

1 Harvey Rosenfield, SBN 123082  
2 Pamela Pressley, SBN 180362  
3 Benjamin Powell, SBN 311624  
4 Ryan Mellino, SBN 342497  
5 **CONSUMER WATCHDOG**  
6 6330 San Vicente Blvd., Suite 250  
7 Los Angeles, CA 90048  
8 Tel. (310) 392-0522  
9 Fax (310) 861-0862  
10 harvey@consumerwatchdog.org  
11 pam@consumerwatchdog.org  
12 ben@consumerwatchdog.org  
13 ryan@consumerwatchdog.org

14 Attorneys for CONSUMER WATCHDOG

15 BEFORE THE INSURANCE COMMISSIONER

16 OF THE STATE OF CALIFORNIA

17 In the Matter of the Rate Application of

18 State Farm General Insurance  
19 Company,

20 Applicant.

21 File No.: 24-1271

22 **CONSUMER WATCHDOG'S FIRST SET  
23 OF DISCOVERY REQUESTS  
24 PROPOUNDED ON STATE FARM  
25 GENERAL INSURANCE COMPANY**

1 DEMANDING PARTY: CONSUMER WATCHDOG

2 RESPONDING PARTIES: STATE FARM GENERAL INSURANCE COMPANY

3 SET NUMBER: ONE

4 Pursuant to California Code of Regulations, title 10 (“10 CCR”), § 2655.1 and  
5 Government Code section 11507.6, liberally construed, Intervenor Consumer Watchdog, hereby  
6 propounds the following discovery requests on STATE FARM GENERAL INSURANCE  
7 COMPANY.

8 Consumer Watchdog requests that delivery of documents be made to Pamela Pressley at  
9 the offices of Consumer Watchdog, located at 6330 San Vicente Boulevard, Suite 250, Los  
10 Angeles, California 90048. To the extent possible, Consumer Watchdog requests that YOU  
11 produce DOCUMENTS in electronic format, such as PDF, or WORD or EXCEL as applicable.  
12 Responsive documents should be produced either in the order they are kept or in correlation to  
13 the request to which they are responsive, and Consumer Watchdog requests that YOU identify  
14 which documents are responsive to which requests.

15 Pursuant to 10 CCR § 2655.1(b), if YOU do not produce a responsive DOCUMENT,  
16 YOU must specifically identify the DOCUMENT along with the specific objection pursuant to  
17 which the item is withheld. In addition, YOU are required to precisely specify why the objection  
18 applies. Moreover, if an item is withheld pursuant to a privilege, YOU must describe the nature of  
19 the item in such a manner to enable a determination as to the applicability of the privilege so  
20 stated.

21 Pursuant to 10 CCR § 2655.1(a), YOU have an ongoing duty to produce additional items  
22 that are responsive to these requests as new items become relevant or are identified.

### 23 DEFINITIONS

24 1. The terms “STATE FARM,” “YOU,” and “YOUR” refer to applicant STATE  
25 FARM GENERAL INSURANCE COMPANY and applicants’ agents, employees, attorneys,  
26 accountants, investigators, and anyone else acting on their behalf.

27 2. The term “DOCUMENT” or “DOCUMENTS” means all items that are  
28 discoverable pursuant to Government Code section 11507.6, liberally construed, including, but

1 not limited to, any written, printed, filmed, microfilmed, computerized, recorded or graphic  
2 matter of any nature whatsoever, whether original or copy, including, but not limited to, all  
3 correspondence, email, notes, memoranda, minutes, logs, calendars, drafts, ledgers, account  
4 records, data, journals, bills, receipts, reports, analyses, accountings, schedules, policies,  
5 contracts, agreements, records, drawings, plans, designs, details, schematics, diagrams, models  
6 and any other writings as defined in section 250 of the Evidence Code. “DOCUMENT” or  
7 “DOCUMENTS” also includes all preliminary versions, revisions, drafts, and amendments of  
8 any of the foregoing, all attachments or appendices to any of the foregoing, and all copies of the  
9 foregoing that contain any commentary, notations, or alterations or that are otherwise not  
10 identical to the original. “DOCUMENT” or “DOCUMENTS” also includes any  
11 “STATEMENT” or “STATEMENTS,” as defined below.

12       3.     “STATEMENT” or “STATEMENTS” shall have the same meaning as that term  
13 is defined in Government Code section 11507.6, liberally construed to include: “written  
14 statements by the person signed or otherwise authenticated by him or her, stenographic,  
15 mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person,  
16 and written reports or summaries of these statements.”

17       4.     The term “RELATED TO” means constitutes, contains, embodies, comprises,  
18 reflects, identifies, states, deals with, comments on, responds to, describes, analyzes, was made  
19 by, was used to determine, was consulted by YOU or any witness YOU intend to call at the  
20 hearing on this matter, or is in any way pertinent to the subject matter described in the request.

21       5.     The term “EXHIBIT” means such exhibit or attachment that was included with  
22 the APPLICATION.

23       6.     The term “APPLICATION” means the Prior Approval Rate Application with  
24 California Department of Insurance file number 24-1271, which is the subject of this hearing,  
25 including all updates and revisions, including those required pursuant to any orders issued by the  
26 Administrative Law Judge.

27       7.     The term “AFFILIATES” means all entities effectively controlling YOU or  
28 controlled by YOU or associated with YOU in any way under common ownership or control.

8. The term "PREDECESSOR" refers to any company within the State Farm Group family of companies that wrote homeowners insurance in California during the time period applicable to the request, including but not limited to State Farm General Insurance Company.

## **DISCOVERY REQUESTS**

1. Provide all DOCUMENTS YOU believe YOU might offer into evidence in this matter.

2. Provide the names and addresses of persons who are witnesses to the subject matter of this proceeding, including all persons who had a role in preparation of the APPLICATION.

3. Provide the names and addresses of persons who are witnesses who have knowledge regarding the DOCUMENTS and issues that are the subject of the document requests contained herein.

4. Provide the names and addresses of persons YOU intend to call as witnesses to testify at the hearing on this matter.

5. Provide any, and all, STATEMENTS pertaining to the subject matter of the proceeding made by any witness that YOU propose to call to testify at the hearing on this matter.

6. Provide any, and all, STATEMENTS pertaining to the subject matter of the proceeding made by any other persons having personal knowledge of the APPLICATION.

7. Provide all DOCUMENTS RELATED TO the APPLICATION, including all correspondence between individuals who assisted in compiling the APPLICATION.

8. Provide all DOCUMENTS exchanged between YOU and any witness YOU intend to call in this proceeding.

9. Provide all DOCUMENTS RELATED TO the APPLICATION exchanged between YOU and the California Department of Insurance including correspondence, but not including DOCUMENTS previously provided to Consumer Watchdog.

10. Provide the actuarial report and underlying workpapers supporting the Statement of Actuarial Opinion of the Loss and Loss Adjustment Expense Reserves as of December 31, 2023.

1        11.    Provide the most recent actuarial report and underlying workpapers for Loss and  
2 Loss Adjustment Expense Reserves, if later than December 31, 2023.

3        12.    Provide all DOCUMENTS related to the calculation of the NAIC IRIS ratios as of  
4 December 31, 2023.

5        13.    Provide all DOCUMENTS related to the most recent calculation of the NAIC  
6 IRIS ratios, if later than December 31, 2023.

7        14.    Provide all DOCUMENTS, reports, data, analyses, and calculations related to the  
8 Reinsurance Attestation Supplement for 2023.

9        15.    Provide the most recent Own Risk and Solvency Assessment (“ORSA”) report  
10 along with any related documents.

11       16.    Provide the Risk-Based Capital Report and Calculation underlying the  
12 “Authorized control level risk-based capital” values set forth in the 2023 Annual Statement at  
13 Page 17, Line 29.

14       17.    Provide the most recent Risk-Based Capital Report and Calculation, if later than  
15 that shown in the 2023 Annual Statement.

16       18.    Provide all DOCUMENTS exchanged during the period from January 1, 2023 to  
17 the present between State Farm General Insurance Company and the “rating agencies”  
18 referenced in Exhibit 13, Page 1, Section D of the Application.

19       19.    Provide all DOCUMENTS exchanged during the period from January 1, 2023 to  
20 the present dealing with solvency issues between State Farm General Insurance Company and  
21 the “IL DOI” as referenced in Exhibit 13, Page 1, Section D of the Application as State Farm  
22 General Insurance Company’s solvency regulator.

23       20.    Provide the loss trend data in Exhibit 8 of the Application by cause of loss.

24       21.    Provide all DOCUMENTS RELATED TO the statements in Notes (3) and (6) on  
25 page 2 of Exhibit 9 that “Adjustments have been made as needed to incorporate any significant  
26 changes in our contract and in the distribution of our book of business.”

1 DATED: July 26, 2024

Respectfully submitted,

2 Harvey Rosenfield  
3 Pamela Pressley  
4 Benjamin Powell  
5 Ryan Mellino  
CONSUMER WATCHDOG

6 By: Pamela Pressley

7 Pamela Pressley  
8 Attorneys for CONSUMER WATCHDOG

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**PROOF OF SERVICE**  
**BY OVERNIGHT OR U.S. MAIL, FAX TRANSMISSION,**  
**EMAIL TRANSMISSION AND/OR PERSONAL SERVICE**

**State of California, City of Los Angeles, County of Los Angeles**

I am employed in the City and County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 6330 South San Vicente Boulevard, Suite 250, Los Angeles, California 90048, and I am employed in the city and county where this service is occurring.

On July 26, 2024, I caused service of true and correct copies of the document entitled

**CONSUMER WATCHDOG'S FIRST SET OF DISCOVERY REQUESTS PROPOUNDED  
ON STATE FARM GENERAL INSURANCE COMPANY**

upon the persons named in the attached service list, in the following manner:

1. If marked FAX SERVICE, by facsimile transmission this date to the FAX number stated to the person(s) named.
2. If marked EMAIL, by electronic mail transmission this date to the email address stated.
3. If marked U.S. MAIL or OVERNIGHT or HAND DELIVERED, by placing this date for collection for regular or overnight mailing true copies of the within document in sealed envelopes, addressed to each of the persons so listed. I am readily familiar with the regular practice of collection and processing of correspondence for mailing of U.S. Mail and for sending of Overnight mail. If mailed by U.S. Mail, these envelopes would be deposited this day in the ordinary course of business with the U.S. Postal Service. If mailed Overnight, these envelopes would be deposited this day in a box or other facility regularly maintained by the express service carrier, or delivered this day to an authorized courier or driver authorized by the express service carrier to receive documents, in the ordinary course of business, fully prepaid.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 26, 2024 at Los Angeles, California.

  
Kaitlyn Gentile

## Service List

1  
2 Nikki McKenna  
3 Rate Enforcement Bureau  
4 **California Department of Insurance**  
5 1901 Harrison Street, 6th Floor  
6 Oakland, CA 94612  
7 Tel. (415) 538-4500  
8 Fax (510) 238-7830  
9 Nikki.McKennedy@insurance.ca.gov

FAX  
 U.S. MAIL  
 OVERNIGHT MAIL  
 HAND DELIVERED  
 EMAIL

10  
11 Jon Phenix  
12 Public Advisor  
13 Edward Wu  
14 Acting Public Advisor  
15 Tina Warren  
16 Office of the Public Advisor  
17 **California Department of Insurance**  
18 300 Capitol Mall, 17th Floor  
19 Sacramento, CA 95814  
20 Tel. (916) 492-3705  
21 Fax (510) 238-7830  
22 Jon.Phenix@insurance.ca.gov  
23 Edward.Wu@insurance.ca.gov  
24 Tina.Warren@insurance.ca.gov

FAX  
 U.S. MAIL  
 OVERNIGHT MAIL  
 HAND DELIVERED  
 EMAIL

25  
26 Nicole Pettis  
27 Pricing Manager  
28 **State Farm**  
One State Farm Plaza  
Bloomington, IL 61710  
Tel. 309-766-2265  
nicole.pettis.m3ht@statefarm.com

FAX  
 U.S. MAIL  
 OVERNIGHT MAIL  
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 EMAIL