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7
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10 **BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF CALIFORNIA**

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12
13 In the Matter of the Rate Applications of
14 STATE FARM GENERAL INSURANCE
15 COMPANY,
16 Applicant.

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

**DECLARATION OF JENNIFER McCUNE
IN SUPPORT OF THE CALIFORNIA
DEPARTMENT OF INSURANCE'S
MOTION TO COMPEL DISCOVERY
FROM STATE FARM GENERAL
INSURANCE COMPANY**

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22 I, Jennifer McCune, declare as follows:

23 1. I am an Attorney V in the Rate Enforcement Bureau ("REB") of the Legal
24 Division of the California Department of Insurance ("CDI" or the "Department") and I am part of
25 REB team of attorneys representing the Department in the rate hearing for the above rate
26 applications submitted by Applicant State Farm General Insurance Company ("State Farm" or
27 "Applicant"), specifically Homeowners Non-Tenant HO-3 line, CDI file no. 24-1271; Overall

1 Renter/Condo Tenant line, CDI file no. 24-1273; and Rental Dwelling line, CDI file no. 24-1330
2 (collectively, “Applications”). I am an attorney licensed to practice law before this Court and the
3 courts of the State of California. I have personal knowledge of the following, and if called to
4 testify hereto, I could and would do so truthfully and competently.

5 2. I am filing this Declaration in Support of CDI’s Motion to Compel discovery from
6 State Farm General, as more fully discussed below.

7 3. On August 12, 2025, I had a telephone call with CDI attorneys and SFG attorneys
8 to begin the Meet and Confer process.

9 4. On August 18, 2025, I sent a Meet and Confer email to counsel for SFG
10 discussing SFG’s document production related to SFG’s nonrenewal program.

11 5. On August 18, 2025, I had a telephone call with State Farm General’s attorney,
12 Vanessa Wells, for the purpose of conducting a further Meet and Confer. The purpose of the
13 Meet and Confer was to discuss the Department’s Motion to Compel discovery with respect to the
14 Applicant’s document production in this matter. Specifically, we discussed the Applicant’s
15 responses to CDI’s Request for Production No. 48 seeking documents related to State Farm
16 General’s nonrenewal of policyholders.

17 6. I am attaching a true and correct copy of State Farm General Insurance Company’s
18 Responses to CDI’s Request for Discovery, Set Two, as Exhibit One.

19 7. I am attaching a true and correct copy of State Farm General Insurance Company –
20 Responsive Document List, dated August 13, 2025, as Exhibit Two.

21 8. I am attaching a true and correct copy of SFG Withheld Document Log, as Exhibit
22 Three.

23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct. Executed in Oakland, California, on August 20, 2025.

25
26 Jennifer McCune
27 Jennifer McCune
28

EXHIBIT 1

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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 TO CDI'S
REQUEST FOR DISCOVERY, SET TWO**

1 PROPOUNDING PARTY : California Department of Insurance, Legal Division

2 RESPONDING PARTY : State Farm General Insurance Company

3 SET NUMBER : Two (2)

4
5 Pursuant to California Government Code Section 11507.6 and the applicable Rules of
6 Practice and Procedure for Insurance Commissioner Rate Proceedings, 10 C.C.R. § 2655.1, State
7 Farm General Insurance Company (“SFG” or “Applicant”) hereby responds to California
8 Department of Insurance, Legal Division’s (“CDI”) Discovery Requests, Set Two (the
9 “Requests”).

10 **PRELIMINARY STATEMENT**

11 Discovery in administrative proceedings must be streamlined and efficient. As the Law
12 Revision Commission for the 1995 Amendment to Cal. Gov. Code §11507.6 put it, “the extensive
13 discovery available in civil proceedings is inappropriate for administrative adjudications, which
14 should be simple, quick, and inexpensive.” *Administrative Adjudications by State Agencies*, 25
15 Cal. L. Revision Comm’n Reports 55 (1995), at 116; *see also Brown v. Valverde*, 183 Cal. App.
16 4th 1531, 1548–49 (2010) (“extensive discovery available in civil proceedings is deemed
17 inappropriate for administrative adjudications, which should be simple, quick, and inexpensive”);
18 Witkin, Cal. Proc. 6th Admin Proc § 109 (2024) (similar). As a result, parties to rate review
19 proceedings may only seek carefully identified categories of information that are narrowly
20 proscribed by statute. *See* Cal. Gov. Code § 11507.6.

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

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

1 **GENERAL OBJECTIONS & OBJECTIONS TO DEFINITIONS**

2 The following general objections apply to each of SFG’s individual responses to the
3 Requests and are incorporated into each and every response.

4 A. General Objections

5 1. SFG objects to the Requests to the extent that they are protected from disclosure
6 by statute, the attorney-client privilege, work product doctrine, joint or common interest privilege,
7 or any other privilege, protection, or immunity. Discovery in these proceedings does not
8 “authorize the inspection of any writing or thing which is privileged from disclosure by law or
9 otherwise made confidential or protected as the attorney’s work product.” Cal. Gov. Code §
10 11507.6. Nor do CDI’s requests seek the inspection or copying of any writing or thing which is
11 privileged from disclosure by law or otherwise made confidential or protected as attorneys’ work
12 product. CDI Disc., Set One, Definitions and General Provisions ¶ O. Nothing in these responses
13 in any way constitutes a waiver of any applicable privilege or protection from disclosure.
14 Further, any inadvertent production of privileged or protected information is not a waiver of any
15 privilege or protection from disclosure.

16 2. SFG objects to the Requests to the extent they seek SFG trade secrets (including
17 but not limited to competitively sensitive information), which are privileged and protected under
18 California law and SFG objects to their disclosure without a suitable protective order, including
19 sealing when such trade secret information is introduced into the record, and an agreement by the
20 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
21 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

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

1 4. SFG objects to these Request to the extent they seek documents not relevant to the
2 Rate Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in
3 this context of requests for documents regarding State Farm General's financial condition that are
4 statutorily privileged and/or protected from disclosure (included but not limited to specific
5 Insurance Code as well as trade secret protection), when State Farm General's solvency regulator
6 (the Illinois Department of Insurance) has made a determination regarding SFG's financial
7 condition, any "relevance" is subsumed in the regulator's determination and the documents are
8 not "relevant" when balanced against confidentiality interests. In addition, the Requests are not
9 relevant to the extent that they seek to treat SFG and State Farm Mutual as a single entity. *See*
10 *State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-73 (2021).

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

16 6. SFG objects to CDI's requests to the extent that they would impose on SFG
17 obligations that go beyond the applicable regulations and statutes that govern these proceedings.
18 SFG further objects to the extent that the requests would not be impracticable to comply with,
19 particularly given the time constraints of this proceeding. SFG further objects to the extent the
20 Requests are improper interrogatories or call for the creation of documents, which are not
21 permitted under Government Code § 11507.6.

22 7. SFG objects to the Requests to the extent they seek personal information of SFG's
23 policyholders, as this information is protected by the California Constitution. *See In re Ins.*
24 *Installment Fee Cases*, 211 Cal. App. 4th 1395, 1426 (2012). SFG cannot disclose this
25 information without notice to the policyholders and depending on the type of personal
26 information, either an opportunity for the policyholder to object or a requirement for affirmative
27 consent from the policyholder prior to disclosure. *Id.* at 1430-31.

1 8. SFG objects to the Requests to the extent they call for production of documents
2 beyond the scope of Cal. Gov. Code § 11507.6.

3 9. SFG will provide a log for discovery responses by the date upon which it
4 completes its document production. Certain examples of withheld documents are being provided
5 at this time in the below responses and objections.

6 B. Objections to Definitions

7 10. SFG objects to the definitions in CDI's requests to the extent they alter the
8 generally understood meanings of common terms. SFG does not adopt CDI's definitions.

9 11. SFG objects to the definition of "APPLICANT" because they seek to impose an
10 obligation to respond on behalf of other entities and persons other than SFG, such as "agents and
11 employees, and all persons working on their behalf." These responses are made on behalf of SFG
12 only and not any other party, entity, or person.

13 12. SFG objects to the definitions of "DOCUMENT" and "DOCUMENTS" overly
14 broad and unduly burdensome.

15 13. These General Objections are applicable to, and incorporated into, each of SFG's
16 responses. Each and every Response is made subject to the General Objections.

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

20 **RESPONSES TO DISCOVERY REQUESTS**

21 **II. DISCOVERY REQUESTED**

22 **REQUEST FOR DISCOVERY NO. 48:**

23 Provide any and all DATA, DOCUMENTS, and/or CALCULATIONS which explain the
24 rate impact resulting from APPLICANT's nonrenewal program beginning in March 2024 as
25 identified in APPLICANT's rule filings 24-651 and 24-652, including:

- 26 a. An alternative indication that appropriately adjusts for the non-renewal program that
27 began in March 2024 and excludes data from policies non-renewed since March
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2024;

- b. The total number of policies nonrenewed since March 2024 by ZIP Code; and
- c. Specific details of the risks that were non-renewed as part of the nonrenewal program that began in March 2024 and the objective underwriting criteria that detail the risk profiles that are no longer eligible.

RESPONSE TO REQUEST FOR DISCOVERY NO. 48:

SFG incorporates its General Objections and Objections to Definitions as if fully set forth herein.

SFG objects to this Request to the extent it seeks documents not relevant to the Rate Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). 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 further objects to the extent this Request seeks SFG trade secrets (including but not limited to competitively sensitive information), which are privileged and protected under California law and SFG objects to their disclosure without a suitable protective order, including sealing when such trade secret information is introduced into the record, and an agreement by the parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§ 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it relates to the terms and phrases “the rate impact resulting from APPLICANT’s nonrenewal program,” “[a]n alternative indication that appropriately adjusts for the non-renewal program,” “excludes data from policies non-renewed,” and “[s]pecific details of the risks that were non-renewed as part of the nonrenewal program.”

SFG objects to this Request as overly broad and unduly burdensome, including due to the

1 use of the terms “any and all” and “including.”

2 SFG objects to this Request as duplicative or previously propounded requests.

3 SFG also objects to this Request as it seeks documents and information already provided
4 to CDI via SERFF.

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

6 SFG is conducting a reasonably diligent search and will produce responsive, non-
7 privileged documents responsive to this Request, if any, based on that search. In addition, SFG
8 directs CDI to responsive documents submitted by SFG via SERFF. In the attached Exhibit A,
9 which is incorporated by reference herein, SFG identifies SERFF documents that SFG believes
10 are responsive to this CDI Request.

11 **REQUEST FOR DISCOVERY NO. 49:**

12 Any and all DOCUMENTS regarding whether VARIANCE 7(C) should be applied in
13 PA-2024-00011, PA-2024-00012 and PA-2024-00013.

14 **RESPONSE TO REQUEST FOR DISCOVERY NO. 49:**

15 SFG incorporates its General Objections and Objections to Definitions as if fully set forth
16 herein.

17 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
18 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). Nor would this
19 category of documents be the sort of evidence on which responsible persons would rely in these
20 rate review proceedings. Cal. Gov. Code § 11513(c).

21 SFG further specifically objects to the extent this Request seeks documents protected from
22 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
23 privilege, or any other privilege, protection, or immunity.

24 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
25 limited to competitively sensitive information), which are privileged and protected under
26 California law and SFG objects to their disclosure without a suitable protective order, including
27 sealing when such trade secret information is introduced into the record, and an agreement by the
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1 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
2 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

3 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
4 because it seeks “DOCUMENTS regarding whether VARIANCE 7(C) should be applied,” which
5 is an extremely broad category.

6 SFG objects to this Request as overly broad and unduly burdensome, including due to the
7 use of the term “[a]ny and all.”

8 SFG objects to this Request as it seeks documents and information already provided to
9 CDI via SERFF.

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

11 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
12 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
13 believes are responsive to this CDI Request.

14 **REQUEST FOR DISCOVERY NO. 50:**

15 Any and all DOCUMENTS containing information that supports the use of VARIANCE
16 7(C).

17 **RESPONSE TO REQUEST FOR DISCOVERY NO. 50:**

18 SFG incorporates its General Objections and Objections to Definitions as if fully set forth
19 herein.

20 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
21 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). Nor would this
22 category of documents be the sort of evidence on which responsible persons would rely in these
23 rate review proceedings. Cal. Gov. Code § 11513(c).

24 SFG further specifically objects to the extent this Request seeks documents protected from
25 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
26 privilege, or any other privilege, protection, or immunity.

27 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
28

1 limited to competitively sensitive information), which are privileged and protected under
2 California law and SFG objects to their disclosure without a suitable protective order, including
3 sealing when such trade secret information is introduced into the record, and an agreement by the
4 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
5 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

6 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
7 because the phrase “information that supports the use of VARIANCE 7(C)” could be viewed as
8 extremely broad.

9 SFG objects to this Request as overly broad and unduly burdensome, including due to the
10 use of the terms “[a]ny and all” and “containing.”

11 SFG objects to this Request as it seeks documents and information already provided to
12 CDI via SERFF.

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

14 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
15 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
16 believes are responsive to this CDI Request.

17 **REQUEST FOR DISCOVERY NO. 51:**

18 Any and all DOCUMENTS that explain or reflect whether the loss development formula
19 in 10 CCR section 2644.6 could produce actuarially sound results.

20 **RESPONSE TO REQUEST FOR DISCOVERY NO. 51:**

21 SFG incorporates its General Objections and Objections to Definitions as if fully set forth
22 herein.

23 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
24 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). Nor would this
25 category of documents be the sort of evidence on which responsible persons would rely in these
26 rate review proceedings. Cal. Gov. Code § 11513(c).

27 SFG further specifically objects to the extent this Request seeks documents protected from
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1 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
2 privilege, or any other privilege, protection, or immunity.

3 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
4 limited to competitively sensitive information), which are privileged and protected under
5 California law and SFG objects to their disclosure without a suitable protective order, including
6 sealing when such trade secret information is introduced into the record, and an agreement by the
7 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
8 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

9 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
10 because it seeks “DOCUMENTS that explain or reflect whether the loss development formula in
11 10 CCR section 2644.6 could produce actuarially sound results.”

12 SFG objects to this Request as overly broad and unduly burdensome, including due to the
13 use of the term “[a]ny and all.”

14 SFG objects to this Request as it seeks documents and information already provided to
15 CDI via SERFF.

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

17 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
18 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
19 believes are responsive to this CDI Request.

20 **REQUEST FOR DISCOVERY NO. 52:**

21 Any and all DOCUMENTS containing information that shows that the loss development
22 formula in section 2644.6 does not produce an actuarially sound result because there are changes
23 in APPLICANT’S reserving or claims closing practices that significantly affect the data.

24 **RESPONSE TO REQUEST FOR DISCOVERY NO. 52:**

25 SFG incorporates its General Objections and Objections to Definitions as if fully set forth
26 herein.

27 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
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1 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). Nor would this
2 category of documents be the sort of evidence on which responsible persons would rely in these
3 rate review proceedings. Cal. Gov. Code § 11513(c).

4 SFG further specifically objects to the extent this Request seeks documents protected from
5 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
6 privilege, or any other privilege, protection, or immunity.

7 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
8 limited to competitively sensitive information), which are privileged and protected under
9 California law and SFG objects to their disclosure without a suitable protective order, including
10 sealing when such trade secret information is introduced into the record, and an agreement by the
11 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
12 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

13 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
14 because it seeks “DOCUMENTS containing information that shows that the loss development
15 formula in section 2644.6 does not produce an actuarially sound result because there are changes
16 in APPLICANT’S reserving or claims closing practices that significantly affect the data.”

17 SFG objects to this Request as overly broad and unduly burdensome, including due to the
18 use of the terms “[a]ny and all” and “containing.”

19 SFG objects to this Request as it seeks documents and information already provided to
20 CDI via SERFF.

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

22 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
23 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
24 believes are responsive to this CDI Request.

25 **REQUEST FOR DISCOVERY NO. 53:**

26 Any and all DATA, DOCUMENTS, and/or CALCULATIONS for every component of
27 the ratemaking formula(s) which APPLICANT used or otherwise relied upon in connection with
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1 its VARIANCE 7(C) Applications, and which contain, RELATE TO, and/or support the amount
2 of the change that use of VARIANCE 7(C) will have on each component of the ratemaking
3 formula, including but not limited to, all documents that:

- 4 a. Identify the extent or amount of the variance requested and the applicable component
5 of the ratemaking formula(s);
- 6 b. Set forth the expected result or impact on the maximum and minimum permitted
7 earned premium that the granting of VARIANCE 7(C) will have, as compared to the
8 expected result if VARIANCE 7(C) is denied; and
- 9 c. Identify the facts and their source justifying APPLICANT'S request for use of
10 VARIANCE 7(C) and demonstrating the effect of VARIANCE 7(C) on the
11 component(s) of the ratemaking formula to which APPLICANT wishes to apply
12 VARIANCE 7(C).

13 **RESPONSE TO REQUEST FOR DISCOVERY NO. 53:**

14 SFG incorporates its General Objections and Objections to Definitions as if fully set forth
15 herein.

16 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
17 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). Nor would this
18 category of documents be the sort of evidence on which responsible persons would rely in these
19 rate review proceedings. Cal. Gov. Code § 11513(c).

20 SFG further specifically objects to the extent this Request seeks documents protected from
21 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
22 privilege, or any other privilege, protection, or immunity.

23 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
24 limited to competitively sensitive information), which are privileged and protected under
25 California law and SFG objects to their disclosure without a suitable protective order, including
26 sealing when such trade secret information is introduced into the record, and an agreement by the
27 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
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1 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

2 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
3 relates to the terms and phrases, “every component of the ratemaking formula(s),” “applicable
4 component of the ratemaking formula(s),” and “expected result or impact on the maximum and
5 minimum permitted earned premium.”

6 SFG objects to this Request as overly broad and unduly burdensome, including due to the
7 use of the terms “[a]ny and all,” “every,” “including but not limited to” and “all.”

8 SFG objects to this Request as it seeks documents and information already provided to
9 CDI via SERFF.

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

11 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
12 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
13 believes are responsive to this CDI Request.

14 **REQUEST FOR DISCOVERY NO. 54:**

15 Any and all DOCUMENTS containing information regarding the use of VARIANCE 9.

16 **RESPONSE TO REQUEST FOR DISCOVERY NO. 54:**

17 SFG incorporates its General Objections and Objections to Definitions as if fully set forth
18 herein.

19 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
20 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this
21 context of requests for documents regarding State Farm General’s financial condition that are
22 statutorily privileged and/or protected from disclosure (included but not limited to specific
23 Insurance Code as well as trade secret protection), when State Farm General’s solvency regulator
24 (the Illinois Department of Insurance) has made a determination regarding SFG’s financial
25 condition, any “relevance” is subsumed in the regulator’s determination and the documents are
26 not “relevant” when balanced against confidentiality interests. Nor would this category of
27 documents be the sort of evidence on which responsible persons would rely in these rate review
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1 proceedings. Cal. Gov. Code § 11513(c).

2 SFG further specifically objects to the extent this Request seeks documents protected from
3 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
4 privilege, or any other privilege, protection, or immunity.

5 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
6 limited to competitively sensitive information), which are privileged and protected under
7 California law and SFG objects to their disclosure without a suitable protective order, including
8 sealing when such trade secret information is introduced into the record, and an agreement by the
9 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
10 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

11 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
12 because it seeks “DOCUMENTS containing information regarding the use of VARIANCE 9,”
13 which is an extremely broad category.

14 SFG objects to this Request as overly broad and unduly burdensome, including due to the
15 use of the term “[a]ny and all.”

16 SFG objects to this Request as it seeks documents and information already provided to
17 CDI via SERFF.

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

19 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
20 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
21 believes are responsive to this CDI Request.

22 **REQUEST FOR DISCOVERY NO. 55:**

23 Any and all DOCUMENTS containing information that supports the use of VARIANCE
24 9.

25 **RESPONSE TO REQUEST FOR DISCOVERY NO. 55:**

26 SFG incorporates its General Objections and Objections to Definitions as if fully set forth
27 herein.

1 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
2 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this
3 context of requests for documents regarding State Farm General's financial condition that are
4 statutorily privileged and/or protected from disclosure (included but not limited to specific
5 Insurance Code as well as trade secret protection), when State Farm General's solvency regulator
6 (the Illinois Department of Insurance) has made a determination regarding SFG's financial
7 condition, any "relevance" is subsumed in the regulator's determination and the documents are
8 not "relevant" when balanced against confidentiality interests. Nor would this category of
9 documents be the sort of evidence on which responsible persons would rely in these rate review
10 proceedings. Cal. Gov. Code § 11513(c).

11 SFG further specifically objects to the extent this Request seeks documents protected from
12 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
13 privilege, or any other privilege, protection, or immunity.

14 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
15 limited to competitively sensitive information), which are privileged and protected under
16 California law and SFG objects to their disclosure without a suitable protective order, including
17 sealing when such trade secret information is introduced into the record, and an agreement by the
18 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
19 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

20 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
21 because the phrase "information that supports the use of VARIANCE 9" could be viewed as
22 extremely broad.

23 SFG objects to this Request as overly broad and unduly burdensome, including due to the
24 use of the term "[a]ny and all."

25 SFG objects to this Request as it seeks documents and information already provided to
26 CDI via SERFF.

27 Subject to and consistent with the foregoing objections, SFG responds as follows:
28

1 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
2 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
3 believes are responsive to this CDI Request.

4 **REQUEST FOR DISCOVERY NO. 56:**

5 Any and all DOCUMENTS containing information regarding whether APPLICANT'S
6 financial condition is such that the maximum permitted earned premium should be increased in
7 order to avoid confiscatory rates.

8 **RESPONSE TO REQUEST FOR DISCOVERY NO. 56:**

9 SFG incorporates its General Objections and Objections to Definitions as if fully set forth
10 herein.

11 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
12 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this
13 context of requests for documents regarding State Farm General's financial condition that are
14 statutorily privileged and/or protected from disclosure (included but not limited to specific
15 Insurance Code as well as trade secret protection), when State Farm General's solvency regulator
16 (the Illinois Department of Insurance) has made a determination regarding SFG's financial
17 condition, any "relevance" is subsumed in the regulator's determination and the documents are
18 not "relevant" when balanced against confidentiality interests. Nor would this category of
19 documents be the sort of evidence on which responsible persons would rely in these rate review
20 proceedings. Cal. Gov. Code § 11513(c).

21 SFG further specifically objects to the extent this Request seeks documents protected from
22 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
23 privilege, or any other privilege, protection, or immunity.

24 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
25 limited to competitively sensitive information), which are privileged and protected under
26 California law and SFG objects to their disclosure without a suitable protective order, including
27 sealing when such trade secret information is introduced into the record, and an agreement by the
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1 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
2 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

3 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
4 because it seeks “DOCUMENTS containing information regarding whether APPLICANT’S
5 financial condition is such that the maximum permitted earned premium should be increased in
6 order to avoid confiscatory rates,” which is an extremely broad category.

7 SFG objects to this Request as overly broad and unduly burdensome, including due to the
8 use of the term “[a]ny and all.”

9 SFG objects to this Request as it seeks documents and information already provided to
10 CDI via SERFF.

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

12 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
13 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
14 believes are responsive to this CDI Request. State Farm further directs CDI to the declaration of
15 David Appel filed on April 2, 2025 in support of State Farm’s Brief in Support of Interim Rate
16 Request and Response to Consumer Watchdog’s Pre-Hearing Objections.

17 **REQUEST FOR DISCOVERY NO. 57:**

18 Any and all DOCUMENTS containing information showing that APPLICANT’S
19 financial condition is such that the maximum permitted earned premium should be increased in
20 order to avoid confiscatory rates.

21 **RESPONSE TO REQUEST FOR DISCOVERY NO. 57:**

22 SFG incorporates its General Objections and Objections to Definitions as if fully set forth
23 herein.

24 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
25 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this
26 context of requests for documents regarding State Farm General’s financial condition that are
27 statutorily privileged and/or protected from disclosure (included but not limited to specific
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1 Insurance Code as well as trade secret protection), when State Farm General's solvency regulator
2 (the Illinois Department of Insurance) has made a determination regarding SFG's financial
3 condition, any "relevance" is subsumed in the regulator's determination and the documents are
4 not "relevant" when balanced against confidentiality interests. Nor would this category of
5 documents be the sort of evidence on which responsible persons would rely in these rate review
6 proceedings. Cal. Gov. Code § 11513(c).

7 SFG further specifically objects to the extent this Request seeks documents protected from
8 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
9 privilege, or any other privilege, protection, or immunity.

10 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
11 limited to competitively sensitive information), which are privileged and protected under
12 California law and SFG objects to their disclosure without a suitable protective order, including
13 sealing when such trade secret information is introduced into the record, and an agreement by the
14 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
15 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

16 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
17 because it seeks "DOCUMENTS containing information showing that APPLICANT'S financial
18 condition is such that the maximum permitted earned premium should be increased in order to
19 avoid confiscatory rates," which is an extremely broad category.

20 SFG objects to this Request as overly broad and unduly burdensome, including due to the
21 use of the term "[a]ny and all."

22 SFG objects to this Request as it seeks documents and information already provided to
23 CDI via SERFF.

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

25 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
26 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
27 believes are responsive to this CDI Request. State Farm directs CDI to the declaration of David
28

1 Appel filed on April 2, 2025 in support of State Farm’s Brief in support of Interim Rate Request
2 and Response to Consumer Watchdog’s Pre-Hearing Objections.

3 **REQUEST FOR DISCOVERY NO. 58:**

4 Any and all DOCUMENTS containing information regarding whether the maximin
5 earned premium would result in deep financial hardship, within the meaning of 20th
6 Century v. Garamendi, 8 Cal.4th 216 (1994), to the enterprise as a whole.

7 **RESPONSE TO REQUEST FOR DISCOVERY NO. 58:**

8 SFG incorporates its General Objections and Objections to Definitions as if fully set forth
9 herein.

10 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
11 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this
12 context of requests for documents regarding State Farm General’s financial condition that are
13 statutorily privileged and/or protected from disclosure (included but not limited to specific
14 Insurance Code as well as trade secret protection), when State Farm General’s solvency regulator
15 (the Illinois Department of Insurance) has made a determination regarding SFG’s financial
16 condition, any “relevance” is subsumed in the regulator’s determination and the documents are
17 not “relevant” when balanced against confidentiality interests. Nor would this category of
18 documents be the sort of evidence on which responsible persons would rely in these rate review
19 proceedings. Cal. Gov. Code § 11513(c).

20 SFG further specifically objects to the extent this Request seeks documents protected from
21 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
22 privilege, or any other privilege, protection, or immunity.

23 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
24 limited to competitively sensitive information), which are privileged and protected under
25 California law and SFG objects to their disclosure without a suitable protective order, including
26 sealing when such trade secret information is introduced into the record, and an agreement by the
27 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
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1 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

2 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
3 because it seeks “DOCUMENTS containing information regarding whether the maximin
4 earned premium would result in deep financial hardship, within the meaning of 20th Century v.
5 Garamendi, 8 Cal.4th 216 (1994), to the enterprise as a whole,” which is an extremely broad
6 category.

7 SFG objects to this Request as overly broad and unduly burdensome, including due to the
8 use of the term “[a]ny and all.”

9 SFG objects to this Request as it seeks documents and information already provided to
10 CDI via SERFF.

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

12 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
13 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
14 believes are responsive to this CDI Request. State Farm directs CDI to the declaration of David
15 Appel filed on April 2, 2025 in support of State Farm’s Brief in support of Interim Rate Request
16 and Response to Consumer Watchdog’s Pre-Hearing Objections.

17 **REQUEST FOR DISCOVERY NO. 59:**

18 Any and all DOCUMENTS containing information regarding whether the maximin
19 earned premium would result in deep financial hardship to the enterprise as a whole.

20 **RESPONSE TO REQUEST FOR DISCOVERY NO. 59:**

21 SFG incorporates its General Objections and Objections to Definitions as if fully set forth
22 herein.

23 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
24 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this
25 context of requests for documents regarding State Farm General’s financial condition that are
26 statutorily privileged and/or protected from disclosure (included but not limited to specific
27 Insurance Code as well as trade secret protection), when State Farm General’s solvency regulator
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1 (the Illinois Department of Insurance) has made a determination regarding SFG’s financial
2 condition, any “relevance” is subsumed in the regulator’s determination and the documents are
3 not “relevant” when balanced against confidentiality interests. In addition, this Request is not
4 relevant to the extent that it seeks to treat SFG and State Farm Mutual as a single entity. *See State*
5 *Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021). Nor would this category of
6 documents be the sort of evidence on which responsible persons would rely in these rate review
7 proceedings. Cal. Gov. Code § 11513(c).

8 SFG further specifically objects to the extent this Request seeks documents protected from
9 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
10 privilege, or any other privilege, protection, or immunity.

11 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
12 limited to competitively sensitive information), which are privileged and protected under
13 California law and SFG objects to their disclosure without a suitable protective order, including
14 sealing when such trade secret information is introduced into the record, and an agreement by the
15 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
16 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

17 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
18 because it seeks “DOCUMENTS containing information regarding whether the maximin earned
19 premium would result in deep financial hardship to the enterprise as a whole,” which is an
20 extremely broad category.

21 SFG objects to this Request as overly broad and unduly burdensome, including due to the
22 use of the term “[a]ny and all.”

23 SFG objects to this Request as it seeks documents and information already provided to
24 CDI via SERFF.

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

26 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
27 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
28

believes are responsive to this CDI Request. State Farm directs CDI to the declaration of David Appel filed on April 2, 2025 in support of State Farm's Brief in support of Interim Rate Request and Response to Consumer Watchdog's Pre-Hearing Objections.

REQUEST FOR DISCOVERY NO. 60:

Any and all DATA, DOCUMENTS, and/or CALCULATIONS for every component of the ratemaking formula(s) which APPLICANT used or otherwise relied upon in connection with its VARIANCE 9 Applications, and which contain, RELATE TO, and/or support the amount of the change that use of VARIANCE 9 will have on each component of the ratemaking formula, including but not limited to, all documents that:

- a. Identify the extent or amount of the variance requested and the applicable component of the ratemaking formula(s);
- b. Set forth the expected result or impact on the maximum and minimum permitted earned premium that the granting of VARIANCE 9 will have, as compared to the expected result if VARIANCE 9 is denied; and
- c. Identify the facts and their source justifying APPLICANT'S request for use of VARIANCE 9 and demonstrating the effect of VARIANCE 9 on the component(s) of the ratemaking formula to which APPLICANT wishes to apply VARIANCE 9.

RESPONSE TO REQUEST FOR DISCOVERY NO. 60:

SFG incorporates its General Objections and Objections to Definitions as if fully set forth herein.

SFG objects to this Request to the extent it seeks documents not relevant to the Rate Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this context of requests for documents regarding State Farm General's financial condition that are statutorily privileged and/or protected from disclosure (included but not limited to specific Insurance Code as well as trade secret protection), when State Farm General's solvency regulator (the Illinois Department of Insurance) has made a determination regarding SFG's financial condition, any "relevance" is subsumed in the regulator's determination and the documents are

1 not “relevant” when balanced against confidentiality interests. Nor would this category of
2 documents be the sort of evidence on which responsible persons would rely in these rate review
3 proceedings. Cal. Gov. Code § 11513(c).

4 SFG further specifically objects to the extent this Request seeks documents protected from
5 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
6 privilege, or any other privilege, protection, or immunity.

7 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
8 limited to competitively sensitive information), which are privileged and protected under
9 California law and SFG objects to their disclosure without a suitable protective order, including
10 sealing when such trade secret information is introduced into the record, and an agreement by the
11 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
12 352 , 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

13 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
14 relates to the terms and phrases, “every component of the ratemaking formula(s),” “applicable
15 component of the ratemaking formula(s),” and “expected result or impact on the maximum and
16 minimum permitted earned premium.”

17 SFG objects to this Request as overly broad and unduly burdensome, including due to the use
18 of the terms “[a]ny and all” and “including but not limited to.”

19 SFG objects to this Request as it seeks documents and information already provided to
20 CDI via SERFF.

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

22 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
23 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
24 believes are responsive to this CDI Request.

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Dated: July 30, 2025

HOGAN LOVELLS US LLP

By: /s/ Vanessa O. Wells

Vanessa O. Wells

Attorneys for Applicant
SFG Insurance Company

EXHIBIT A

Request #	SERFF documents
48	<p>NT Filing 24-1271</p> <p>Objections</p> <p>Response to 5-23 Objection</p> <p>5-23-2025 Objection Response.pdf</p> <p>Question 5</p> <p>Supplemental Exhibit E.pdf</p> <p>Supplemental Exhibit E.xlsx</p>
49	<p>NT filing 24-1271</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>NT Filing Memo.pdf</p> <p>Part 1</p> <p>Q1 2025 Data</p> <p>NT Filing Memo - 1Q 2025 Data.pdf</p> <p>Part 1</p> <p>NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9.pdf</p> <p>Exhibit 13 Page 9</p> <p>Filing Correspondence</p> <p>Objections</p> <p>Response to 5-23 Objection submitted on 6/06/2025</p> <p>5-23-2025 Objection Response.pdf</p> <p>Question 2</p> <p>Response to 6-27-2025 Objection submitted 7/08/2025</p> <p>6-27-2025 Objection Response.pdf</p> <p>Question 1</p> <p>Supplemental Exhibit 6-27-2025 1a.pdf</p> <p>TN filing 24-1273</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>TN Filing Memo.pdf</p> <p>Part 1</p> <p>Q1 2025 Data</p> <p>TN Filing Memo - 1Q 2025 Data.pdf</p> <p>Part 1</p> <p>Updated TN Filing Exhibits - 1Q 2025.pdf</p> <p>Exhibit 13 Page 9</p> <p>RDP filing 24-1330</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>RDP Filing Memo.pdf</p>

	<p style="text-align: center;">Part 1</p> <p style="text-align: center;">Q1 2025 Data</p> <p style="text-align: center;">RDP Filing Memo - 1Q 2025 Data.pdf</p> <p style="text-align: center;">Part 1</p> <p style="text-align: center;">RDP Filing Exhibits.pdf</p> <p style="text-align: center;">Exhibit 13 Page 9</p> <p>Please refer to relevant responses to the Berquist & Sherman "Sample Questions for Department Executives" in the 6-4-2025 Consumer Watchdog RFI, Question #2.</p>
50	<p>NT filing 24-1271</p> <p style="padding-left: 20px;">Supporting Documentation</p> <p style="padding-left: 40px;">New Prior Approval Rate Application</p> <p style="padding-left: 40px;">NT Filing Memo.pdf</p> <p style="padding-left: 40px;">Part 1</p> <p style="padding-left: 20px;">Q1 2025 Data</p> <p style="padding-left: 40px;">NT Filing Memo - 1Q 2025 Data.pdf</p> <p style="padding-left: 40px;">Part 1</p> <p style="padding-left: 40px;">NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9.pdf</p> <p style="padding-left: 40px;">Exhibit 13 Page 9</p> <p style="padding-left: 20px;">Filing Correspondence</p> <p style="padding-left: 20px;">Objections</p> <p style="padding-left: 40px;">Response to 5-23 Objection submitted on 6/06/2025</p> <p style="padding-left: 40px;">5-23-2025 Objection Response.pdf</p> <p style="padding-left: 40px;">Question 2</p> <p style="padding-left: 40px;">Response to 6-27-2025 Objection submitted 7/08/2025</p> <p style="padding-left: 40px;">6-27-2025 Objection Response.pdf</p> <p style="padding-left: 40px;">Question 1b</p> <p>TN filing 24-1273</p> <p style="padding-left: 20px;">Supporting Documentation</p> <p style="padding-left: 40px;">New Prior Approval Rate Application</p> <p style="padding-left: 40px;">TN Filing Memo.pdf</p> <p style="padding-left: 40px;">Part 1</p> <p style="padding-left: 20px;">Q1 2025 Data</p> <p style="padding-left: 40px;">TN Filing Memo - 1Q 2025 Data.pdf</p> <p style="padding-left: 40px;">Part 1</p> <p style="padding-left: 40px;">Updated TN Filing Exhibits - 1Q 2025.pdf</p> <p style="padding-left: 40px;">Exhibit 13 Page 9</p> <p>RDP filing 24-1330</p> <p style="padding-left: 20px;">Supporting Documentation</p> <p style="padding-left: 40px;">New Prior Approval Rate Application</p> <p style="padding-left: 40px;">RDP Filing Memo.pdf</p> <p style="padding-left: 40px;">Part 1</p> <p style="padding-left: 20px;">Q1 2025 Data</p>

	<p style="text-align: center;"> RDP Filing Memo - 1Q 2025 Data.pdf Part 1 RDP Filing Exhibits.pdf Exhibit 13 Page 9 </p> <p>Please refer to relevant responses to the Berquist & Sherman “Sample Questions for Department Executives” in the 6-4-2025 Consumer Watchdog RFI, Question #2.</p>
51	<p> NT filing 24-1271 Filing Correspondence Objections Response to 5-23 Objection submitted on 6/06/2025 5-23-2025 Objection Response.pdf Question 2 Response to 6-27-2025 Objection submitted 7/08/2025 6-27-2025 Objection Response.pdf Question 1b </p>
52	<p> NT filing 24-1271 Supporting Documentation Filing Correspondence Objections Response to 5-23 Objection submitted on 6/06/2025 5-23-2025 Objection Response.pdf Question 2 </p> <p>Please refer to relevant responses to the Berquist & Sherman “Sample Questions for Department Executives” in the 6-4-2025 Consumer Watchdog RFI, Question #2.</p>
53	<p> a. NT Filing 24-1271 Supporting Documentation Q1 2025 Data NT PriorAppRateAPL - 1Q 2025.pdf NT PriorAppRateAPL - 1Q 2025.xlsm Variance Request tab NT Filing Memo - 1Q 2025 Data.pdf NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9.pdf Exhibit 13 Page 9 </p> <p> TN Filing 24-1273 Supporting Documentation Q1 2025 Data TN Filing Memo - 1Q 2025 Data.pdf Updated TN Filing Exhibits - 1Q 2025.pdf Exhibit 13 Page 9 </p>

	<p>RD Filing 24-1330</p> <p>Supporting Documentation</p> <p>Q1 2025 Data</p> <p>RDP Filing Memo - 1Q 2025 Data.pdf</p> <p>RDP Filing Exhibits.pdf</p> <p>Exhibit 13 Page 9</p> <p>b.</p> <p>NT Filing 24-1271</p> <p>Supporting Documentation</p> <p>Q1 2025 Data</p> <p>NT PriorAppRateTI Var 8 - 1Q 2025.pdf</p> <p>NT PriorAppRateTI Var 8 - 1Q 2025.xlsm</p> <p>NT PriorAppRateTI No Var - 1Q 2025.pdf</p> <p>NT PriorAppRateTI No Var - 1Q 2025.xlsm</p> <p>TN Filing 24-1273</p> <p>Supporting Documentation</p> <p>Q1 2025 Data</p> <p>TN PriorAppRateTI Var 8 - 1Q 2025.pdf</p> <p>TN PriorAppRateTI Var 8 - 1Q 2025.xlsm</p> <p>TN PriorAppRateTI No Var - 1Q 2025.pdf</p> <p>TN PriorAppRateTI No Var - 1Q 2025.xlsm</p> <p>RD Filing 24-1330</p> <p>Supporting Documentation</p> <p>Q1 2025 Data</p> <p>RDP PriorAppRateTI Var 8 - 1Q 2025.pdf</p> <p>RDP PriorAppRateTI Var 8 - 1Q 2025.xlsm</p> <p>RDP PriorAppRateTI No Var - 1Q 2025.pdf</p> <p>RDP PriorAppRateTI No Var - 1Q 2025.xlsm</p> <p>c.</p> <p>NT Filing 24-1271</p> <p>Objections</p> <p>Response to 5-23 Objection</p> <p>5-23-2025 Objection Response.pdf</p> <p>Question 2</p> <p>Response to 6-27 Objection</p> <p>6-27-2025 Objection Response.pdf</p> <p>Question 1b</p> <p>Please refer to relevant responses to the Berquist & Sherman “Sample Questions for Department Executives” in the 6-4-2025 Consumer Watchdog RFI, Question #2.</p>
54-59	NT Filing 24-1271

	<p>Supporting Documentation Q1 2025 Data NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9.pdf Exhibit 13 Page 10</p> <p>TN Filing 24-1273 Supporting Documentation Q1 2025 Data Updated TN Filing Exhibits - 1Q 2025.pdf Exhibit 13 Page 10</p> <p>RD Filing 24-1330 Supporting Documentation Q1 2025 Data RDP Filing Exhibits.pdf Exhibit 13 Page 10</p>
60	<p>a.</p> <p>NT Filing 24-1271 Supporting Documentation Q1 2025 Data NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9.pdf Exhibit 13 Page 10</p> <p>TN Filing 24-1273 Supporting Documentation Q1 2025 Data Updated TN Filing Exhibits - 1Q 2025.pdf Exhibit 13 Page 10</p> <p>RD Filing 24-1330 Supporting Documentation Q1 2025 Data RDP Filing Exhibits.pdf Exhibit 13 Page 10</p> <p>b.</p> <p>NT Filing 24-1271 Supporting Documentation Q1 2025 Data NT PriorAppRateAPL - 1Q 2025.pdf NT PriorAppRateAPL - 1Q 2025.xlsm Variance Request tab NT PriorAppRateTI All Var - 1Q 2025.pdf NT PriorAppRateTI All Var - 1Q 2025.xlsx NT PriorAppRateTI Var 8 - 1Q 2025.pdf NT PriorAppRateTI Var 8 - 1Q 2025.xlsm NT PriorAppRateTI No Var - 1Q 2025.pdf NT PriorAppRateTI No Var - 1Q 2025.xlsm</p> <p>TN Filing 24-1273</p>

Supporting Documentation

Q1 2025 Data

TN PriorAppRateAPL - 1Q 2025.pdf

TN PriorAppRateAPL - 1Q 2025.xlsm

Variance Request tab

TN PriorAppRateTI All Var - 1Q 2025.pdf

TN PriorAppRateTI All Var - 1Q 2025.xlsx

TN PriorAppRateTI Var 8 - 1Q 2025.pdf

TN PriorAppRateTI Var 8 - 1Q 2025.xlsm

TN PriorAppRateTI No Var - 1Q 2025.pdf

TN PriorAppRateTI No Var - 1Q 2025.xlsm

RD Filing 24-1330

Supporting Documentation

Q1 2025 Data

RDP PriorAppRateAPL - 1Q 2025.pdf

RDP PriorAppRateAPL - 1Q 2025.xlsm

Variance Request tab

RDP PriorAppRateTI All Var - 1Q 2025.pdf

RDP PriorAppRateTI All Var - 1Q 2025.xlsx

RDP PriorAppRateTI Var 8 - 1Q 2025.pdf

RDP PriorAppRateTI Var 8 - 1Q 2025.xlsm

RDP PriorAppRateTI No Var - 1Q 2025.pdf

RDP PriorAppRateTI No Var - 1Q 2025.xlsm

c.

NT Filing 24-1271

Supporting Documentation

Q1 2025 Data

NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9.pdf

Exhibit 13 Page 10

TN Filing 24-1273

Supporting Documentation

Q1 2025 Data

Updated TN Filing Exhibits - 1Q 2025.pdf

Exhibit 13 Page 10

RD Filing 24-1330

Supporting Documentation

Q1 2025 Data

RDP Filing Exhibits.pdf

Exhibit 13 Page 10

EXHIBIT 2

State Farm General Insurance Company – Responsive Documents List
August 13, 2025

In re State Farm General Insurance Company; Before the Insurance Commissioner of the State of California
File Nos. PA-2024-00011, PA-2024-00012; PA-2024-00013

Beg Bates	Request No.
SFG_00000207	CDI 16, CW 62
SFG_00000208	CDI 16, CW 62
SFG_00000209	CDI 16, CW 62
SFG_00000210	CDI 16, CW 62
SFG_00000211	CDI 16, CW 62
SFG_00000212	CDI 16, CW 62
SFG_00000213	CDI 16, CW 62
SFG_00000214	CDI 16, CW 62
SFG_00000215	CDI 16, CW 62
SFG_00000216	CDI 16, CW 62
SFG_00000217	CDI 16, CW 62
SFG_00000218	CDI 16, CW 62
SFG_00000219	CDI 16, CW 62
SFG_00000220	CDI 16, CW 62
SFG_00000221	CDI 16, CW 62
SFG_00000222	CDI 16, CW 62
SFG_00000223	CDI 16, CW 62
SFG_00000224	CDI 16, CW 62
SFG_00000225	CDI 16, CW 62
SFG_00000226	CDI 16, CW 62
SFG_00000227	CDI 15, CW 61
SFG_00000245	CDI 15, CW 61
SFG_00000256	CDI 15, CW 61
SFG_00000267	CDI 15, CW 61
SFG_00000278	CDI 15, CW 61
SFG_00000288	CDI 15, CW 61
SFG_00000298	CDI 15, CW 61
SFG_00000308	CDI 15, CW 61
SFG_00000318	CDI 15, CW 61
SFG_00000328	CDI 15, CW 61
SFG_00000338	CDI 15, CW 61
SFG_00000356	CDI 15, CW 61
SFG_00000367	CDI 15, CW 61
SFG_00000378	CDI 15, CW 61
SFG_00000389	CDI 15, CW 61
SFG_00000399	CDI 15, CW 61
SFG_00000409	CDI 15, CW 61
SFG_00000419	CDI 15, CW 61
SFG_00000429	CDI 15, CW 61
SFG_00000439	CDI 15, CW 61
SFG_00000449	CDI 16, CW 62
SFG_00000450	CDI 15, CW 61
SFG_00000460	CDI 16, CW 62
SFG_00000461	CDI 15, CW 61
SFG_00000471	CDI 12
SFG_00000472	CW 34

State Farm General Insurance Company – Responsive Documents List

August 13, 2025

In re State Farm General Insurance Company; Before the Insurance Commissioner of the State of California

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

SFG_00000479	CW 34
SFG_00000481	CW 34
SFG_00000490	CW 34
SFG_00000499	CW 34
SFG_00000508	CW 34
SFG_00000520	CW 41, 46, 47
SFG_00000521	CW 41, 46, 47
SFG_00000524	CW 41, 46, 47
SFG_00000526	CW 41, 46, 47
SFG_00000528	CW 41, 46, 47
SFG_00000529	CW 41, 46, 47
SFG_00000532	CW 41, 46, 47
SFG_00000533	CW 41, 46, 47
SFG_00000534	CW 41, 46, 47
SFG_00000536	CW 41, 46, 47
SFG_00000538	CW 41, 46, 47
SFG_00000540	CW 41, 46, 47
SFG_00000542	CW 41, 46, 47
SFG_00000544	CW 41, 46, 47
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SFG_00000549	CDI 47, 48
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SFG_00000708	CW 7
SFG_00000709	CW 73
SFG_00000710	CDI 29, 33
SFG_00000719	CW 7
SFG_00000720	CW 7
SFG_00000721	CW 49
SFG_00000724	CW 49
SFG_00000725	CW 49
SFG_00000728	CW 49
SFG_00000730	CW 49
SFG_00000735	CW 81
SFG_00000736	CW 73
SFG_00000737	CDI 37
SFG_00000738	CW 73
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SFG_00000740	CW 41, 46, 47
SFG_00000741	CW 41, 46, 47
SFG_00000752	CW 41, 46, 47
SFG_00000754	CW 41, 46, 47
SFG_00000756	CW 41, 46, 47
SFG_00000758	CW 41, 46, 47
SFG_00000760	CW 41, 46, 47
SFG_00000770	CW 41, 46, 47
SFG_00000779	CDI 9, 10, 11, CW 28, 63

State Farm General Insurance Company – Responsive Documents List
August 13, 2025

In re State Farm General Insurance Company; Before the Insurance Commissioner of the State of California

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

SFG_00000784	CW 34
IRH-ALJ-001	CDI 22
Documents posted by SFG in SERFF for Application Nos. PA-2024-00011, PA-2024-00012, PA-2024-00013 (see also Ex. A to SFG's Responses and Objections)	CDI 2, 3, 7, 8, 18, 19, 21, 23, 26, 27, 29, 30, 31, 32, 34-41, 44, 45, 47, 48-60 CW 9, 22, 23, 25, 26, 30, 36, 37, 42, 44, 48, 64, 72, 75, 77, 78
April 7, 2025 document production via email by SFG	CW 14
David Appel Declaration and Exhibits	CDI 4, 5, 6, 20, 56, 57, 58, 59 CW 5, 6, 31, 32
Bryon Ehrhart Declaration and Exhibits	CDI 4, 5, 6, 12CW 5, 6, 39

EXHIBIT 3

SFG – Withheld Document Log¹

Title/Description of Document	File Name (if applicable)	Request(s)	Basis for Withholding
ORSA report and appendices for 2020		CW Request No. 18	<ul style="list-style-type: none">• Trade Secret and Confidentiality²• Code Protection³
ORSA report and appendices for 2021		CW Request No. 18	<ul style="list-style-type: none">• Trade Secret and Confidentiality• Code Protection
ORSA report and appendices for 2022		CDI Request No. 25; CW Request No. 18	<ul style="list-style-type: none">• Trade Secret and Confidentiality• Code Protection
ORSA report and appendices for 2023		CDI Request No. 25; CW Request No. 18	<ul style="list-style-type: none">• Trade Secret and Confidentiality• Code Protection
ORSA report and appendices for 2024		CDI Request No. 25; CW Request No. 18	<ul style="list-style-type: none">• Trade Secret and Confidentiality• Code Protection
Catastrophe adjustment data excel	CDI_Question_37_d_e_f.xlsx	CDI Request No. 37	<ul style="list-style-type: none">• Trade Secret and Confidentiality
P&C Claims Policies and Procedures, Claim Reserves Operation Guide, No. 70-101, dated 06-24-2020	70-101; OG; CLAIM RESERVES	CDI Request Nos. 43, 46; CW, Request Nos. 70, 71, 74	<ul style="list-style-type: none">• Trade Secret and Confidentiality

¹ This withheld documents log is being provided subject and pursuant to State Farm General Insurance Company’s (“SFG”) responses and objections to CDI and Consumer Watchdog’s Requests for Discovery, which SFG served on July 30, 2025 (the “R&Os”). This log is not intended to brief the entirety of the objections, which will be further expressed in SFG’s motion for a protective order and other briefing and argument, as necessary.

² As stated in the R&Os, SFG is withholding documents on the basis that they seek confidential information and trade secrets (including but not limited to competitively sensitive information), which are privileged and protected under California law and SFG objects to their disclosure without a suitable protective order, including sealing when such confidential and trade secret information is introduced into the record, and an agreement by the parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§ 352, 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f); Cal. Gov. Code § 11507.6 (“Trade Secret and Confidentiality,” as referenced herein).

³ As stated in the R&Os, SFG is withholding documents on the basis that they seek SFG’s information and/or documents that are statutorily protected from disclosure, including but not limited to the protections of the following statutes: 215 ILCS Section 5/129.8, 215 ILCS Section 5/131.22, 215 ILCS Section 5/35A-50, 215 ILCS Section 5/136, 765 ILCS 1065/1 to 1065/9, 215 ILCS 5/404, CIC § 935.8, CIC § 1215.8, CIC § 739.8, CIC § 923.6, Cal. Civ. Code §§ 3426-3426.11, Cal. Evid. Code § 1060, Cal. Gov. Code § 11513(e). (“Code Protection,” as referenced herein).

Title/Description of Document	File Name (if applicable)	Request(s)	Basis for Withholding
P&C Claims Policies and Procedures, Claim Reserves Operation Guide, No. 70-101, dated 04-12-2023	70-101; OG; CLAIM RESERVES	CDI Request Nos. 43, 46; CW, Request Nos. 70, 71, 74	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
P&C Claims Policies and Procedures, Claim Reserves Operation Guide, No. 70-101, dated 04-17-2023	70-101; OG; CLAIM RESERVES	CDI Request Nos. 43, 46; CW, Request Nos. 70, 71, 74	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
P&C Claims Policies and Procedures, Claim Reserves Operation Guide, No. 70-101, dated 04-26-2023	70-101; OG; CLAIM RESERVES	CDI Request Nos. 43, 46; CW, Request Nos. 70, 71, 74	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
P&C Claims Policies and Procedures, Claim Reserves Operation Guide, No. 70-101, dated 08-30-2023	70-101; OG; CLAIM RESERVES	CDI Request Nos. 43, 46; CW, Request Nos. 70, 71, 74	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
DRAFT rate template Excel with notes regarding internal trend reviews that are outside the scope of the rate template and filing	CDI EXCEL RATE TEMPLATE V1.0 - CONDO 1Q 2025 WF.XLSX	CW Request No. 7	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
DRAFT rate template Excel with notes regarding internal trend reviews that are outside the scope of the rate template and filing	CDI EXCEL RATE TEMPLATE V1.0 - NT 1Q 2025 WF.XLSX	CW Request No. 7	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
DRAFT rate template Excel with notes regarding internal trend reviews that are outside the scope of the rate template and filing	CDI EXCEL RATE TEMPLATE V1.0 - NT 1Q 2025 WF AND NR.XLSX	CW Request No. 7	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
DRAFT rate template Excel with notes regarding internal trend reviews that are outside the scope of the rate template and filing	CDI EXCEL RATE TEMPLATE V1.0 - RENTERS 1Q 2025 WF.XLSX	CW Request No. 7	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
CAP Inputs and FFEQ Model Results excel	HO HO-6 CDI 4Q 2023 WF NO VAR - BRETT FIX.XLSX	CW Request No. 7	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
Actuarial report for 2023	FINAL State Farm General Report 12-31-23.pdf	CW Request No. 10	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection
Actuarial report for 2024	FINAL State Farm General Report 12-31-24.pdf	CW Request No. 11	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection

Title/Description of Document	File Name (if applicable)	Request(s)	Basis for Withholding
2023 CRCP Study	2023 CRCP STUDY - UPDATED WITH EC BENCHMARKS.PDF	CW Request No. 24	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
Corporate Governance Annual Disclosure		CW Request No. 27	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
Managements Report of Internal Control		CW Request No. 27	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
Annual Holding Company Registration Statement		CW Request No. 28	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection
2015 Reinsurance Summary – Active Contracts	REINSURANCE SUMMARY - ACTIVE CONTRACTS	CW Request No. 28	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection
2016 Reinsurance Summary – Active Contracts	REINSURANCE SUMMARY - ACTIVE CONTRACTS	CW Request No. 28	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection
2017 Reinsurance Summary – Active Contracts	REINSURANCE SUMMARY - ACTIVE CONTRACTS	CW Request No. 28	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection
2018 Reinsurance Summary – Active Contracts	REINSURANCE SUMMARY - ACTIVE CONTRACTS	CW Request No. 28	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection
2019 Reinsurance Summary – Active Contracts	REINSURANCE SUMMARY - ACTIVE CONTRACTS	CW Request No. 28	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection
2020 Reinsurance Summary – Active Contracts	REINSURANCE SUMMARY - ACTIVE CONTRACTS	CW Request No. 28	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection
2021 Reinsurance Summary – Active Contracts	REINSURANCE SUMMARY - ACTIVE CONTRACTS	CW Request No. 28	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection
2022 Reinsurance Summary – Active Contracts	REINSURANCE SUMMARY - ACTIVE CONTRACTS	CW Request No. 28	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection

Title/Description of Document	File Name (if applicable)	Request(s)	Basis for Withholding
2023 Reinsurance Summary – Active Contracts	REINSURANCE SUMMARY - ACTIVE CONTRACTS	CW Request No. 28	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection
2024 Reinsurance Summary – Active Contracts	REINSURANCE SUMMARY - ACTIVE CONTRACTS	CW Request No. 28	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection
RBC report for 2024	2024 RBC Plan - Company Action Level Event - State Farm General Insurance Company.pdf	CW Request No. 29	<ul style="list-style-type: none"> • Trade Secret and Confidentiality • Code Protection
2020 State Farm Stress Test Results, Capital Management, Appendices	TRADE SECRET_2020_STRESS_TEST_RESULTS_APPENDICES_COMBINED_FINAL.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2020 State Farm Stress Test Results, Capital Management	TRADE SECRET_2020_ST_RESULTS_ANALYSIS_FINAL.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2020 State Farm Stress Test Results Review and Summary, Enterprise Risk Management	TRADE SECRET_2020_ST_RESULTS_SUMMARY.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
Risk Conversation: Catastrophe Risk	TRADE SECRET_Q1_2021_MUTUAL_BOD_RISK_CONVERSATION_CATASTROPHE_EXPOSURE.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2021 State Farm Stress Test Results, Capital Management, Appendices	TRADE SECRET_2021_ST_RESULTS_ANALYSIS_APPENDICES_COMBINED_EECC.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2021 State Farm Stress Test Results Review and Summary, Enterprise Risk Management	TRADE SECRET_2021_ST_RESULTS_SUMMARY_EECC.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2021 State Farm Stress Test Results, Capital Management	TRADE SECRET_2021_ST_RESULTS_ANALYSIS_EECC.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
CA TRA Refresh, 2021 Targeted Risk Assessment	TRADE SECRET_2021_CA TARGETED RISK ASSESSMENT REFRESH_EXEC SUMMARY.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
CA TRA Refresh, 2021 Targeted Risk Assessment, Appendix A	2021 CA TRA APP A.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
CA TRA Refresh, 2021 Targeted Risk Assessment, Appendix B	2021 CA TRA APP B.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
Chief Risk Officer Report, Q3 2021	TRADE SECRET_2021Q3_MUTUAL_BOD_CRO_REPORT.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
Chief Risk Officer Report, Q2 2022	TRADE SECRET_2022Q2_MUTUAL_BOD_CRO_REPORT.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality

Title/Description of Document	File Name (if applicable)	Request(s)	Basis for Withholding
2022 State Farm Stress Test Results, Capital Management, Appendices	TRADE SECRET_2022_ST RESULTS ANALYSIS APPENDICES_EECC.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2022 State Farm Stress Test Results, Capital Management	TRADE SECRET_2022_ST_RESULTS_ANALYSIS_EECC.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2022 State Farm Stress Test Results Summary, Enterprise Risk Management	TRADE SECRET_2022_ST_RESULTS_SUMMARY_ERC.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
Chief Risk Officer Report, Q3 2022	TRADE SECRET_2022Q3_MUTUAL_BOD_CRO_REPORT.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
Capital Philosophy	TRADE SECRET_2023_AFFILIATE EC.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2023 CA Strategy Risk Summary, Enterprise Risk Management	TRADE SECRET_2023_CA STRATEGY WHITE PAPER_FINAL.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
Chief Risk Officer Report, Q2 2023	TRADE SECRET_2023Q2_MUTUAL_BOD_CRO_REPORT.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2023 State Farm Stress Test Results, Capital Management, Appendices	TRADE SECRET_2023_ST_RESULTS_APPENDICES_EECC.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2023 State Farm Stress Test Results, Capital Management	TRADE SECRET_2023_ST_RESULTS_ANALYSIS_EECC.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2023 State Farm Stress Test Results Summary, Enterprise Risk Management	TRADE SECRET_2023_ST_RESULTS_SUMMARY.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2023 State Farm Stress Test Results Summary, Enterprise Risk Management	TRADE SECRET_GENERAL-BOD-2023-STRESS-TEST-RESULTS-SUMMARY.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
Chief Risk Officer Report, Q3 2023	TRADE SECRET_2023Q3_MUTUAL_BOD_CRO_REPORT.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
FAIR Plan Policy Perils Exclusion Endorsement Summary of Risk and Opportunities, Enterprise Risk Management	TRADE SECRET_2024_CA FAIR PLAN POLICY PERILS EXCLUSION-RISK REVIEW.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2024 State Farm Stress Test Results, Capital Management, Appendices	TRADE SECRET_2024_ST_RESULTS_APPENDICES_EECC.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
2024 State Farm Stress Test Results, Capital Management	TRADE SECRET_2024_ST_RESULTS_ANALYSIS_EECC.PDF	CW Request No. 35	<ul style="list-style-type: none"> • Trade Secret and Confidentiality

Title/Description of Document	File Name (if applicable)	Request(s)	Basis for Withholding
2024 State Farm Stress Test Results Summary, Enterprise Risk Management	TRADE SECRET_2024_ST_RESULTS_SUMMARY.PDF	CW Request No. 35	<ul style="list-style-type: none"> Trade Secret and Confidentiality
2024 State Farm Stress Test Results Summary, Enterprise Risk Management	TRADE SECRET_BOD_GENERAL_STATE_FARM_2024_STRESS_TEST_RESULTS.PDF	CW Request No. 35	<ul style="list-style-type: none"> Trade Secret and Confidentiality
Chief Risk Officer Report, Q1 2025	TRADE SECRET_2025Q1_MUTUAL_BOD_CRO_REPORT.PDF	CW Request No. 35	<ul style="list-style-type: none"> Trade Secret and Confidentiality
2020 California Non-Tenant Homeowners GSP	2020 CA GSP EXEC RECOMMENDATION .DOCX	CW Request Nos. 41, 46, 47	<ul style="list-style-type: none"> Trade Secret and Confidentiality
2020 California Growth Sustainability Plan (GSP)	SL PRESENTATION CA 2020 GSP OVERVIEW SESSION.PPTX	CW Request Nos. 41, 46, 47	<ul style="list-style-type: none"> Trade Secret and Confidentiality
2020 California Growth Sustainability Plan (GSP)	VPA PRESENTATION CA 2020 GSP OVERVIEW SESSION.PPTX	CW Request Nos. 41, 46, 47	<ul style="list-style-type: none"> Trade Secret and Confidentiality
2020 California Homeowners (HO-W only) Growth Sustainability Plan – FAQs	2020 GSP FAQ .DOCX	CW Request Nos. 41, 46, 47	<ul style="list-style-type: none"> Trade Secret and Confidentiality
Policyholder Protection Fund excel	MICROSOFT_EXCEL_WORKSHEET.XLSX	CW Request Nos. 41, 46, 47	<ul style="list-style-type: none"> Trade Secret and Confidentiality
2021 California NTHO GSP	2021 CA GSP EXECUTIVE RECOMMENDATION .PPTX	CW Request Nos. 41, 46, 47	<ul style="list-style-type: none"> Trade Secret and Confidentiality
Internal – 2021 California Homeowners Non-Tenant Growth Sustainability Plan Message Points	CA 2021 GSP INTERNAL MESSAGE POINTS.DOCX	CW Request Nos. 41, 46, 47	<ul style="list-style-type: none"> Trade Secret and Confidentiality
2021 California Homeowners Non-Tenant GSP – Additional Information	2021 GSP FAQs.DOCX	CW Request Nos. 41, 46, 47	<ul style="list-style-type: none"> Trade Secret and Confidentiality
2022 California NTHO GSP	2022 CA NTHO GSP RECOMMENDATION .PPTX	CW Request Nos. 41, 46, 47	<ul style="list-style-type: none"> Trade Secret and Confidentiality
Leadership EMC – California Homeowners Non-Tenant Growth Sustainability Plan (GSP)	2022 GSP LEADERSHIP COMMUNICATION .DOCX	CW Request Nos. 41, 46, 47	<ul style="list-style-type: none"> Trade Secret and Confidentiality
2022 GSP Message for Agency Leadership	2022 HIGH VALUE AGENCY LEADERSHIP MESSAGE.DOCX	CW Request Nos. 41, 46, 47	<ul style="list-style-type: none"> Trade Secret and Confidentiality
2022 California Non-Tenant Homeowners GSP Communication Resources	2022 GSP MESSAGE FOR AGENCY LEADERSHIP .DOCX	CW Request Nos. 41, 46, 47	<ul style="list-style-type: none"> Trade Secret and Confidentiality

Title/Description of Document	File Name (if applicable)	Request(s)	Basis for Withholding
California P&C Eligibility Changes	2023 INTERNAL MESSAGING FOR HIGH VALUE .DOCX	CW Request Nos. 41, 46, 47	• Trade Secret and Confidentiality
California – Non-Tenant Homeowners Managed Growth Areas	MICROSOFT_WORD_DOCUMENT.DOCX	CW Request Nos. 41, 46, 47	• Trade Secret and Confidentiality
PIF Growth and Incremental Rate History	2022-02-01 CALIFORNIA NON-TENANT HOMEOWNERS RATE PROPOSAL.HTML	CW Request Nos. 42, 44, 48	• Trade Secret and Confidentiality
PIF Growth and Incremental Rate History	2023-06-01 CALIFORNIA NON-TENANT HOMEOWNERS AND CONDOMINIUM UNITOWNERS RATE PROPOSAL.HTML	CW Request Nos. 42, 44, 48	• Trade Secret and Confidentiality
PIF Growth and Incremental Rate History	2024-03-15 CALIFORNIA NON-TENANT HOMEOWNERS AND CONDOMINIUM UNITOWNERS RATE PROPOSAL.HTML	CW Request Nos. 42, 44, 48	• Trade Secret and Confidentiality
California Homeowners Rate Proposal	2020-10-15 CALIFORNIA HOMEOWNERS RATE PROPOSAL.PDF	CW Request Nos. 42, 44, 48	• Trade Secret and Confidentiality
California Homeowners Rate Proposal and Homeowners Program Rewrite	2021-04-01 CALIFORNIA HOMEOWNERS REWRITE RATE PROPOSAL.PDF	CW Request Nos. 42, 44, 48	• Trade Secret and Confidentiality
California Homeowners Rate Proposal	2018-07-15 CALIFORNIA HOMEOWNERS RATE PROPOSAL.PDF	CW Request Nos. 42, 44, 48	• Trade Secret and Confidentiality
High Value Homes: California by County	HIGH VALUE HOMES: CALIFORNIA BY COUNTY	CW Request No. 49	• Trade Secret and Confidentiality
SF CA HO Competitiveness by County	SF CA HO COMPETITIVENESS BY COUNTY	CW Request No. 49	• Trade Secret and Confidentiality
NTHO Comparative Rating – CA 1/2024	NTHO COMPARATIVE RATING - CA	CW Request No. 49	• Trade Secret and Confidentiality
California NTHO Non-Renewals, August 2024 update	California NTHO Non-Renewals - August 2024 Update	CW Request No. 68	• Trade Secret and Confidentiality
California NTHO Non-Renewals, September 2024 update	California NTHO Non-Renewals - September 2024 Update	CW Request No. 68	• Trade Secret and Confidentiality
California NTHO Non-Renewals, October 2024 update	California NTHO Non-Renewals - October 2024 Update	CW Request No. 68	• Trade Secret and Confidentiality
California NTHO Non-Renewals, November 2024 update	California NTHO Non-Renewals - November 2024 Update	CW Request No. 68	• Trade Secret and Confidentiality
California NTHO Non-Renewals, December 2024 update	California NTHO Non-Renewals - December 2024 Update	CW Request No. 68	• Trade Secret and Confidentiality
California Apartment and 30K Initiatives and California NTHO Non-Renewals, January 2025 update	JANUARY 2025 CALIFORNIA APT AND 30K REVIEW.PDF	CW Request No. 68	• Trade Secret and Confidentiality

Title/Description of Document	File Name (if applicable)	Request(s)	Basis for Withholding
California Apartment and 30K Initiatives and California NTHO Non-Renewals, February 2025 update	FEBRUARY 2025 CALIFORNIA APT AND 30K REVIEW.PDF	CW Request No. 68	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
California Apartment and 30K Initiatives and California NTHO Non-Renewals, March 2025 update	MARCH 2025 CALIFORNIA APT AND 30K REVIEW.PDF	CW Request No. 68	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
California Apartment and 30K Initiatives and California NTHO Non-Renewals, April 2025 update	APRIL 2025 CALIFORNIA APT AND 30K REVIEW.PDF	CW Request No. 68	<ul style="list-style-type: none"> • Trade Secret and Confidentiality
California Apartment and 30K Initiatives and California NTHO Non-Renewals, May 2025 update	MAY 2025 CALIFORNIA APT AND 30K REVIEW.PDF	CW Request No. 68	<ul style="list-style-type: none"> • Trade Secret and Confidentiality