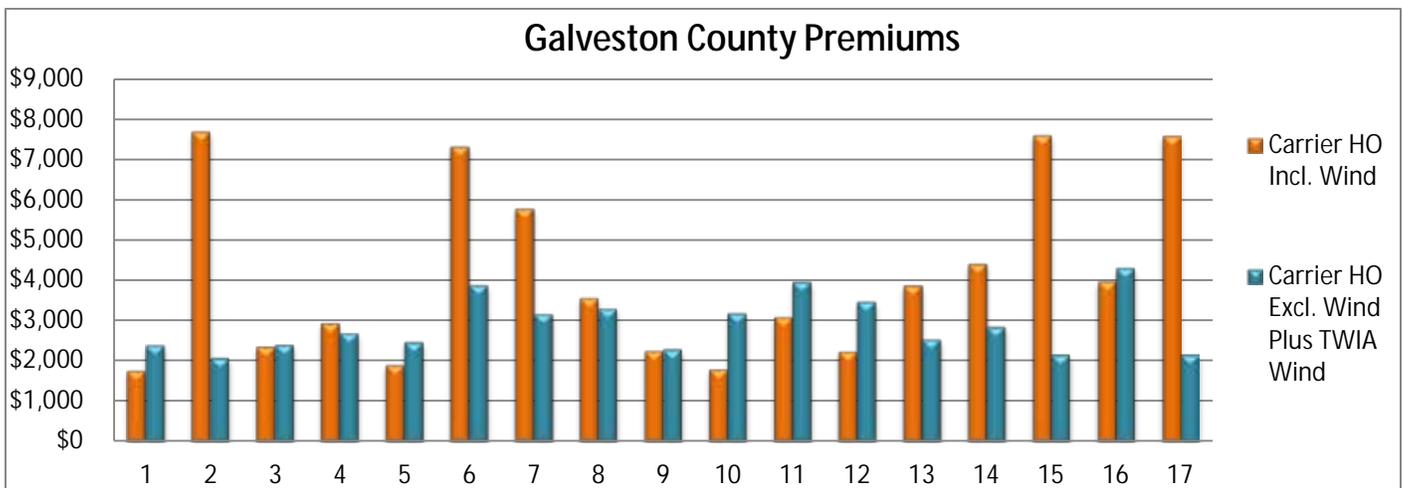
\* Premium analysis and data for all counties, including summary analysis, is included in the [appendix](#).

Galveston County

Galveston County represents approximately 31% of TWIA's total insured liability and 27% of the total number of TWIA policies in force. TWIA currently writes wind coverage for 57% of the market in Galveston County.

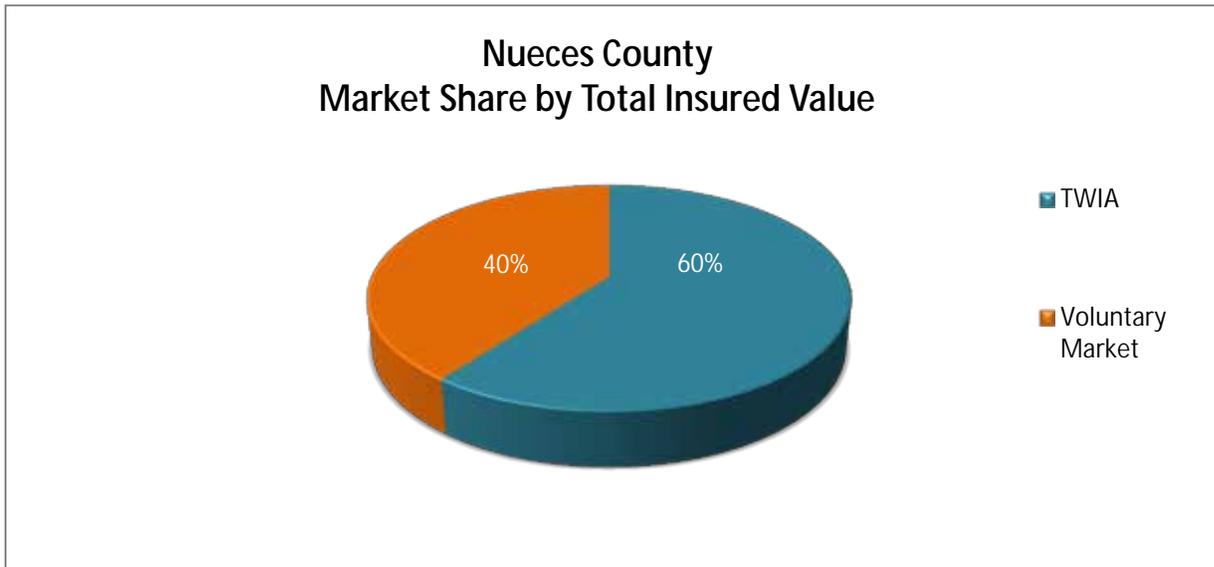


In Galveston County, 9 reporting carriers had premiums that were higher than TWIA and 8 had premiums that were lower.

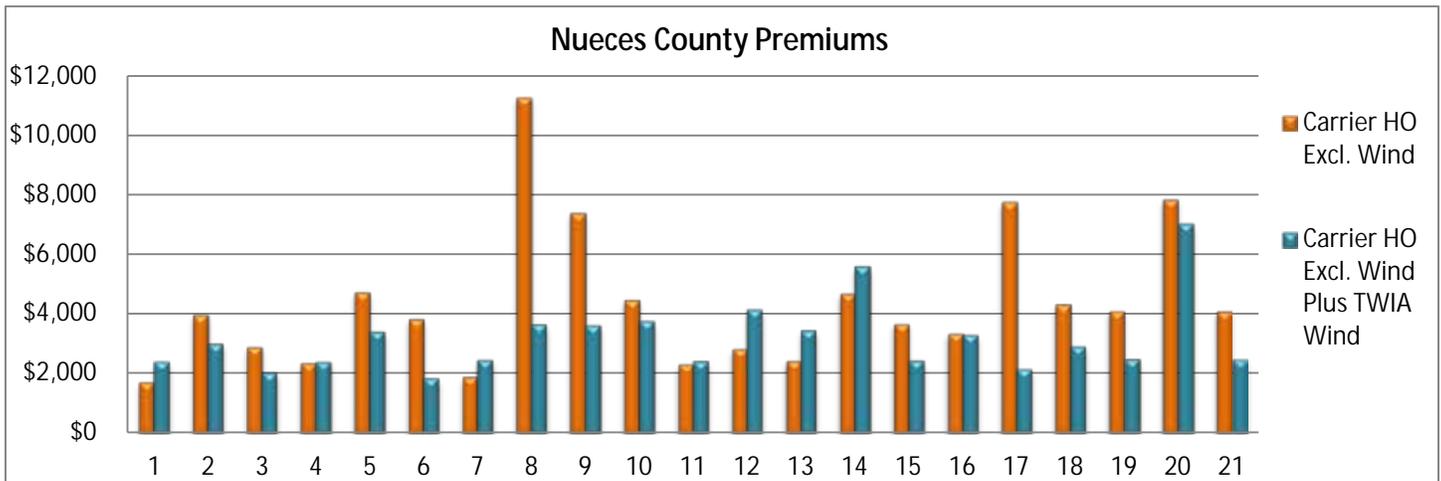


Nueces County

Nueces County represents approximately 16% of TWIA's total insured liability and 19% of the total number of TWIA policies in force. TWIA currently writes wind coverage for 60% of the market in Nueces County.

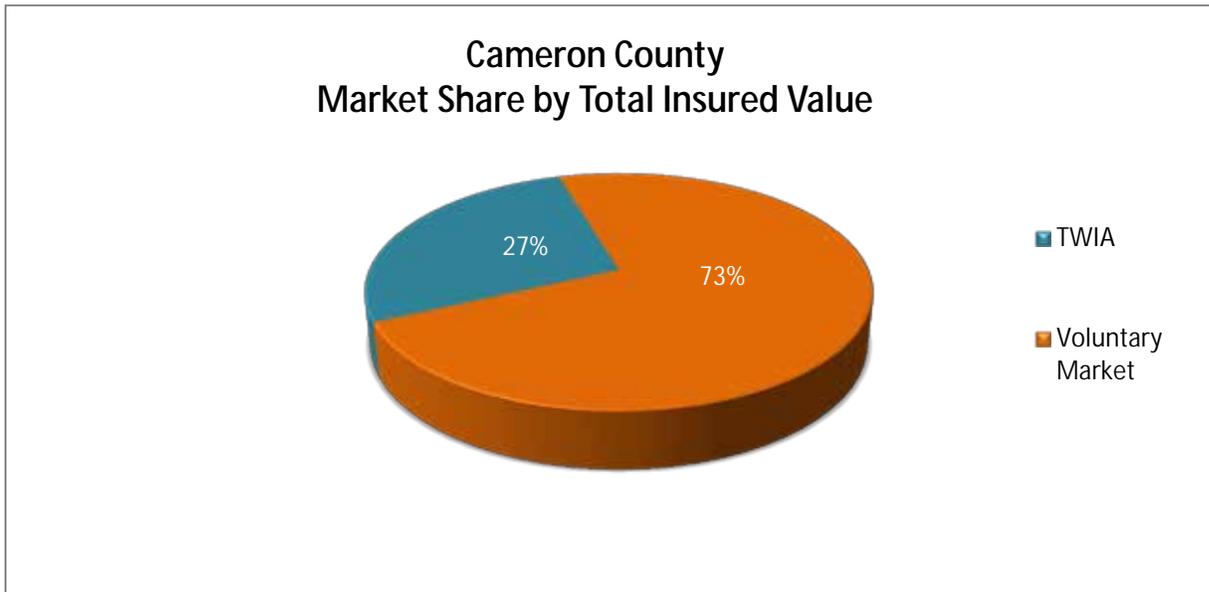


In Nueces County, 14 reporting carriers had premiums that were higher than TWIA and 7 had premiums that were lower.

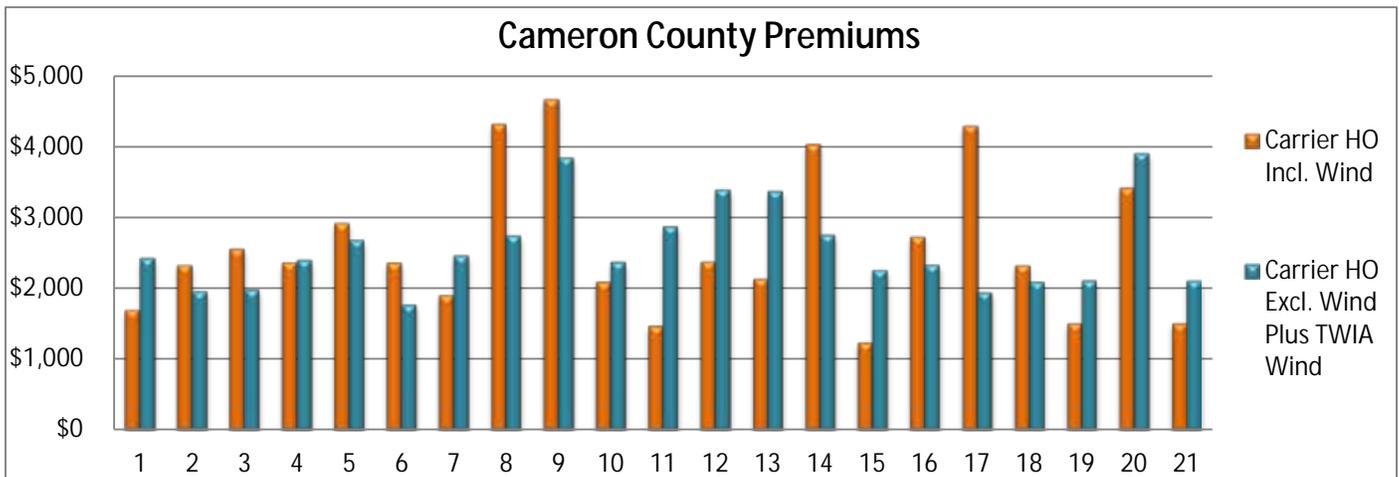


*Cameron County*

Cameron County represents approximately 5% of TWIA’s total insured liability and 7% of the total number of TWIA policies in force. TWIA currently writes wind coverage for 27% of the market in Cameron County.

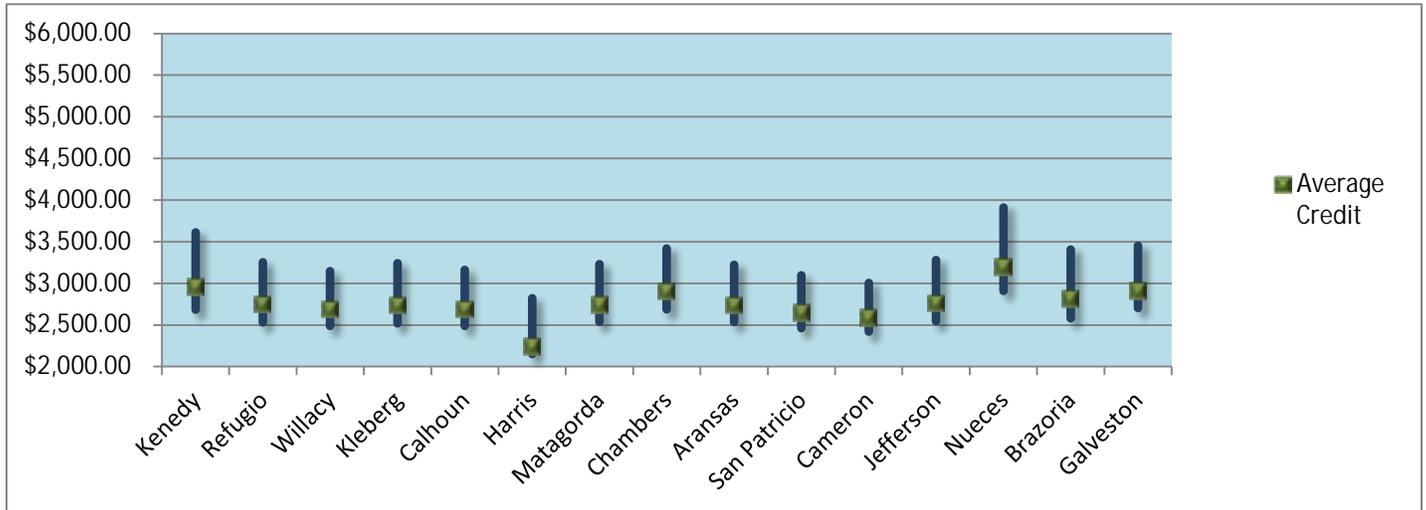


In Cameron County, 10 reporting carriers had premiums that were higher than TWIA and 11 had premiums that were lower.

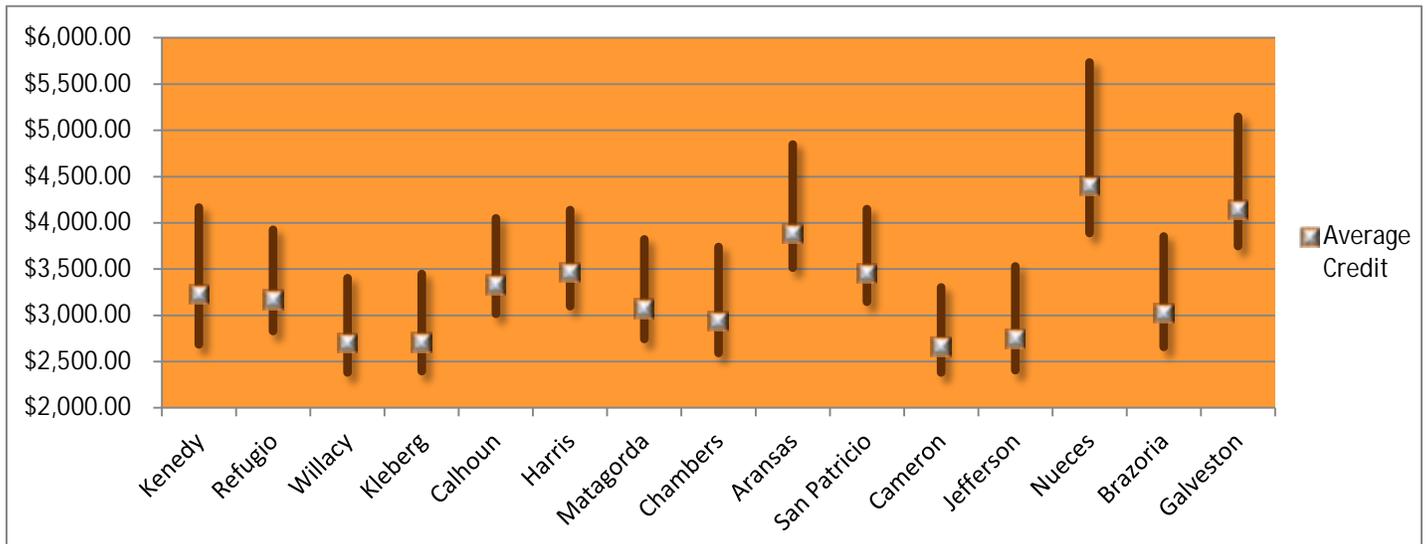


## PREMIUM COMPARISON FOR VARYING CREDIT PROFILES

The below analysis uses the "Carrier HO Excl Wind Plus TWIA Wind" data from the previous section, and shows averages for each county ordered by increasing market share. The information represents averages for different credit profiles: poor credit (represented by the high end of the range), average (represented with the marker), and good credit (represented by the low end of the range).



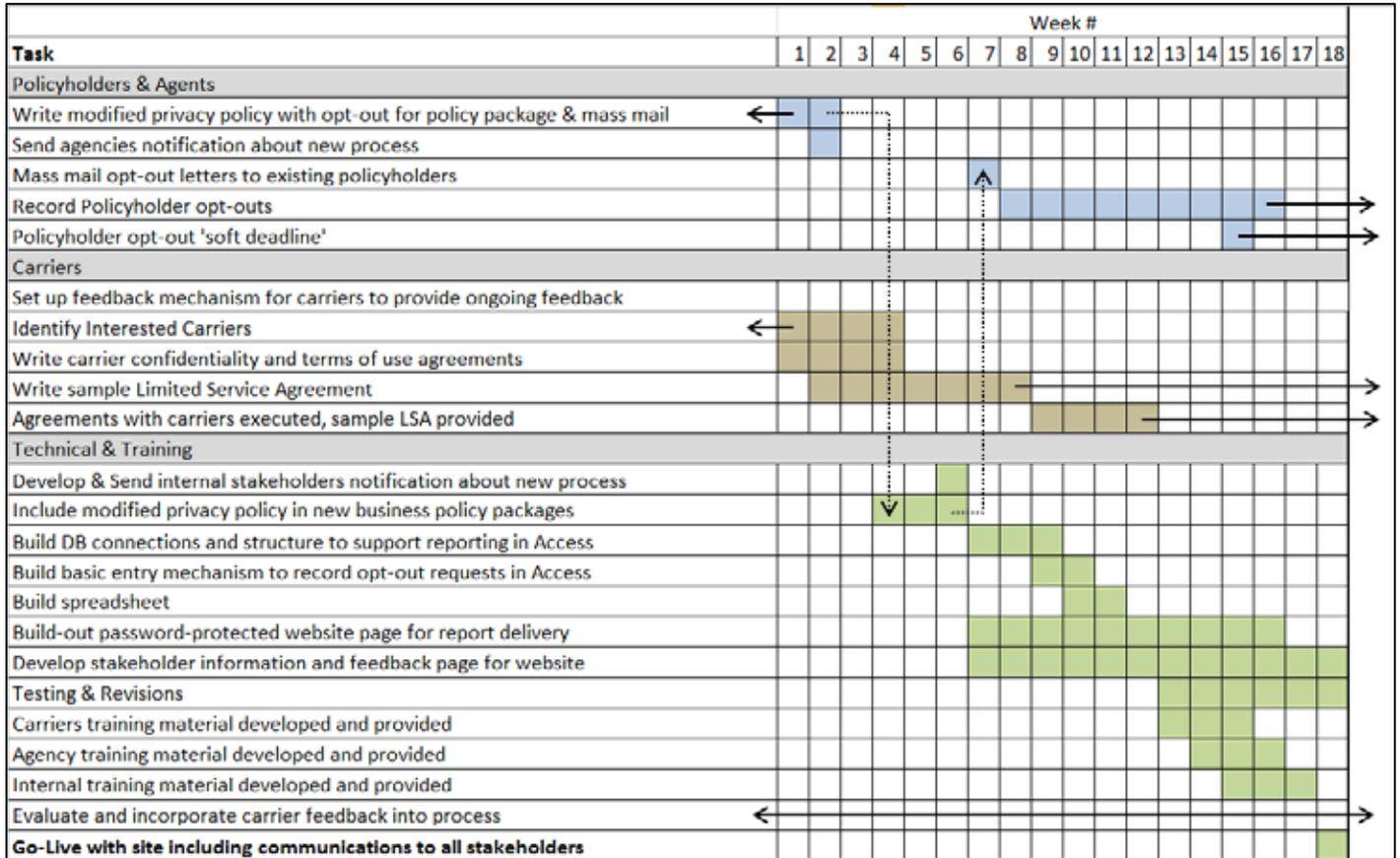
The below graphic uses the "Carrier HO Incl. wind" data from the previous section, and shows averages for each county ordered by increasing market share. This compared with the graphic above demonstrates the high premium variability due to creditworthiness. This will result in some policyholders being unable to find comparable coverage in the voluntary market even if TWIA's rates are more actuarially sound, because TWIA doesn't rate based on creditworthiness.



## POTENTIAL SCHEDULE

Implementation could be complete in Q2 2014 if it were started by Dec 31, 2013. See [Technical Approach](#) section for more details. There are three main focus areas for the implementation that will run concurrently: Policyholders & Agents, Carriers, and Technical & Training.

Proposed Timeline:



## SUCCESS FACTORS

- Ø Encourage actual depopulation of TWIA's book of business rather than BOR transfers by restricting access to the Policy in Force list to pre-approved carriers who agree to terms and conditions of use
- Ø Update TWIA Underwriting Guidelines to facilitate modified cancellation process
- Ø Supplement this effort by modifying assessment credits and using other supporting measures
- Ø Continually monitor and adjust the program, available data, and supporting measures as needed
- Ø A feedback mechanism should be provided so carriers can request additional data for inclusion in the list. The requests should be evaluated and the list should be adjusted when feasible to help carriers determine what policies are good candidates for takeout.

## OVERVIEW

Florida's Citizens Property Insurance Corporation has a similar organizational mission to TWIA, was established for similar reasons and has similar operational requirements with regard to statute adherence and a state-regulated and approved plan of operations. Florida has an active depopulation program which was most recently furthered by the 2013 legislative session. On notable difference between TWIA and Florida Citizens is that Florida Citizens writes coverage for either the whole policy, or for just the wind in designated wind-only areas. TWIA does not write coverage for a whole policy, although the sister company TFPA, does. This difference should be kept in mind when considering transferability of Florida's depopulation and clearinghouse model to TWIA.

## FLORIDA MARKET ASSISTANCE PLAN

In addition to the topics discussed below, Florida has a free property insurance referral service called FMAP that was created by the state legislature in 1985. This plan is a separate entity from Florida Citizens. The FMAP online tool contains the Citizen's book of business list to allow agents to review policies for potential take-out. More importantly, it contains an online tool where consumers who enter property quote requests are matched with agents who have agreed to provide coverage specific to the attributes of that quote.

This type of self-service facility could be extremely useful for consumers who are currently working with TWIA and are looking for alternative options. Properly executed, it could help with both the take-out and the keep-out efforts and supplement alternative approaches like an online portal for potential take-out carriers.

## DEPOPULATION BEFORE THE 2013 LEGISLATIVE SESSION

The prevailing law in Florida requires that Citizens create depopulation programs. In conjunction with the Florida Office of Insurance Regulation (OIR) they have made several targeted depopulation efforts.

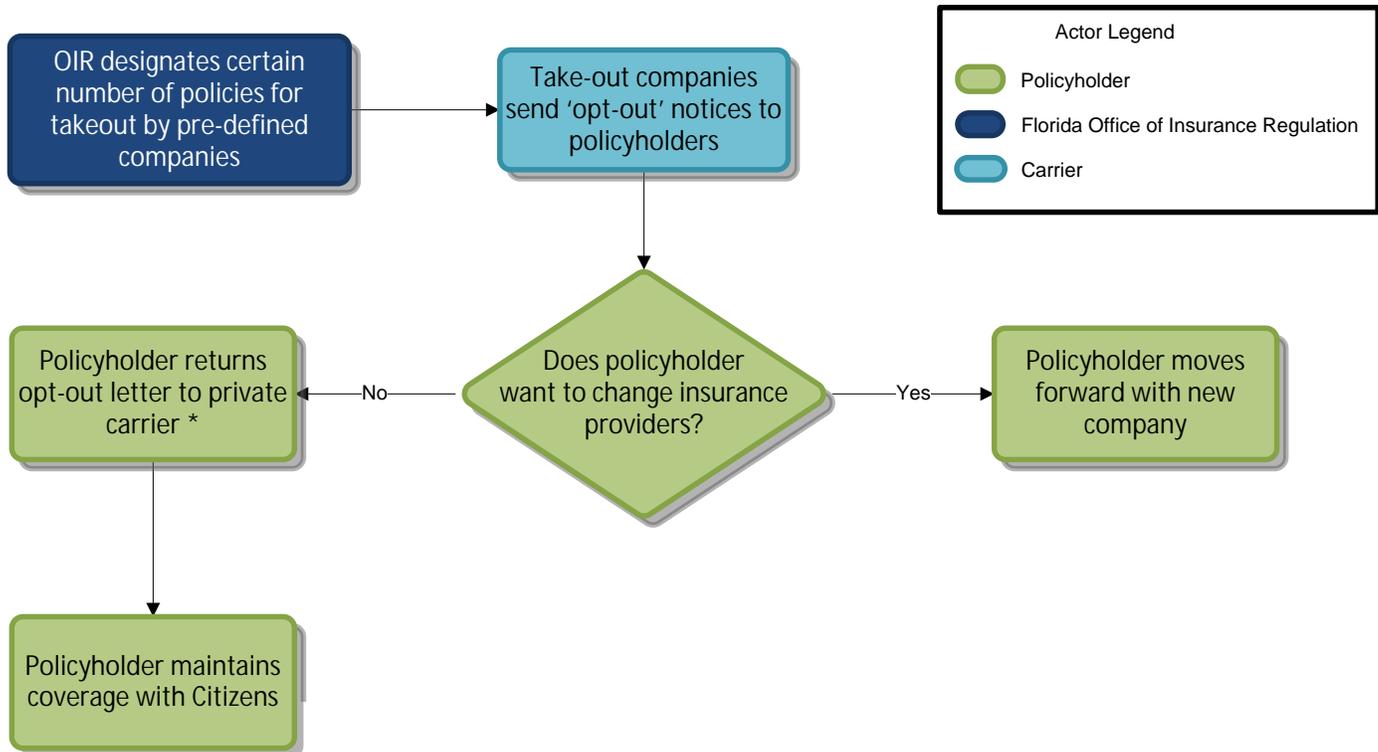
Citizens was able to reduce their policy count in October 2012 by 150,000 when they entered into reinsurance loss portfolio transfers, which are reinsurance contracts where the private company takes over full responsibility for all losses under a pre-defined block of policies. The following is an excerpt from the 2012 Legislative and External Affairs Committee Report that contains more details on this process and the potential applicability to TWIA:

*"Under the contract, the private insurer also agrees to offer each of the policyholders a private market policy at their next TWIA policy renewal date. When first entering into the portfolio transfer agreement, Citizens transfers the unearned premium on the block of policies to the private insurer that has assumed the risk. Citizens does not charge the assuming insurer a ceding commission, an amount typically paid by an assuming insurer to cover the costs of producing and issuing the policies (including agents' commissions). Therefore, the financial incentive for an insurer to remove policies from Citizens in this fashion is that the insurer gets to instantly have a large portfolio of policies without having to pay for the initial costs of building the book of business. If private companies are permitted to take blocks of policies out of TWIA in this fashion, the Legislature could consider requiring them to write the policies for a minimum of five years;*

*a shorter period could be permitted if the Commissioner deems it necessary for the financial health of the insurer.”<sup>2</sup>*

Another Florida Citizens depopulation program, which has resulted in the take out of around 150,000 in 2013,<sup>3</sup> involves the following:

### Citizens Current (Pre-2013 Statute) depopulation process



The first step involves the OIR designating a certain number of policies for takeout by pre-defined companies via a Consent Order. To become an approved take-out company, a carrier or their MGA must submit an application that contains information including: the proposed number of take-out policies, information about those policies, the company’s underwriting criteria, a schedule for assumption, and solvency information such as reinsurance, financial projections, and catastrophe models.

To maintain existing agency involvement in the take-out policies, take-out carriers or their MGAs execute Limited Servicing Agreements. This typically establishes a legal relationship to allow the agencies to continue servicing the policies that are being taken out without granting them binding authority. Until the policies renew, the servicing agencies are also able to continue using the same policy administration system that is operated by Florida Citizens.

<sup>2</sup> <http://www.twia.org/Portals/0/Documents/TWIA%20Biennial%20Report%20December%202012.pdf>

<sup>3</sup> <https://www.citizensfla.com/about/depopinfo.cfm?type=stats&show=pdf&link=/shared/depop/documents/2013.pdf>

\* Note that in this context, opting-out pertains to opting out of changing carriers, not opting out of the entire process altogether.

Once a policy renews, it will be administered by the takeout company. The terms of the Limited Service Agreement crafted by each take-out company dictates the extent of the ownership that each servicing agency has on expirations.

One of the main features of this process is that the choice of insurance provider, whether it's through Citizens or a private carrier, remains with the policyholder. There are several prevalent decision points for insured to evaluate when making the choice to switch, including but not limited to:

- Rates and Coverage – full policy rate and coverage comparison including wind coverage
- Customer Service / Familiarity
- Convenience

These efforts historically depopulated approximately 60% of the policies that were approved for removal. Given the large number of the existing policies in force, the accompanying liability, and a continued increase of over 8,000 new policies a week, this effort alone was not enough and citizens moved to create a clearinghouse.<sup>4</sup>

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## DEPOPULATION AFTER THE 2013 LEGISLATIVE SESSION

During Florida's 2013 legislative session, a statute implementing an electronic policy clearinghouse was passed. The statute builds upon and in some cases modifies the existing depopulation program as follows:

- Ø The new clearinghouse provides a single data-entry mechanism from the agent and facilitates multiple-quotes from participating carriers.
- Ø Policyholder's choices are more limited: policyholders aren't eligible to renew their policy with Florida Citizens if they receive a comparable private-market offer with a premium that is equal to or less than their renewal premium, effective July 1, 2013.
- Ø The clearinghouse is scheduled for implementation in 2014. Before it is implemented, policyholders and their agents are encouraged to identify potential private-market carriers and place policies with them where possible.
- Ø Once the clearinghouse launches, agents will attempt to match policyholders with private-market coverage when it's available.
- Ø Agents whose customers receive an offer of coverage through the clearinghouse must be offered either a standard appointment or limited service agreement by those participating insurers that make an offer of coverage.
- Ø Carriers can customize the criteria and request quotes containing specific risk characteristics that they're interested in, ex: those that are limited to specific counties or zip codes.

Florida Citizens signed a \$44.9 Million, 10-year contract with Bolt systems for the initial clearinghouse implementation and ongoing integrations with carriers. The implementation is customized for each participating carrier based on their current system capabilities. Each carrier completes an insurer readiness questionnaire that contains an analytical way to rate carriers, including metrics that Citizens and Bolt use to determine the order in which carriers should be approached for implementation. They expect to reduce their policies in force from 1.2M to 850,000 policies in the first 12-18 months of the release.<sup>5</sup>

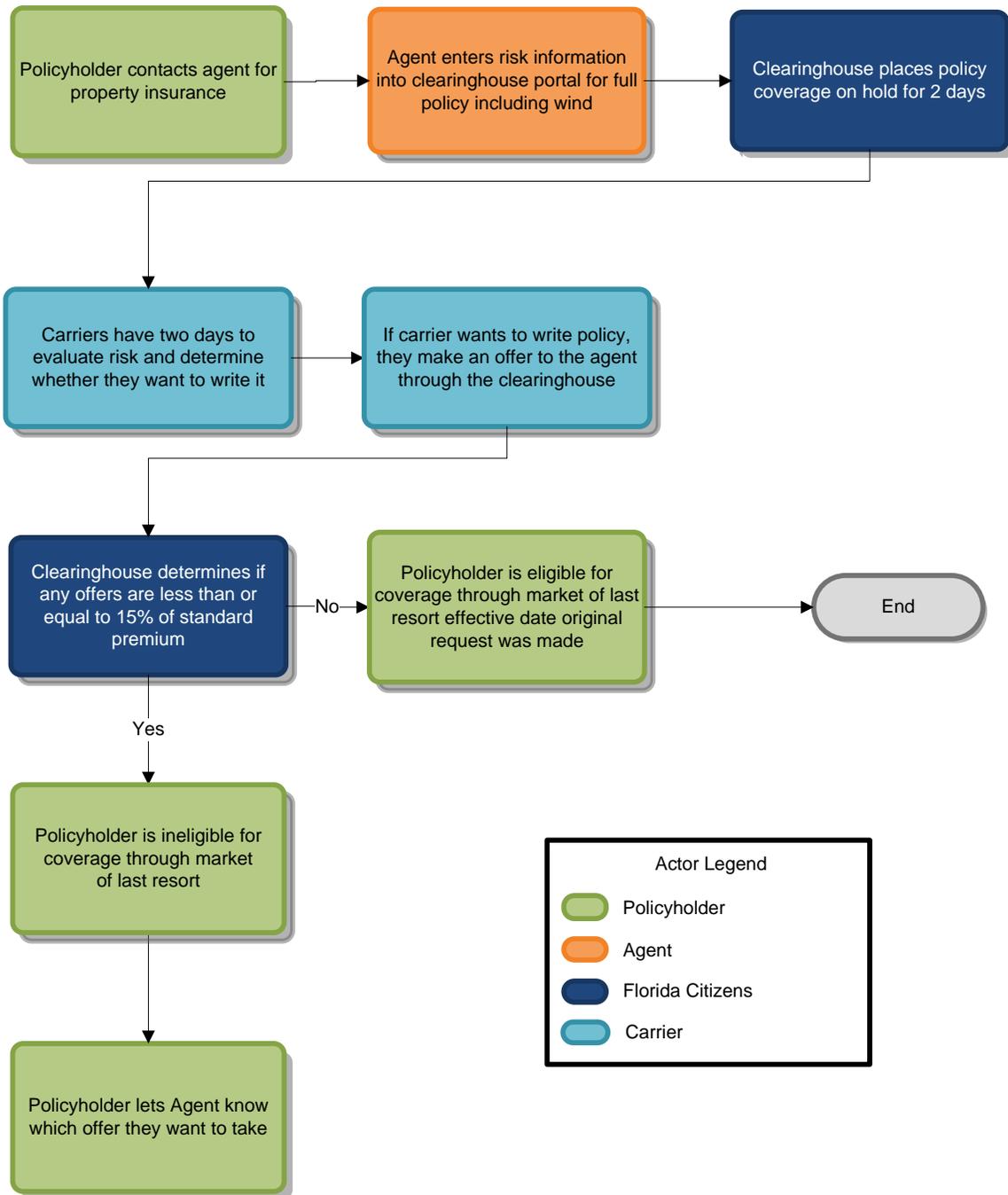
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4 <https://www.citizensfla.com/about/depoinfo.cfm>

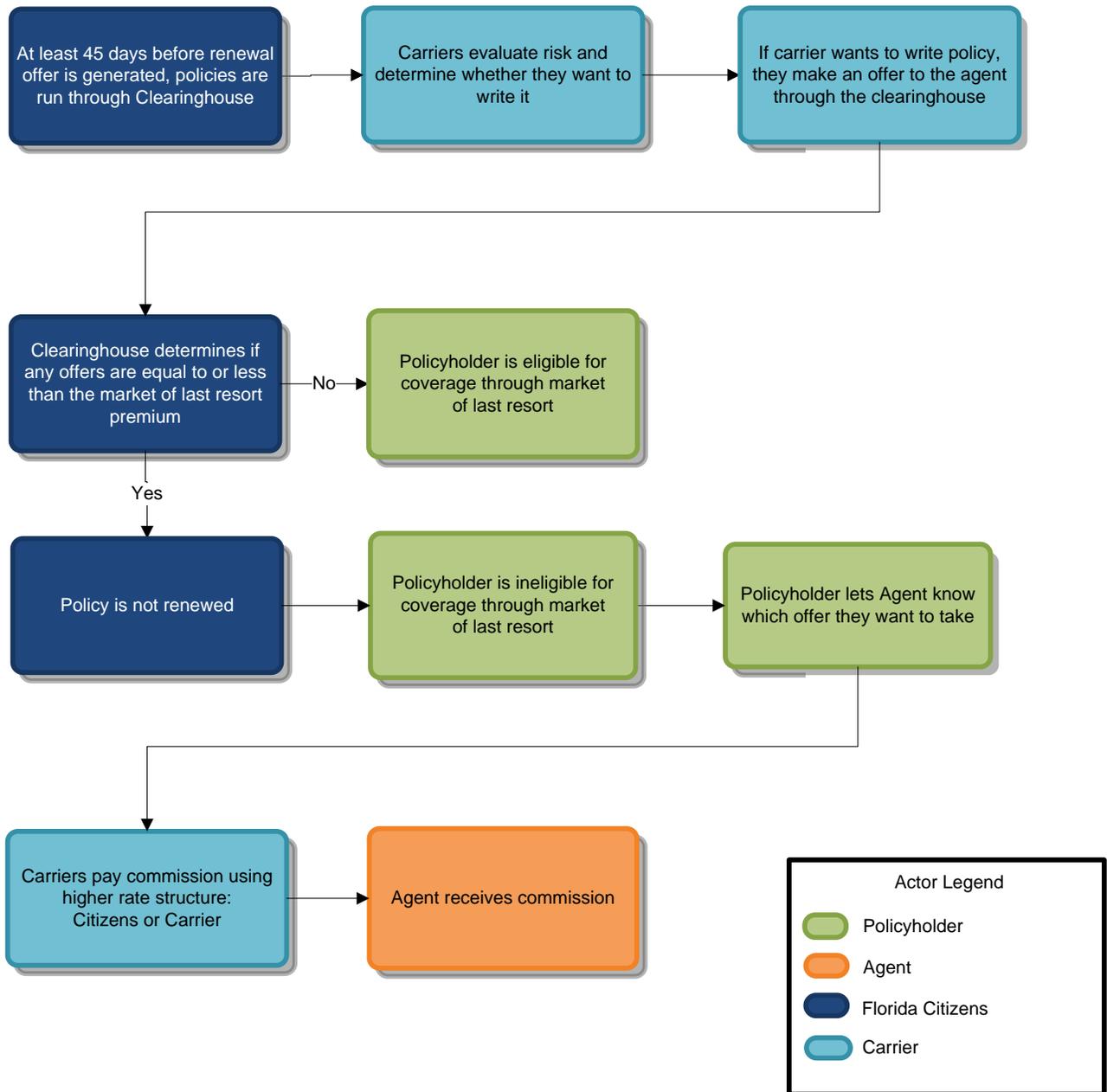
5 [https://www.citizensfla.com/about/mDetails\\_boardmtgs.cfm?show=PDF&link=/bnc\\_meet/docs/499/05A\\_Consumer\\_Clearinghouse\\_Exec\\_Summary.pdf&event=499&when=Past](https://www.citizensfla.com/about/mDetails_boardmtgs.cfm?show=PDF&link=/bnc_meet/docs/499/05A_Consumer_Clearinghouse_Exec_Summary.pdf&event=499&when=Past)

High-level new and renewal business processes are as follows:

## New Business



# Renewal Business



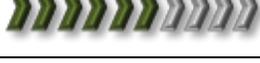
FEASIBILITY

AT A GLANCE

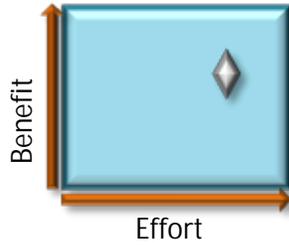
**Pre-2013 Legislative Session**

The feasibility, cost and impact of implementing something similar to Florida’s pre-2013 legislation process is comparable to that of the policy-in-force list.

**Post-2013 Legislative Session**

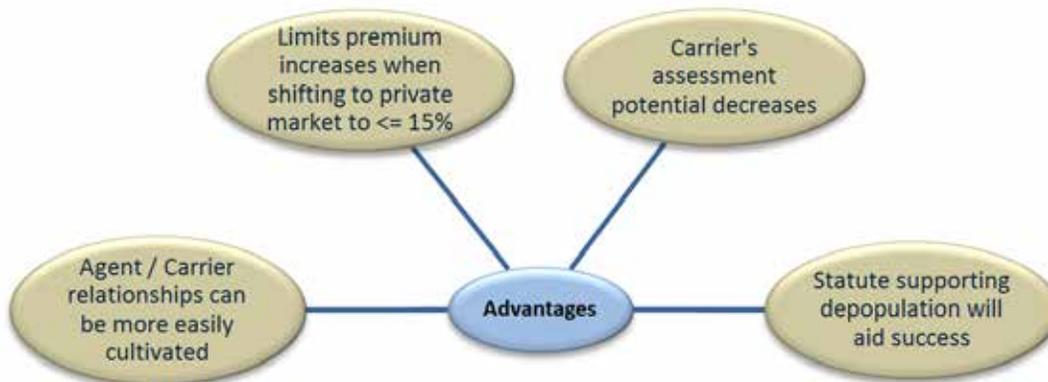
Legislative Change(s) Required?	✓
Plan of Operations Change(s) Required?	✓
TDI Rules Change(s) Required?	✓
TWIA Underwriting Guidelines Change(s) Required?	✓
Projected Carrier/Agent Participation	
Implementation Time (Estimated # Quarters)	 4 Quarters
Proposed Implementation Start	Must be defined by legislation
Projected Policyholder Participation	
Implementation Complexity	
Implementation Cost	
Stakeholder Impact	 
Policy in Force Impact	
Impact to Loss Exposure	

# Impact Summary



## POTENTIAL ADVANTAGES

Advantages to implementing something similar to Florida's clearinghouse model at TWIA are as follows:



## POTENTIAL DISADVANTAGES

Disadvantages to implementing something similar to Florida's clearinghouse model at TWIA are as follows:



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## SUCCESS FACTORS

There are several key success factors or components of the Florida model that differ from TWIA's business model and therefore limits the ability for TWIA to adapt this process to the letter, including:

- Ø Florida statute states that the insured is ineligible for coverage through Citizens if there is comparable coverage available with a premium that is not more than 15% higher. Essentially, the policyholder is not allowed to opt-out of the process. There is no such statute in Texas.
- Ø Differences in the coverage written: a key part of this process involves comparing a complete policy premium from the standard market with a complete policy premium from the private market. This is much more straightforward process for Florida Citizens because:
  - a) As previously mentioned, Florida writes the whole homeowners policy so they already have the characteristics of the property and the full property premium available, whereas TWIA does not.
    - The whole policy is being depopulated from Florida's book, not just the wind portion.
  - b) Similarly, since TWIA writes only the wind, there is an additional challenge to either:
    - Place or find wind-only coverage, or
    - Aid take-out carriers, agents, and consumers in the evaluation and comparison process because TWIA does not have all of the information necessary to write a homeowners policy on file. For example, TWIA doesn't collect information on fire hydrants, fire districts, or stilts/breakaway walls. Carriers will need this information as early as possible in the take-out process to ensure that they would cover the entire risk and that they can provide an accurate premium for the risk.

## OTHER STATES – LOUISIANA

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### OVERVIEW

Louisiana Citizens Property Insurance Corporation, like Florida Citizens, has an active depopulation program that is supported by state statute. They have a formal, posted depopulation plan and have developed an electronic portal to help facilitate their depopulation process. One of the key success components of the Louisiana depopulation plan that allows private market companies to compete with Louisiana Citizens is their rate structure, which is governed by statute and is specifically designed to maintain higher than market rates. Louisiana credits the success of their depopulation effort partially to their commission rates, which are currently 10% for both new business and renewals.

Some additional characteristics of the Louisiana depopulation plan are:

- Ø All policies must be offered up for take-out at least once a year
- Ø Agents maintain the exclusive use of expirations – no policy can be assumed by a take-out company without the authorization of the agent of record
- Ø Insurers must apply to be take-out companies (this is similar to Florida's process). One procedural difference in the application process is that Florida's approvals are carried out by the OIR and Louisiana's are carried out by the Citizen's Board of Directors.
- Ø According to Louisiana statute, guidelines that takeout carriers must meet include:

- ü Capacity to absorb policies and concentration of risk of those policies, must have at least B+ rating with AM Best, or equivalent
- ü Rates must have been approved by Louisiana Department of Insurance
- ü Rates must comply with R.S. 22:2303 during first year (see [Louisiana Statute Text](#) in appendix for more details)
- ü For second and subsequent years, rates can't be higher than those in R.S. 22:2303
- Ø Louisiana Citizens reaches out to companies and aggressively pursues their participation in these take-out programs
- Ø Take-out companies sign confidentiality agreements before initiating the takeout process, which:
  - ü Protect the insured's information and ensure that it's not used for any other purpose
  - ü Ensure that take-out companies don't contact policyholders without written consent of agent of record
- Ø Take-out companies request assumption of desired groups of policies through a portal and the Agent either authorizes the assumption or doesn't
- Ø Any policyholder wishing to 'opt out' of the assumption and remain with Louisiana Citizens can do so within 60 days of the assumption date. The agent completes and sign the Request to Continue Coverage Form available on our website to effect a policyholder opt out.

Louisiana Citizens reduced its policy count by approximately 43% over a five-year period (from 174,000 to 74, 539) through the depopulation program summarized above.<sup>6</sup> The majority of Louisiana Citizens' depopulation efforts have been for entire homeowners policies, not wind-only. This changed last year when they successfully reached agreements with 4 companies that are interested in writing the wind only policies in addition to the standard policies. Since the addition of the wind-only takeout process, Louisiana Citizens was able to reduce their wind-only policy count by 4900.

The four companies who participated in last year's takeout are:

- Access Home insurance funded by Access Re
- Centauri Specialty
- Lighthouse
- Maison

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<sup>6</sup> Louisiana Citizens Releases Nearly 7K Homeowners Policies. *Insurance Journal*, November 20, 2012.



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## POTENTIAL ADVANTAGES

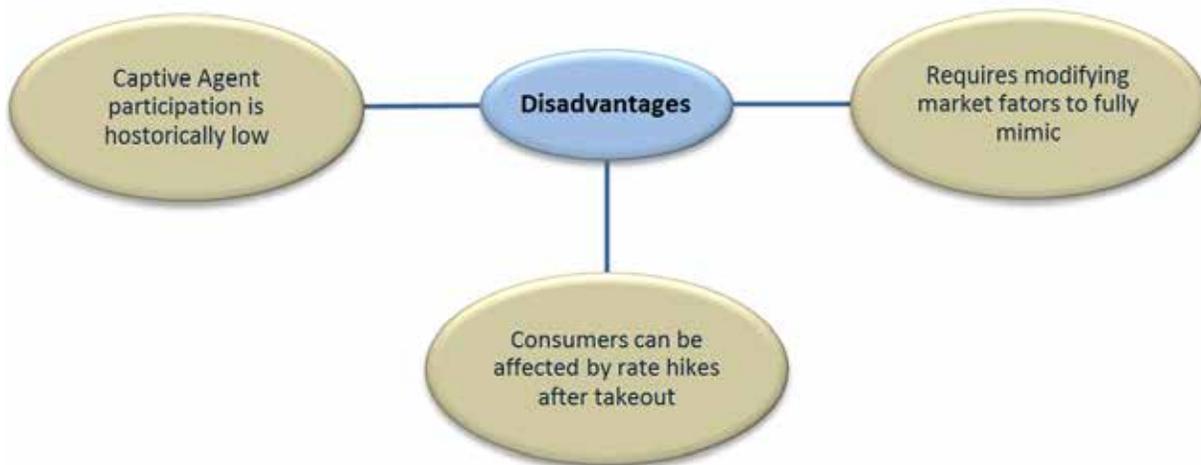
Advantages to implementing something similar to Louisiana's depopulation portal at TWIA are as follows:



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## POTENTIAL DISADVANTAGES

Disadvantages to implementing something similar to Louisiana's depopulation portal at TWIA are as follows:

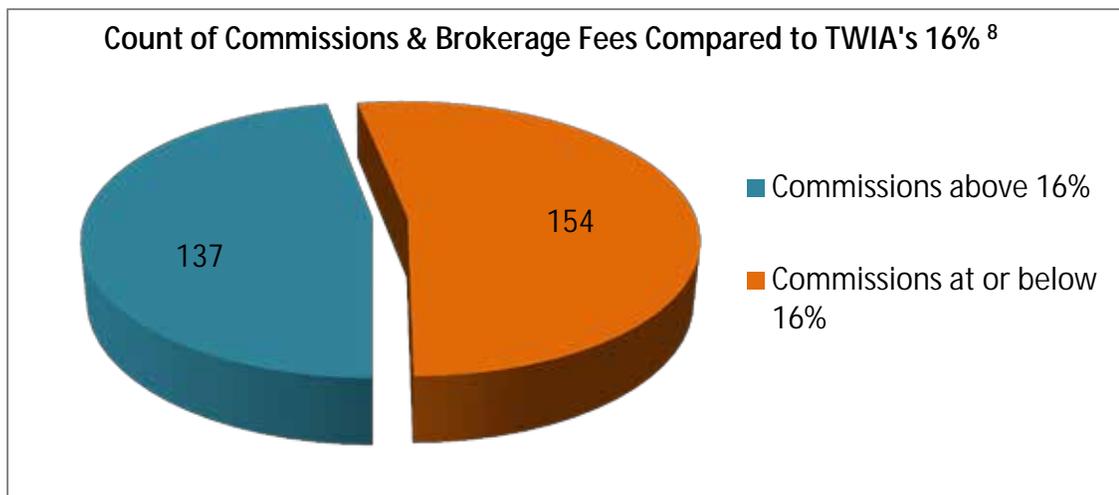
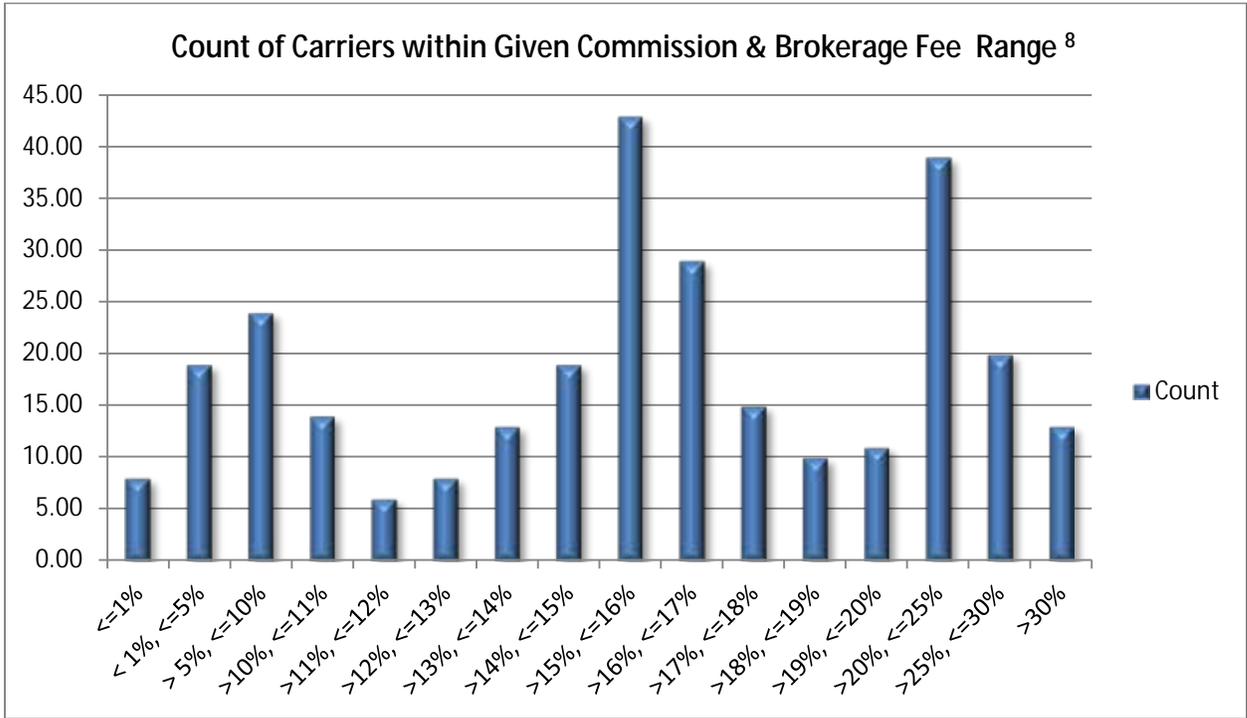


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## SUCCESS FACTORS

- Ø Rate hikes and problems in the takeout process can occur, so we would need to include a capability to take back policies in the event situations like these arise.
- Ø As previously mentioned, Louisiana's statute ensures that Citizen's premiums are high in order to make the environment more conducive to depopulation.

Ø Louisiana Citizens credits the success of their depopulation efforts partially to their commission rates, which are currently 10%. To determine the potential impact that commissions could have on TWIA's depopulation efforts, TWIA's commission rate of 16% was compared with other homeowners and allied lines carriers in Texas using data from TDI, see below.<sup>7</sup> One potential conclusion is that the count of carriers with commissions higher than TWIA is not materially different those with commissions lower than TWIA. This is likely not an accurate statement because the data does not contain retail commissions only.<sup>8</sup> When it is determined that a more accurate analysis is needed, the 'Commission Only' data should be gathered from individual companies and similarly analyzed.



<sup>7</sup> <http://www.tdi.texas.gov/reports/report4.html#page15>

<sup>8</sup> The available commission data contains both commissions and brokerage fees, so it does not differentiate between the rates that are being paid to MGAs and the rates that are being paid to retail agents, which could differ substantially. Since this data does not contain commissions for retail agents alone, the conclusion and resulting impact on expected participation is most likely skewed.

## OVERVIEW

Several recent pieces of proposed legislation have included some form of a risk reduction plan, depopulation effort, or TWIA policy clearinghouse. Such bills include SB1089, SB1700, SB18, and HB2352. The scope and breadth of each of these bills varies, so this section is intended to focus on unique ideas in a depopulation context, including:

- Creating an electronic portal or clearinghouse for the voluntary market, which includes details of the TWIA policy and other policies, including the FAIR policy (if applicable)
  - One approach prohibited renewal with TWIA if comparable coverage is offered within 110% and explicitly protected the agent's ownership of expirations. This approach is the similar to Florida's post-2013 approach.
  - Another approach stated that participation should be voluntary and did not explicitly protect the agent's ownership of expirations
  - Either approach would require legislative changes to implement because TWIA does not have the ability to require and publish information like premiums and coverage on policies written by other carriers
- Reinsurance programs where insurers write the risk and process claims but cede a portion of the risk to TWIA and TWIA pays a proportionate amount of the claim. This approach was also included in the Alvarez & Marsal Report. (p. 48)
- Mandatory insurer participation in a risk assignment program (with some exceptions) based on a pre-determined risk-adjusted exposure

The evaluation for the above topics does not call out advantages and disadvantages in a separate section, but does include them in the success factors sections. As with other depopulation methods, these are not mutually exclusive, but are considered in isolation for the purpose of an objective evaluation on the following pages.

The following components are aimed more at funding TWIA rather than depopulation, but they can also be considered incentives for participation in a depopulation program. In general, a decrease in TWIA's exposure will result in the decreased need for these types of assessments:

- Pre-event and/or post-event member agency assessments
- Pre-event and/or post-event premium surcharges for most dwelling, contents, and automobile policies on policyholders residing in first-tier coastal areas
- Creation of an exposure reduction plan with accompanying member assessments

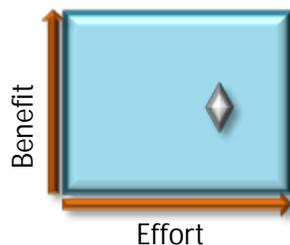
FEASIBILITY

ELECTRONIC PORTAL / CLEARINGHOUSE

AT A GLANCE

Legislative Change(s) Required?	✓
Plan of Operations Change(s) Required?	✓
TDI Rules Change(s) Required?	✓
TWIA Underwriting Guidelines Change(s) Required?	✓
Projected Carrier/Agent Participation	
Implementation Time (Estimated # Quarters)	 4 Quarters
Proposed Implementation Start	Could be implemented at any time
Projected Policyholder Participation	
Implementation Complexity	
Implementation Cost	
Stakeholder Impact	 
Policy in Force Impact	
Impact to Loss Exposure	

Impact Summary



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## SUCCESS FACTORS

Most of the factors for an electronic portal / clearinghouse are detailed or discussed in other sections of the report, and include:

- Ø Making the full policy information available online to interested carriers was included in proposed legislation from the last session. Since TWIA doesn't have all information necessary for carriers to accurately quote a full homeowners policy, some considerations on how best to facilitate this process in the future should be made.
  - Collecting and distributing this information will incur additional costs, but having the information will help the overall takeout process, so the benefits could offset the costs
- Ø Requiring 'take-out' if comparable coverage is available, as contemplated in the last legislative session, is not within TWIA's purview at this time. There are differing opinions as to whether or not this should be a component of a clearinghouse. TWIA does not have an adequate understanding of the costs and benefits of this component and its alternatives in order to take a position at this time.

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## AGENT OWNERSHIP OF EXPIRATIONS DURING SEARCH FOR ALTERNATE COVERAGE

This is not a depopulation or clearinghouse approach, but could be a potential component of a clearinghouse.

### AT A GLANCE

Legislative Change(s) Required?	✓
Plan of Operations Change(s) Required?	✓
TDI Rules Change(s) Required?	✓
TWIA Underwriting Guidelines Change(s) Required?	✓

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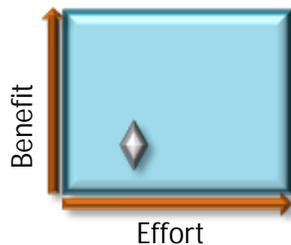
## SUCCESS FACTORS

- Ø For any take-out process to work that ensures that the current agent maintains ownership of the expiration, the agent will need the ability to work with the take-out carrier either directly or through a Limited Service Agreement.
- Ø If the agent is not able to work with a particular take-out carrier, specifically in the event that they're a captive agent, the majority of the policies with those carriers will not be taken out unless their associated carrier is the one taking out the business. Participation of those captive companies in the take-out program should be pursued.

**AT A GLANCE**

Legislative Change(s) Required?	X	
Plan of Operations Change(s) Required?	X	
TDI Rules Change(s) Required?	X	
TWIA Underwriting Guidelines Change(s) Required?	X	
Projected Carrier/Agent Participation		
Implementation Time (Estimated # Quarters)	2 Quarters	
Proposed Implementation Start	Could be implemented at any time	
Projected Policyholder Participation	X	
Implementation Complexity		
Implementation Cost		
Stakeholder Impact		
Policy in Force Impact		
Impact to Loss Exposure		

**Impact Summary**



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## SUCCESS FACTORS

- Ø This approach could encourage more carriers to write on the coast and increase insured's choice overall
- Ø This approach could increase the number of carriers ceding business to TWIA, and therefore negatively affect TWIA's funding capacity.
- Ø One of the biggest risks with this solution is that TWIA will become a credit risk for the carriers, because this approach does not improve TWIA's strained funding capacity. This should be carefully evaluated for mitigating factors when considering this alternative in the future.
- Ø TWIA is liable to pay claims that are processed and settled by many different companies with varying processes and procedures. In addition, the carriers are not protected under HB3, so TWIA will not have the financial protection from claim-related costs and potential liability from lawsuits that HB3 provides under this approach. This also should be carefully evaluated for mitigating factors and potential impacts when considering this approach in the future.
- Ø Each carrier has their own underwriting criteria, which differ from TWIA's. TWIA should set reinsurance rates for this adjusted level of risk.



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## SUCCESS FACTORS

- Ø One success factor is to mitigate potential negative impacts to the homeowner's insurance market in other parts of the state. One source posits that capital to support these new policies could be withdrawn from existing policies, and this would result in non-renewal.<sup>9</sup>
- Ø Risks should not be placed with companies unless they have the capital to support them

## OTHER SUPPORTING MEASURES

As discussed previously, there are multiple different facets that could be employed to support a book of business depopulation effort and improve TWIA's overall funding capacity. One method would be to utilize carriers as reinsurance facilities. This doesn't reduce the total policy count, but could reduce TWIA's overall exposure and help spread the risk. Other methods include modifying premium assessment credits and adjusting premiums. Other options could include reducing coverage amounts, not writing non-essential coverages, increasing stringency of underwriting guidelines, increasing the number of private market declinations required, or rendering a policyholder ineligible for coverage in the residual market if they've received any comparable policy offer.

For the purposes of this analysis, we are focusing closely on utilizing carriers as reinsurance facilities, modifying the assessment formula, and implementing more actuarially sound rates.

## CARRIERS AS REINSURANCE FACILITIES

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### OVERVIEW

To enable carriers to perform as reinsurance facilities, TWIA would need to make a list like the one outlined in the 'Policies in Force List' section available, and the process would need to be altered as follows:

- Carriers would contact us directly if they are interested in taking on a group of risks – they would never need to contact the insured or the agent.
- To mitigate credit risks that could be presented by certain carriers, we would need to establish some eligibility screening criteria.

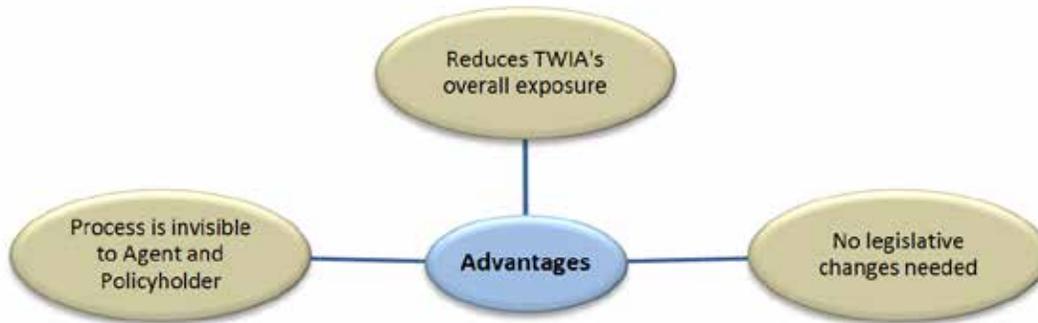
Assumption for the follow analysis is that TWIA would cede 100% of the loss, but there are different potential levels at which the loss risk can be ceded.

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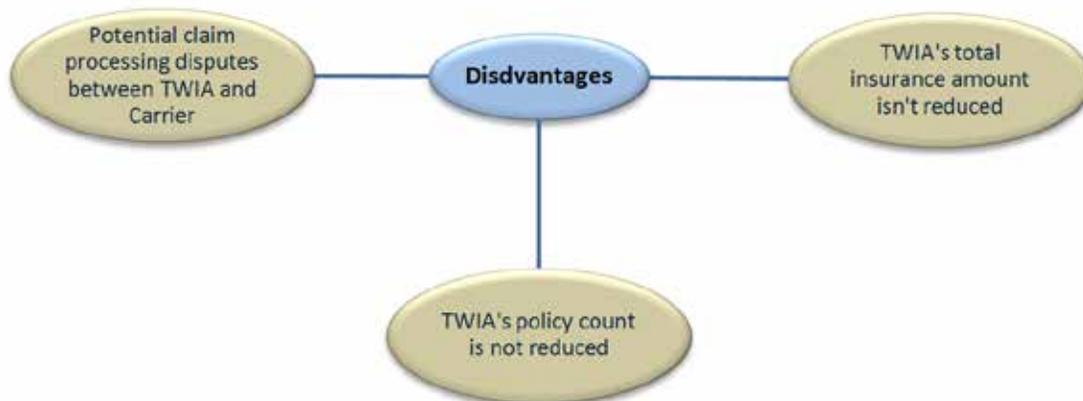
<sup>9</sup> [http://www.iii-insurancematters.org/white\\_papers/residual-markets.html](http://www.iii-insurancematters.org/white_papers/residual-markets.html)



## POTENTIAL ADVANTAGES



## POTENTIAL DISADVANTAGES



## SUCCESS FACTORS

- Ø TWIA's premiums must be sufficient so that carriers are not placed in an actuarially unsound position
- Ø An administrative charge should be assessed per policy, and checks for the remaining premium amount should be cut for carriers by TWIA. The charge must cover commissions and could be extended to cover adjuster expenses. Last year, TWIA spent 22.6% of premium to cover commissions, taxes, and general administrative expenses, so an estimated 25% of premium could be kept as an administrative charge.
- Ø TWIA should screen carriers for creditworthiness, develop and execute master agreements with approved carriers, maintain a policy list for each agreement
- Ø Master Agreement should include verbiage about carrier's acceptance of TWIA's claims resolution process and a formal process for disputes.

### OVERVIEW

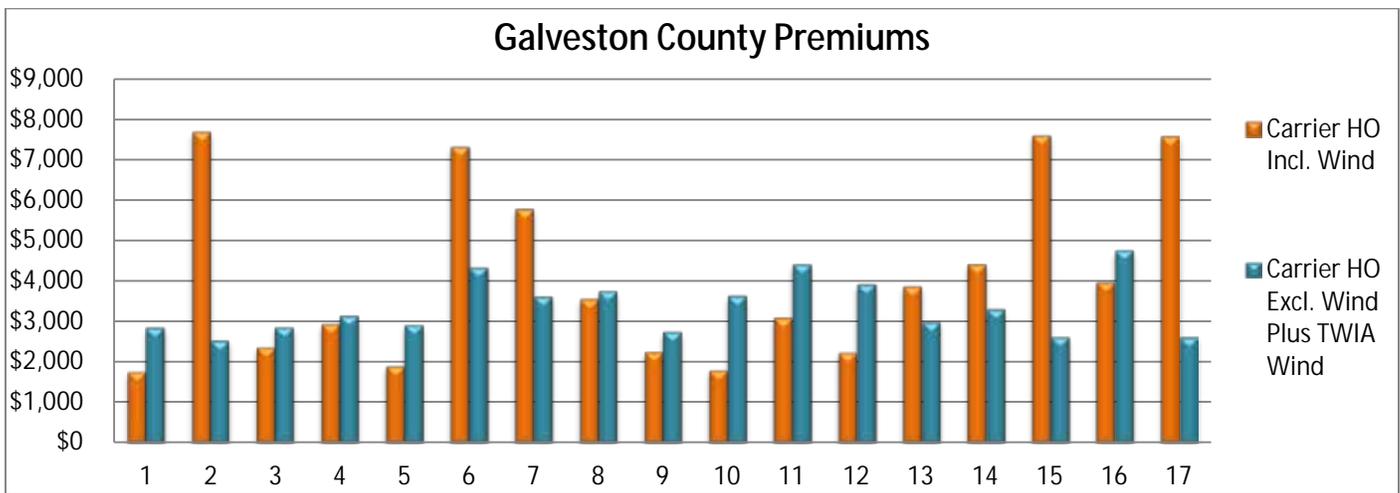
Dollar-for-dollar premium credits are currently provided to carriers writing wind voluntarily on the coast for repayment assessments of post-event, class 2 and class 3 bonds. Modifying the assessment formula to provide greater credits to companies that write more exposed risks entails revising the existing formula. The current assessment formula is based on a carrier's statewide market share ratio, and then subtracts credits for writing voluntarily on the coast. The credits are equal to every dollar of premium voluntarily written. A potential modification for the purposes of this illustration would be to increase the credit to \$2 for every \$1 of premium written voluntarily for risks that are closer to the coast. Another component of the formula could be to decrease the credit to \$0.50 for every \$1 of premium written on risks that are farther away from the coast. The formula could also potentially have a minimum participation threshold that must be met before providing any assessment credits.



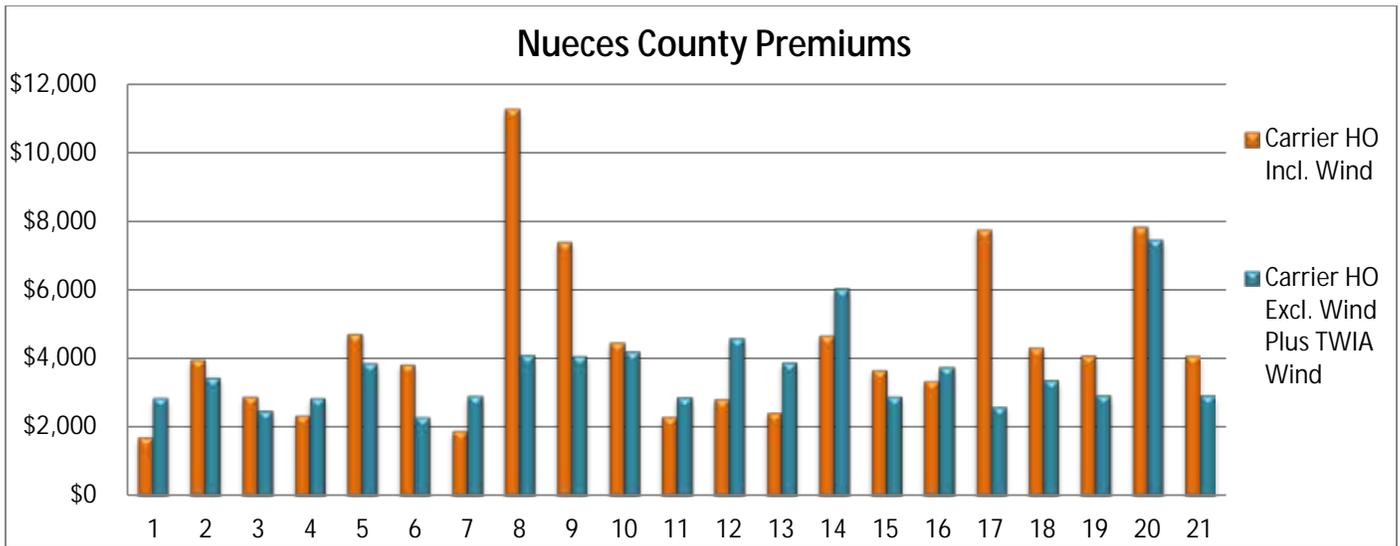
## MORE ACTUARIALLY SOUND RATES

### OVERVIEW

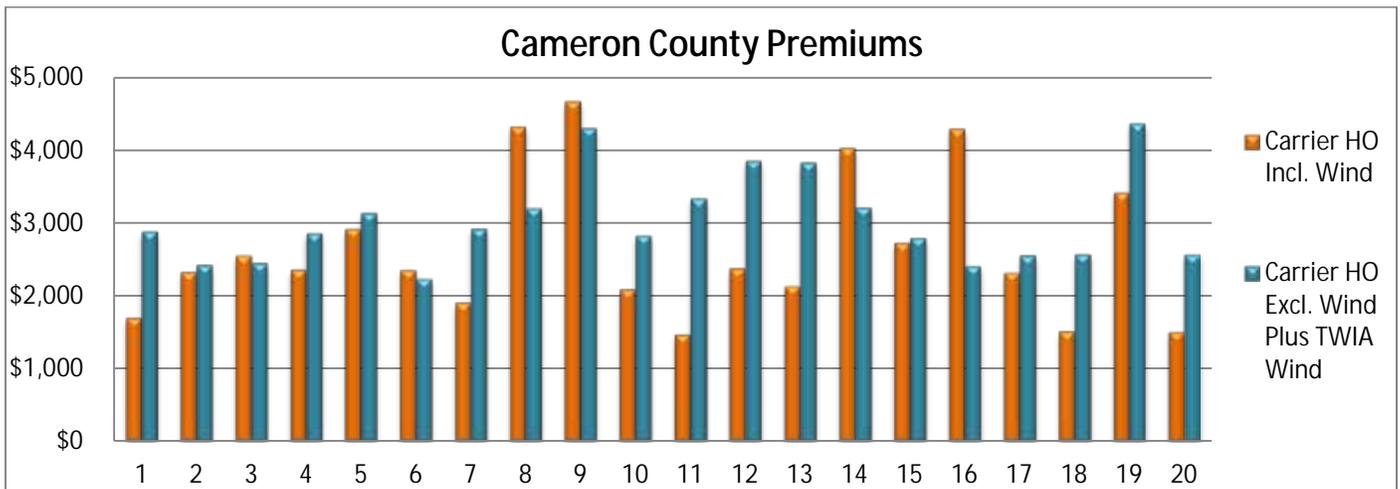
Implementing more actuarially sound TWIA rates would entail raising TWIA's rates. TWIA's rates are approximately 30% under what is actuarially sound for the types of risks on the book of business. TWIA is not advocating for a 30% increase in rates, rather, we are recommending a gradual increase over a multiple-year period in order to reduce the burden on policyholders and allow time for other depopulation methods to take effect. This is consistent with the Board's current strategy. The below analysis revisits a portion of the [previous premium comparison](#) but with modified data for 'Carrier HO Excl. Wind Plus TWIA Wind' to illustrate the impact that the gradual change would have when fully realized over the appropriate period as determined by the board. The conclusion is that such an increase would increase the ability for carriers to provide comparable coverage to that which TWIA provides.



Galveston County Summary: With 30% increase, the count of premiums competitive with TWIA is 10. This number would be 7 without such an increase. This increases comparable options for policyholder by about 30%.



Nueces County Summary: With a 30% increase, the count of premiums competitive with TWIA is 8. This number would be 7 without such an increase. This increases comparable options for policyholder by about 15%.



Cameron County Summary: With 30% increase, the count of premiums competitive with TWIA is 14. This number would be 10 without such an increase. This increases comparable options for policyholder by about 40%.



APPENDICES

SAMPLE TWIA POLICY LIST

**TWIA Policy Expiration List**  
01/01/2014 - 01/31/2014

Policy Expiration Date	Policy ID	Policy Holder Name	Mailing Address	Item #	Item Description	Premium	Structure Coverage Amount	Contents Coverage Amount	Deductible	Coinsurance	Construction Type	Roof Type	Total Area	Stories	Risk Location Address	City
1/9/2014	48171706	Policy Holder 1	123 Main St. Galveston, TX	1	Personal Property	\$651.00	\$200,000	\$10,000	1%	80	brick	Cedar Shingle	NULL	10	123 Sea Avenue	Brownsv
1/11/2014	21857117	Policy Holder 2	123 Main St. Galveston, TX	1	Building	\$430.00	\$54,000	\$20,000	\$25	80	WR	Composition	1700	1	124 Sea Avenue	South Padre
1/12/2014	28381812	Policy Holder 3	123 Main St. Galveston, TX	1	Building	\$12.00	---	\$30,000	\$25	80	WR	Composition	1700	1	125 Sea Avenue	South Padre
1/13/2014	32654510	Policy Holder 4	123 Main St. Galveston, TX	1	Building	\$711.00	\$45,000	\$10,000	\$25	80	BV	Composition	1700	1	126 Sea Avenue	Brownsv
1/14/2014	32670410	Policy Holder 5	123 Main St. Galveston, TX	1	Building	\$355.00	\$40,300	\$20,000	1%	N/A	FRAME	Composition	1234	2	127 Sea Avenue	Brownsv
1/15/2014	48032406	Policy Holder 6	123 Main St. Galveston, TX	1	NULL	\$450.00	\$20,000	\$30,000	1%	N/A	FRAME	Composition	3256	1	128 Sea Avenue	Laguna Vista
1/16/2014	40760706	Policy Holder 7	123 Main St. Galveston, TX	1	Building	\$109.00	\$164,450	\$20,000	\$25	80	BV	Composition	1760	1	129 Sea Avenue	Port Lavaca
1/17/2014	48785006	Policy Holder 8	123 Main St. Galveston, TX	1	Business Personal Property	\$485.00	\$73,750	\$20,000	1%	80	BV	Metal	3500	1	130 Sea Avenue	Brownsv
1/18/2014	64809404	Policy Holder 9	123 Main St. Galveston, TX	1	Building	\$385.00	\$32,853	\$30,000	1%	80	VINYL	Composition	1760	1	131 Sea Avenue	Port Lavaca
1/19/2014	64855004	Policy Holder 10	123 Main St. Galveston, TX	1	Personal Property	\$530.00	\$50,000	\$10,000	1%	80	brick	COMPOSITION	NULL	6	132 Sea Avenue	Sweeny
1/21/2014	64862504	Policy Holder 11	123 Main St. Galveston, TX	1	Building	\$708.00	\$145,000	---	1%	80	BV	Tar and Gravel	1600	1	133 Sea Avenue	Lake Jackson
1/31/2014	74713702	Policy Holder 12	123 Main St. Galveston, TX 77777	1	Building	\$1,980.00	\$233,383	\$30,000	530	80	BV	Composition	400	1	134 Sea Avenue	Pearland
1/18/2014	75105502	Policy Holder 13	123 Main St. Galveston, TX	1	Building	\$377.00	\$107,280	\$30,000	530	80	BV	Composition	1528	1	135 Sea Avenue	Brownsv
1/19/2014	80512201	Policy Holder 14	123 Main St. Galveston, TX	1	Building	\$576.00	\$40,000	\$10,000	\$25	80	WR	Composition	990	1	136 Sea Avenue	South Padre
1/14/2014	80533301	Policy Holder 15	123 Main St. Galveston, TX	1	Building	\$463.00	\$137,500	\$10,000	530	80	bv	Composition	400	1	137 Sea Avenue	Angleton
1/20/2014	85672000	Policy Holder 16	123 Main St. Galveston, TX 77777	1	Building	\$136.00	\$151,200	---	\$25	80	bv	Concrete	506	1	138 Sea Avenue	Brownsv
1/5/2014	85686200	Policy Holder 17	123 Main St. Galveston, TX	1	Personal Property	\$1,289.00	\$231,000	\$20,000	1%	80	FRAME	Composition	1714	1	139 Sea Avenue	Freeport
1/21/2014	85687500	Policy Holder 18	123 Main St. Galveston, TX	1	Building	\$241.00	\$115,200	\$30,000	\$25	80	BV	Composition	1077	1	140 Sea Avenue	Brownsv
1/6/2014	85689000	Policy Holder 19	123 Main St. Galveston, TX	1	Building	\$426.00	\$140,300	\$30,000	\$10	80	FRAME	Composition	1525	2	141 Sea Avenue	Freeport
1/22/2014	85694700	Policy Holder 20	123 Main St. Galveston, TX	1	Building	\$469.00	---	\$10,000	\$10	80	WR	Composition	1247	1	142 Sea Avenue	South Padre
1/7/2014	85837000	Policy Holder 21	123 Main St. Galveston, TX	1	Building	\$1,227.00	---	\$10,000	\$25	80	frame	Asphalt	2052	1	143 Sea Avenue	Freeport
1/23/2014	85740600	Policy Holder 22	123 Main St. Galveston, TX	1	Personal Property	\$145.00	\$200,813	\$20,000	1%	80	BV	Concrete	1484	6	144 Sea Avenue	Brownsv
1/10/2014	88138500	Policy Holder 23	123 Main St. Galveston, TX	1	Building	\$2.00	\$80,000	\$10,000	\$25	80	FRAME	Composition	1760	1	145 Sea Avenue	PORT OCCOCHOWEE
1/24/2014	88143900	Policy Holder 24	123 Main St. Galveston, TX	1	Building	\$1,136.00	\$180,000	\$30,000	1%	N/A	BV	Asbestos Shingle	1716	2	146 Sea Avenue	Brownsv

There are 35 rows of data in the sample report, so the above is for conceptual purposes only. The current list of available and proposed data points is below. Discussions with carriers and resources available to TWIA will determine whether any additional information, such as inspection results, photos, litigation history, loss history, clue information, and credit information, may be added at any time in order to increase the usefulness of the data.

Policy Expiration Date
Policy ID
Policy Holder Name
Mailing Address
Item #
Item Description
Premium
Structure Coverage Amount
Contents Coverage Amount
Deductible
Coinsurance
Construction Type
Roof Type
Total Area

Stories
Risk Location Address
City
County
Zip
Occupancy
Primary/Secondary
Replacement Cost
Cash Value
Companion Policy Type
Wind Driven Rain
Companion Policy Provider
Construction Date
Addition Date
Re-Roof Date
Re-Roof Description
Repair Date
Repair Reason
Increased Cost of Construction
Contents Replacement Cost
ACV Roof Endorsement
WPI-8 Waiver
Location of Risk
Building Code
Building Code Credit Type
Mortgage
Agent Name
Agent Phone Number
Agent Address

Additional Notes:

- A disclaimer should be included with the report indicating that all values, including policy status, could change at any time. Policies on the report could even be cancelled back to inception after the report is generated.
- Content of the list could be modified at any time based on stakeholder feedback
- This example shows policies with only one item. Policies with multiple items will be nested under a 'parent' location record.

TECHNICAL APPROACH FOR PORTAL ACCESS TO POLICY-IN-FORCE LIST

The fastest implementation as outlined in this report is to create an access database, manually generate a report on a regular basis, and manually upload it to a password-protected page on the TWIA website. Policyholder opt-outs should be manually recorded in the access database as well so they can be automatically excluded when the report is generated.

There are other more automated options that will take more time to implement, for example, we could automatically generate a policy in force list on a regular basis from the reporting system and automatically deliver it to a password-protected location. Some comments on this approach:

- Development for this solution couldn't begin until Q2 2014 at the earliest.

- Creating the report would take about a month.
- Enabling recording and automated exclusion of those who have opted out in both the legacy and new policy systems will add about 3 months to the implementation (with 4 dedicated resources).
- There are additional complexities with the more automated approach, including how to handle opt-outs on expiring policies in the old policy system when a new policy has already been generated in the new policy system. These types of complexities should be kept in mind when estimating a potential delivery date for this type of approach, if desired.
- At the earliest, a more automated solution might be available by the end of 2014, given the proper resource allocations.

## CANCELLATION POLICY

From the TAC Plan of Operation, Rule 5.4 section 3B:

- Insured needs to 'surrender the policy'
- Policy number and term of what would consist as duplicate coverage is required

From the TDI rules manual:

"A policy may be canceled at any time at the request of the insured or a premium financier by notifying the Association in writing of the date cancellation is to take effect. The Association will refund premium in accordance with §5.4905 of this subchapter (relating to Minimum Retained Premium) when the policy is returned to the Association. The refund will be pro rata of the amount in excess of the minimum retained premium under subsection (2) of this section in which case the Association shall upon demand and surrender of the policy refund the unearned premium on a pro-rata basis."

From the TWIA UW Guidelines manual:

"CANCELLATIONS:

When requesting a policy cancellation, state the reason for the cancellation and the requested effective date by using one of the following methods:

- The original policy. Scanned copy of original policy is not acceptable; an original policy must be mailed.
- A completed lost policy voucher, signed by the named insured with each signature witnessed.
- A request for T.W.I.A. to send a 14-day Notice of Cancellation.

When Coverage has been rewritten or there is duplicate coverage:

- When the T.W.I.A. policy is being cancelled due to the coverage being rewritten or due to duplicate coverage, a copy of the policy providing the duplicate coverage or the company name"

MARKET DATA FOR INSURANCE AMOUNT

Year	Policy Type	Territory	County	TWIA	Voluntary Market	Total Amount of Insurance	Windpool Percentage
2012	Residential	10	Kenedy	6,461,993	18,075,750	24,537,743	26.33%
2012	Residential	10	Refugio	79,425,744	216,514,594	295,940,338	26.84%
2012	Residential	10	Willacy	92,751,378	242,523,030	335,274,408	27.66%
2012	Residential	10	Kleberg	237,825,986	631,519,090	869,345,076	27.36%
2012	Residential	10	Calhoun	796,242,485	262,583,770	1,058,826,255	75.20%
2012	Residential	1	Harris	968,988,939	736,546,362	1,705,535,301	56.81%
2012	Residential	10	Matagorda	1,025,740,696	649,968,432	1,675,709,128	61.21%
2012	Residential	10	Chambers	1,642,610,994	1,008,623,960	2,651,234,954	61.96%
2012	Residential	10	Aransas San	1,812,477,476	442,533,398	2,255,010,874	80.38%
2012	Residential	10	Patricio	1,912,803,089	1,019,867,526	2,932,670,615	65.22%
2012	Residential	10	Cameron	3,048,057,049	6,483,702,032	9,531,759,081	31.98%
2012	Residential	10	Jefferson	7,631,805,149	5,034,489,812	12,666,294,961	60.25%
2012	Residential	9	Nueces	10,193,658,960	5,417,609,420	15,611,268,380	65.30%
2012	Residential	10	Brazoria	13,182,248,611	7,895,368,840	21,077,617,451	62.54%
2012	Residential	8	Galveston	18,884,619,114	5,531,627,240	24,416,246,354	77.34%
				61,515,717,663	35,591,553,256	97,107,270,919	63.35%

## POLICIES IN FORCE BY COUNTY

<b>County</b>	<b>Count</b>
Aransas	6,895
Brazoria	51,337
Calhoun	4,203
Cameron	17,723
Chambers	5,962
Galveston	72,260
Harris	3,805
Jefferson	37,455
Kenedy	25
Kleberg	1,323
Matagorda	5,386
Nueces	49,512
Refugio	415
San Patricio	8,591
Willacy	589
<b>Total</b>	<b>265,481</b>

## PREMIUM EVALUATION BY COUNTY

Criteria stated in section titled [‘Market Share and Premium Comparison for Selected Counties’](#). TWIA coverage for all scenarios except for Harris County is \$1,517. TWIA coverage for Harris County is \$946.

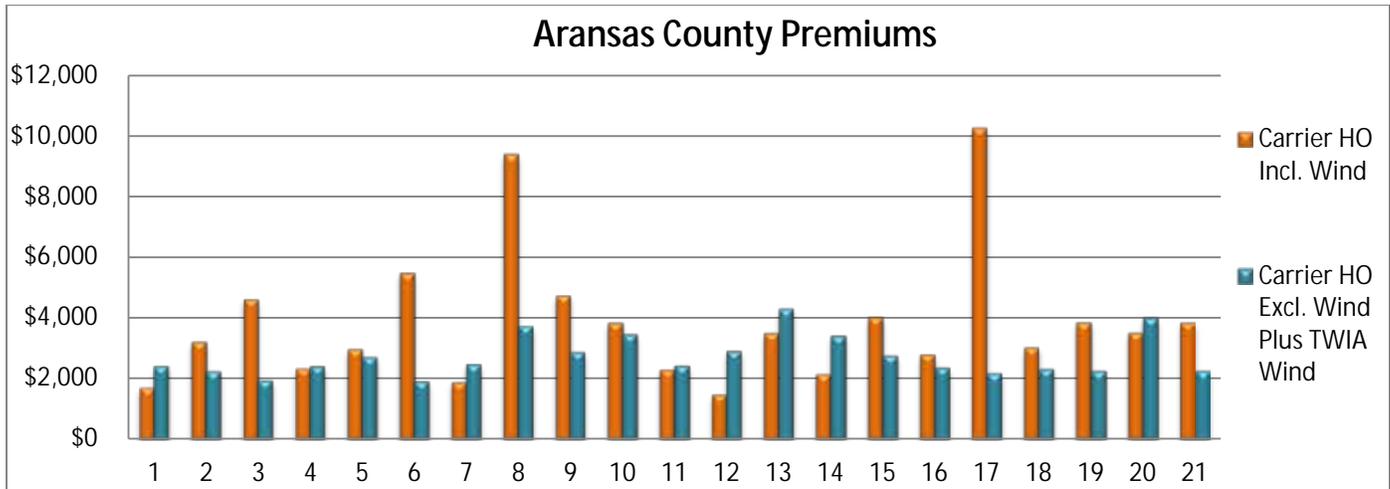
### SUMMARY

Below is a summary of the count of carriers reporting total policy premiums with the wind included that are either higher or lower than what the premium would be with a TWIA wind policy.

County	Count of Premiums Higher than TWIA	Count of Premiums Lower than TWIA
Aransas	13	8
Brazoria	10	8
Calhoun	12	8
Cameron	10	10
Chambers	9	10
Galveston	9	8
Harris	10	2
Jefferson	7	11
Kenedy	11	9
Kleberg	8	11
Matagorda	11	8
Nueces	14	7
Refugio	12	8
San Patricio	12	8
Willacy	8	12
<b>Total</b>	<b>156</b>	<b>128</b>

## ARANSAS

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Aransas County, 13 reporting carriers had premiums that were higher than TWIA and 8 had premiums that were lower.

Aransas county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,733	\$904	\$2,421
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$3,242	\$733	\$2,250
3	ASI LLOYDS	\$4,645	\$440	\$1,957
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FARMERS INSURANCE EXCHANGE	\$5,503	\$413	\$1,930
7	FOREMOST LLOYDS OF TEXAS	\$1,913	\$957	\$2,474
8	LIBERTY INSURANCE CORPORATION	\$9,427	\$2,213	\$3,730
9	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$4,776	\$1,364	\$2,881
10	NATIONAL SURETY CORPORATION	\$3,869	\$1,935	\$3,452
11	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,329	\$914	\$2,431
12	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,503	\$1,393	\$2,910
13	SAFECO INSURANCE COMPANY OF INDIANA	\$3,527	\$2,789	\$4,306
14	SENTINEL INSURANCE COMPANY, LTD.	\$2,181	\$1,895	\$3,412
15	STATE FARM LLOYDS	\$4,046	\$1,250	\$2,767
16	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,820	\$852	\$2,369
17	TEXAS FARMERS INSURANCE COMPANY	\$10,291	\$676	\$2,193

18	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$3,052	\$809	\$2,326
19	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$3,886	\$746	\$2,263
20	UNITRIN SAFEGUARD INSURANCE COMPANY	\$3,539	\$2,477	\$3,994
21	USAA TEXAS LLOYD'S COMPANY	\$3,876	\$740	\$2,257
	Mean	\$3,763.55	\$1,198.27	\$2,715.27

Aransas county premium detail – good credit:

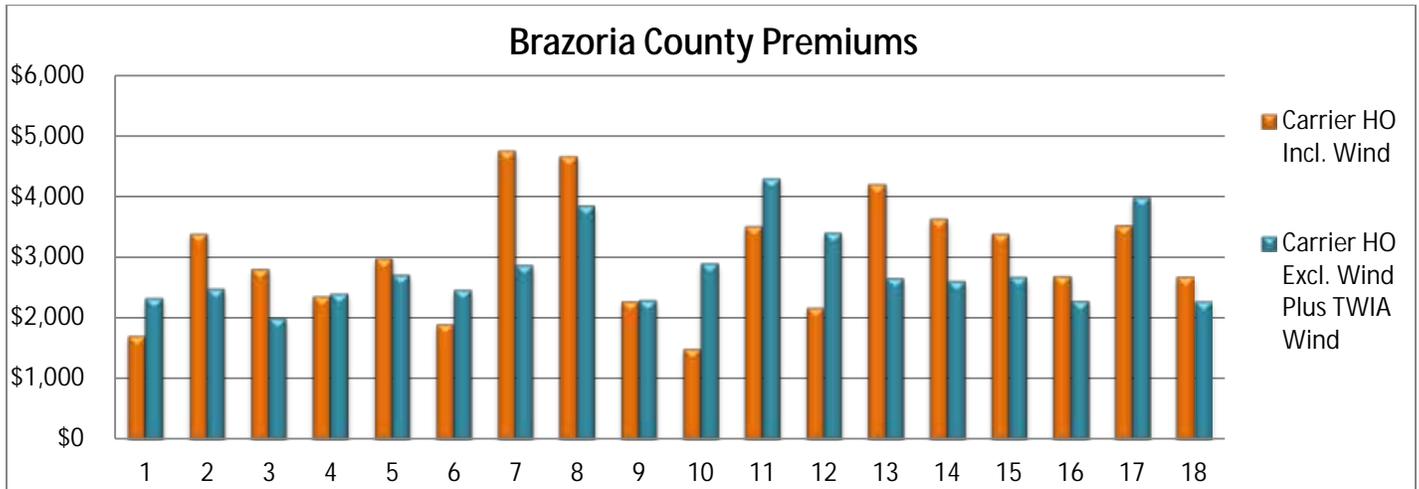
	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,632	\$806	\$2,323
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,694	\$332	\$1,849
3	ASI LLOYDS	\$4,645	\$440	\$1,957
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FARMERS INSURANCE EXCHANGE	\$5,414	\$347	\$1,864
7	FOREMOST LLOYDS OF TEXAS	\$1,457	\$546	\$2,063
8	LIBERTY INSURANCE CORPORATION	\$7,978	\$2,009	\$3,526
9	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$3,622	\$969	\$2,486
10	NATIONAL SURETY CORPORATION	\$3,501	\$1,750	\$3,267
11	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,103	\$890	\$2,407
12	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,299	\$1,205	\$2,722
13	SAFECO INSURANCE COMPANY OF INDIANA	\$2,703	\$2,138	\$3,655
14	SENTINEL INSURANCE COMPANY, LTD.	\$1,945	\$1,691	\$3,208
15	STATE FARM LLOYDS	\$3,722	\$1,150	\$2,667
16	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,538	\$767	\$2,284
17	TEXAS FARMERS INSURANCE COMPANY	\$10,154	\$568	\$2,085
18	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,771	\$562	\$2,079
19	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$3,759	\$627	\$2,144
20	UNITRIN SAFEGUARD INSURANCE COMPANY	\$2,725	\$1,907	\$3,424
21	USAA TEXAS LLOYD'S COMPANY	\$3,750	\$623	\$2,140
	Mean	\$3,513.24	\$1,020.00	\$2,537.00

Aransas county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$2,077	\$1,170	\$2,687
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$3,711	\$934	\$2,451
3	ASI LLOYDS	\$4,645	\$440	\$1,957
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FARMERS INSURANCE EXCHANGE	\$5,593	\$478	\$1,995
7	FOREMOST LLOYDS OF TEXAS	\$2,999	\$1,934	\$3,451
8	LIBERTY INSURANCE CORPORATION	\$15,265	\$2,982	\$4,499
9	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$6,209	\$1,883	\$3,400
10	NATIONAL SURETY CORPORATION	\$4,606	\$2,303	\$3,820
11	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,694	\$1,504	\$3,021
12	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,347	\$2,172	\$3,689
13	SAFECO INSURANCE COMPANY OF INDIANA	\$5,524	\$4,370	\$5,887
14	SENTINEL INSURANCE COMPANY, LTD.	\$3,565	\$3,091	\$4,608
15	STATE FARM LLOYDS	\$4,398	\$1,358	\$2,875
16	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,243	\$980	\$2,497
17	TEXAS FARMERS INSURANCE COMPANY	\$10,413	\$769	\$2,286
18	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$4,447	\$1,710	\$3,227
19	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$4,005	\$860	\$2,377
20	UNITRIN SAFEGUARD INSURANCE COMPANY	\$5,626	\$3,939	\$5,456
21	USAA TEXAS LLOYD'S COMPANY	\$3,993	\$853	\$2,370
	Mean	\$4,844.10	\$1,705.86	\$3,222.86

BRAZORIA

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Brazoria County, 10 reporting carriers had premiums that were higher than TWIA and 8 had premiums that were lower.

Brazoria county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,721	\$817	\$2,334
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$3,407	\$969	\$2,486
3	ASI LLOYDS	\$2,820	\$492	\$2,009
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FOREMOST LLOYDS OF TEXAS	\$1,913	\$957	\$2,474
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$4,776	\$1,364	\$2,881
8	NATIONAL SURETY CORPORATION	\$4,682	\$2,341	\$3,858
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,291	\$783	\$2,300
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,503	\$1,393	\$2,910
11	SAFECO INSURANCE COMPANY OF INDIANA	\$3,527	\$2,789	\$4,306
12	SENTINEL INSURANCE COMPANY, LTD.	\$2,181	\$1,895	\$3,412
13	STATE FARM LLOYDS	\$4,218	\$1,149	\$2,666
14	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,642	\$1,098	\$2,615
15	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$3,402	\$1,165	\$2,682
16	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$2,703	\$772	\$2,289
17	UNITRIN SAFEGUARD INSURANCE COMPANY	\$3,539	\$2,477	\$3,994
18	USAA TEXAS LLOYD'S COMPANY	\$2,692	\$766	\$2,283

Mean	\$3,021.28	\$1,295.56	\$2,812.56
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Brazoria county premium detail – good credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,622	\$727	\$2,244
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,733	\$415	\$1,932
3	ASI LLOYDS	\$2,820	\$492	\$2,009
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FOREMOST LLOYDS OF TEXAS	\$1,457	\$546	\$2,063
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$3,622	\$969	\$2,486
8	NATIONAL SURETY CORPORATION	\$4,236	\$2,118	\$3,635
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,048	\$754	\$2,271
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,299	\$1,205	\$2,722
11	SAFECO INSURANCE COMPANY OF INDIANA	\$2,703	\$2,138	\$3,655
12	SENTINEL INSURANCE COMPANY, LTD.	\$1,945	\$1,691	\$3,208
13	STATE FARM LLOYDS	\$3,883	\$1,058	\$2,575
14	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,278	\$988	\$2,505
15	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,995	\$769	\$2,286
16	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$2,570	\$650	\$2,167
17	UNITRIN SAFEGUARD INSURANCE COMPANY	\$2,725	\$1,907	\$3,424
18	USAA TEXAS LLOYD'S COMPANY	\$2,560	\$644	\$2,161
	Mean	\$2,659.00	\$1,064.67	\$2,581.67

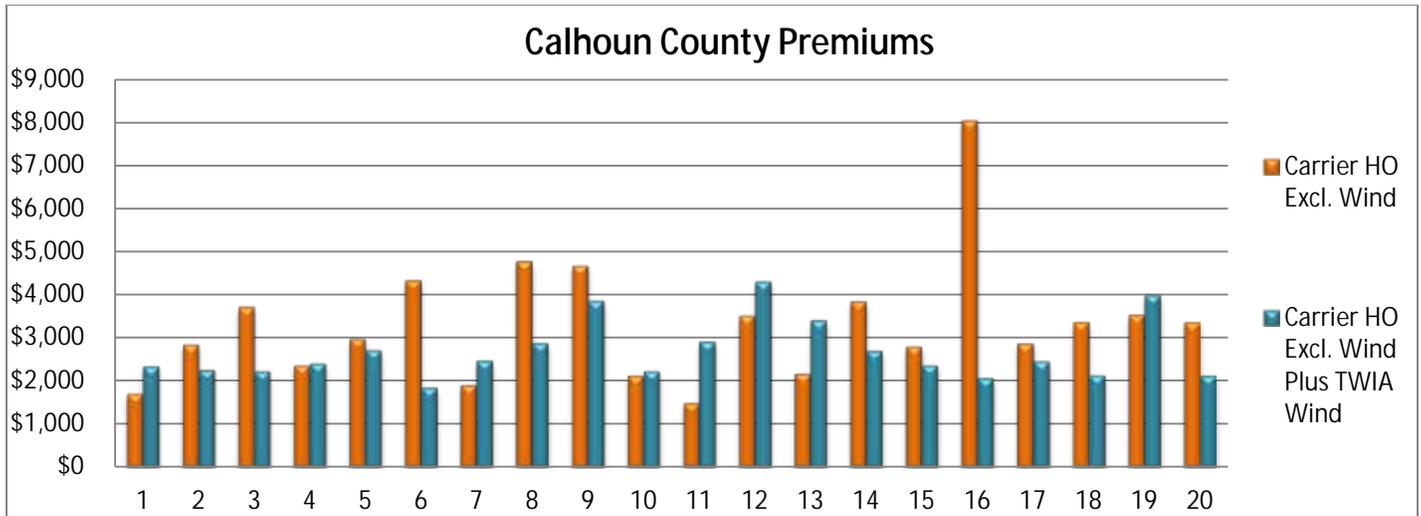
Brazoria county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$2,086	\$1,093	\$2,610
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$3,938	\$1,249	\$2,766
3	ASI LLOYDS	\$2,820	\$492	\$2,009
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FOREMOST LLOYDS OF TEXAS	\$2,999	\$1,934	\$3,451
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$6,209	\$1,883	\$3,400
8	NATIONAL SURETY CORPORATION	\$5,573	\$2,787	\$4,304
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,519	\$1,184	\$2,701
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,347	\$2,172	\$3,689

11	SAFECO INSURANCE COMPANY OF INDIANA	\$5,524	\$4,370	\$5,887
12	SENTINEL INSURANCE COMPANY, LTD.	\$3,565	\$3,091	\$4,608
13	STATE FARM LLOYDS	\$4,586	\$1,250	\$2,767
14	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$4,188	\$1,263	\$2,780
15	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$5,334	\$2,661	\$4,178
16	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$2,827	\$891	\$2,408
17	UNITRIN SAFEGUARD INSURANCE COMPANY	\$5,626	\$3,939	\$5,456
18	USAA TEXAS LLOYD'S COMPANY	\$2,814	\$883	\$2,400
	Mean	\$3,851.17	\$1,846.39	\$3,407.71

CALHOUN

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Calhoun County, 12 reporting carriers had premiums that were higher than TWIA and 8 had premiums that were lower.

Calhoun county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,716	\$823	\$2,340
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,852	\$747	\$2,264
3	ASI LLOYDS	\$3,728	\$712	\$2,229
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FARMERS INSURANCE EXCHANGE	\$4,344	\$335	\$1,852
7	FOREMOST LLOYDS OF TEXAS	\$1,913	\$957	\$2,474
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$4,776	\$1,364	\$2,881
9	NATIONAL SURETY CORPORATION	\$4,682	\$2,341	\$3,858
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,136	\$717	\$2,234
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,503	\$1,393	\$2,910
12	SAFECO INSURANCE COMPANY OF INDIANA	\$3,527	\$2,789	\$4,306
13	SENTINEL INSURANCE COMPANY, LTD.	\$2,181	\$1,895	\$3,412
14	STATE FARM LLOYDS	\$3,853	\$1,190	\$2,707
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,807	\$847	\$2,364
16	TEXAS FARMERS INSURANCE COMPANY	\$8,044	\$561	\$2,078
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,878	\$943	\$2,460
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$3,379	\$616	\$2,133

19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$3,539	\$2,477	\$3,994
20	USAA TEXAS LLOYD'S COMPANY	\$3,371	\$612	\$2,129
	Mean	\$3,329.75	\$1,170.60	\$2,687.60

Calhoun county premium detail – good credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,542	\$712	\$2,229
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$1,898	\$449	\$1,966
3	ASI LLOYDS	\$2,133	\$507	\$2,024
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$3,118	\$1,251	\$2,768
6	FARMERS INSURANCE EXCHANGE	\$1,834	\$216	\$1,733
7	FOREMOST LLOYDS OF TEXAS	\$1,514	\$563	\$2,080
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$3,991	\$1,068	\$2,585
9	NATIONAL SURETY CORPORATION	\$4,236	\$2,118	\$3,635
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,115	\$890	\$2,407
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,361	\$1,262	\$2,779
12	SAFECO INSURANCE COMPANY OF INDIANA	\$2,816	\$2,228	\$3,745
13	SENTINEL INSURANCE COMPANY, LTD.	\$2,038	\$1,772	\$3,289
14	STATE FARM LLOYDS	\$3,909	\$1,207	\$2,724
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,652	\$801	\$2,318
16	TEXAS FARMERS INSURANCE COMPANY	\$6,901	\$492	\$2,009
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,826	\$868	\$2,385
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$3,291	\$536	\$2,053
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$2,779	\$1,945	\$3,462
20	USAA TEXAS LLOYD'S COMPANY	\$3,283	\$531	\$2,048
	Mean	\$2,830.45	\$1,015.40	\$2,532.40

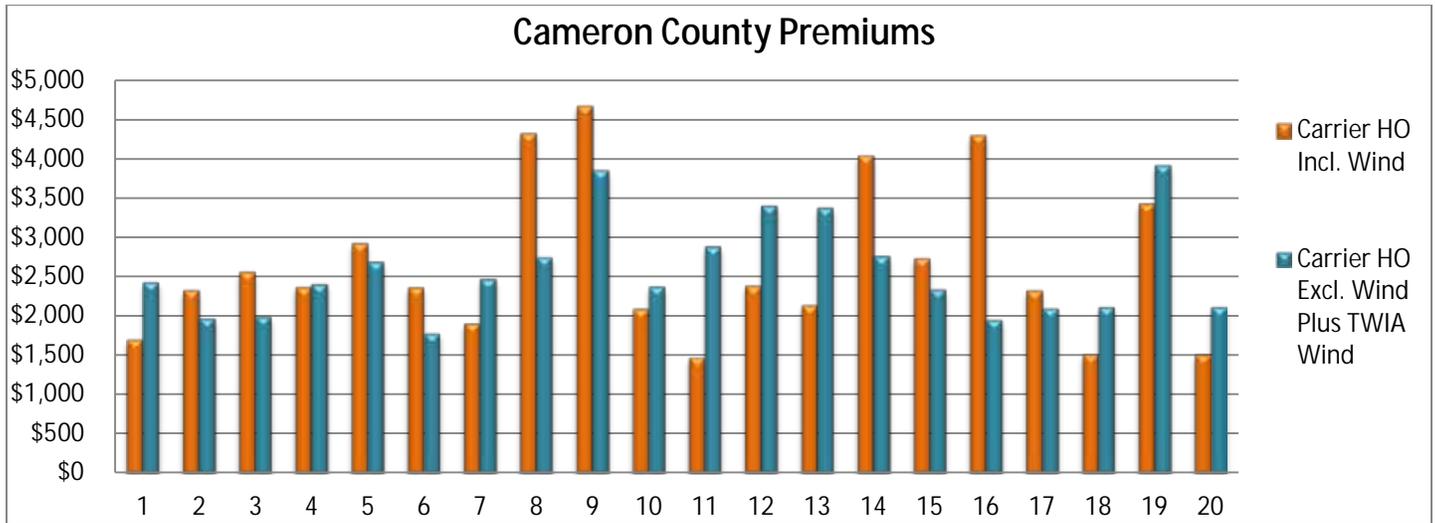
Calhoun county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$2,060	\$1,079	\$2,596
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$3,270	\$941	\$2,458
3	ASI LLOYDS	\$3,728	\$712	\$2,229
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FARMERS INSURANCE EXCHANGE	\$4,431	\$389	\$1,906
7	FOREMOST LLOYDS OF TEXAS	\$2,999	\$1,934	\$3,451

8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$6,209	\$1,883	\$3,400
9	NATIONAL SURETY CORPORATION	\$5,573	\$2,787	\$4,304
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,383	\$1,186	\$2,703
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,347	\$2,172	\$3,689
12	SAFECO INSURANCE COMPANY OF INDIANA	\$5,524	\$4,370	\$5,887
13	SENTINEL INSURANCE COMPANY, LTD.	\$3,565	\$3,091	\$4,608
14	STATE FARM LLOYDS	\$4,188	\$1,294	\$2,811
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,228	\$974	\$2,491
16	TEXAS FARMERS INSURANCE COMPANY	\$8,161	\$643	\$2,160
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$4,343	\$2,008	\$3,525
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$3,476	\$710	\$2,227
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$5,626	\$3,939	\$5,456
20	USAA TEXAS LLOYD'S COMPANY	\$3,467	\$704	\$2,221
	Mean	\$4,047.20	\$1,645.45	\$3,162.45

CAMERON

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Cameron County, 10 reporting carriers had premiums that were higher than TWIA and 10 had premiums that were lower.

Cameron county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,707	\$918	\$2,435
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,337	\$456	\$1,973
3	ASI LLOYDS	\$2,566	\$480	\$1,997
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,931	\$1,176	\$2,693
6	FARMERS INSURANCE EXCHANGE	\$2,368	\$267	\$1,784
7	FOREMOST LLOYDS OF TEXAS	\$1,913	\$957	\$2,474
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$4,333	\$1,238	\$2,755
9	NATIONAL SURETY CORPORATION	\$4,682	\$2,341	\$3,858
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,098	\$864	\$2,381
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,479	\$1,371	\$2,888
12	SAFECO INSURANCE COMPANY OF INDIANA	\$2,389	\$1,890	\$3,407
13	SENTINEL INSURANCE COMPANY, LTD.	\$2,146	\$1,865	\$3,382
14	STATE FARM LLOYDS	\$4,046	\$1,250	\$2,767
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,739	\$827	\$2,344
16	TEXAS FARMERS INSURANCE COMPANY	\$4,307	\$441	\$1,958
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,332	\$587	\$2,104
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,519	\$605	\$2,122

19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$3,433	\$2,403	\$3,920
20	USAA TEXAS LLOYD'S COMPANY	\$1,514	\$602	\$2,119
	Mean	\$2,660.55	\$1,071.50	\$2,588.50

Cameron county premium detail – good credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,606	\$818	\$2,335
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,029	\$245	\$1,762
3	ASI LLOYDS	\$2,566	\$480	\$1,997
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,931	\$1,176	\$2,693
6	FARMERS INSURANCE EXCHANGE	\$2,302	\$223	\$1,740
7	FOREMOST LLOYDS OF TEXAS	\$1,457	\$546	\$2,063
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$3,287	\$879	\$2,396
9	NATIONAL SURETY CORPORATION	\$4,236	\$2,118	\$3,635
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$1,900	\$841	\$2,358
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,279	\$1,186	\$2,703
12	SAFECO INSURANCE COMPANY OF INDIANA	\$1,832	\$1,449	\$2,966
13	SENTINEL INSURANCE COMPANY, LTD.	\$1,914	\$1,665	\$3,182
14	STATE FARM LLOYDS	\$3,722	\$1,150	\$2,667
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,465	\$744	\$2,261
16	TEXAS FARMERS INSURANCE COMPANY	\$4,204	\$366	\$1,883
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,151	\$427	\$1,944
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,419	\$509	\$2,026
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$2,643	\$1,850	\$3,367
20	USAA TEXAS LLOYD'S COMPANY	\$1,414	\$506	\$2,023
	Mean	\$2,386.45	\$903.50	\$2,420.50

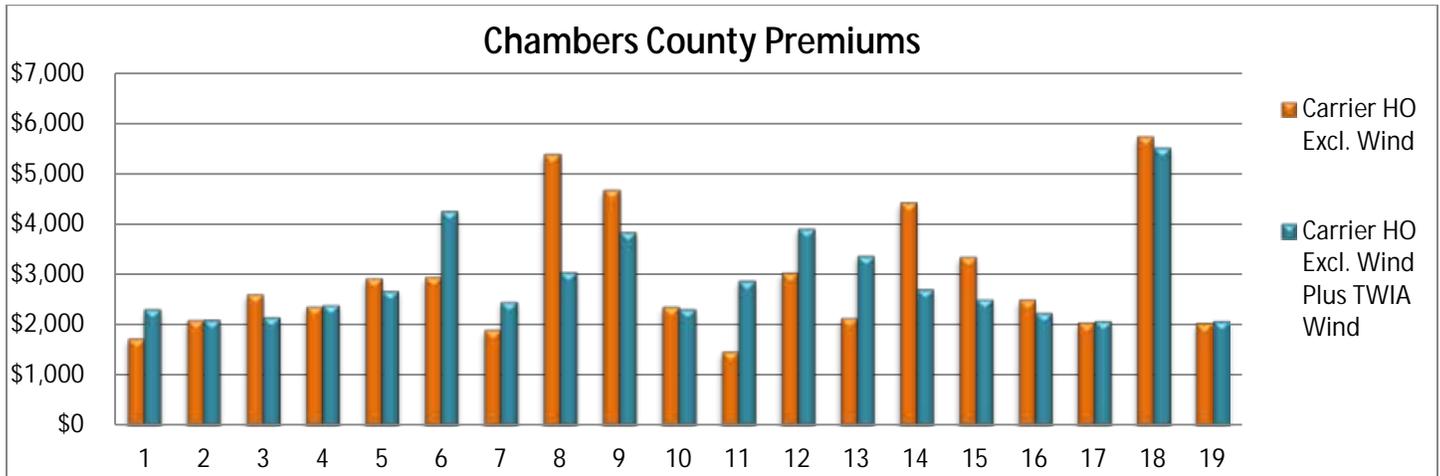
Cameron county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$2,051	\$1,190	\$2,707
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,632	\$554	\$2,071
3	ASI LLOYDS	\$2,566	\$480	\$1,997
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,931	\$1,176	\$2,693
6	FARMERS INSURANCE EXCHANGE	\$2,438	\$313	\$1,830
7	FOREMOST LLOYDS OF TEXAS	\$2,999	\$1,934	\$3,451

8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$5,633	\$1,709	\$3,226
9	NATIONAL SURETY CORPORATION	\$5,573	\$2,787	\$4,304
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,352	\$1,441	\$2,958
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,309	\$2,137	\$3,654
12	SAFECO INSURANCE COMPANY OF INDIANA	\$3,743	\$2,961	\$4,478
13	SENTINEL INSURANCE COMPANY, LTD.	\$3,507	\$3,041	\$4,558
14	STATE FARM LLOYDS	\$4,398	\$1,358	\$2,875
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,150	\$951	\$2,468
16	TEXAS FARMERS INSURANCE COMPANY	\$4,399	\$506	\$2,023
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$3,274	\$1,141	\$2,658
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,611	\$695	\$2,212
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$5,458	\$3,820	\$5,337
20	USAA TEXAS LLOYD'S COMPANY	\$1,605	\$691	\$2,208
	Mean	\$3,300.05	\$1,488.85	\$3,005.85

CHAMBERS

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Chambers County, 9 reporting carriers had premiums that were higher than TWIA and 10 had premiums that were lower.

Chambers county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,734	\$813	\$2,330
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,104	\$597	\$2,114
3	ASI LLOYDS	\$2,616	\$652	\$2,169
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,931	\$1,176	\$2,693
6	CONSOLIDATED LLOYDS	\$2,960	\$2,760	\$4,277
7	FOREMOST LLOYDS OF TEXAS	\$1,913	\$957	\$2,474
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$5,394	\$1,541	\$3,058
9	NATIONAL SURETY CORPORATION	\$4,682	\$2,341	\$3,858
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,369	\$811	\$2,328
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,479	\$1,371	\$2,888
12	SAFECO INSURANCE COMPANY OF INDIANA	\$3,040	\$2,405	\$3,922
13	SENTINEL INSURANCE COMPANY, LTD.	\$2,146	\$1,865	\$3,382
14	STATE FARM LLOYDS	\$4,430	\$1,207	\$2,724
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,354	\$1,012	\$2,529
16	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,506	\$738	\$2,255
17	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$2,052	\$579	\$2,096
18	UNITRIN SAFEGUARD INSURANCE COMPANY	\$5,744	\$4,021	\$5,538
19	USAA TEXAS LLOYD'S COMPANY	\$2,040	\$573	\$2,090

Mean	\$2,940.32	\$1,384.79	\$2,901.79
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Chambers county premium detail – good credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,634	\$722	\$2,239
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$1,702	\$277	\$1,794
3	ASI LLOYDS	\$2,616	\$652	\$2,169
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,931	\$1,176	\$2,693
6	CONSOLIDATED LLOYDS	\$2,960	\$2,760	\$4,277
7	FOREMOST LLOYDS OF TEXAS	\$1,457	\$546	\$2,063
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$4,093	\$1,094	\$2,611
9	NATIONAL SURETY CORPORATION	\$4,236	\$2,118	\$3,635
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,094	\$757	\$2,274
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,279	\$1,186	\$2,703
12	SAFECO INSURANCE COMPANY OF INDIANA	\$2,331	\$1,844	\$3,361
13	SENTINEL INSURANCE COMPANY, LTD.	\$1,914	\$1,665	\$3,182
14	STATE FARM LLOYDS	\$4,076	\$1,110	\$2,627
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,019	\$911	\$2,428
16	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,256	\$500	\$2,017
17	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,947	\$487	\$2,004
18	UNITRIN SAFEGUARD INSURANCE COMPANY	\$4,423	\$3,096	\$4,613
19	USAA TEXAS LLOYD'S COMPANY	\$1,936	\$481	\$1,998
	Mean	\$2,593.47	\$1,172.32	\$2,689.32

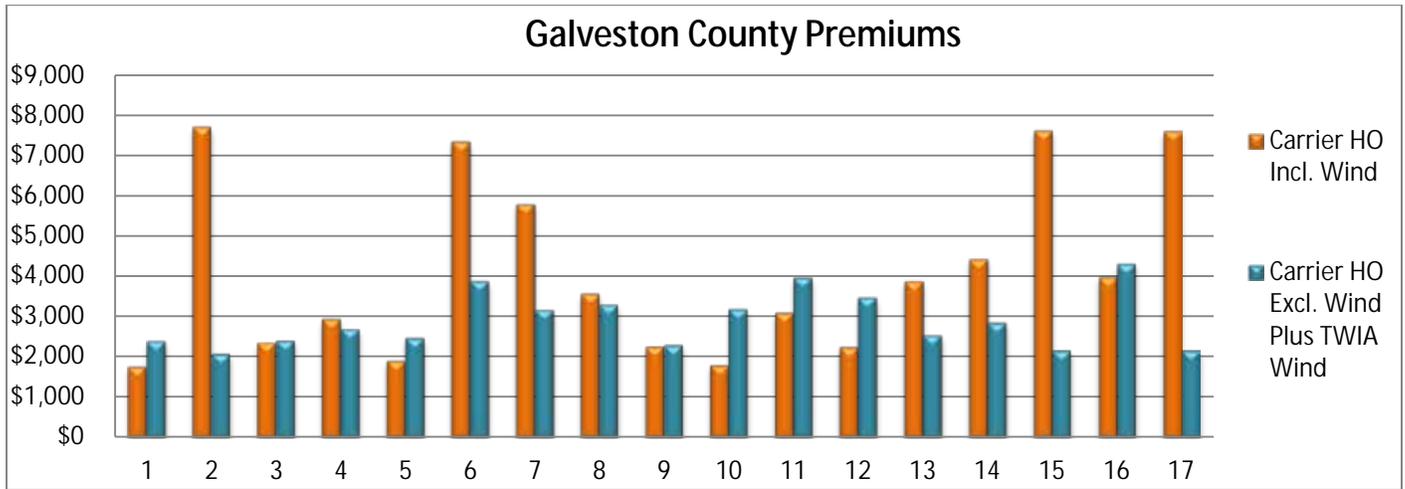
Chambers county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$2,112	\$1,097	\$2,614
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,426	\$759	\$2,276
3	ASI LLOYDS	\$2,616	\$652	\$2,169
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,931	\$1,176	\$2,693
6	CONSOLIDATED LLOYDS	\$2,960	\$2,760	\$4,277
7	FOREMOST LLOYDS OF TEXAS	\$2,999	\$1,934	\$3,451
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$7,014	\$2,127	\$3,644
9	NATIONAL SURETY CORPORATION	\$5,573	\$2,787	\$4,304

10	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,587	\$1,174	\$2,691
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,309	\$2,137	\$3,654
12	SAFECO INSURANCE COMPANY OF INDIANA	\$4,762	\$3,767	\$5,284
13	SENTINEL INSURANCE COMPANY, LTD.	\$3,507	\$3,041	\$4,558
14	STATE FARM LLOYDS	\$4,816	\$1,312	\$2,829
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,857	\$1,164	\$2,681
16	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$3,755	\$1,632	\$3,149
17	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$2,149	\$670	\$2,187
18	UNITRIN SAFEGUARD INSURANCE COMPANY	\$9,133	\$6,393	\$7,910
19	USAA TEXAS LLOYD'S COMPANY	\$2,136	\$662	\$2,179
	Mean	\$3,737.58	\$1,901.89	\$3,418.89

GALVESTON

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Galveston County, 9 reporting carriers had premiums that were higher than TWIA and 8 had premiums that were lower.

Galveston county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,776	\$882	\$2,399
2	ASI LLOYDS	\$7,716	\$572	\$2,089
3	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
4	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,955	\$1,185	\$2,702
5	FOREMOST LLOYDS OF TEXAS	\$1,913	\$957	\$2,474
6	LIBERTY INSURANCE CORPORATION	\$7,345	\$2,374	\$3,891
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$5,797	\$1,656	\$3,173
8	NATIONAL SURETY CORPORATION	\$3,577	\$1,789	\$3,306
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,262	\$779	\$2,296
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,806	\$1,673	\$3,190
11	SAFECO INSURANCE COMPANY OF INDIANA	\$3,105	\$2,456	\$3,973
12	SENTINEL INSURANCE COMPANY, LTD.	\$2,252	\$1,957	\$3,474
13	STATE FARM LLOYDS	\$3,887	\$1,023	\$2,540

14	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$4,432	\$1,338	\$2,855
15	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$7,620	\$656	\$2,173
16	UNITRIN SAFEGUARD INSURANCE COMPANY	\$3,995	\$2,797	\$4,314
17	USAA TEXAS LLOYD'S COMPANY	\$7,605	\$650	\$2,167
	Mean	\$3,973.83	\$1,350.50	\$2,867.50

Galveston county premium detail – good credit

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,670	\$785	\$2,302
2	ASI LLOYDS	\$7,716	\$572	\$2,089
3	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
4	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,955	\$1,185	\$2,702
5	FOREMOST LLOYDS OF TEXAS	\$1,457	\$546	\$2,063
6	LIBERTY INSURANCE CORPORATION	\$6,362	\$2,171	\$3,688
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$4,397	\$1,176	\$2,693
8	NATIONAL SURETY CORPORATION	\$3,237	\$1,619	\$3,136
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,025	\$753	\$2,270
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,559	\$1,445	\$2,962
11	SAFECO INSURANCE COMPANY OF INDIANA	\$2,380	\$1,883	\$3,400
12	SENTINEL INSURANCE COMPANY, LTD.	\$2,008	\$1,746	\$3,263
13	STATE FARM LLOYDS	\$3,576	\$941	\$2,458
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,989	\$1,204	\$2,721
16	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$7,493	\$551	\$2,068
17	UNITRIN SAFEGUARD INSURANCE COMPANY	\$3,076	\$2,153	\$3,670
18	USAA TEXAS LLOYD'S COMPANY	\$7,479	\$547	\$2,064
	Mean	\$3,750.06	\$1,186.41	\$2,703.41

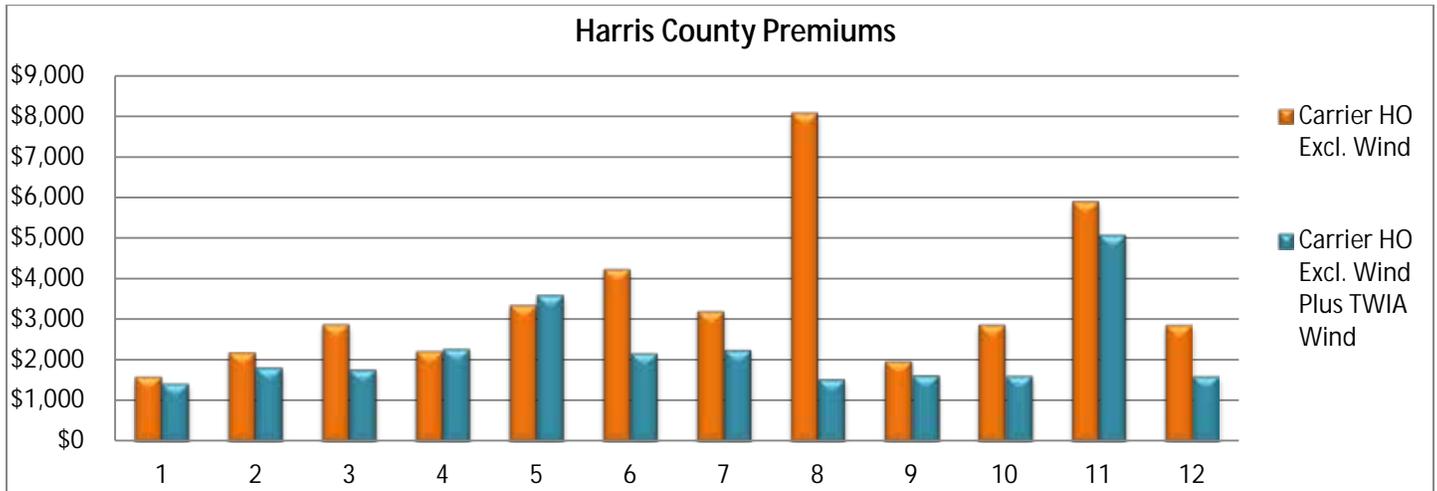
Galveston county premium detail – bad credit

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$2,153	\$1,171	\$2,688

2	ASI LLOYDS	\$7,716	\$572	\$2,089
3	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
4	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,955	\$1,185	\$2,702
5	FOREMOST LLOYDS OF TEXAS	\$2,999	\$1,934	\$3,451
6	LIBERTY INSURANCE CORPORATION	\$11,374	\$3,151	\$4,668
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$7,534	\$2,286	\$3,803
8	NATIONAL SURETY CORPORATION	\$4,258	\$2,130	\$3,647
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,612	\$1,316	\$2,833
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,828	\$2,617	\$4,134
11	SAFECO INSURANCE COMPANY OF INDIANA	\$4,864	\$3,848	\$5,365
12	SENTINEL INSURANCE COMPANY, LTD.	\$3,683	\$3,193	\$4,710
13	STATE FARM LLOYDS	\$4,226	\$1,112	\$2,629
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$5,097	\$1,539	\$3,056
16	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$7,732	\$757	\$2,274
17	UNITRIN SAFEGUARD INSURANCE COMPANY	\$6,352	\$4,447	\$5,964
18	USAA TEXAS LLOYD'S COMPANY	\$7,715	\$750	\$2,267
	Mean	\$5,145.29	\$1,935.29	\$3,452.29

HARRIS

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Harris County, 10 reporting carriers had premiums that were higher than TWIA and 2 had premiums that were lower.

Harris county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$1,612	\$493	\$1,439
2	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,208	\$886	\$1,832
3	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$2,898	\$828	\$1,774
4	NATIONAL SURETY CORPORATION	\$2,237	\$1,343	\$2,289
5	SAFECO INSURANCE COMPANY OF INDIANA	\$3,368	\$2,664	\$3,610
6	STATE FARM LLOYDS	\$4,255	\$1,238	\$2,184
7	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,223	\$1,316	\$2,262
8	TEXAS FARMERS INSURANCE COMPANY	\$8,098	\$599	\$1,545
9	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$1,988	\$688	\$1,634
10	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$2,893	\$679	\$1,625
11	UNITRIN SAFEGUARD INSURANCE COMPANY	\$5,922	\$4,145	\$5,091
12	USAA TEXAS LLOYD'S COMPANY	\$2,880	\$672	\$1,618
	Mean	\$3,465.17	\$1,295.92	\$2,241.92

Harris county premium detail – good credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$1,335	\$276	\$1,222

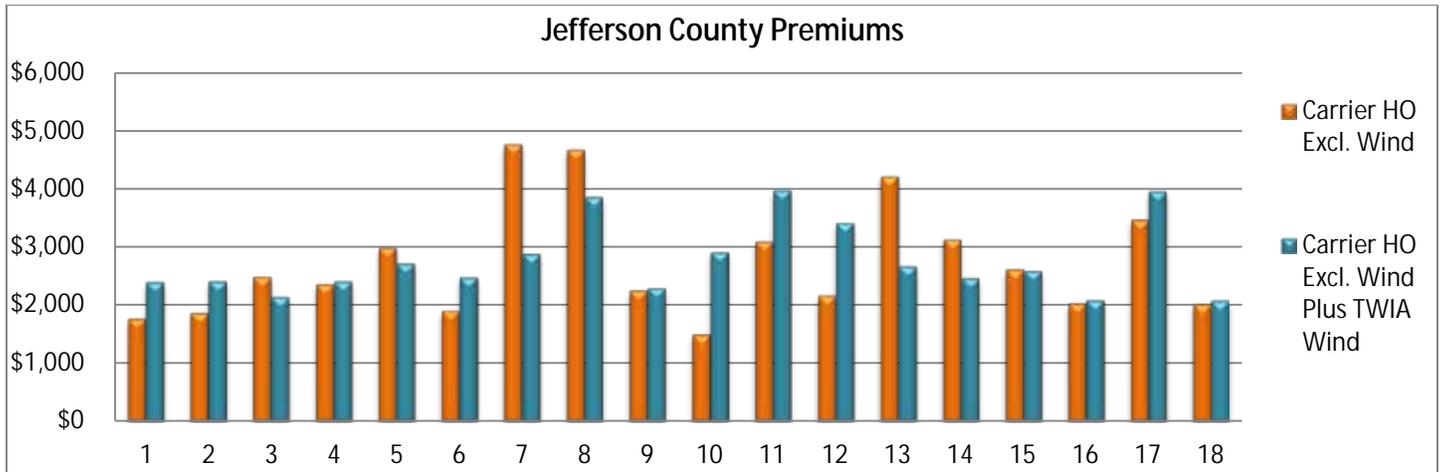
2	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,208	\$886	\$1,832
3	CONSOLIDATED LLOYDS	\$3,243	\$3,024	\$3,970
4	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$2,198	\$587	\$1,533
5	NATIONAL SURETY CORPORATION	\$2,025	\$1,215	\$2,161
6	SAFECO INSURANCE COMPANY OF INDIANA	\$2,581	\$2,042	\$2,988
7	STATE FARM LLOYDS	\$3,914	\$1,139	\$2,085
8	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,901	\$1,184	\$2,130
9	TEXAS FARMERS INSURANCE COMPANY	\$7,967	\$500	\$1,446
10	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$1,802	\$512	\$1,458
11	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$2,770	\$570	\$1,516
12	UNITRIN SAFEGUARD INSURANCE COMPANY	\$4,560	\$3,192	\$4,138
13	USAA TEXAS LLOYD'S COMPANY	\$2,758	\$565	\$1,511
	Mean	\$3,097.08	\$1,207.08	\$2,153.08

Harris county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$1,827	\$591	\$1,537
2	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,208	\$886	\$1,832
3	CONSOLIDATED LLOYDS	\$3,243	\$3,024	\$3,970
4	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$3,768	\$1,143	\$2,089
5	NATIONAL SURETY CORPORATION	\$2,666	\$1,599	\$2,545
6	SAFECO INSURANCE COMPANY OF INDIANA	\$5,276	\$4,174	\$5,120
7	STATE FARM LLOYDS	\$4,626	\$1,346	\$2,292
8	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,706	\$1,513	\$2,459
9	TEXAS FARMERS INSURANCE COMPANY	\$8,215	\$686	\$1,632
10	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,849	\$1,278	\$2,224
11	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$3,006	\$785	\$1,731
12	UNITRIN SAFEGUARD INSURANCE COMPANY	\$9,415	\$6,591	\$7,537
13	USAA TEXAS LLOYD'S COMPANY	\$2,991	\$776	\$1,722
	Mean	\$4,138.15	\$1,876.31	\$2,822.31

JEFFERSON

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Jefferson County, 7 reporting carriers had premiums that were higher than TWIA and 11 had premiums that were lower.

Jefferson county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,776	\$882	\$2,399
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$1,875	\$892	\$2,409
3	ASI LLOYDS	\$2,496	\$625	\$2,142
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FOREMOST LLOYDS OF TEXAS	\$1,913	\$957	\$2,474
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$4,776	\$1,364	\$2,881
8	NATIONAL SURETY CORPORATION	\$4,682	\$2,341	\$3,858
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,262	\$779	\$2,296
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,503	\$1,393	\$2,910
11	SAFECO INSURANCE COMPANY OF INDIANA	\$3,105	\$2,456	\$3,973
12	SENTINEL INSURANCE COMPANY, LTD.	\$2,181	\$1,895	\$3,412
13	STATE FARM LLOYDS	\$4,218	\$1,149	\$2,666
14	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,137	\$947	\$2,464
15	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,622	\$1,071	\$2,588
16	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$2,039	\$566	\$2,083
17	UNITRIN SAFEGUARD INSURANCE COMPANY	\$3,474	\$2,432	\$3,949
18	USAA TEXAS LLOYD'S COMPANY	\$2,027	\$560	\$2,077
	Mean	\$2,747.33	\$1,244.56	\$2,761.56

Jefferson county premium detail – good credit:

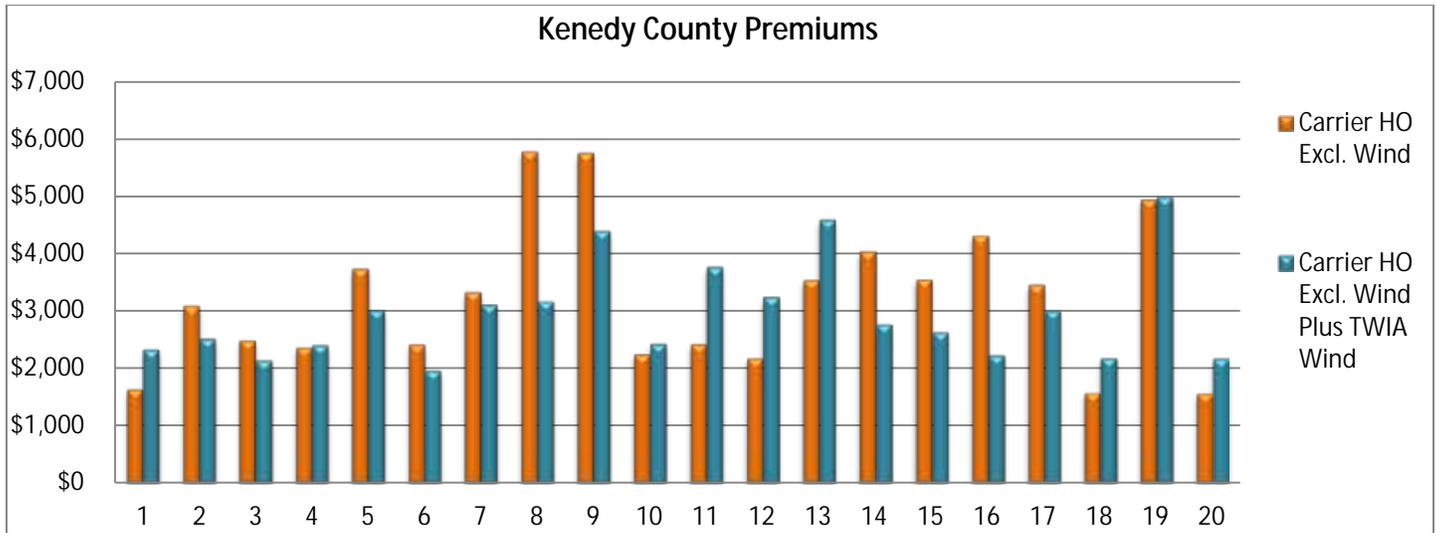
	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,670	\$785	\$2,302
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$1,333	\$425	\$1,942
3	ASI LLOYDS	\$2,496	\$625	\$2,142
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FOREMOST LLOYDS OF TEXAS	\$1,457	\$546	\$2,063
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$3,622	\$969	\$2,486
8	NATIONAL SURETY CORPORATION	\$4,236	\$2,118	\$3,635
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,025	\$753	\$2,270
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,299	\$1,205	\$2,722
11	SAFECO INSURANCE COMPANY OF INDIANA	\$2,380	\$1,883	\$3,400
12	SENTINEL INSURANCE COMPANY, LTD.	\$1,945	\$1,691	\$3,208
13	STATE FARM LLOYDS	\$3,883	\$1,058	\$2,575
14	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,823	\$852	\$2,369
15	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,268	\$749	\$2,266
16	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,936	\$476	\$1,993
17	UNITRIN SAFEGUARD INSURANCE COMPANY	\$2,675	\$1,873	\$3,390
18	USAA TEXAS LLOYD'S COMPANY	\$1,925	\$470	\$1,987
	Mean	\$2,407.72	\$1,031.72	\$2,548.72

Jefferson county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$2,153	\$1,171	\$2,688
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,216	\$1,118	\$2,635
3	ASI LLOYDS	\$2,496	\$625	\$2,142
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FOREMOST LLOYDS OF TEXAS	\$2,999	\$1,934	\$3,451
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$6,209	\$1,883	\$3,400
8	NATIONAL SURETY CORPORATION	\$5,573	\$2,787	\$4,304
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,612	\$1,316	\$2,833

10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,347	\$2,172	\$3,689
11	SAFECO INSURANCE COMPANY OF INDIANA	\$4,864	\$3,848	\$5,365
12	SENTINEL INSURANCE COMPANY, LTD.	\$3,565	\$3,091	\$4,608
13	STATE FARM LLOYDS	\$4,586	\$1,250	\$2,767
14	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,608	\$1,089	\$2,606
15	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$4,148	\$2,224	\$3,741
16	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$2,134	\$655	\$2,172
17	UNITRIN SAFEGUARD INSURANCE COMPANY	\$5,524	\$3,867	\$5,384
18	USAA TEXAS LLOYD'S COMPANY	\$2,121	\$648	\$2,165
	Mean	\$3,528.94	\$1,765.06	\$3,282.06

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Kenedy County, 11 reporting carriers had premiums that were higher than TWIA and 9 had premiums that were lower.

Kenedy county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,643	\$818	\$2,335
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$3,094	\$1,008	\$2,525
3	ASI LLOYDS	\$2,496	\$625	\$2,142
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$3,741	\$1,499	\$3,016
6	FARMERS INSURANCE EXCHANGE	\$2,429	\$450	\$1,967
7	FOREMOST LLOYDS OF TEXAS	\$3,333	\$1,596	\$3,113
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$5,791	\$1,655	\$3,172
9	NATIONAL SURETY CORPORATION	\$5,764	\$2,882	\$4,399
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,257	\$919	\$2,436
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,432	\$2,250	\$3,767
12	SAFECO INSURANCE COMPANY OF INDIANA	\$2,186	\$1,729	\$3,246
13	SENTINEL INSURANCE COMPANY, LTD.	\$3,546	\$3,075	\$4,592
14	STATE FARM LLOYDS	\$4,046	\$1,250	\$2,767
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,556	\$1,123	\$2,640
16	TEXAS FARMERS INSURANCE COMPANY	\$4,324	\$718	\$2,235
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$3,462	\$1,489	\$3,006
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,581	\$667	\$2,184

19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$4,954	\$3,468	\$4,985
20	USAA TEXAS LLOYD'S COMPANY	\$1,571	\$659	\$2,176
	Mean	\$3,228.90	\$1,438.60	\$2,955.60

Kenedy county premium detail – good credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,550	\$728	\$2,245
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,372	\$404	\$1,921
3	ASI LLOYDS	\$2,496	\$625	\$2,142
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$3,741	\$1,499	\$3,016
6	FARMERS INSURANCE EXCHANGE	\$2,297	\$343	\$1,860
7	FOREMOST LLOYDS OF TEXAS	\$2,504	\$850	\$2,367
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$4,393	\$1,175	\$2,692
9	NATIONAL SURETY CORPORATION	\$5,215	\$2,608	\$4,125
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,010	\$862	\$2,379
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,096	\$1,940	\$3,457
12	SAFECO INSURANCE COMPANY OF INDIANA	\$1,676	\$1,326	\$2,843
13	SENTINEL INSURANCE COMPANY, LTD.	\$3,157	\$2,739	\$4,256
14	STATE FARM LLOYDS	\$3,722	\$1,150	\$2,667
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,200	\$1,011	\$2,528
16	TEXAS FARMERS INSURANCE COMPANY	\$4,111	\$537	\$2,054
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,865	\$933	\$2,450
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,470	\$560	\$2,077
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$3,815	\$2,670	\$4,187
20	USAA TEXAS LLOYD'S COMPANY	\$1,461	\$554	\$2,071
	Mean	\$2,826.15	\$1,170.30	\$2,687.30

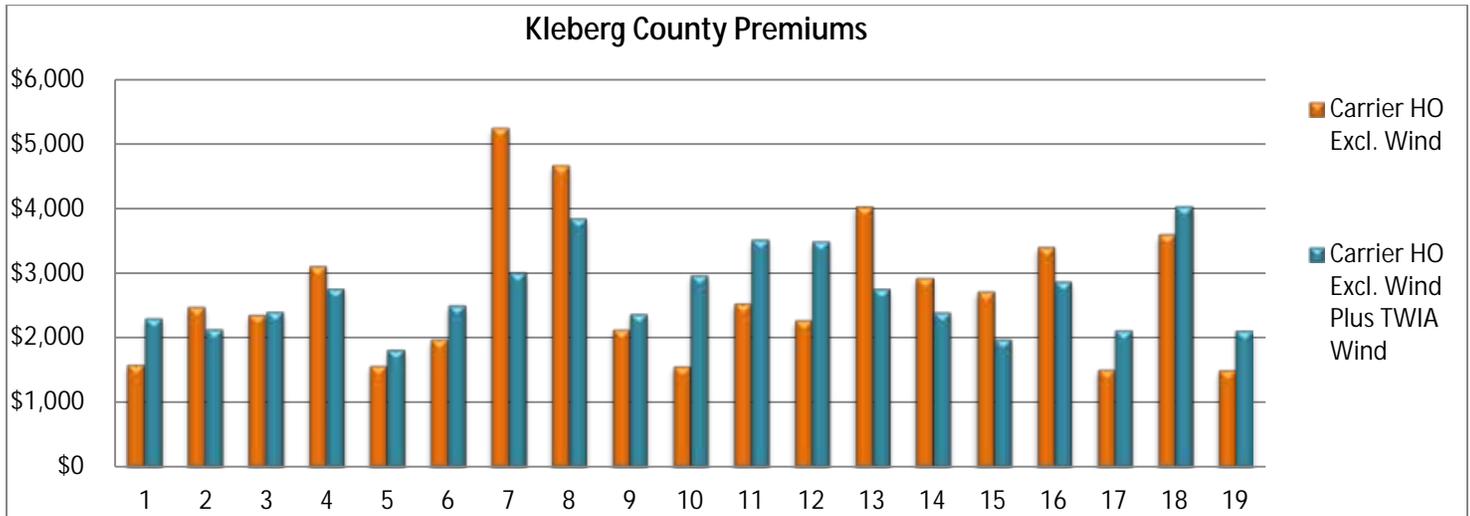
Kenedy county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,984	\$1,082	\$2,599
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$3,630	\$1,324	\$2,841
3	ASI LLOYDS	\$2,496	\$625	\$2,142
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$3,741	\$1,499	\$3,016

6	FARMERS INSURANCE EXCHANGE	\$2,564	\$558	\$2,075
7	FOREMOST LLOYDS OF TEXAS	\$5,307	\$3,372	\$4,889
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$7,529	\$2,283	\$3,800
9	NATIONAL SURETY CORPORATION	\$6,862	\$3,431	\$4,948
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,388	\$1,318	\$2,835
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$3,824	\$3,535	\$5,052
12	SAFECO INSURANCE COMPANY OF INDIANA	\$3,424	\$2,709	\$4,226
13	SENTINEL INSURANCE COMPANY, LTD.	\$5,830	\$5,049	\$6,566
14	STATE FARM LLOYDS	\$4,398	\$1,358	\$2,875
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$4,089	\$1,291	\$2,808
16	TEXAS FARMERS INSURANCE COMPANY	\$4,515	\$879	\$2,396
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$6,102	\$3,656	\$5,173
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,690	\$774	\$2,291
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$7,877	\$5,514	\$7,031
20	USAA TEXAS LLOYD'S COMPANY	\$1,678	\$764	\$2,281
	Mean	\$4,165.00	\$2,095.65	\$3,612.65

KLEBERG

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Kleberg County, 8 reporting carriers had premiums that were higher than TWIA and 11 had premiums that were lower.

Kleberg county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,599	\$790	\$2,307
2	ASI LLOYDS	\$2,496	\$625	\$2,142
3	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
4	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$3,118	\$1,251	\$2,768
5	FARMERS INSURANCE EXCHANGE	\$1,582	\$309	\$1,826
6	FOREMOST LLOYDS OF TEXAS	\$1,991	\$992	\$2,509
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$5,261	\$1,503	\$3,020
8	NATIONAL SURETY CORPORATION	\$4,682	\$2,341	\$3,858
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,143	\$861	\$2,378
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,574	\$1,459	\$2,976
11	SAFECO INSURANCE COMPANY OF INDIANA	\$2,542	\$2,011	\$3,528
12	SENTINEL INSURANCE COMPANY, LTD.	\$2,286	\$1,986	\$3,503
13	STATE FARM LLOYDS	\$4,046	\$1,250	\$2,767
14	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,934	\$886	\$2,403
15	TEXAS FARMERS INSURANCE COMPANY	\$2,727	\$477	\$1,994
16	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$3,414	\$1,363	\$2,880
17	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,521	\$607	\$2,124
18	UNITRIN SAFEGUARD INSURANCE COMPANY	\$3,609	\$2,527	\$4,044

19	USAA TEXAS LLOYD'S COMPANY	\$1,515	\$603	\$2,120
	Mean	\$2,705.89	\$1,196.47	\$2,736.06

Kleberg county premium detail – good credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,512	\$706	\$2,223
2	ASI LLOYDS	\$2,496	\$625	\$2,142
3	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
4	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$3,118	\$1,251	\$2,768
5	FARMERS INSURANCE EXCHANGE	\$1,480	\$232	\$1,749
6	FOREMOST LLOYDS OF TEXAS	\$1,514	\$563	\$2,080
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$3,991	\$1,068	\$2,585
8	NATIONAL SURETY CORPORATION	\$4,236	\$2,118	\$3,635
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$1,943	\$844	\$2,361
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,361	\$1,262	\$2,779
11	SAFECO INSURANCE COMPANY OF INDIANA	\$1,949	\$1,542	\$3,059
12	SENTINEL INSURANCE COMPANY, LTD.	\$2,038	\$1,772	\$3,289
13	STATE FARM LLOYDS	\$3,722	\$1,150	\$2,667
14	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,641	\$797	\$2,314
15	TEXAS FARMERS INSURANCE COMPANY	\$2,571	\$353	\$1,870
16	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,953	\$954	\$2,471
17	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,420	\$511	\$2,028
18	UNITRIN SAFEGUARD INSURANCE COMPANY	\$2,779	\$1,945	\$3,462
19	USAA TEXAS LLOYD'S COMPANY	\$1,415	\$507	\$2,024
	Mean	\$2,395.32	\$1,004.84	\$2,521.84

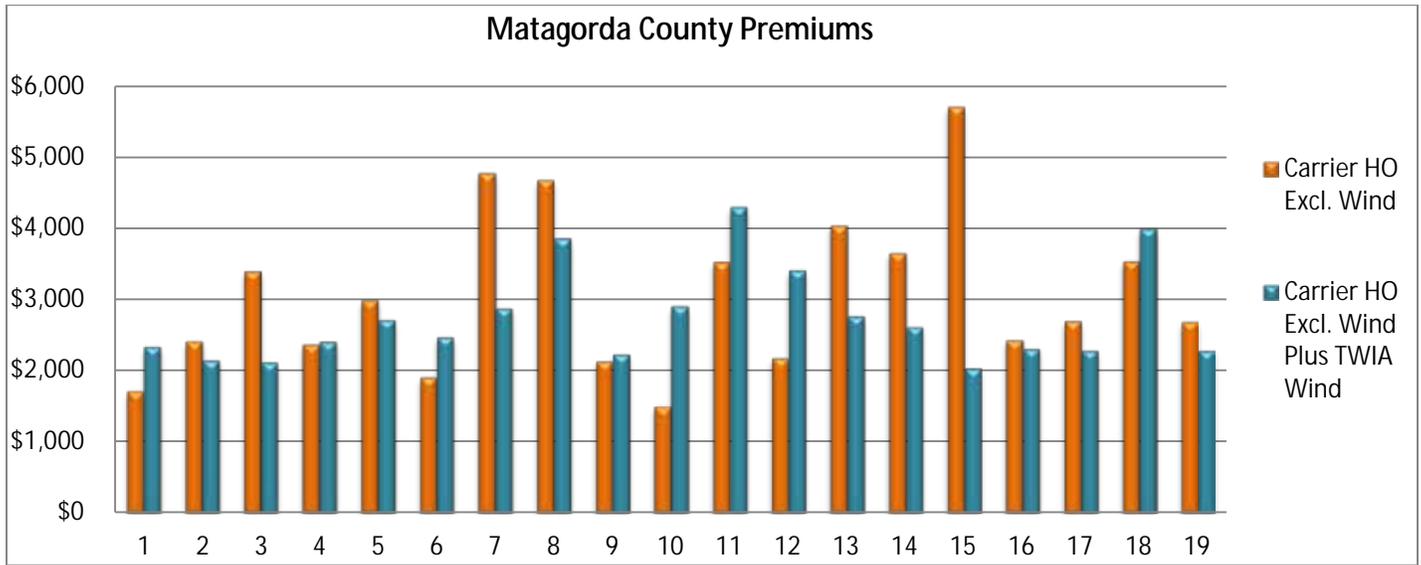
Kleberg county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,911	\$1,028	\$2,545
2	ASI LLOYDS	\$2,496	\$625	\$2,142
3	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409

4	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$3,118	\$1,251	\$2,768
5	FARMERS INSURANCE EXCHANGE	\$1,685	\$384	\$1,901
6	FOREMOST LLOYDS OF TEXAS	\$3,126	\$2,014	\$3,531
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$6,841	\$2,075	\$3,592
8	NATIONAL SURETY CORPORATION	\$5,573	\$2,787	\$4,304
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,194	\$1,210	\$2,727
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,460	\$2,277	\$3,794
11	SAFECO INSURANCE COMPANY OF INDIANA	\$3,982	\$3,151	\$4,668
12	SENTINEL INSURANCE COMPANY, LTD.	\$3,739	\$3,242	\$4,759
13	STATE FARM LLOYDS	\$4,398	\$1,358	\$2,875
14	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,374	\$1,019	\$2,536
15	TEXAS FARMERS INSURANCE COMPANY	\$2,865	\$585	\$2,102
16	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$5,382	\$2,819	\$4,336
17	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,615	\$699	\$2,216
18	UNITRIN SAFEGUARD INSURANCE COMPANY	\$5,739	\$4,017	\$5,534
19	USAA TEXAS LLOYD'S COMPANY	\$1,608	\$694	\$2,211
	Mean	\$3,446.21	\$1,690.89	\$3,244.72

MATAGORDA

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Matagorda County, 11 reporting carriers had premiums that were higher than TWIA and 8 had premiums that were lower.

Matagorda county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,716	\$823	\$2,340
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,419	\$633	\$2,150
3	ASI LLOYDS	\$3,398	\$604	\$2,121
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FOREMOST LLOYDS OF TEXAS	\$1,913	\$957	\$2,474
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$4,776	\$1,364	\$2,881
8	NATIONAL SURETY CORPORATION	\$4,682	\$2,341	\$3,858
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,136	\$717	\$2,234
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,503	\$1,393	\$2,910
11	SAFECO INSURANCE COMPANY OF INDIANA	\$3,527	\$2,789	\$4,306
12	SENTINEL INSURANCE COMPANY, LTD.	\$2,181	\$1,895	\$3,412
13	STATE FARM LLOYDS	\$4,046	\$1,250	\$2,767
14	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,659	\$1,103	\$2,620
15	TEXAS FARMERS INSURANCE COMPANY	\$5,711	\$520	\$2,037
16	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,434	\$791	\$2,308

17	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$2,703	\$772	\$2,289
18	UNITRIN SAFEGUARD INSURANCE COMPANY	\$3,539	\$2,477	\$3,994
19	USAA TEXAS LLOYD'S COMPANY	\$2,692	\$766	\$2,283
	Mean	\$3,073.74	\$1,225.68	\$2,742.68

Matagorda county premium detail – good credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,619	\$734	\$2,251
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$1,979	\$304	\$1,821
3	ASI LLOYDS	\$3,398	\$604	\$2,121
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FOREMOST LLOYDS OF TEXAS	\$1,457	\$546	\$2,063
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$3,622	\$969	\$2,486
8	NATIONAL SURETY CORPORATION	\$4,236	\$2,118	\$3,635
9	NATIONWIDE GENERAL INSURANCE COMPANY	\$1,912	\$695	\$2,212
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,299	\$1,205	\$2,722
11	SAFECO INSURANCE COMPANY OF INDIANA	\$2,703	\$2,138	\$3,655
12	SENTINEL INSURANCE COMPANY, LTD.	\$1,945	\$1,691	\$3,208
13	STATE FARM LLOYDS	\$3,722	\$1,150	\$2,667
14	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,293	\$993	\$2,510
15	TEXAS FARMERS INSURANCE COMPANY	\$5,577	\$428	\$1,945
16	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,171	\$548	\$2,065
17	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$2,570	\$650	\$2,167
18	UNITRIN SAFEGUARD INSURANCE COMPANY	\$2,725	\$1,907	\$3,424
19	USAA TEXAS LLOYD'S COMPANY	\$2,560	\$644	\$2,161
	Mean	\$2,744.95	\$1,021.95	\$2,538.95

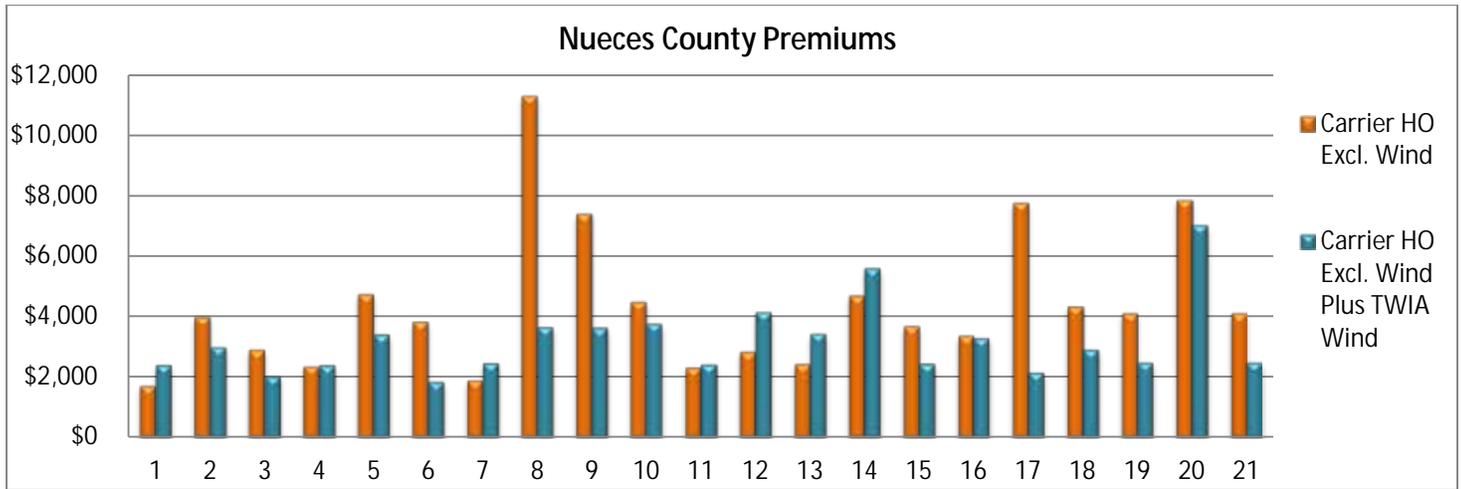
Matagorda county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$2,060	\$1,079	\$2,596
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,775	\$794	\$2,311
3	ASI LLOYDS	\$3,398	\$604	\$2,121
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FOREMOST LLOYDS OF TEXAS	\$2,999	\$1,934	\$3,451
7	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$6,209	\$1,883	\$3,400
8	NATIONAL SURETY CORPORATION	\$5,573	\$2,787	\$4,304

9	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,383	\$1,186	\$2,703
10	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,347	\$2,172	\$3,689
11	SAFECO INSURANCE COMPANY OF INDIANA	\$5,524	\$4,370	\$5,887
12	SENTINEL INSURANCE COMPANY, LTD.	\$3,565	\$3,091	\$4,608
13	STATE FARM LLOYDS	\$4,398	\$1,358	\$2,875
14	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$4,208	\$1,268	\$2,785
15	TEXAS FARMERS INSURANCE COMPANY	\$5,830	\$598	\$2,115
16	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$3,668	\$1,674	\$3,191
17	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$2,827	\$891	\$2,408
18	UNITRIN SAFEGUARD INSURANCE COMPANY	\$5,626	\$3,939	\$5,456
19	USAA TEXAS LLOYD'S COMPANY	\$2,814	\$883	\$2,400
	Mean	\$3,819.47	\$1,716.00	\$3,233.00

NUECES

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Nueces County, 14 reporting carriers had premiums that were higher than TWIA and 7 had premiums that were lower.

Nueces county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,733	\$904	\$2,421
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$4,001	\$1,489	\$3,006
3	ASI LLOYDS	\$2,919	\$525	\$2,042
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$4,754	\$1,904	\$3,421
6	FARMERS INSURANCE EXCHANGE	\$3,858	\$345	\$1,862
7	FOREMOST LLOYDS OF TEXAS	\$1,913	\$957	\$2,474
8	LIBERTY INSURANCE CORPORATION	\$11,309	\$2,144	\$3,661
9	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$7,417	\$2,119	\$3,636
10	NATIONAL SURETY CORPORATION	\$4,501	\$2,251	\$3,768
11	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,329	\$914	\$2,431
12	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,849	\$2,635	\$4,152
13	SAFECO INSURANCE COMPANY OF INDIANA	\$2,450	\$1,938	\$3,455
14	SENTINEL INSURANCE COMPANY, LTD.	\$4,710	\$4,081	\$5,598
15	STATE FARM LLOYDS	\$3,694	\$936	\$2,453
16	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,375	\$1,793	\$3,310
17	TEXAS FARMERS INSURANCE COMPANY	\$7,786	\$643	\$2,160
18	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$4,350	\$1,410	\$2,927

19	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$4,124	\$978	\$2,495
20	UNITRIN SAFEGUARD INSURANCE COMPANY	\$7,869	\$5,508	\$7,025
21	USAA TEXAS LLOYD'S COMPANY	\$4,114	\$971	\$2,488
	Mean	\$4,401.29	\$1,682.71	\$3,199.71

Nueces county premium detail – good credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,632	\$806	\$2,323
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$3,037	\$685	\$2,202
3	ASI LLOYDS	\$2,919	\$525	\$2,042
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$4,754	\$1,904	\$3,421
6	FARMERS INSURANCE EXCHANGE	\$3,777	\$287	\$1,804
7	FOREMOST LLOYDS OF TEXAS	\$1,457	\$546	\$2,063
8	LIBERTY INSURANCE CORPORATION	\$9,496	\$1,963	\$3,480
9	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$5,628	\$1,504	\$3,021
10	NATIONAL SURETY CORPORATION	\$4,073	\$2,036	\$3,553
11	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,103	\$890	\$2,407
12	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,453	\$2,270	\$3,787
13	SAFECO INSURANCE COMPANY OF INDIANA	\$1,879	\$1,486	\$3,003
14	SENTINEL INSURANCE COMPANY, LTD.	\$4,190	\$3,632	\$5,149
15	STATE FARM LLOYDS	\$3,398	\$861	\$2,378
16	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,038	\$1,614	\$3,131
17	TEXAS FARMERS INSURANCE COMPANY	\$7,647	\$534	\$2,051
18	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$3,878	\$981	\$2,498
19	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$3,962	\$822	\$2,339
20	UNITRIN SAFEGUARD INSURANCE COMPANY	\$6,059	\$4,242	\$5,759
21	USAA TEXAS LLOYD'S COMPANY	\$3,954	\$817	\$2,334
	Mean	\$3,890.76	\$1,395.10	\$2,912.10

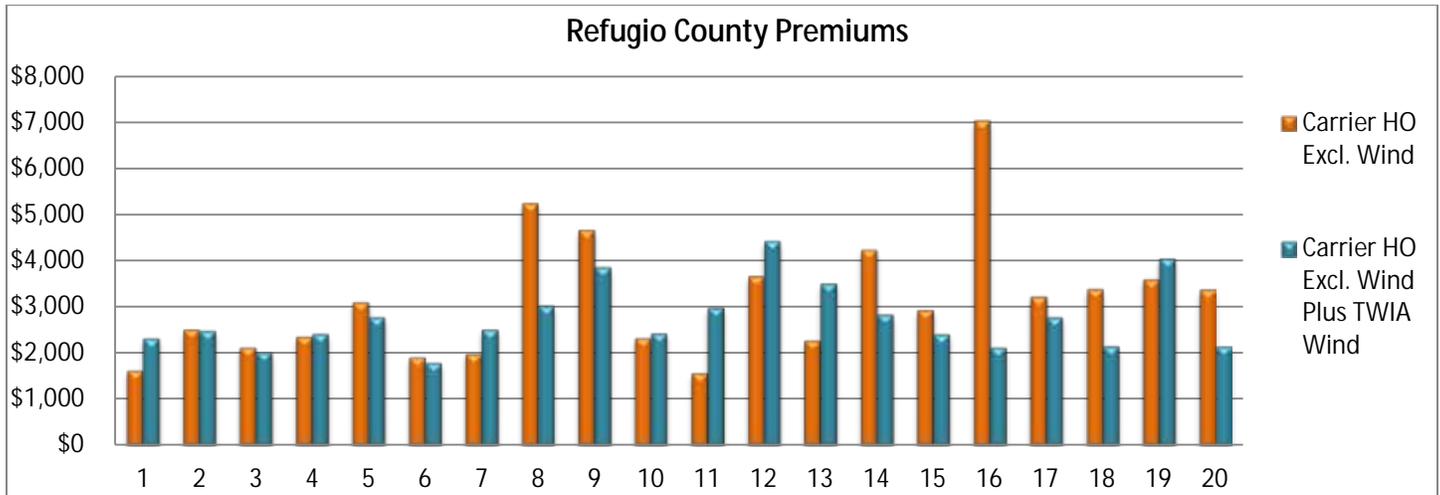
Nueces county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$2,077	\$1,170	\$2,687
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$4,666	\$1,874	\$3,391
3	ASI LLOYDS	\$2,919	\$525	\$2,042
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$4,754	\$1,904	\$3,421
6	FARMERS INSURANCE EXCHANGE	\$3,941	\$402	\$1,919

7	FOREMOST LLOYDS OF TEXAS	\$2,999	\$1,934	\$3,451
8	LIBERTY INSURANCE CORPORATION	\$18,525	\$2,840	\$4,357
9	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$9,642	\$2,925	\$4,442
10	NATIONAL SURETY CORPORATION	\$5,359	\$2,679	\$4,196
11	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,694	\$1,504	\$3,021
12	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$4,487	\$4,148	\$5,665
13	SAFECO INSURANCE COMPANY OF INDIANA	\$3,838	\$3,036	\$4,553
14	SENTINEL INSURANCE COMPANY, LTD.	\$7,760	\$6,717	\$8,234
15	STATE FARM LLOYDS	\$4,016	\$1,018	\$2,535
16	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,881	\$2,062	\$3,579
17	TEXAS FARMERS INSURANCE COMPANY	\$7,908	\$736	\$2,253
18	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$6,531	\$2,937	\$4,454
19	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$4,276	\$1,126	\$2,643
20	UNITRIN SAFEGUARD INSURANCE COMPANY	\$12,512	\$8,758	\$10,275
21	USAA TEXAS LLOYD'S COMPANY	\$4,264	\$1,117	\$2,634
	Mean	\$5,734.33	\$2,395.43	\$3,912.43

REFUGIO

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Refugio County, 12 reporting carriers had premiums that were higher than TWIA and 8 had premiums that were lower.

Refugio county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,632	\$797	\$2,314
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,524	\$966	\$2,483
3	ASI LLOYDS	\$2,133	\$507	\$2,024
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$3,118	\$1,251	\$2,768
6	FARMERS INSURANCE EXCHANGE	\$1,920	\$278	\$1,795
7	FOREMOST LLOYDS OF TEXAS	\$1,991	\$992	\$2,509
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$5,261	\$1,503	\$3,020
9	NATIONAL SURETY CORPORATION	\$4,682	\$2,341	\$3,858
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,338	\$910	\$2,427
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,574	\$1,459	\$2,976
12	SAFECO INSURANCE COMPANY OF INDIANA	\$3,674	\$2,906	\$4,423
13	SENTINEL INSURANCE COMPANY, LTD.	\$2,286	\$1,986	\$3,503
14	STATE FARM LLOYDS	\$4,249	\$1,313	\$2,830
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,947	\$890	\$2,407
16	TEXAS FARMERS INSURANCE COMPANY	\$7,050	\$610	\$2,127
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$3,237	\$1,255	\$2,772
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$3,400	\$637	\$2,154
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$3,609	\$2,527	\$4,044

20	USAA TEXAS LLOYD'S COMPANY	\$3,391	\$632	\$2,149
	Mean	\$3,169.40	\$1,232.60	\$2,749.60

Refugio county premium detail – good credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,542	\$712	\$2,229
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$1,898	\$449	\$1,966
3	ASI LLOYDS	\$2,133	\$507	\$2,024
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$3,118	\$1,251	\$2,768
6	FARMERS INSURANCE EXCHANGE	\$1,834	\$216	\$1,733
7	FOREMOST LLOYDS OF TEXAS	\$1,514	\$563	\$2,080
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$3,991	\$1,068	\$2,585
9	NATIONAL SURETY CORPORATION	\$4,236	\$2,118	\$3,635
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,115	\$890	\$2,407
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,361	\$1,262	\$2,779
12	SAFECO INSURANCE COMPANY OF INDIANA	\$2,816	\$2,228	\$3,745
13	SENTINEL INSURANCE COMPANY, LTD.	\$2,038	\$1,772	\$3,289
14	STATE FARM LLOYDS	\$3,909	\$1,207	\$2,724
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,652	\$801	\$2,318
16	TEXAS FARMERS INSURANCE COMPANY	\$6,901	\$492	\$2,009
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,826	\$868	\$2,385
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$3,291	\$536	\$2,053
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$2,779	\$1,945	\$3,462
20	USAA TEXAS LLOYD'S COMPANY	\$3,283	\$531	\$2,048
	Mean	\$2,830.45	\$1,015.40	\$2,532.40

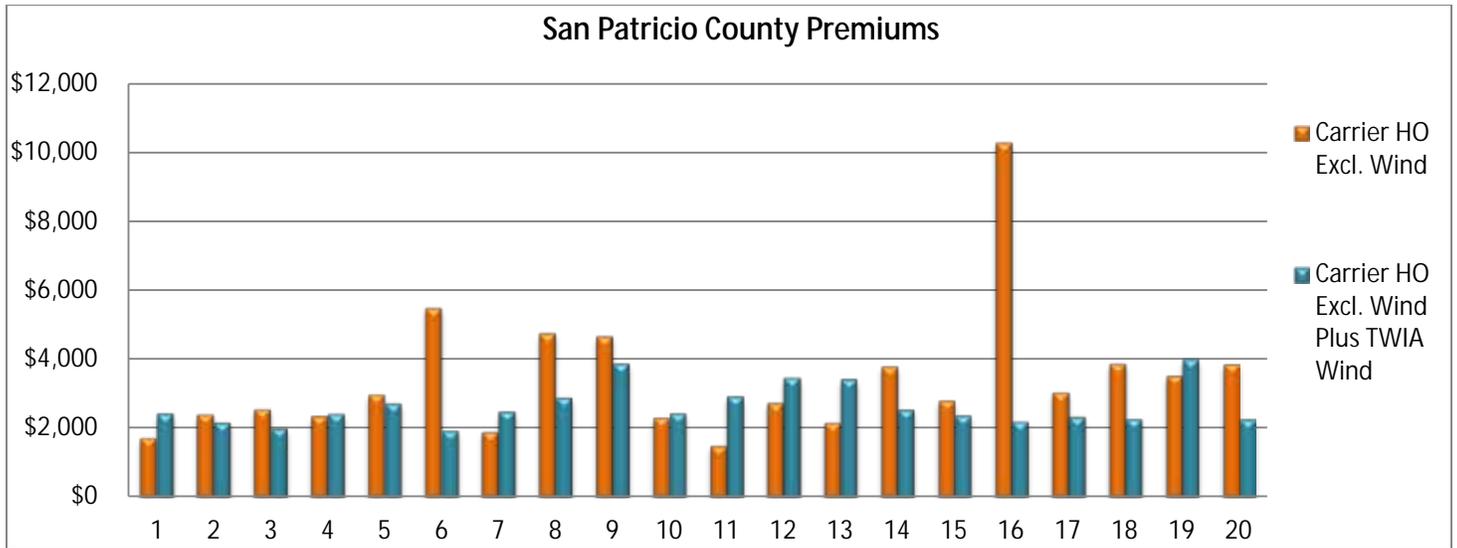
Refugio county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,949	\$1,036	\$2,553
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,952	\$1,219	\$2,736
3	ASI LLOYDS	\$2,133	\$507	\$2,024
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$3,118	\$1,251	\$2,768
6	FARMERS INSURANCE EXCHANGE	\$2,008	\$339	\$1,856
7	FOREMOST LLOYDS OF TEXAS	\$3,126	\$2,014	\$3,531
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$6,841	\$2,075	\$3,592
9	NATIONAL SURETY CORPORATION	\$5,573	\$2,787	\$4,304

10	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,492	\$1,281	\$2,798
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,460	\$2,277	\$3,794
12	SAFECO INSURANCE COMPANY OF INDIANA	\$5,755	\$4,552	\$6,069
13	SENTINEL INSURANCE COMPANY, LTD.	\$3,739	\$3,242	\$4,759
14	STATE FARM LLOYDS	\$4,618	\$1,426	\$2,943
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,389	\$1,024	\$2,541
16	TEXAS FARMERS INSURANCE COMPANY	\$7,183	\$714	\$2,231
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$5,053	\$2,657	\$4,174
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$3,501	\$735	\$2,252
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$5,739	\$4,017	\$5,534
20	USAA TEXAS LLOYD'S COMPANY	\$3,491	\$728	\$2,245
	Mean	\$3,924.60	\$1,738.65	\$3,255.65

SAN PATRICIO

Graphical premium analysis showing annual sample rate for consumers with average credit:



In San Patricio County, 12 reporting carriers had premiums that were higher than TWIA and 8 had premiums that were lower.

San Patricio county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,733	\$904	\$2,421
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,423	\$644	\$2,161
3	ASI LLOYDS	\$2,566	\$480	\$1,997
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FARMERS INSURANCE EXCHANGE	\$5,503	\$413	\$1,930
7	FOREMOST LLOYDS OF TEXAS	\$1,913	\$957	\$2,474
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$4,776	\$1,364	\$2,881
9	NATIONAL SURETY CORPORATION	\$4,682	\$2,341	\$3,858
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,329	\$914	\$2,431
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,503	\$1,393	\$2,910
12	SAFECO INSURANCE COMPANY OF INDIANA	\$2,741	\$1,938	\$3,455
13	SENTINEL INSURANCE COMPANY, LTD.	\$2,181	\$1,895	\$3,412
14	STATE FARM LLOYDS	\$3,813	\$1,018	\$2,535
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,820	\$852	\$2,369
16	TEXAS FARMERS INSURANCE COMPANY	\$10,291	\$676	\$2,193
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$3,052	\$809	\$2,326
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$3,886	\$746	\$2,263

19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$3,539	\$2,477	\$3,994
20	USAA TEXAS LLOYD'S COMPANY	\$3,876	\$740	\$2,257
	Mean	\$3,449.65	\$1,132.70	\$2,649.70

San Patricio county premium detail – good credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,632	\$806	\$2,323
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$1,985	\$310	\$1,827
3	ASI LLOYDS	\$2,566	\$480	\$1,997
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FARMERS INSURANCE EXCHANGE	\$5,414	\$347	\$1,864
7	FOREMOST LLOYDS OF TEXAS	\$1,457	\$546	\$2,063
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$3,622	\$969	\$2,486
9	NATIONAL SURETY CORPORATION	\$4,236	\$2,118	\$3,635
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,103	\$890	\$2,407
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,299	\$1,205	\$2,722
12	SAFECO INSURANCE COMPANY OF INDIANA	\$2,102	\$1,486	\$3,003
13	SENTINEL INSURANCE COMPANY, LTD.	\$1,945	\$1,691	\$3,208
14	STATE FARM LLOYDS	\$3,508	\$936	\$2,453
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,538	\$767	\$2,284
16	TEXAS FARMERS INSURANCE COMPANY	\$10,154	\$568	\$2,085
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,771	\$562	\$2,079
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$3,759	\$627	\$2,144
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$2,725	\$1,907	\$3,424
20	USAA TEXAS LLOYD'S COMPANY	\$3,750	\$623	\$2,140
	Mean	\$3,146.60	\$946.55	\$2,463.55

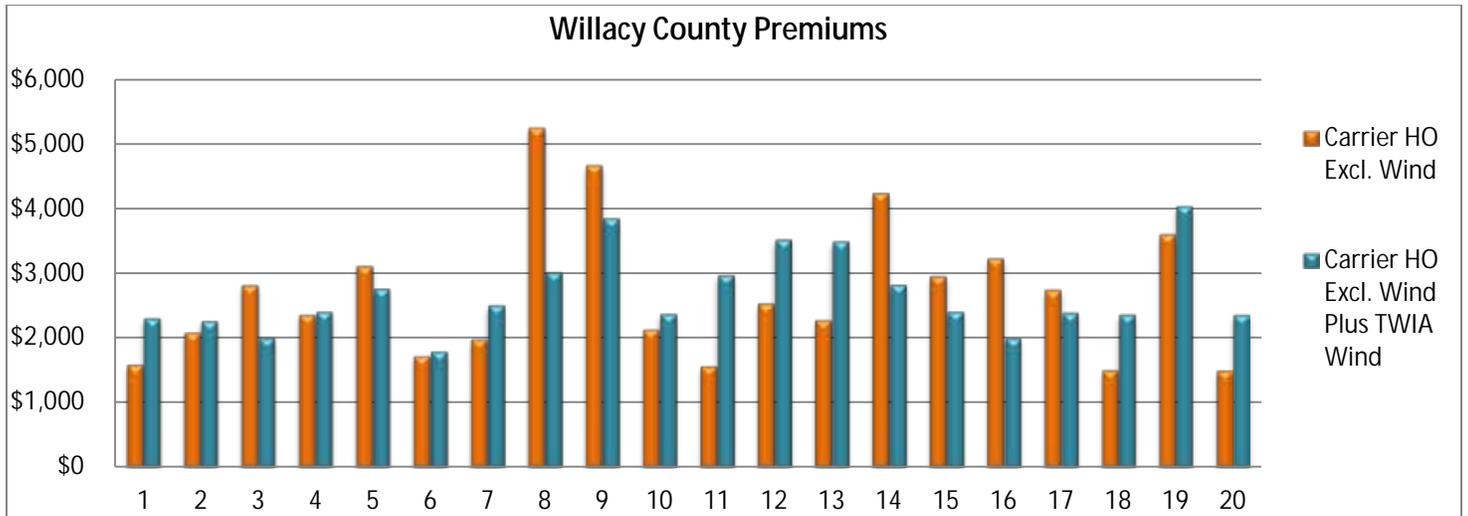
San Patricio county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$2,077	\$1,170	\$2,687
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,777	\$807	\$2,324
3	ASI LLOYDS	\$2,566	\$480	\$1,997
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$2,994	\$1,201	\$2,718
6	FARMERS INSURANCE EXCHANGE	\$5,593	\$478	\$1,995
7	FOREMOST LLOYDS OF TEXAS	\$2,999	\$1,934	\$3,451
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$6,209	\$1,883	\$3,400

9	NATIONAL SURETY CORPORATION	\$5,573	\$2,787	\$4,304
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,694	\$1,504	\$3,021
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,347	\$2,172	\$3,689
12	SAFECO INSURANCE COMPANY OF INDIANA	\$4,294	\$3,036	\$4,553
13	SENTINEL INSURANCE COMPANY, LTD.	\$3,565	\$3,091	\$4,608
14	STATE FARM LLOYDS	\$4,145	\$1,106	\$2,623
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,243	\$980	\$2,497
16	TEXAS FARMERS INSURANCE COMPANY	\$10,413	\$769	\$2,286
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$4,447	\$1,710	\$3,227
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$4,005	\$860	\$2,377
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$5,626	\$3,939	\$5,456
20	USAA TEXAS LLOYD'S COMPANY	\$3,993	\$853	\$2,370
	Mean	\$4,146.60	\$1,582.60	\$3,099.60

WILLACY

Graphical premium analysis showing annual sample rate for consumers with average credit:



In Willacy County, 8 reporting carriers had premiums that were higher than TWIA and 12 had premiums that were lower.

Willacy county premium detail – average credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,599	\$790	\$2,307
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,088	\$749	\$2,266
3	ASI LLOYDS	\$2,820	\$492	\$2,009
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$3,118	\$1,251	\$2,768
6	FARMERS INSURANCE EXCHANGE	\$1,730	\$281	\$1,798
7	FOREMOST LLOYDS OF TEXAS	\$1,991	\$992	\$2,509
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$5,261	\$1,503	\$3,020
9	NATIONAL SURETY CORPORATION	\$4,682	\$2,341	\$3,858
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$2,143	\$861	\$2,378
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,574	\$1,459	\$2,976
12	SAFECO INSURANCE COMPANY OF INDIANA	\$2,542	\$2,011	\$3,528
13	SENTINEL INSURANCE COMPANY, LTD.	\$2,286	\$1,986	\$3,503
14	STATE FARM LLOYDS	\$4,249	\$1,313	\$2,830
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,961	\$894	\$2,411
16	TEXAS FARMERS INSURANCE COMPANY	\$3,240	\$490	\$2,007
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,749	\$879	\$2,396
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,512	\$849	\$2,366
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$3,609	\$2,527	\$4,044

20	USAA TEXAS LLOYD'S COMPANY	\$1,502	\$843	\$2,360
	Mean	\$2,701.40	\$1,170.15	\$2,687.15

Willacy county premium detail – good credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,512	\$706	\$2,223
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$1,559	\$348	\$1,865
3	ASI LLOYDS	\$2,820	\$492	\$2,009
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$3,118	\$1,251	\$2,768
6	FARMERS INSURANCE EXCHANGE	\$1,649	\$223	\$1,740
7	FOREMOST LLOYDS OF TEXAS	\$1,514	\$563	\$2,080
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$3,991	\$1,068	\$2,585
9	NATIONAL SURETY CORPORATION	\$4,236	\$2,118	\$3,635
10	NATIONWIDE GENERAL INSURANCE COMPANY	\$1,943	\$844	\$2,361
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$1,361	\$1,262	\$2,779
12	SAFECO INSURANCE COMPANY OF INDIANA	\$1,949	\$1,542	\$3,059
13	SENTINEL INSURANCE COMPANY, LTD.	\$2,038	\$1,772	\$3,289
14	STATE FARM LLOYDS	\$3,909	\$1,207	\$2,724
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$2,665	\$805	\$2,322
16	TEXAS FARMERS INSURANCE COMPANY	\$3,096	\$386	\$1,903
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$2,408	\$605	\$2,122
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,367	\$714	\$2,231
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$2,779	\$1,945	\$3,462
20	USAA TEXAS LLOYD'S COMPANY	\$1,359	\$709	\$2,226
	Mean	\$2,382.25	\$972.60	\$2,489.60

Willacy county premium detail – bad credit:

	Company Name	Annual Sample Rate (ASR) - Carrier's HO incl. wind coverage	ASR – Carrier's HO excl. wind coverage	ASR – Carrier's HO excl. wind coverage plus TWIA Wind
1	ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY	\$1,911	\$1,028	\$2,545
2	AMERICAN MERCURY LLOYD'S INSURANCE COMPANY	\$2,451	\$948	\$2,465
3	ASI LLOYDS	\$2,820	\$492	\$2,009
4	CHARTIS PROPERTY CASUALTY COMPANY	\$2,372	\$892	\$2,409
5	CHUBB LLOYDS INSURANCE COMPANY OF TEXAS	\$3,118	\$1,251	\$2,768
6	FARMERS INSURANCE EXCHANGE	\$1,814	\$339	\$1,856
7	FOREMOST LLOYDS OF TEXAS	\$3,126	\$2,014	\$3,531
8	METROPOLITAN LLOYDS INSURANCE COMPANY OF TEXAS	\$6,841	\$2,075	\$3,592
9	NATIONAL SURETY CORPORATION	\$5,573	\$2,787	\$4,304

10	NATIONWIDE GENERAL INSURANCE COMPANY	\$3,194	\$1,210	\$2,727
11	PROPERTY AND CASUALTY INSURANCE COMPANY OF HARTFORD	\$2,460	\$2,277	\$3,794
12	SAFECO INSURANCE COMPANY OF INDIANA	\$3,982	\$3,151	\$4,668
13	SENTINEL INSURANCE COMPANY, LTD.	\$3,739	\$3,242	\$4,759
14	STATE FARM LLOYDS	\$4,618	\$1,426	\$2,943
15	TEXAS FARM BUREAU MUTUAL INSURANCE COMPANY	\$3,405	\$1,028	\$2,545
16	TEXAS FARMERS INSURANCE COMPANY	\$3,367	\$580	\$2,097
17	TRAVELERS HOME AND MARINE INSURANCE COMPANY, THE	\$4,248	\$1,879	\$3,396
18	UNITED SERVICES AUTOMOBILE ASSOCIATION	\$1,645	\$977	\$2,494
19	UNITRIN SAFEGUARD INSURANCE COMPANY	\$5,739	\$4,017	\$5,534
20	USAA TEXAS LLOYD'S COMPANY	\$1,634	\$970	\$2,487
	Mean	\$3,402.85	\$1,629.15	\$3,146.15

POLICY TAKE-OUT PROGRAM

§2314

A. The legislature created the Louisiana Citizens Property Insurance Corporation to operate insurance plans as a residual market for residential and commercial property. The legislature further intends that the corporation work toward the ultimate depopulation of these residual market plans. To encourage the ultimate depopulation of these residual market plans, there is hereby created the Louisiana Citizens Property Insurance Corporation Policy Take-Out Program.

B.

(1) Not less than once per calendar year, the corporation shall offer all of its in-force policies for removal to the voluntary market. The corporation shall include offers for depopulation policies with all available geographic and risk characteristics that serve to reduce the exposure of the corporation.

(2) Each insurer participating in the take-out program shall be offered all of the corporation's in-force policies. In response, the insurers shall provide the corporation with a list of policies they propose to take out subject to authorization by the policy's agent of record. No policy shall be assumed by a take-out company without the authorization of the agent of record.

C. Each insurer admitted to write homeowners insurance or insurance insuring one- or two-family owner occupied premises for fire and allied lines or insurance which covers commercial structures in the state of Louisiana may apply to the Louisiana Citizens Property Insurance Corporation to become a take-out company. Insurers will be approved to participate in the depopulation of the Louisiana Citizens Property Insurance Corporation based on the following criteria:

(1) The capacity of the insurer to absorb the policies proposed to be taken out of the corporation and the concentration of risks of those policies. Such capacity may be evidenced by providing to the Louisiana Citizens Property Insurance Corporation a copy of a valid certificate of authority issued by the Louisiana Department of Insurance to the insurer. An insurer shall not be qualified to participate in the take-out program unless that insurer has at least a B+ rating with A.M. Best, or its equivalent.

(2) An insurer shall have the rates proposed to be charged for the policies being taken out, filed, and approved by the Louisiana Department of Insurance with an effective date prior to the assumption of policies. The insurer shall provide proof to Louisiana Citizens Property Insurance Corporation that the rates have been approved and are adequate under R.S. 22:1451 et seq.

(3) The rates which are charged by the company submitting a take-out plan must comply with R.S. 22:2303 in the first year that the company charges premiums to the customer. During the second and subsequent years of coverage, the take-out company shall apply to the Department of Insurance for rates which are actuarially justified, but in no case may the rates be greater than those authorized in R.S. 22:2303.

D. The corporation shall submit an insurer's application to participate to the governing board for approval.

E. The board of directors of the Louisiana Citizens Property Insurance Corporation shall develop guidelines for the take-out program which shall be filed with and approved by the Senate Committee on Insurance, the House Committee on Insurance, and the commissioner of insurance.

F. The provisions of this Section shall not be construed to impair the right of any Louisiana Citizens Property Insurance Corporation policyholder, upon receipt of an approved take-out offer, to retain his current producer, so long as that producer is a licensed insurance producer authorized to bind insurance coverage for the FAIR and Coastal Plans, or to retain Louisiana Citizens Property Insurance Corporation as their insurer. This right shall not be canceled, suspended, impeded, abridged, or otherwise compromised by any rule, plan of operation, or depopulation plan.

Acts 2007, No. 377, §1, eff. Nov. 1, 2007; Redesignated from R.S. 22:1430.23 by Acts 2008, No. 415, §1, eff. Jan. 1, 2009; Acts 2008, No. 465, §1; Acts 2010, No. 397, §1, eff. June 21, 2010; Acts 2012, No. 271, §1.

View the source of this text here: <http://www.legis.state.la.us/lss/lss.asp?doc=509416&showback>

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## RATES, RATING PLANS, AND RATE RULES APPLICABLE

### §2303. Rates, rating plans, and rate rules applicable

A. (1) As residual markets, the plans made available by the Louisiana Citizens Property Insurance Corporation are not intended to offer rates competitive with the voluntary market. Rates for policies issued under the Coastal Plan and the FAIR Plan shall be set by the governing board of the Louisiana Citizens Property Insurance Corporation, adjusted annually, and shall exceed by at least ten percent the higher of (a) the actuarially justified rate or (b) the highest rates charged among assessable insurers that have a minimum of two percent of the total direct written premium in each respective parish for that line of business in the preceding year, or, with respect to personal lines property insurance, excluding wind and hail policies, only, (c) the highest rates charged among assessable insurers in each respective parish which in the preceding year increased by at least twenty-five additional personal lines property insurance policies, excluding wind and hail policies, in such parish, the total number of such policies in effect for the parish over the year before. Such rates shall include an appropriate catastrophe loading factor and may include rules for classification of risks insured hereunder and rate modifications hereof.

*For complete text of the statute, please visit <http://www.legis.state.la.us/lss/lss.asp?doc=509402&showback>*