



December 21, 2020

State of California Department of Insurance
Attn: Commissioner Ricardo Lara
300 Capitol Mall, 17th Floor
Sacramento, CA 95814

Response submitted electronically December 21, 2020 to
RSBCovid19PR@insurance.ca.gov

Commissioner Lara;

Please accept the following response from Argo Group US, Inc. on behalf of the following California licensed insurance companies operating in the state and our apologies for the lateness of our report on Premium Refunds, Credits and Reductions in Response to COVID-19 Pandemic as stated in Bulletin 2020-8, which was due on October 1, 2020.

- Argonaut Insurance Company, MAIC 19801
- Argonaut Great Central Insurance Company, NAIC 19860
- Argonaut Midwest Insurance Company, NAIC 19828
- Colony Specialty Insurance Company, NAIC 36927

Argo Group US, Inc, reviewed Bulletin 2020-8 that was issued by California Insurance Commissioner Ricardo Lara in June 2020 that orders licensed property and casualty insurers to return premium for the months of June, July and August after reviewing their book of business to determine if the measures of risk for policyholders adversely impacted by COVID-19 have become substantially overstated.

As a specialty, niche market insurer, Argo Group US, Inc. provides insurance coverage to commercial policyholders operating in a broad range of industries, many of which were considered essential businesses during the state of California's stay-at-home orders. Due to the diversity of commercial entities that make up our portfolio, Argo Group US, Inc. has determined that we will not offer refunds across the board on any line of business we write. While we will not be making an across the board refund to policyholders, we do recognize that some of our California policyholders may be adversely impacted by COVID-19 in a manner that makes the measure of risk substantially overstated for their individual policy. Argo Group US, Inc. will continue to review requests received from our policyholders on a case by case basis and evaluate the individual situation of our insureds to determine if a premium refund is warranted.



Argo Group US, Inc. does write workers compensation insurance in California. We recognize that this line of business may be impacted by COVID-19, even for those businesses deemed essential by the state during the state stay-at-home orders during the pandemic. If a Worker Compensation policyholder that has been adversely impacted by COVID-19 has not requested a review of their individual circumstance of COVID-19, the adjustment to their policy exposures will occur during the premium audit process at the end of the policy term.

Argo Group US, Inc. took additional voluntary action to provide assistance to our policyholders experiencing financial hardship due to COVID-19. We provided a nationwide temporary suspension of policy cancellations for nonpayment of premium through September 1, 2020. We also provided flexibility of payment dates, offered installment payment plans and waived late fees for premium payments. We continue to comply with state orders requiring policyholder leniency for policyholders adversely impacted by COVID-19.

Argo Group US, Inc. continues to monitor our loss experience resulting from the COVID-19 pandemic.

Please do not hesitate to contact me if you should have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Toby Mills", written over a light blue horizontal line.

Toby Mills
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Enclosure: NAIC Group 457 Argo Group - Covid19RptFormsOct2020Final