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14 Attorneys for CONSUMER WATCHDOG

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BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF CALIFORNIA

In the Matter of the Rate Application of
State Farm General Insurance
Company,
Applicant.

File No.: 24-1271

**CONSUMER WATCHDOG'S FIRST SET
OF DISCOVERY REQUESTS
PROPOUNDED ON STATE FARM
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.

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.”
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DATED: July 26, 2024

Respectfully submitted,

Harvey Rosenfield
Pamela Pressley
Benjamin Powell
Ryan Mellino
CONSUMER WATCHDOG

By: *Pamela Pressley*
Pamela Pressley
Attorneys for CONSUMER WATCHDOG

Service List

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