From: Chen, Ja-Lin
To: Ho, Fion
Subject: FW: Question Re Absence of Reporting
Date: Tuesday, December 29, 2020 12:50:48 PM
Attachments: image001.png

Hi Fion,

The CopperPoint Group of insurance companies (NAIC# 4485) –

(1) Pacific Compensation Insurance Co. (NAIC# 11555)
(2) Alaska National Insurance Co. (NAIC# 38733)
(3) MountainPoint Insurance Company (NAIC# 42242),(already in NoPR folder)

Revised to no refund due to NAIC's INT 20-08, can you change the status in your records as no refund. Do you want me to move those files to NoPR folder for both 2020-03/04 and 2020-08? Please also change the status for Amended 2020-08 as no refund for those three companies.

Thank you,

Ja-Lin

From: Skaggs, David <dskaggs@pacificcomp.com>
Sent: Tuesday, December 29, 2020 12:00 PM
To: Chen, Ja-Lin <Ja-Lin.Chen@insurance.ca.gov>
Subject: RE: Question Re Absence of Reporting

Thank you Ja-Lin … have a Happy New Year!

Best,

David M. Skaggs
Vice President, Legal
T: 818-597-7486 | F: 818-475-1459

From: Chen, Ja-Lin <Ja-Lin.Chen@insurance.ca.gov>
Sent: Tuesday, December 29, 2020 10:46 AM
To: Skaggs, David <dskaggs@pacificcomp.com>
Subject: RE: Question Re Absence of Reporting

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear David Skaggs,

I will take this email as your revisions for prior filings as no refund due to new NIAC 's INT 20-08. You already stated the reason of revision, I will keep this email in our record as a proof of your submission.
If you require any further information, feel free to contact us.
Ja-Lin Chen
Senior Insurance Rate Analyst
California Department of Insurance
Rate Regulation Branch
300 South Spring Street
Los Angeles, CA 90013
(213) 346-6772

From: Skaggs, David <dskaggs@pacificcomp.com>
Sent: Tuesday, December 29, 2020 9:01 AM
To: Chen, Ja-Lin <Ja-Lin.Chen@insurance.ca.gov>
Subject: RE: Question Re Absence of Reporting

Hello Ja-Lin,

Thank you for your reply. The attached is the memo that we filed with our last premium reduction repot. I highlighted the portions that speak to the NAIC guidance. Based upon this highlighted language which was part of our filing, do you think we need to revise the first report or leave as is?

Thank you,

David M. Skaggs
Vice President, Legal
T: 818-597-7486 | F: 818-475-1459

From: Chen, Ja-Lin <Ja-Lin.Chen@insurance.ca.gov>
Sent: Thursday, December 24, 2020 10:27 AM
To: Skaggs, David <dskaggs@pacificcomp.com>
Subject: FW: Question Re Absence of Reporting

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear David Skaggs,

If your company revised your position on refund status, please submit an email indicated that your company will revised 2020-03/2020-04 and 2020-08 to no refund (no excel files needed). We can put in our file for future reference.
If you require any further information, feel free to contact us.

Ja-Lin Chen
Senior Insurance Rate Analyst
California Department of Insurance
Rate Regulation Branch
300 South Spring Street
Los Angeles, CA 90013
(213) 346-6772

From: Skaggs, David <dskaggs@pacificcomp.com>
Sent: Monday, December 21, 2020 1:48 PM
To: RSBCovid19PR <RSBCovid19PR@insurance.ca.gov>
Subject: Question Re Absence of Reporting

Hello RSB COVID19PR Team,

The CopperPoint Group of insurance companies (NAIC# 4485) – which consists predominantly of CopperPoint Insurance Co. (NAIC# 14216), domiciled in AZ, Pacific Compensation Insurance Co. (NAIC# 11555), domiciled in CA, and Alaska National Insurance Co. (NAIC# 38733), domiciled in AK, – submitted two, prior reports responsive to the COVID premium reduction request. These reports were submitted on behalf of Pacific Compensation Insurance Company, Alaska National Insurance Company and, also, MountainPoint Insurance Company (NAIC# 42242), with the latter writing no lines of insurance at all.

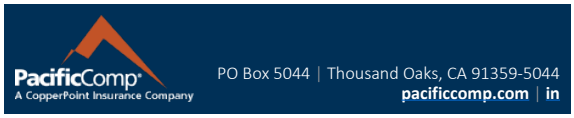
In the our first reporting, we reported on the reduction to payroll that was occasioned by the impact of COVID and also the reduction in our commercial auto premiums. By the second reporting, and after having consulted with our finance dept. in regard to workers' compensation policies, we recognized that workers' compensation premium reductions that are consistent with the terms of our policies were not actual COVID reductions according to NAIC guidance contained in *INT 20-08: COVID-19 Premium Refunds, Limited-Time Exception, Rate Reductions and Policyholder Dividends*. This is because reductions in payroll resulting in premium refunds or reductions (including deposit changes, EAP adjustments, reduced installments, etc.) would fall under existing policy terms/mechanisms such as payroll reporting, revised payroll estimates, interim audits, exposure related endorsements, etc. Guided by the NAIC's *INT 20-08* and in an effort to report consistent with our finance dept.'s reporting, we adopted the NAIC guidance as it relates to the CA COVID reporting. Regarding commercial auto, our underwriters determined that the few commercial policies that we write in CA would see no further premium reduction as the level of risk had resumed to a roughly pre-pandemic level.

Therefore, at this point (i.e., for the third and any future reporting), we would have nothing to report. However, I want to confirm with you first whether we should file something on behalf of each organization mentioned above that had filed in the past stating that there is nothing to report, or do we merely, silently cease reporting?

I appreciate any information or advice you might be able to offer.

Thank you,

David M. Skaggs
Vice President, Legal
T: 818-597-7486 | F: 818-475-1459



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