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STATE FARM GENERAL INSURANCE COMPANY

**BEFORE THE INSURANCE COMMISSIONER  
OF THE STATE OF CALIFORNIA**

In the Matter of the Rate Application of

STATE FARM GENERAL  
INSURANCE COMPANY,

Applicant.

File Nos.: PA-2024-00011, PA-2024-00012,  
PA-2024-00013

**STATE FARM GENERAL INSURANCE  
COMPANY'S RESPONSES AND  
OBJECTIONS TO CONSUMER  
WATCHDOG'S DISCOVERY  
PROPOUNDED ON STATE FARM  
GENERAL INSURANCE COMPANY FOR  
APRIL 8, 2025 HEARING ON  
STIPULATION FOR INTERIM RATE**

PROPOUNDING PARTY : Consumer Watchdog

RESPONDING PARTY : State Farm General Insurance Company

STATE FARM GENERAL INSURANCE COMPANY'S  
RESPONSES TO CONSUMER WATCHDOG'S  
DISCOVERY REQUESTS

FILE NOS. PA-2024-00011, PA-2024-00012, PA-2024-  
00013

1 Pursuant to California Government Code Section 11507.6 and the applicable Rules of  
2 Practice and Procedure for Insurance Commissioner Rate Proceedings, 10 C.C.R. § 2655.1, and  
3 the ALJ’s April 2, 2025 Order, State Farm General Insurance Company (“SFG” or “Applicant”)  
4 hereby provides its written response in answer to Intervenor Consumer Watchdog’s (“CW”)  
5 Discovery Requests Propounded on State Farm General Insurance Company for the April 8, 2025  
6 Hearing on Stipulation for Interim Rate (the “Requests”).

7 **BACKGROUND AND PRELIMINARY STATEMENT**

8 Prior to responding to each individual Request, SFG provides here an overview of its  
9 positions regarding the Requests in the context of this Interim Rate Hearing proceeding and the  
10 forthcoming Full Rate Hearing.

11 First, SFG has already completed a document production and disclosure of information  
12 ahead of the Interim Rate Hearing that directly responds to several Requests, and is the type of  
13 discoverable evidence that is relevant and admissible at the Interim Rate Hearing. (*See, e.g.*,  
14 Requests 1, 2, 4, 6; Cal. Gov. Code § 11507.6(d)). That production of over 50 exhibits,  
15 accompanied by three witness declarations, shows what SFG plans to offer into evidence for the  
16 Interim Rate Hearing on April 8, 2025, as well as the witnesses who SFG will make available for  
17 testimony at the hearing. Importantly, that production will “safeguard against surprise,” which is  
18 a key purpose of discovery in these proceedings as set forth in the ALJ’s April 2 Order.

19 Second, as the ALJ’s April 2 Order counsels, the “context” of this proceeding is important  
20 for considering the appropriate scope of discovery. The Commissioner provisionally granted  
21 SFG’s request for an “**emergency** interim rate” due to concern over “**swift** capital depletion.”  
22 (March 14 Order; emphasis added.) That is why the Commissioner set an Interim Rate Hearing  
23 for April 8, 2025—an appropriately short timeframe given the interim and emergency nature of  
24 the relief sought by SFG. (March 14 Order.) The Commissioner’s intention for this Interim Rate  
25 Hearing to occur within a very short timeframe is consistent with SFG’s position, as set forth in  
26 these responses and objections, that the extreme breadth of discovery being pursued by CW was  
27 not intended by the Commissioner’s Order. Indeed, there is no mention of discovery in the Order,  
28

1 which instead specifies a discrete category of documents<sup>1</sup> as the basis for the ALJ’s decision,  
2 along with “correspondence, evidence, and argument” that the parties may provide at the hearing.

3 Third, CW’s Requests have a vast scope and demanded instantaneous email review and  
4 production that would have been impossible to accomplish in a matter of days.<sup>2</sup> For example, CW  
5 requests new data (*see, e.g.*, Request 20) and “all documents and communications” over several  
6 years about broad segments of SFG’s business and decisions (*see, e.g.*, Requests 23, 30, 31).  
7 These demands run contrary to the March 14 Order of the Commissioner that sought to swiftly  
8 resolve the request for an **emergency** interim rate. They are indicative of a long and burdensome  
9 fishing expedition.<sup>3</sup>

10 Fourth, many of CW’s Requests can be tabled until the Full Rate Hearing. As CW put it  
11

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12 <sup>1</sup> The Administrative Law Judge “shall hear from State Farm regarding its emergency interim rate  
13 requests based on [1] updated rate-setting data through the end of the first quarter of 2025 in the  
14 Applications, [2] the two-way stipulation between the Department and State Farm, [3]  
15 Watchdog’s objections to the interim rate, [4] argument from the Commissioner’s February 26,  
2025, and March 11, 2025 conferences, and [5] the Commissioner’s subsequent proposal to the  
parties.” (3/14/25 Order.)

16 <sup>2</sup> CW also delayed propounding its discovery, waiting until March 28, 2025 and two weeks after  
17 the March 14, 2025 notice, such that SFG’s written response to the discovery request was not due  
18 until April 9, 2025—one day **after** the April 8 hearing. *See* 10 C.C.R. § 2655.1(a); 10 C.C.R. §  
19 2651.1(i); Cal Code Civ. Proc. §§ 1011, 1013; Cal Code Civ. Proc. § 1010.6(a)(3)(B) (adding two  
20 court days after service by electronic means). Thus, it was contrary to both the California Code  
21 of Regulations and the March 14 Order for CW to demand that SFG instantaneously complete  
22 production of all requested documents within a few days of receiving a long set of overbroad  
document requests. It would also be disingenuous for CW to claim a need for SFG produce  
documents in less time than it took CW to propound the requests after being on notice of the  
hearing.

23 <sup>3</sup> Discovery in any administrative proceeding, particularly an emergency proceeding, must be  
24 streamlined and efficient. As the Law Revision Commission for the 1995 Amendment to Cal.  
25 Gov. Code §11507.6 put it, “the extensive discovery available in civil proceedings is  
26 inappropriate for administrative adjudications, which should be simple, quick, and inexpensive.”  
27 *Administrative Adjudications by State Agencies*, 25 Cal. L. Revision Comm’n Reports 55 (1995),  
at 116; *see also Brown v. Valverde*, 183 Cal. App. 4th 1531, 1548–49 (2010) (“extensive  
discovery available in civil proceedings is deemed inappropriate for administrative adjudications,  
which should be simple, quick, and inexpensive”); Witkin, Cal. Proc. 6th Admin Proc § 109  
(2024) (similar). As a result, parties to rate review proceedings may only seek carefully identified  
categories of information that are narrowly proscribed by statute. *See* Cal. Gov. Code § 11507.6.

1 at the March 26, 2025 Scheduling Conference, it is CW's view that "discovery needs to be keyed  
2 off of the new application" that SFG expects to submit in May 2025, and that could "set the stage  
3 for the ultimate issues in the case." Thus, CW's attempt now to break open discovery through  
4 this emergency interim mechanism that will not decide the ultimate rate (and that can be reversed  
5 by the Full Rate Hearing) is an improper and inefficient use of time. CW can re-propound  
6 Requests in the normal course of the Full Rate Hearing and SFG continues to reserve the  
7 opportunity to object as appropriate.

### 8 **GENERAL OBJECTIONS & OBJECTIONS TO DEFINITIONS**

9 SFG reserves the right to amend or supplement its Responses to the Requests from time to  
10 time as appropriate. This reservation is not to be construed as an undertaking by SFG of an  
11 affirmative duty to alter, supplement, amend, or otherwise modify these responses in any manner  
12 or at any time, except as otherwise required by law.

13 Any response or agreement to search for and produce documents in response to a Request  
14 is not an acknowledgment or concession that the documents sought exist, are relevant to this  
15 matter, or are in SFG's possession, custody, or control.

16 The following general objections apply to each of SFG's individual responses to the  
17 Requests.

18 1. SFG objects to the Requests to the extent that they are protected from disclosure  
19 by the attorney-client privilege, work product doctrine, joint or common interest privilege, or any  
20 other privilege, protection, or immunity. Discovery in these proceedings does not "authorize the  
21 inspection of any writing or thing which is privileged from disclosure by law or otherwise made  
22 confidential or protected as the attorney's work product." Cal. Gov. Code § 11507.6. SFG will  
23 not produce privileged information, and nothing in these responses in any way constitutes a  
24 waiver of any applicable privilege or protection from disclosure. Further, any inadvertent  
25 production of privileged information is not a waiver of any privilege or protection from  
26 disclosure.

27 2. SFG objects to the Requests to the extent that they seek SFG's highly sensitive  
28

1 trade secrets and proprietary information and information that is protected by statute as  
2 confidential.

3 3. SFG objects to the Requests to the extent that they seek SFG's information and/or  
4 documents that are statutorily protected from disclosure, including but not limited to the  
5 protections of the following statutes: 215 ILCS Section 5/129.8, 215 ILCS Section 5/131.22, 215  
6 ILC Section 5/35A-50, 215 ILCS Section 5/136, 765 ILCS 1065/1 to 1065/9, 215 ILCS 5/404,  
7 CIC § 935.8, CIC § 1215.8, CIC § 739.8, CIC § 923.6, Cal. Civ. Code §§ 3426-3426.11, Cal.  
8 Evid. Code § 1060, Cal. Gov. Code § 11513(e).

9 4. SFG objects to CW's request that SFG produce documents "in the order they are  
10 kept or in correlation to the request to which they are responsive." SFG also objects to CW's  
11 request that SFG "identify which documents are responsive to which requests." While SFG will  
12 endeavor to produce materials in a reasonably organized fashion, there is no legal authority for  
13 CW's requests that SFG produce documents in this fashion.

14 5. SFG objects to CW's requests to the extent that they would impose on SFG  
15 obligations that go beyond the applicable regulations and statutes that govern these proceedings.  
16 SFG further objects to the extent that responding to these requests would be impractical and  
17 unduly burdensome.

18 6. SFG objects to the extent that the requests seek documents beyond the "Recorded  
19 Period" prescribed by 10 C.C.R. § 2642.6—i.e., beyond the most recent three years for which  
20 reliable data are available.

21 7. SFG objects to the definitions in CW's requests to the extent they alter the  
22 generally understood meanings of common terms. SFG does not adopt CW's definitions.

23 8. SFG objects to the definition of "STATE FARM," "YOU," and "YOUR" because  
24 they seek to impose an obligation to respond on behalf of other entities and persons other than  
25 Applicant, such as "agents, employees, attorneys, accountants, investigators, and anyone else  
26 acting on their behalf." These responses are made on behalf of Applicant only and not any other  
27 party, entity, or person.

1           9.       SFG objects to the definition of “DOCUMENT” or “DOCUMENTS.” That  
2 definition refers to Government Code section 11507.6, but that statute does not include a  
3 definition of documents so it is unclear what CW is referring to. The remainder of the definition  
4 is unreasonable and goes far beyond what is reasonably required in these proceedings.

5           10.       SFG objects to the definition of “STATEMENTS” because CW misquotes  
6 Government Code section 11507.6. Government Code section 11507.6 defines “statements” to  
7 “include written statements by the person signed or otherwise authenticated by the person,  
8 stenographic, mechanical, electrical, or other recordings, or transcripts thereof, of oral statements  
9 by the person, and written reports or summaries of these *oral* statements.” CW’s definition omits  
10 the word “oral” from the phrase “summaries of these oral statements,” which alters the statutory  
11 meaning of “statements.” CW is not entitled to discovery beyond what is statutorily prescribed,  
12 and SFG interprets “statements” to include only those statements consistent with the definition in  
13 Government Code section 11507.6.

14           11.       SFG objects to the Requests to the extent they call for production of documents  
15 beyond the scope of Cal. Gov. Code § 11507.6(1).

16           12.       SFG objects to the Requests to the extent they require compliance within a time  
17 period that is unreasonably short and unduly burdensome.

18           13.       These General Objections are applicable to, and incorporated into, each of  
19 Defendant’s responses. Each and every Response is made subject to the General Objections.

20           14.       Stating specific objections, or some but not all of these General Objections, in  
21 response to a particular Request does not in any way waive any of the objections enumerated in  
22 the General Objections.

## 23                               **RESPONSES TO DISCOVERY REQUESTS**

### 24                   **REQUEST FOR DISCOVERY NO. 1:**

25                   Provide all DOCUMENTS YOU propose to offer into evidence for the INTERIM RATE  
26 HEARING.

### 27                   **RESPONSE TO REQUEST FOR DISCOVERY NO. 1:**

1 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
2 herein. Subject to and consistent with the foregoing objections, SFG responds as follows:

3 SFG completed a production of documents as of April 2, 2025, which are responsive to  
4 this Request. SFG also directs CW to the documents publicly available on SERFF under the  
5 applicable file numbers.

6 **REQUEST FOR DISCOVERY NO. 2:**

7 Provide the names and addresses of persons who are witnesses to the subject matter of the  
8 INTERIM RATE HEARING, including all persons who had a role in preparation of the Rate  
9 Templates and updated Exhibit 9 submitted on SERFF in each of the APPLICATIONS on  
10 February 5, 2025, and any updated rate templates and underlying data, in support of YOUR  
11 interim rate requests.

12 **RESPONSE TO REQUEST FOR DISCOVERY NO. 2:**

13 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
14 herein. SFG objects that this request exceeds permissible discovery under California Government  
15 Code § 11507.6(1), which only permits the identification of “the names and addresses of  
16 witnesses to the extent known to the other party, including, but not limited to, those intended to  
17 be called to testify at the hearing,” and does not “permit seeking the identity of all persons having  
18 knowledge of relevant facts.” *Romero v. California State Lab. Comm'r*, 276 Cal. App. 2d 787,  
19 794 (1969). SFG further objects that this Request is vague and unduly burdensome insofar as it  
20 refers to all witnesses to the “subject matter” of the emergency interim rate hearing.

21 Subject to and consistent with the foregoing objections, SFG responds as follows:

22 David Appel, Bryon Ehrhart, and Nancy Watkins have provided written declarations in  
23 support of SFG’s Interim Rate and Response to Consumer Watchdog’s Pre-Hearing Objections  
24 and will be available for testimony at the hearing on April 8, 2025.

25 **REQUEST FOR DISCOVERY NO. 3:**

26 Provide the names and addresses of persons most knowledgeable regarding the  
27 DOCUMENTS and issues that are the subject of the discovery requests contained herein.  
28

1                   **RESPONSE TO REQUEST FOR DISCOVERY NO. 3:**

2                   SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
3 herein. SFG objects that this request exceeds permissible discovery under California Government  
4 Code § 11507.6, which does not permit discovery into “persons most knowledgeable” about  
5 documents and discovery requests. The information about persons who are knowledgeable about  
6 documents is also not relevant to the issues at the Interim Rate Hearing. SFG further objects that  
7 this Request is vague and unduly burdensome, including because the “DOCUMENTS and issues  
8 that are the subject of the discovery requests contained herein” is an extremely broad category.

9                   **REQUEST FOR DISCOVERY NO. 4:**

10                  Provide the names and addresses of persons YOU intend to call as witnesses to testify at the  
11 INTERIM RATE HEARING, whether through declarations or live testimony.

12                  **RESPONSE TO REQUEST FOR DISCOVERY NO. 4:**

13                  SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
14 herein. SFG identifies the following:

15                  David Appel, Bryon Ehrhart, and Nancy Watkins have provided written declarations in  
16 support of SFG’s Interim Rate and Response to Consumer Watchdog’s Pre-Hearing Objections  
17 and will be available for testimony at the hearing on April 8, 2025.

18                  **REQUEST FOR DISCOVERY NO. 5:**

19                  Provide any, and all, STATEMENTS pertaining to the subject matter of the INTERIM  
20 RATE HEARING made by any witness whose testimony YOU intend to present in the INTERIM  
21 RATE HEARING on this matter, whether through declarations or live testimony, including on the  
22 financial condition issues YOU have raised in connection with YOUR interim rate requests.

23                  **RESPONSE TO REQUEST FOR DISCOVERY NO. 5:**

24                  SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
25 herein. SFG further specifically objects to the extent this Request seeks documents protected from  
26 disclosure by the attorney-client privilege, work product doctrine, joint or common interest  
27 privilege, or any other privilege, protection, or immunity. SFG also objects to the extent that this  
28



1 request seeks documents that contain trade secrets and other confidential information, the public  
2 disclosure of which would violate statutory protections, pose a significant risk to SFG's business,  
3 and/or violate confidentiality obligations to third parties. SFG further objects that this Request  
4 seeks information regarding the "subject matter" of this proceeding because it is vague,  
5 ambiguous, overbroad, and unduly burdensome.

6 Subject to and consistent with the foregoing objections, SFG responds as follows:

7 David Appel, Bryon Ehrhart, and Nancy Watkins have provided written declarations in  
8 support of SFG's Interim Rate and Response to Consumer Watchdog's Pre-Hearing Objections  
9 and will be available for testimony at the hearing on April 8, 2025.

10 **REQUEST FOR DISCOVERY NO. 6:**

11 Provide any, and all, STATEMENTS pertaining to the subject matter of the INTERIM  
12 RATE HEARING made by any other persons having personal knowledge of the  
13 APPLICATIONS.

14 **RESPONSE TO REQUEST FOR DISCOVERY NO. 6:**

15 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
16 herein. SFG further specifically objects to the extent this Request seeks documents protected from  
17 disclosure by the attorney-client privilege, work product doctrine, joint or common interest  
18 privilege, or any other privilege, protection, or immunity. SFG also objects to the extent that this  
19 request seeks documents that contain trade secrets and other confidential information, the public  
20 disclosure of which would violate statutory protections, pose a significant risk to SFG's business,  
21 and/or violate confidentiality obligations to third parties. SFG further objects that this Request  
22 seeks information regarding the "subject matter" of these proceedings because it is vague,  
23 ambiguous, overbroad, and unduly burdensome. SFG further objects that the Request seeks  
24 information that is not relevant and goes beyond discoverable statements under Cal. Gov't Code §  
25 11507.6.

26 Subject to and consistent with the foregoing objections, SFG responds as follows:

27 David Appel, Bryon Ehrhart, and Nancy Watkins have provided written declarations in  
28

1 support of SFG's Interim Rate and Response to Consumer Watchdog's Pre-Hearing Objections  
2 and will be available for testimony at the hearing on April 8, 2025.

3 **REQUEST FOR DISCOVERY NO. 7:**

4 Provide all DOCUMENTS RELATED TO the Rate Template pages and updated  
5 EXHIBIT 9 submitted on February 5, 2025 on SERFF in each of the APPLICATIONS and any  
6 updated Rate Templates and EXHIBITS submitted in support of YOUR requests for interim rates.

7 **RESPONSE TO REQUEST FOR DISCOVERY NO. 7:**

8 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
9 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
10 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
11 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
12 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
13 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
14 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
15 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
16 the extent that this request seeks documents that contain trade secrets and other confidential  
17 information, the public disclosure of which would violate statutory protections, pose a significant  
18 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
19 objects that this Request is unduly burdensome given the breadth of documents sought and time  
20 until the Interim Rate Hearing.

21 Subject to and consistent with the foregoing objections, SFG responds as follows:

22 SFG completed a production of documents as of April 2, 2025, which are responsive to  
23 this Request. SFG also directs CW to the documents publicly available on SERFF under the  
24 applicable file numbers.

25 **REQUEST FOR DISCOVERY NO. 8:**

26 Provide all DOCUMENTS RELATED TO the two-way stipulation between the YOU and  
27 the CDI concerning YOUR emergency interim rate requests exchanged between YOU and the  
28

1 CDI including correspondence, but not including DOCUMENTS previously provided to  
2 Consumer Watchdog.

3 **RESPONSE TO REQUEST FOR DISCOVERY NO. 8:**

4 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
5 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
6 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
7 be admissible in evidence. *See* Cal. Gov. Code § 11507.6. Nor would this category of documents  
8 be the sort of evidence on which responsible persons would rely in these rate review proceedings.  
9 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
10 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
11 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
12 the extent that this request seeks documents that contain trade secrets and other confidential  
13 information, the public disclosure of which would violate statutory protections, pose a significant  
14 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
15 objects that this Request is unduly burdensome given the breadth of documents sought and time  
16 until the Interim Rate Hearing. SFG further objects that this Request seeks protected  
17 communications under California Evidence Code section 1152 that are beyond the scope of  
18 relevant and admissible evidence discoverable under California Government Code section  
19 11507.6.

20 **REQUEST FOR DISCOVERY NO. 9:**

21 Provide all DOCUMENTS that support YOUR statements in YOUR February 25, 2025  
22 Written Responses to the Commissioner's Questions from February 14 that "the current estimate  
23 of direct losses for State Farm General from the Los Angeles fires stands at approximately \$7.9  
24 billion, including loss adjustment expenses, and taking into account both reported and not  
25 reported claims. Estimates for SFG's retained losses after reinsurance, and for SFG's share of  
26 total FAIR Plan losses, are approximately \$212 million and \$400 million, respectively."  
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1                   **RESPONSE TO REQUEST FOR DISCOVERY NO. 9:**

2           SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
3 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
4 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
5 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
6 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
7 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
8 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
9 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
10 the extent that this request seeks documents that contain trade secrets and other confidential  
11 information, the public disclosure of which would violate statutory protections, pose a significant  
12 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
13 objects that this Request is unduly burdensome given the breadth of documents sought and time  
14 until the Interim Rate Hearing.

15           Subject to and consistent with the foregoing objections, SFG responds as follows: SFG  
16 completed a production of documents as of April 2, 2025, which are responsive to this Request.  
17 SFG also directs CW to the documents publicly available on SERFF under the applicable file  
18 numbers.

19                   **REQUEST FOR DISCOVERY NO. 10:**

20           Provide all DOCUMENTS related to the calculation of YOUR NAIC IRIS ratios as of  
21 December 31, 2024.

22                   **RESPONSE TO REQUEST FOR DISCOVERY NO. 10:**

23           SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
24 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
25 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
26 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
27 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
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1 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
2 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
3 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
4 the extent that this request seeks documents that contain trade secrets and other confidential  
5 information, the public disclosure of which would violate statutory protections, pose a significant  
6 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
7 objects that this Request is unduly burdensome given the breadth of documents sought and time  
8 until the Interim Rate Hearing.

9 **REQUEST FOR DISCOVERY NO. 11:**

10 Provide all DOCUMENTS related to the most recent calculation of YOUR NAIC IRIS  
11 ratios, if later than December 31, 2024.

12 **RESPONSE TO REQUEST FOR DISCOVERY NO. 11:**

13 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
14 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
15 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
16 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
17 the sort of evidence on which responsible persons would rely in these rate review proceedings.

18 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
19 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
20 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
21 the extent that this request seeks documents that contain trade secrets and other confidential  
22 information, the public disclosure of which would violate statutory protections, pose a significant  
23 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
24 objects that this Request is unduly burdensome given the breadth of documents sought and time  
25 until the Interim Rate Hearing.

26 **REQUEST FOR DISCOVERY NO. 12:**

27 Provide all DOCUMENTS, reports, data, analyses, and calculations related to the  
28

Reinsurance Attestation Supplement for 2024.

**RESPONSE TO REQUEST FOR DISCOVERY NO. 12:**

SFG incorporates its General Objections and Objections to Definitions as if fully set forth herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be the sort of evidence on which responsible persons would rely in these rate review proceedings. Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks documents protected from disclosure by the attorney-client privilege, work product doctrine, joint or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to the extent that this request seeks documents that contain trade secrets and other confidential information, the public disclosure of which would violate statutory protections, pose a significant risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further objects that this Request is unduly burdensome given the breadth of documents sought and time until the Interim Rate Hearing.

**REQUEST FOR DISCOVERY NO. 13:**

Provide all DOCUMENTS related to the calculation of the NAIC IRIS ratios as of December 31, 2024.

**RESPONSE TO REQUEST FOR DISCOVERY NO. 13:**

SFG incorporates its General Objections and Objections to Definitions as if fully set forth herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be the sort of evidence on which responsible persons would rely in these rate review proceedings. Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks documents protected from disclosure by the attorney-client privilege, work product doctrine, joint or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to

1 the extent that this request seeks documents that contain trade secrets and other confidential  
2 information, the public disclosure of which would violate statutory protections, pose a significant  
3 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
4 objects that this Request is unduly burdensome given the breadth of documents sought and time  
5 until the Interim Rate Hearing.

6 **REQUEST FOR DISCOVERY NO. 14:**

7 Provide all DOCUMENTS related to the most recent calculation of the NAIC IRIS ratios,  
8 if later than December 31, 2024.

9 **RESPONSE TO REQUEST FOR DISCOVERY NO. 14:**

10 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
11 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
12 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
13 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
14 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
15 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
16 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
17 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
18 the extent that this request seeks documents that contain trade secrets and other confidential  
19 information, the public disclosure of which would violate statutory protections, pose a significant  
20 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
21 objects that this Request is unduly burdensome given the breadth of documents sought and time  
22 until the Interim Rate Hearing.

23 **REQUEST FOR DISCOVERY NO. 15:**

24 Provide the Risk-Based Capital Report and Calculation underlying the "Authorized  
25 control level risk-based capital" values set forth in YOUR 2024 Annual Statement at Page 17,  
26 Line 29.

27 **RESPONSE TO REQUEST FOR DISCOVERY NO. 15:**

1 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
2 herein. CW is not authorized to inspect “any writing or thing which is privileged from disclosure  
3 by law or otherwise made confidential or protected as the attorney’s work product.” Cal. Gov.  
4 Code § 11507.6. Risk-Based Capital Reports are protected from disclosure. Cal. Ins. Code §  
5 739.8. SFG further specifically objects to the extent this Request seeks documents protected from  
6 disclosure by the attorney-client privilege, work product doctrine, joint or common interest  
7 privilege, or any other privilege, protection, or immunity. SFG also objects to the extent that this  
8 request seeks documents that contain trade secrets and other confidential information, the public  
9 disclosure of which would violate statutory protections, pose a significant risk to SFG’s business,  
10 and/or violate confidentiality obligations to third parties. SFG objects that this request goes  
11 beyond the permissible scope of discovery. The broad category of documents that CW seeks is  
12 not relevant to the Interim Rate Hearing and would not be admissible in evidence. Cal. Gov. Code  
13 § 11507.6. Nor would this category of documents be the sort of evidence on which responsible  
14 persons would rely in these rate review proceedings. Cal. Gov. Code § 11513(c). SFG further  
15 objects that this Request is unduly burdensome given the breadth of documents sought and time  
16 until the Interim Rate Hearing.

17 **REQUEST FOR DISCOVERY NO. 16:**

18 Provide the most recent Risk-Based Capital Report and Calculation, if later than that shown in  
19 the 2024 Annual Statement.

20 **RESPONSE TO REQUEST FOR DISCOVERY NO. 16:**

21 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
22 herein. CW is not authorized to inspect “any writing or thing which is privileged from disclosure  
23 by law or otherwise made confidential or protected as the attorney’s work product.” Cal. Gov.  
24 Code § 11507.6. Risk-Based Capital Reports are protected from disclosure. Cal. Ins. Code §  
25 739.8. SFG further specifically objects to the extent this Request seeks documents protected from  
26 disclosure by the attorney-client privilege, work product doctrine, joint or common interest  
27 privilege, or any other privilege, protection, or immunity. SFG also objects to the extent that this  
28



1 request seeks documents that contain trade secrets and other confidential information, the public  
2 disclosure of which would violate statutory protections, pose a significant risk to SFG's business,  
3 and/or violate confidentiality obligations to third parties. SFG objects that this request goes  
4 beyond the permissible scope of discovery. The broad category of documents that CW seeks is  
5 not relevant to the Interim Rate Hearing and would not be admissible in evidence. *See* Cal. Gov.  
6 Code § 11507.6, Cal. Gov. Code § 11513(c). SFG further objects that this Request is unduly  
7 burdensome given the breadth of documents sought and time until the Interim Rate Hearing.

8 **REQUEST FOR DISCOVERY NO. 17:**

9 Provide all COMMUNICATIONS AND DOCUMENTS exchanged during the period  
10 from January 1, 2023 to the present between State Farm General Insurance Company or any of its  
11 AFFILIATES and any financial strength "rating agencies."

12 **RESPONSE TO REQUEST FOR DISCOVERY NO. 17:**

13 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
14 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
15 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
16 be admissible in evidence. *See* Cal. Gov. Code § 11507.6, Cal. Gov. Code § 11513(c). SFG  
17 further specifically objects to the extent this Request seeks documents protected from disclosure  
18 by the attorney-client privilege, work product doctrine, joint or common interest privilege, or any  
19 other privilege, protection, or immunity. SFG also objects to the extent that this request seeks  
20 documents that contain trade secrets and other confidential information, the public disclosure of  
21 which would violate statutory protections, pose a significant risk to SFG's business, and/or  
22 violate confidentiality obligations to third parties. SFG further objects that this Request is unduly  
23 burdensome given the breadth of documents sought and time until the Interim Rate Hearing.

24 **REQUEST FOR DISCOVERY NO. 18:**

25 Provide all COMMUNICATIONS AND DOCUMENTS exchanged during the period  
26 from January 1, 2023 to the present between STATE FARM and the Illinois Department of  
27 Insurance as State Farm General Insurance Company's domestic financial solvency regulator  
28

1 RELATED TO YOUR failure to meet NAIC Risk-Based Capital (RBC) requirements as of year-  
2 end 2024 as stated in YOUR February 25, 2025 Written Responses to the Commissioner's  
3 Questions from February 14.

4 **RESPONSE TO REQUEST FOR DISCOVERY NO. 18:**

5 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
6 herein. CW is not authorized to inspect "any writing or thing which is privileged from disclosure  
7 by law or otherwise made confidential or protected as the attorney's work product." Cal. Gov.  
8 Code § 11507.6. Risk-Based Capital Reports are protected from disclosure. Cal. Ins. Code §  
9 739.8. SFG further specifically objects to the extent this Request seeks documents protected from  
10 disclosure by the attorney-client privilege, work product doctrine, joint or common interest  
11 privilege, or any other privilege, protection, or immunity. SFG also objects to the extent that this  
12 request seeks documents that contain trade secrets and other confidential information, the public  
13 disclosure of which would violate statutory protections, pose a significant risk to SFG's business,  
14 and/or violate confidentiality obligations to third parties. The broad category of documents that  
15 CW seeks is not relevant to the Interim Rate Hearing and would not be admissible in evidence.  
16 See Cal. Gov. Code § 11507.6, Cal. Gov. Code § 11513(c). SFG General objects that this request  
17 goes beyond the permissible scope of discovery. SFG further objects that this Request is unduly  
18 burdensome given the breadth of documents sought and time until the Interim Rate Hearing.

19 **REQUEST FOR DISCOVERY NO. 19:**

20 Provide all DOCUMENTS that include detailed numerical support for the weighting  
21 scheme used on page 2 of Exhibit 9 submitted with YOUR 2/5/25 interim rate request, and the  
22 rationale for the specific amount of weight given to the latest period (partial year 2025). Please  
23 provide any Excel files with formulas intact.

24 **RESPONSE TO REQUEST FOR DISCOVERY NO. 19:**

25 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
26 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
27 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
28

1 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
2 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
3 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
4 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
5 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
6 the extent that this request seeks documents that contain trade secrets and other confidential  
7 information, the public disclosure of which would violate statutory protections, pose a significant  
8 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
9 objects that this Request is unduly burdensome given the breadth of documents sought and time  
10 until the Interim Rate Hearing.

11 Subject to and consistent with the foregoing objections, SFG responds as follows:

12 SFG completed a production of documents as of April 2, 2025, which are responsive to  
13 this Request. SFG also directs CW to the documents publicly available on SERFF under the  
14 applicable file numbers.

15 **REQUEST FOR DISCOVERY NO. 20:**

16 Provide fully-updated Rate Templates in all three matters, with data through year-end 2024  
17 or Q1 2025, whichever is the latest available at the time of responding to these requests.

18 **RESPONSE TO REQUEST FOR DISCOVERY NO. 20:**

19 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
20 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
21 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
22 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
23 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
24 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
25 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
26 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
27 the extent that this request seeks documents that contain trade secrets and other confidential  
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1 information, the public disclosure of which would violate statutory protections, pose a significant  
2 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
3 objects that this Request is unduly burdensome given the breadth of documents sought and time  
4 until the Interim Rate Hearing.

5 **REQUEST FOR DISCOVERY NO. 21:**

6 Provide all DOCUMENTS supporting YOUR statements in YOUR February 25, 2025  
7 Written Responses to the Commissioner's Questions from February 14 that State Farm Mutual  
8 provides YOUR reinsurance "at a fair price that is well below what is available from external  
9 reinsurers and at an amount of coverage that external reinsurers wouldn't provide" and "that  
10 external reinsurer capacity to underwrite significantly greater portions of SFG's massive risk  
11 portfolio at a reasonable price (or possibly, at any price) does not currently exist."

12 **RESPONSE TO REQUEST FOR DISCOVERY NO. 21:**

13 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
14 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
15 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
16 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
17 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
18 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
19 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
20 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
21 the extent that this request seeks documents that contain trade secrets and other confidential  
22 information, the public disclosure of which would violate statutory protections, pose a significant  
23 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
24 objects that this Request is unduly burdensome given the breadth of documents sought and time  
25 until the Interim Rate Hearing.

26 Subject to and consistent with the foregoing objections, SFG responds as follows:

27 SFG completed a production of documents as of April 2, 2025, which are responsive to  
28

1 this Request. SFG also directs CW to the documents publicly available on SERFF under the  
2 applicable file numbers.

3 **REQUEST FOR DISCOVERY NO. 22:**

4 Provide all DOCUMENTS supporting YOUR statements in YOUR February 25, 2025  
5 Written Responses to the Commissioner's Questions from February 14 that "SFG's financial  
6 distress results from macroeconomic changes and market trends, including construction cost  
7 inflation and litigation."

8 **RESPONSE TO REQUEST FOR DISCOVERY NO. 22:**

9 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
10 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
11 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
12 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
13 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
14 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
15 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
16 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
17 the extent that this request seeks documents that contain trade secrets and other confidential  
18 information, the public disclosure of which would violate statutory protections, pose a significant  
19 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
20 objects that this Request is unduly burdensome given the breadth of documents sought and time  
21 until the Interim Rate Hearing.

22 Subject to and consistent with the foregoing objections, SFG responds as follows:

23 SFG completed a production of documents as of April 2, 2025, which are responsive to  
24 this Request. SFG also directs CW to the documents publicly available on SERFF under the  
25 applicable file numbers.

26 **REQUEST FOR DISCOVERY NO. 23:**

27 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO STATE FARM  
28

1 business strategies or management decisions RELATED TO determining whether to continue to  
2 write, cancel, or nonrenew homeowners insurance policies due to wildfire risk from 2020 to the  
3 present.

4 **RESPONSE TO REQUEST FOR DISCOVERY NO. 23:**

5 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
6 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
7 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
8 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
9 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
10 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
11 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
12 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
13 the extent that this request seeks documents that contain trade secrets and other confidential  
14 information, the public disclosure of which would violate statutory protections, pose a significant  
15 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
16 objects that this Request is unduly burdensome given the breadth of documents sought and time  
17 until the Interim Rate Hearing.

18 **REQUEST FOR DISCOVERY NO. 24:**

19 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO STATE FARM  
20 business strategies or management decisions RELATED TO STATE FARM requesting 6.9%  
21 homeowners rate increases in California, rather than any higher amount, from 2018 to 2022.

22 **RESPONSE TO REQUEST FOR DISCOVERY NO. 24:**

23 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
24 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
25 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
26 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
27 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
28

1 Cal. Gov. Code § 11513(c). Further, allegations about past rate increases and CW's accusations  
2 regarding purported "predatory pricing" should be struck, and SFG has filed a motion seeking  
3 that relief. SFG further specifically objects to the extent this Request seeks documents protected  
4 from disclosure by the attorney-client privilege, work product doctrine, joint or common interest  
5 privilege, or any other privilege, protection, or immunity. SFG also objects to the extent that this  
6 request seeks documents that contain trade secrets and other confidential information, the public  
7 disclosure of which would violate statutory protections, pose a significant risk to SFG's business,  
8 and/or violate confidentiality obligations to third parties. SFG further objects that this Request is  
9 unduly burdensome given the breadth of documents sought and time until the Interim Rate  
10 Hearing.

11 **REQUEST FOR DISCOVERY NO. 25:**

12 Provide all DOCUMENTS and COMMUNICATIONS with the Commissioner or CDI  
13 indicating that STATE FARM would cancel or non-renew homeowners policies if YOU were  
14 unable to obtain approval of requested rate increases from 2020 to the present.

15 **RESPONSE TO REQUEST FOR DISCOVERY NO. 25:**

16 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
17 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
18 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
19 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
20 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
21 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
22 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
23 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
24 the extent that this request seeks documents that contain trade secrets and other confidential  
25 information, the public disclosure of which would violate statutory protections, pose a significant  
26 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
27 objects that this Request is unduly burdensome given the breadth of documents sought and time  
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1 until the Interim Rate Hearing.

2 **REQUEST FOR DISCOVERY NO. 26:**

3 Provide all DOCUMENTS and COMMUNICATIONS by YOU RELATED TO whether  
4 YOUR then-current rate levels were adequate given levels of wildfire risk for YOUR in-force  
5 homeowners policies from 2020 to the present.

6 **RESPONSE TO REQUEST FOR DISCOVERY NO. 26:**

7 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
8 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
9 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
10 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
11 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
12 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
13 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
14 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
15 the extent that this request seeks documents that contain trade secrets and other confidential  
16 information, the public disclosure of which would violate statutory protections, pose a significant  
17 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
18 objects that this Request is unduly burdensome given the breadth of documents sought and time  
19 until the Interim Rate Hearing.

20 **REQUEST FOR DISCOVERY NO. 27:**

21 Provide all DOCUMENTS and COMMUNICATIONS related to a 2021 internal list  
22 containing zip codes wherein STATE FARM intended to restrict sales of homeowners insurance  
23 policies.

24 **RESPONSE TO REQUEST FOR DISCOVERY NO. 27:**

25 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
26 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
27 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
28



1 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
2 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
3 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
4 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
5 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
6 the extent that this request seeks documents that contain trade secrets and other confidential  
7 information, the public disclosure of which would violate statutory protections, pose a significant  
8 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
9 objects that this Request is unduly burdensome given the breadth of documents sought and time  
10 until the Interim Rate Hearing.

11 **REQUEST FOR DISCOVERY NO. 28:**

12 Provide all DOCUMENTS and COMMUNICATIONS related to STATE FARM's  
13 decision to cease selling new home insurance policies in California in 2024.

14 **RESPONSE TO REQUEST FOR DISCOVERY NO. 28:**

15 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
16 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
17 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
18 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
19 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
20 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
21 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
22 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
23 the extent that this request seeks documents that contain trade secrets and other confidential  
24 information, the public disclosure of which would violate statutory protections, pose a significant  
25 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
26 objects that this Request is unduly burdensome given the breadth of documents sought and time  
27 until the Interim Rate Hearing.

1                   **REQUEST FOR DISCOVERY NO. 29:**

2                   Provide all DOCUMENTS and COMMUNICATIONS related to State Farm’s decision to  
3 non-renew residential homeowners policies on a “block” basis in March 2024.

4                   **RESPONSE TO REQUEST FOR DISCOVERY NO. 29:**

5                   SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
6 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
7 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
8 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
9 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
10 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
11 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
12 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
13 the extent that this request seeks documents that contain trade secrets and other confidential  
14 information, the public disclosure of which would violate statutory protections, pose a significant  
15 risk to SFG’s business, and/or violate confidentiality obligations to third parties. SFG further  
16 objects that this Request is unduly burdensome given the breadth of documents sought and time  
17 until the Interim Rate Hearing.

18                   **REQUEST FOR DISCOVERY NO. 30:**

19                   Provide all DOCUMENTS and COMMUNICATIONS RELATED TO STATE FARM  
20 insurance premium pricing decisions, analysis, reviews, or strategies regarding homeowners  
21 insurance policies in California from 2020 to the present.

22                   **RESPONSE TO REQUEST FOR DISCOVERY NO. 30:**

23                   SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
24 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
25 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
26 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
27 the sort of evidence on which responsible persons would rely in these rate review proceedings.  
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1 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
2 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
3 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
4 the extent that this request seeks documents that contain trade secrets and other confidential  
5 information, the public disclosure of which would violate statutory protections, pose a significant  
6 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
7 objects that this Request is unduly burdensome given the breadth of documents sought and time  
8 until the Interim Rate Hearing.

9 **REQUEST FOR DISCOVERY NO. 31:**

10 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO STATE FARM's  
11 analysis of insurance premium pricing information related to all other home insurers offering  
12 homeowners insurance policies in California from 2020 to the present.

13 **RESPONSE TO REQUEST FOR DISCOVERY NO. 31:**

14 SFG incorporates its General Objections and Objections to Definitions as if fully set forth  
15 herein. SFG objects that this request goes beyond the permissible scope of discovery. The broad  
16 category of documents that CW seeks is not relevant to the Interim Rate Hearing and would not  
17 be admissible in evidence. Cal. Gov. Code § 11507.6. Nor would this category of documents be  
18 the sort of evidence on which responsible persons would rely in these rate review proceedings.

19 Cal. Gov. Code § 11513(c). SFG further specifically objects to the extent this Request seeks  
20 documents protected from disclosure by the attorney-client privilege, work product doctrine, joint  
21 or common interest privilege, or any other privilege, protection, or immunity. SFG also objects to  
22 the extent that this request seeks documents that contain trade secrets and other confidential  
23 information, the public disclosure of which would violate statutory protections, pose a significant  
24 risk to SFG's business, and/or violate confidentiality obligations to third parties. SFG further  
25 objects that this Request is unduly burdensome given the breadth of documents sought and time  
26 until the Interim Rate Hearing.

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Dated: April 4, 2025

HOGAN LOVELLS US LLP

By:



Michael M. Maddigan  
Jordan D. Teti  
Attorneys for Applicant  
State Farm General Insurance Company

**PROOF OF SERVICE**

I, Jordan Teti, declare:

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 1999 Avenue of the Stars, Suite 1400, Los Angeles, CA 90067. On April 4, 2025, I served a copy of the within document(s):

**STATE FARM GENERAL INSURANCE COMPANY'S RESPONSES AND  
OBJECTIONS TO CONSUMER WATCHDOG'S DISCOVERY PROPOUNDED ON  
STATE FARM GENERAL INSURANCE COMPANY FOR APRIL 8, 2025 HEARING  
ON STIPULATION FOR INTERIM RATE**

- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Redwood City, California addressed as set forth below.
- ☐ by placing the document(s) listed above in a sealed Federal Express envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal Express agent for delivery.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ by transmitting via my electronic service address ([jordan.teti@hoganlovells.com](mailto:jordan.teti@hoganlovells.com)) the document(s) listed above to the person(s) at the e-mail address(es) set forth below.
- ☐ by electronically filing the document(s) with the Clerk of the Court by causing the documents to be sent to One Legal, the Court's Electronic Filing Services Provider for electronic filing and service. Electronic service will be effected by One Legal's case-filing system at the electronic mail addresses indicated on the attached Service List.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 4, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Signature

**SERVICE LIST**  
**All service via e-mail**

Nikki S. McKennedy (SBN 184269)

*Attorneys for the Department of Insurance*

Jennifer McCune (SBN 160089)

Daniel Wade (SBN 296958)

Duncan Montgomery (SBN 176138)

**CALIFORNIA DEPARTMENT OF  
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