

**October 1 COVID-19 CA reporting form
Nationwide Insurance Company of America
Private Passenger Auto**

Explanatory Memorandum question II

Additional responses for June, July, and August are bolded and highlighted. For these months, we have returned additional premium back to customers who have made policy adjustments to their mileage or vehicle usage. Also, we have withdrawn our rate filing due to COVID-19 impacts.

*Responses for question #: 2, **3**, 4, 5, and 6*

2b. Please provide a summary of your action plan to achieve the premium refund in response to this bulletin in the Explanatory Memorandum-section II.

PPA: The amount the Nationwide group of companies directly returned to private passenger automobile insurance customers was a one-time payment of \$50 applied uniformly for each personal auto policy in force on March 31, 2020 to each customer's most recent method of payment. Given that potential changes in risk differ individually, and given the limited duration of this event to date, it is our belief that the amount directly returned is a fair distribution back to our individual customers. However, as explained in additional sections of this memorandum (particularly 5d.), this was not the sole effort undertaken by Nationwide to accommodate PPA customers in accord with the spirit of Bulletins 2020-3 and 2020-4.

3. Does your company have any rate filings pending approval by the Rate Regulation Branch in the California Department of Insurance?

PPA: We filed a PPA rate filing (CDI # 19-4279, 19-427-A) in November 2019 with June 2020 effective dates. Impact was a 4.5% increase on an indicated change of 19.5%. In May we deferred this filing due to COVID-19. Now in September, we have withdrawn this filing. This is a DWP impact reduction of \$27 million.

4. How did your company accomplish its refund of premium to policyholders? Please answer by line of insurance. If the method differs by program within line of insurance, please check all boxes that apply and provide additional explanation in the accompanying Explanatory Memorandum - section II.

PPA: Customers didn't need to do anything to receive the refund. Refunds were automatically credited to the customers' most recent method of payment (automatic withdrawal, credit card, personal check, etc.), along with an explanatory communication, which also affirmed customers' ability to reassess estimated mileage driven and vehicle classification on a case-by-case basis. We believe this was the quickest way possible to get relief into the hands of our customers.

5. *Explain which of the following method(s) your company used to compute the premium refund. Please check the appropriate box for each line of insurance. If the response differs by program within line of insurance, check the box for the predominant program in the line, and provide additional explanation for the remaining programs in the accompanying Explanatory Memorandum - section II.*

5d. PPA: We directly communicated an ability to continue to allow customers to reclassify Annual Mileage and Vehicle Use (from Work and Business to Pleasure), as appropriate under case-by-case circumstances, based on their individual situations. This has resulted in additional relief being extended to personal auto customers beyond the refund. This has reduced our annual DWP by an additional **\$6.6 million as of the end of August. It will continue to grow as more members reduce their annual mileage in coming months.**

6. *Identify any and all other measures that your company has taken to help policyholders during the COVID-19 quarantine period. Select a method from the list below for each line of insurance. If the method differs by program within line of insurance, check the box for the predominant program in the line, and provide additional explanation for the remaining programs in Explanatory Memorandum - section II.*

We extended underwriting leniency for expired Driver's Licenses and vehicle registrations (Ref - CDI Notice of May 5, 2020).

We broadened delivery coverage on personal auto coverage (Ref - CDI Notice of April 9, 2020).

We provided billing and cancellation leniency (Ref - CDI Notice of March 18, 2020).

If your company writes in one of the lines specified in Bulletin 2020-3 and has issued refunds for your policyholders, please explain all actions taken to date to refund premium in response to or consistent with this Bulletin. Please include California-specific information and an explanation and justification for the amount, effective date, and duration of any premium refund, and how those measures reflect the actual or expected reduction of exposure to loss.

PPA: The number of miles driven by our customers and personal auto claims have fallen since Stay-at-Home and Shelter-in-Place orders have taken effect in many states, resulting from and accompanied by vastly increased use of work-from-home technologies and other social distancing efforts. To reflect potential change in risk and to respond to the hardship that many households are experiencing as a result of the COVID-19 pandemic, Nationwide developed a plan to return a fixed dollar amount to our customers as quickly as possible. Though there continues to be uncertainty about what the true impact of COVID-19 will be, the fixed dollar amount we returned to our customers reflects our best estimate of the decrease in personal auto claims and miles driven throughout the duration of this event.

This table shows the California-specific experience on frequency and severity effects from the COVID-19 Stay at Home order in California.

<i>Change in</i>	March	April	May	June	July	August
Frequency	-27%	-64%	-54%	-13%	-7%	-4%
Severity	-3%	23%	12%	9%	-4%	5%

BI, PD, and Collision Incurred Frequency and Paid Severity

Relative to February, the incurred frequency fell in the spring and has returned nearly to its pre-COVID level. Paid severity counteracted some of that frequency favorability during this time. We expect severity to remain pressured due to increased vehicle speeds, higher PPE and cleaning costs, and possible supply chain delays. However, it is key to note that in addition to and beyond the fixed refund amount provided directly to our California PPA customers, Nationwide is also honoring appropriate adjustment of annual mileage estimates and vehicle use classification on a case-by-case basis, resulting in additional relief (see 5d.).

As we work together through this difficult time for our customers across the country, we have proactively identified and implemented several measures consonant with the framework of reasonable flexibility empowered by CDI Bulletins 2020-3 and 2020-4 (and other CDI Notices) to help Nationwide customers face the sudden challenges presented by the COVID-19 pandemic. We offered this rapid relief, additional case-by-case accommodation, and underwriting/billing leniency at a time when drivers are making the right choice to stay off the road and remain home to help “flatten the curve.” This relief, and the manner in which we have chosen to provide it to our customers, is just one more way in which we are furthering our mission to protect people, business, and futures with extraordinary care.