

1 Harvey Rosenfield, SBN 123082
2 Pamela Pressley, SBN 180362
3 William Pletcher, SBN 212664
4 Benjamin Powell, SBN 311624
5 Ryan Mellino, SBN 342497
6 **CONSUMER WATCHDOG**
7 6330 San Vicente Blvd., Suite 250
8 Los Angeles, CA 90048
9 Tel. (310) 392-0522
10 Fax (310) 861-0862
11 harvey@consumerwatchdog.org
12 pam@consumerwatchdog.org
13 will@consumerwatchdog.org
14 ben@consumerwatchdog.org
15 ryan@consumerwatchdog.org

16 Attorneys for CONSUMER WATCHDOG

17
18
19
20
21
22
23
24
25
26
27
28
BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF CALIFORNIA

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

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

**DECLARATION OF BENJAMIN
POWELL IN SUPPORT OF CONSUMER
WATCHDOG'S MOTION TO COMPEL
DISCOVERY RESPONSES AGAINST
CDI**

1 I, Benjamin Powell, declare as follows:

- 2 1. I am an active member in good standing of the Bar of the State of California. I am a Staff
3 Attorney with Consumer Watchdog and am one of the counsel for intervenor Consumer
4 Watchdog in the above-captioned matters. I have personal knowledge of the facts set
5 forth herein, and, if called upon, could and would competently testify thereto under oath.
- 6 2. True and correct copies of State Farm's "emergency" rate request and CDI's
7 recommendation that the Commissioner grant the request are attached hereto as Exhibits
8 1 and 2, respectively.
- 9 3. On an August 13, 2025 meet and confer call, I took part in a discussion in which counsel
10 for CDI suggested that the Parties stipulate as to State Farm's financial condition.
- 11 4. A true and correct copy of the Commissioner's March 14, 2025 Order is attached hereto
12 as Exhibit 3.
- 13 5. A true and correct copy of the Declaration of Tina Shaw in Support of Hearing on
14 Objections to Stipulation Pursuant to 10 CCR 2656.1 is attached hereto as Exhibit 4.
- 15 6. A true and correct copy of Consumer Watchdog's June 30, 2025 Discovery Requests
16 Propounded on California Department of Insurance is attached hereto as Exhibit 5.
- 17 7. A true and correct copy of CDI's July 30, 2025 Objections and Responses to Consumer
18 Watchdog's Discovery Requests is attached hereto as Exhibit 6.
- 19 8. A true and correct copy of CDI's August 5, 2025 *Amended* Objections and Responses to
20 Consumer Watchdog's Discovery Requests is attached hereto as Exhibit 7.
- 21 9. A true and correct copy of the August 12, 2025 meet and confer letter sent by Consumer
22 Watchdog is attached hereto as Exhibit 8.
- 23 10. A true and correct copy of the document produced by CDI clarifying the bases of its
24 privilege objections is attached hereto as Exhibit 9.
- 25 11. A true and correct copy of the August 13, 2025 meet and confer letter sent by Consumer
26 Watchdog is attached hereto as Exhibit 10.
- 27 12. A true and correct copy of the August 15, 2025 letter sent by CDI to Consumer
28 Watchdog is attached hereto as Exhibit 11.

1 13. A true and correct copy of the August 20, 2025 letter sent by Consumer Watchdog is
2 attached hereto as Exhibit 12.

3 14. To date, CDI has failed or refused to produce the documents requested in Request
4 Numbers 4, 5, 10, 11, 15, 20, 21, and 23.

5 15. In response to requests from both Consumer Watchdog and State Farm that CDI produce
6 the "NAIC Master Information Sharing and Confidentiality Agreement," counsel for CDI
7 responded "All: We cannot provide you with a copy of the NAIC Master Information
8 Sharing and Confidentiality Agreement. If you wish to bring a motion to compel
9 production of any of the documents on the privileged[sic] log, CDI will stand on its
10 remaining objections, which by themselves preclude disclosure of the listed documents."

11 A true and correct copy of this August 15, 2025 email is attached hereto as Exhibit 13.

12 16. During a meet and confer call with CDI, counsel for CDI asserted that documents
13 responsive to Request numbers 4, 10, 11, and 15 are held by the Financial Surveillance
14 Bureau at the Department, and are therefore not subject to disclosure. Counsel for CDI
15 stated that the Financial Surveillance Bureau "definitely has documents about all
16 companies' financial condition."

17
18
19 I declare under penalty of perjury that the foregoing is true and correct and that this Declaration
20 was executed on August 20, 2025 in Los Angeles, California.

21
22 /s/ Benjamin Powell
23 Benjamin Powell (SBN: 311624)
24 ben@consumerwatchdog.org
25 6330 San Vicente Blvd., Suite 250
26 Los Angeles, CA 90048
27 Tel: (310) 392-0522

28 *Attorneys for Intervenor*
CONSUMER WATCHDOG

EXHIBIT 1

February 3, 2025

The Honorable Ricardo Lara
Commissioner of Insurance
California Department of Insurance
300 Capitol Mall, 17th Floor
Sacramento, CA 95814
via email: commissionerlara@insurance.ca.gov

Re: State Farm General Insurance Company Request for Emergency Interim Rate Approval

Commissioner Lara,

State Farm has served the customers of California for nearly 100 years and our intention is to continue serving them for many more. As the largest insurance group in the state, we appreciate all you and your staff are doing to help consumers navigate the aftermath of last month's horrific Los Angeles wildfires. Thousands of State Farm agents, agent team members and employees are on the ground and assisting customers virtually in the wake of this tragedy. As of February 1st, State Farm General Insurance Company¹ (SFG) has received more than 8,700 claims and has already paid over \$1 billion to customers. We know we will ultimately pay out significantly more, as these fires will collectively be the costliest in the history of the company. Although reinsurance will assist us in paying what we owe to customers, the costs of these fires will further deplete capital from SFG. Last year, one rating agency downgraded SFG and, with further capital deterioration as a result of the fires, additional downgrades could follow. If that were to happen, customers with a mortgage might not be able to use State Farm General insurance as collateral backing for their mortgage. With nearly three million policies in force, including more than one million homeowners customers, SFG needs your urgent assistance in the form of emergency interim approval of additional rate to help avert a dire situation for our customers and the insurance market in the state of California.

Nearly a year ago, we shared with you that *"the swift capital depletion of SFG is an alarm signaling the grave need for rapid and transformational action, including the critical need for rapid review and approval of currently pending and future rate filings."* (See attached March 2024 letter.) As you are aware, SFG has three rate applications, for four lines of business, that have been pending since last summer.² We are requesting that you take emergency action to help protect California's fragile insurance market by immediately approving interim rate increases on these filings, with rates to be effective May 1, 2025, in the following amounts: 22% for Non-Tenant Homeowners, 15% for Tenants – Renters, 15% for Tenants – Condominium Unitowners, and 38% for

¹ As a reminder, SFG is almost exclusively a California insurer, with homeowners insurance being its largest line of business. State Farm products written by affiliates of SFG – such as State Farm branded auto and life insurance – are not the subject of this letter.

² See SERFF Filings SFMA-123139896, filed 6/27/2024 for +30.0% for Non-Tenant (Homeowners); SFMA-134139931, filed 6/27/2024 for +52.0% for Tenants – Renters and +36.0% for Tenants – Condominium Unitowners; and SFMA-134139850, filed 7/5/2025 for +38.0% for Rental Dwelling (RDP). We note that these three applications were all originally based on Variance 6, a solvency-related adjustment to what is otherwise the maximum permitted premium under the rate regulations. Because of the upward impact of the Los Angeles fires on the maximum permitted premium, it's possible that SFG's rate increases for some lines may ultimately be supportable without Variance 6, but the financial condition that led to its invocation has only worsened.

Rental Dwelling (RDP). Because all three applications are for rate increases above 7%, and all three have an intervenor, ordinarily they can only be approved after a hearing (if one is requested by the intervenor) or via a three-way settlement. Hearings are historically very rare because of the uncertainty and length of the process, with the last SFG rate hearing not resulting in a final rate order until about 17 months after the notice of hearing was issued. Even resolution through settlement can be very difficult and usually takes months. An emergency *interim* rate approval would allow SFG to start collecting additional premiums much more quickly and possibly begin rebuilding its risk-bearing capacity. A *final* approved rate would subsequently be determined by you after a full hearing, if a settlement can't be reached first. If the final rate (whether after hearing or by settlement) is lower than the interim rate, refunds would be issued by SFG for the difference for any period during which the interim rates were in effect. The interim amounts SFG is requesting are smaller (for most lines) than the full rate need we originally applied for, in the hope that this will facilitate a speedy emergency approval. There is simply too much at stake for SFG's customers and the broader market if any rate increase has to wait on a full hearing or other resolution in the normal course.

While the California Department of Insurance (CDI) has recently approved several smaller SFG rate filings and made progress on your Sustainable Insurance Strategy, the fact is that SFG's capital position continued to deteriorate even *before* the latest fires. By year-end 2024, SFG's Policyholder Protection Fund – i.e. surplus, or capital available to pay claims – was approximately a quarter of what it was in 2016, and its surplus relative to the risk it supports dropped nearly eighty-five percent by one measure, putting the company below certain minimum regulatory Risk-Based Capital requirements. (See attached illustration of SFG's financial deterioration.) Over the nine-year period ending with 2024, SFG will pay \$1.26 in claims and expenses for every \$1.00 collected in premium, resulting in over \$5 billion in cumulative underwriting losses. While this underwriting loss was partially offset by investment income, SFG's after-tax net loss totals \$2.8 billion over this same nine-year period. Meanwhile, SFG's attempts over that same period to both raise rates and restrict growth, in order to keep our risk profile in line with available surplus, were constrained by regulatory considerations and met with limited success. This was due in no small part to intervenors in the rate review process, whose very efforts to delay and decrease needed rate adjustments prevented SFG from maintaining a capital position supportive of its risk profile and impaired its ability to support continued underwriting of California properties.³

In order to better preserve its claims-paying capacity under these circumstances, SFG made the difficult decision in [May 2023](#) that it would stop writing any new policies in California, and in [March 2024](#) that it would nonrenew 72,000 existing policies, approximately 29,000 of which are homeowners policies. That non-renewal process is ongoing. When asked by the CDI to pause non-renewals in wildfire moratoriums, we have abided by all requests. Further, following the recent wildfires, homeowners non-renewals in Los Angeles County were paused. Any of these homeowner policies which had pended non-renewals in Los Angeles County that were on the books on January 7th will have an option to renew with SFG. The high concentrations of risk covered by SFG in the fire footprint will generate a direct loss many times larger than the company's pre-event surplus. SFG's already stressed financial position will be further weakened, even after accounting for billions of dollars in anticipated recoveries from a prudently robust reinsurance program that includes State Farm Mutual Automobile Insurance

³ For example, intervenors succeeded in convincing the prior commissioner to order SFG to reduce dwelling insurance rates 7% and issue a \$100M+ refund after SFG filed in 2014 for a 7% increase (an annual difference of more than \$150M). SFG's legal position in the dispute was later vindicated, but not until 2022 (when the California Supreme Court [denied review](#) of the [Court of Appeal's decision](#) in SFG's favor).

Company (“State Farm Mutual”) as the primary reinsurer. State Farm Mutual provides the majority of SFG’s reinsurance cover. External reinsurer capacity to underwrite significantly greater portions of SFG’s massive risk portfolio at a reasonable price (or possibly, at any price) does not exist. These fires reinforce why reinsurance is a critically important part of SFG’s claims-paying capacity, now and into the future, allowing SFG to write or retain significantly more property insurance in areas with significant risk such as wildfires than would otherwise be possible. The situation also reinforces SFG’s absolute disagreement with any characterization that its payments for necessary reinsurance are in any way inflated or that SFG may have ‘engineered’ its weakened financial condition – that is irresponsible and simply not true.

The importance of our ask for your immediate help to protect all Californians cannot be overstated. The magnitude of expected claims payments for the Los Angeles fires, along with SFG’s participation in FAIR Plan losses⁴, puts tremendous strain on the company’s already-diminished surplus and very significant pressure on internal and external (regulatory and rating agency) measures of financial strength and claims-paying ability, which must necessarily include the potential for *additional* catastrophic loss events in the future. Last March, SFG’s financial strength rating was downgraded by AM Best⁵ and SFG triggered a regulatory Company Action Level Event after failing to meet the NAIC’s Risk-Based Capital ratio requirements based on its year-end 2023 financial position. SFG must be able to prospectively demonstrate its ability to generate sufficient capital to support its risk profile.

As the Insurance Commissioner, you can have a very significant impact on SFG’s ability to continue operating in California by immediately approving the requested interim rate changes. This is the most concrete evidence you can provide to solvency regulators, rating agencies and SFG leadership that SFG has a chance to begin rebuilding capital to sustain itself. Ordinarily, the conditional nature of such a rate approval (i.e. the possibility of refunds if the final approved rate is lower than the interim rate) might not be enough to prevent much more significant and necessary actions by SFG or to assuage solvency regulators and the rating agencies. In this case, however, the enormous losses generated by the Los Angeles fires will soon flow into the CDI rating template and will clearly demonstrate that the interim amounts SFG has requested are supportable.⁶ This then is primarily a

⁴ SFG is required to book its share of FAIR Plan losses on its financial statements, regardless of whether an assessment is issued. SFG’s participation rate for dwelling losses (commercial losses are treated separately) is expected to be around 16%.

⁵ The downgraded financial strength rating is below what is acceptable to some mortgage lenders as appropriate insurance cover for mortgage collateral. This had limited impact on SFG policyholders because the company continued to receive an acceptable rating from another rating agency. Additional downgrades have the potential to force hundreds of thousands of SFG policyholders to seek insurance from another company or the FAIR Plan.

⁶ We request that the full hearing for final rate amounts be based on fully-updated rate templates using data from the first quarter of 2025. For purposes of determining the interim rates requested, we have calculated an updated rate indication using the standard rate templates included in the filings by changing two inputs: 1) using a 5/1/2025 effective date and 2) a new catastrophe provision that incorporates wildfire loss estimates up through the most recent fires. The following table shows the initial indication prior to the adjustments, the updated indication, and the interim rate request.

Line of Business	Filed CDI Template Indication (without using Variance 6)	Updated CDI Template Indication	Interim Rate Increase Request
Non-Tenant Homeowners	-10.0%	+21.8%	+22.0%
Tenants – Renters	+7.9%	+16.6%	+15.0%
Tenants – Condominium Unitowners	+5.1%	+20.0%	+15.0%
Rental Dwelling	+10.5%	+42.0%	+38.0%

question of timing, and of what could happen to SFG's customers and the larger market if SFG has to wait months for additional premiums to begin flowing to possibly halt the decline of, or even begin to rebuild, SFG's Policyholder Protection Fund.

You have noted your desire to have an insurance market where insurers want to invest and protect more Californians. In addition to your other efforts, immediate approval of additional and appropriately supported rate for SFG (even on an interim basis) sends a strong message that the state is serious about reforming its insurance market and allowing insurers to collect sufficient premiums to protect Californians against the risk of loss to their homes. When insurers are able to be self-sustaining, it drives further investment and competition in the state of California, which increases availability and supports a sustainable insurance market.

We commend you and your staff for their ongoing work to implement your Sustainable Insurance Strategy. We especially look forward to seeing your plans come to fruition for faster and more efficient rate reviews, to allow for nimbler pricing in reaction to market changes. And we will cooperate with you and other public officials (including the Governor and legislators) on measures that bolster resilience through public investment in risk mitigation, improved community design and robust emergency response, to begin to address the cost curve for this wildfire peril. Having said that, your immediate approval of SFG's interim rate request is an indispensable and critical first step to eventually restoring the company's financial strength, potentially preserving coverage for millions of SFG's remaining customers, and working toward a more sustainable insurance environment in California.

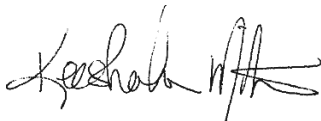
Sincerely,



Dan Krause
President and Chief Executive Officer
State Farm General Insurance Company



Mark Schwamberger
Vice President and Treasurer
State Farm General Insurance Company



Keesha-Lu Mitra
Vice President and General Counsel
State Farm General Insurance Company

CC: Michael Martinez, Chief Deputy Commissioner, California Department of Insurance
Nikki McKennedy, Assistant Chief Counsel, California Department of Insurance
Pamela Pressley, Senior Staff Attorney, Consumer Watchdog
Vanessa Wells, Esq., Hogan Lovells

Attachments:

- March 20, 2024 letter from State Farm General to Commissioner Lara
- Illustration of State Farm General financial deterioration

EXHIBIT 2



RICARDO LARA
CALIFORNIA INSURANCE COMMISSIONER

February 7, 2025

VIA ELECTRONIC MAIL

The Honorable Ricardo Lara
Insurance Commissioner
California Department of Insurance
300 Capitol Mall, 16th Floor
Sacramento, CA 95814

SUBJECT: Request for Interim Rate Order in *In the Matter of the Rate Applications of State Farm General Insurance Company* (CDI Rate Application File Nos. 24-1271, 24-1273, and 24-1330) (PA-2024-00011, PA-2024-00012, and PA-2024-00013)

To the Honorable Ricardo Lara, Insurance Commissioner of the State of California:

Enclosed please find a Stipulation to Interim Rate Subject to Refunds with Interest Pending a Final Determination of the Rate (Stipulation) and a [Proposed] Interim Rate Order Subject to Refunds with Interest Pending a Final Determination of the Legality of the Rate (Interim Rate Order), in the above matters. Also, enclosed for your convenience is a Word version of the Interim Rate Order.

The Stipulation responds to the letter you received on February 3, 2025, from Applicant State Farm General Insurance Company (State Farm), requesting that you grant its request for an immediate interim rate increase subject to refunds with interest following a full rate hearing on the above rate applications (the Interim Rate Increase Request). The Stipulation has been executed by State Farm and your staff in the Rate Enforcement Bureau (REB) of the California Department of Insurance. Intervenor Consumer Watchdog has declined to stipulate.

Based upon the Stipulation, the Interim Rate Increase Request, and the updated information that State Farm has publicly provided in support of its request, REB respectfully recommends that you review and approve the Stipulation and execute the enclosed Order, thereby granting State Farm an interim rate increase subject to refunds with interest following a full rate hearing on the rate applications, and that you do so as expeditiously as possible in response to State Farm's urgent situation.

Please copy all parties when responding to this communication, including by issuing the Order or other response to the Interim Rate Increase Request.

Thank you for your attention to this matter.

Very truly yours,

Nikki McKennedy

Nikki McKennedy

#1494546

CALIFORNIA DEPARTMENT OF INSURANCE
PROTECT • PREVENT • PRESERVE
1901 Harrison St., 6th Floor
Oakland, CA 94612
Tel: 415-538-4162
Nikki.McKennedy@insurance.ca.gov

The Honorable Ricardo Lara, Insurance Commissioner of the State of California
February 7, 2025
Page 2 of 2

cc: Michael Martinez, Chief Deputy Commissioner
Lucy Wang, Deputy Commissioner and Special Counsel to the Commissioner
Teresa Campbell, Deputy Commissioner and General Counsel
Heather Hoesterey, Assistant General Counsel of the Legal Division
Margaret Hosel, Public Advisor
All parties listed on attached Proof of Service

EXHIBIT 3

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

In the Matter of the Rate Applications of

STATE FARM GENERAL INSURANCE
COMPANY,

Applicant.

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

**ORDER REGARDING STATE FARM
GENERAL INSURANCE COMPANY’S
REQUEST FOR AN EMERGENCY
INTERIM RATE PENDING RATE
HEARING**

The above entitled-matter consists of three separate rate application (Applications) filed by State Farm General Insurance Company (State Farm), on or about June 27, 2024, with the Department of Insurance (Insurance). Intervenor Consumer Watchdog (Watchdog) submitted a petition to intervene in all of the Applications. Despite months of discussions, the parties could not agree upon a rate and resolve State Farm’s Applications. On February 3, 2025, State Farm sent a request to the Insurance Commissioner (Commissioner) for approval of an emergency interim rate based on concern over its “swift capital depletion.”

After reviewing materials submitted by State Farm, Watchdog and the Department, the Commissioner held an informal conference with the parties on February 26, 2025, where the Commissioner sought answers from State Farm to a series of questions regarding its emergency

1 request, and financial condition. The Insurance Commissioner then held a video conference with
2 the parties on March 11, 2025, regarding a proposed resolution.

3 Having reviewed State Farm's request for an emergency interim rate, the materials
4 submitted by State Farm, Watchdog and the Department regarding the request for an emergency
5 interim rate, and the information received and discussed during, and associated with, both the
6 February 26, 2025 hearing and March 11, 2025 video conference, and GOOD CAUSE appearing
7 therefor,

8 IT IS ORDERED as follows:

9 1. The Commissioner orders the Department to issue a Notice of Hearing on State
10 Farm's Applications pursuant to Insurance Code section 1861.05, subdivision (c)(2), and the
11 California Code of Regulations, title 10, section 2648.3, and that the date of the hearing shall be
12 set for no later than June 1, 2025.

13 2. State Farm's requests for an emergency interim rate - 21.8% for homeowners non-
14 tenant HO-3 (File No. 24-1271); 15% for overall renter/condo tenant (File No. 24-1273) and 38%
15 for rental dwelling (File No. 24-1330) - are provisionally granted, with an effective date of June
16 1, 2025, subject to the following:

- 17 a. Pursuant to 10 CCR 2656.1, subdivision (g), an Administrative Law Judge shall
18 hear from State Farm regarding its emergency interim rate requests based on
19 updated rate-setting data through the end of the first quarter of 2025 in the
20 Applications, the two-way stipulation between the Department and State Farm,
21 Watchdog's objections to the interim rate, argument from the Commissioner's
22 February 26, 2025, and March 11, 2025 conferences, the Commissioner's
23 subsequent proposal to the parties along with such additional correspondence,
24 evidence and argument provided at the hearing.
- 25 b. This hearing shall commence on **April 8, 2025**, at **10:00 a.m.** at the
26 Department's office in Oakland before an Administrative Law Judge.
- 27 c. Upon conclusion of the hearing on State Farm's requests for an emergency
28 interim rate, the Administrative Law Judge shall provide the Commissioner

1 with a proposed decision for acceptance, adoption, or amendment, in
2 accordance with Insurance Code section 1861.08.

3 d. The Administrative Law Judge shall provide the Commissioner with a proposed
4 decision within ten (10) days of the conclusion of the hearing.

5 3. The Commissioner will then issue an interim rate order if State Farm is able to
6 meet its burden to support these interim rate requests.

7 4. Any interim rate order shall be implemented subject to potential refunds with
8 interest.

9 **IT IS SO ORDERED.**

10
11 Dated: March 14, 2025

12
13 
14 RICARDO LARA
Insurance Commissioner

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE
In the Matter of the Rate Applications of:
STATE FARM GENERAL INSURANCE COMPANY
Case No. PA-2024-00011, PA-2024-00012, PA-2024-00013

I am over the age of eighteen years and am not a party to the within action. I am an employee of the Department of Insurance, State of California, employed at 1901 Harrison St. Oakland, CA 94612. On March 14, 2025, I served the following document(s):

**INSURANCE COMMISSIONER'S RULING ON REQUEST FOR A
FINDING OF ELIGIBILITY TO SEEK COMPENSATION**

on all persons named on the attached Service List, by the method of service indicated, as follows:

If **U.S. MAIL** is indicated, by placing on this date, true copies in sealed envelopes, addressed to each person indicated, in this office's facility for collection of outgoing items to be sent by mail, pursuant to Code of Civil Procedure Section 1013. I am familiar with this office's practice of collecting and processing documents placed for mailing by U.S. Mail. Under that practice, outgoing items are deposited, in the ordinary course of business, with the U.S. Postal Service on that same day, with postage fully prepaid, in the city of Oakland and the county of Alameda, California.

If **OVERNIGHT SERVICE** is indicated, by placing on this date, true copies in sealed envelopes, addressed to each person indicated, in this office's facility for collection of outgoing items for overnight delivery, pursuant to Code of Civil Procedure Section 1013. I am familiar with this office's practice of collecting and processing documents placed for overnight delivery. Under that practice, outgoing items are deposited, in the ordinary course of business, with an authorized courier or a facility regularly maintained by one of the following overnight services in the city and the county of Oakland, California: Express Mail, UPS, Federal Express, or Golden State overnight service, with an active account number shown for payment.


If **FAX SERVICE** is indicated, by facsimile transmission this date to fax number stated for the person(s) so marked.

If **PERSONAL SERVICE** is indicated, by hand delivery this date.

If **INTRA-AGENCY MAIL** is indicated, by placing this date in a place designated for collection for delivery by Department of Insurance intra-agency mail.

If **EMAIL** is indicated, by electronic mail transmission this date to the email address(es) listed.

Executed this date at Oakland, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



Lucy Wang

**PROOF OF SERVICE
SERVICE LIST
In the Matter of the Rate Applications of:
STATE FARM GENERAL INSURANCE COMPANY
Case No. PA-2024-00011, PA-2024-00012, PA-2024-00013**

<u>Name/Address</u>	<u>Phone/Fax Numbers</u>	<u>Method of Service</u>
Pamela Pressley Will Pletcher Ben Armstrong CONSUMER WATCHDOG 6330 San Vicente Blvd., Suite 250 Los Angeles, CA 90048 pam@consumerwatchdog.org will@consumerwatchdog.org ben.a@consumerwatchdog.org	Tel: 310 392-0522 Fax: 310 392-8874	Via EMAIL
Vanessa Wells Counsel HOGAN LOVELLS US LLP 855 Main Street Suite 200 Redwood City, CA 94063 vanessa.wells@hoganlovells.com	Tel: 650 463 4000 Fax: 650 463 4199	Via EMAIL
David Grow Counsel STATE FARM GENERAL INSURANCE COMPANY 1201 K Street, Suite 1200 Sacramento, CA 95814 david.grow.jhns@statefarm.com	Tel: 916 321 6914 Fax: N/A	Via EMAIL
Nikki McKennedy Rate Enforcement Bureau Legal Division CALIFORNIA DEPARTMENT OF INSURANCE 1901 Harrison Street, 4th Floor Oakland, CA 94612 Nikki.McKennedy@insurance.ca.gov	Tel: 415 538-4500 Fax: 510 238-7830	Via EMAIL

1 Michael Martinez Tel: 916 492 3573 Via EMAIL
2 Chief Deputy Insurance Commissioner Fax: N/A
3 CALIFORNIA DEPARTMENT
4 OF INSURANCE
5 300 Capitol Mall, 17th Floor
6 Sacramento, CA 95814
7 Michael.Martinez@insurance.ca.gov

6 Kenneth Allen Tel: 213 346 6783 Via EMAIL
7 Rate Regulation Branch Fax: N/A
8 CALIFORNIA DEPARTMENT
9 OF INSURANCE
10 300 South Spring Street, 12th Floor
11 Los Angeles, CA 90013
12 Ken.Allen@insurance.ca.gov

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 4

1 NIKKI S. McKENNEDY (SBN 184269)
JENNIFER McCUNE (SBN 160089)
2 DANIEL WADE (SBN 296958)
DUNCAN MONTGOMERY (SBN 176138)
3 CALIFORNIA DEPARTMENT OF INSURANCE
1901 Harrison Street, Sixth Floor
4 Oakland, CA 94612
Tel: (415) 538-4162
5 Fax: (510) 238-7829
Email: nikki.mckennedy@insurance.ca.gov
6 jennifer.mccune@insurance.ca.gov
daniel.wade@insurance.ca.gov
7 duncan.montgomery@insurance.ca.gov

8 *Attorneys for The California Department of Insurance*

9
10 **BEFORE THE INSURANCE COMMISSIONER**
11 **OF THE STATE OF CALIFORNIA**

12 In the Matter of the Rate Applications of

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

13
14
15 STATE FARM GENERAL
INSURANCE COMPANY,

16 Applicant.

**DECLARATION OF TINA SHAW
SUBMITTED BY CALIFORNIA
DEPARTMENT OF INSURANCE IN
SUPPORT OF HEARING ON
OBJECTIONS TO STIPULATION
PURSUANT TO 10 CCR 2656.1**

Date of Hearing: April 8, 2025
Time: 10:00 a.m.

17
18
19
20 **DECLARATION OF TINA SHAW**

21 I, Tina Shaw, declare as follows:

22 1. I submit this declaration in support of the Stipulation¹ between State Farm General
23 Insurance Company (Applicant or SFG) and staff at the California Department of Insurance
24 (Department or CDI), submitted on February 7, 2025, to California Insurance Commissioner
25 Ricardo Lara (Commissioner). I have personal knowledge of the facts set forth below, and if
26 called to testify, I could and would do so truthfully.

27
28 ¹ Stipulation to Interim Rate Subject to Refunds with Interest Pending a Final Determination of the Legality of the
Rate between SFG and Department staff (Stipulation).

2. As more fully set forth herein, I recommend the Commissioner adopt the Stipulation with the following additional terms: 1) that Applicant be required to obtain a capital infusion of \$400 million; and 2) a reduction of the stipulated interim rate increase in the Homeowners Non-Tenant HO-3 line from 21.8% to 17.0% in order to take into account the capital infusion and that the Applicant's analysis does not include any potential rate impact of nonrenewals. The Applicant's requested rate increases will be investigated fully during the rate hearing process once additional data and support are available, and will be subject to the possibility of refunds with interest if the interim rate turns out to be excessive. The reduction in the interim rate proposed for the Homeowners Non-Tenant HO-3 line may decrease the likelihood that Applicant will owe any refunds with interest following a full rate hearing.

3. My opinions in this declaration are based upon a holistic assessment of the Applicant's current financial condition and the overall health of the California homeowners insurance marketplace. The Commissioner has the responsibility to ensure companies stay solvent so they can pay claims with the goal of supporting a functioning voluntary market. In this case, the Applicant is currently in a precarious financial position. Given its significant share (approximately 20%) of the California homeowners insurance market as measured by gross written premium, in my opinion, for the purposes of reviewing the Applicant's emergency interim rate increase request, we cannot solely focus on technical rating issues while ignoring the fact that, should Applicant become insolvent, the health of the entire marketplace will continue to deteriorate. This interim rate and the surplus note that Department staff are recommending are stop-gap measures and will be subject to further investigation and proof as part of the full rate hearing process, as well as the possibility of refunds with interest if the interim rate turns out to be excessive.

My Current Duties and Background

4. I was appointed the Chief Actuary to supervise the Rate Actuarial Office in the Rate Regulation Branch at the Department in 2024. My job duties include, among other things, supervising, supporting, and advising multiple Supervising Casualty Actuaries and Senior

1 Casualty Actuaries at the Department in evaluating various property and casualty (P&C)
2 complete rate applications submitted to the Department for prior approval pursuant to the
3 provisions of Proposition 103, including without limitation numerous rate applications involving
4 homeowners lines. My supervisory role requires me to establish guidance on P&C ratemaking,
5 develop branch policies and procedures, and advise on insurance regulation, all of which impact
6 Californians. I received a degree in Math Applied Science (Actuarial Plan) at UCLA in 1991, and
7 I became a Fellow of the Casualty Actuarial Society (FCAS) in 2002. Prior to joining the CDI, I
8 worked for Farmers Insurance for over 20 years serving in various roles including pricing,
9 reserving, capital modeling, exposure management, and enterprise risk management. My role at
10 Farmers required me to gain a deep understanding of how to evaluate material risks facing the
11 organization and their impact on surplus and solvency. Based upon all of my education and
12 experience to date, I am familiar with and expert at reviewing Proposition 103 homeowners rate
13 applications and also in reviewing and evaluating insurers' financial conditions as juxtaposed
14 against their rate needs and requested rate changes in Proposition 103 complete rate applications.

15 5. I am familiar with and have reviewed Applicant's rate applications submitted in
16 the above matters, specifically CDI File Nos. 24-1271 (Homeowners Non-Tenant HO3), 24-1273
17 (Overall Renter/Condo Tenant), and 24-1330 (Rental Dwelling Program) (collectively, the
18 Applications). I have also reviewed Applicant's 2023 and 2024 annual statements, as well as the
19 State Farm Group's Combined Annual Statement for 2023 (2024 is not yet available) as filed by
20 its parent company, State Farm Mutual Automobile Insurance Company (SFMA). The opinions I
21 express in this declaration are based upon my review of these matters as well as my education and
22 experience.

23 6. My understanding is that Applicant operates exclusively in the State of California
24 and underwrites insurance personal property, commercial multi-peril, and both personal and
25 commercial excess liability. Applicant currently writes a total of approximately 2.2 million
26 personal homeowners policies, consisting of approximately 1.2 million policies in Homeowners
27 Non-Tenant HO3, 700,000 in Renter/Condo, and 260,000 in the Rental Dwelling Program, which

1 are at issue in this proceeding. These personal lines policies make up approximately 70% of
2 Applicant's overall book of business. The remaining 30% of Applicant's book of business,
3 consisting of approximately 984,000 policies, is in commercial and excess liability programs,
4 which are not being contested in this proceeding.

5 7. In its Applications, Applicant requested that it be allowed a section 2644.27(f)(6)²
6 variance (Variance 6) from the ratemaking regulations. Under Variance 6, an insurer may request
7 an adjustment to, *inter alia*, the maximum rates it is permitted to charge under the ratemaking
8 formula, on the grounds "[t]hat the insurer's financial condition is such that its maximum
9 permitted earned premium should be increased in order to protect the insurer's solvency."
10 Variance 6 is rarely requested by insurers, and this is my first experience reviewing a Variance 6
11 rate request.

12 **Applicant's Deteriorating Financial Condition Warrants an Interim Rate Increase**

13 8. It is my opinion, based upon Applicant's representations in the Applications as
14 well as its annual statement filings, that Applicant has made a preliminary showing that its
15 financial condition is concerning. At the end of 2022, Applicant had approximately \$2.24 billion
16 in surplus available to support the overall amount of insurance it underwrites in property lines in
17 California. As of the end of the third financial quarter of 2024, Applicant's available surplus had
18 decreased to approximately \$1.3 billion. By year-end 2024, Applicant's available surplus had
19 further decreased, to approximately \$1.0 billion. Following the January 2025 wildfires in
20 Southern California, Applicant has reported an additional decrease of approximately \$400 million
21 in its surplus, leaving it with approximately \$620 million in surplus.

22 9. Applicant's decrease in surplus from 2022 to present is concerning to me because,
23 as a matter of sound actuarial principles, insurers, including Applicant, are required to maintain a
24 certain amount of minimum surplus in order to be able to underwrite the amount of insurance in
25 their book of business. It is my opinion that Applicant does not currently have sufficient surplus
26 to underwrite the amount of insurance it is providing to Californians. This is apparent to me based
27

28 ² All regulatory references are to Title 10 of the California Code of Regulations.

1 upon my analysis of Applicant's risk-based capital (RBC) ratios. Property and casualty insurers
2 doing business in California are required to file an annual RBC Report with their regulator in
3 their domiciled state, in order to assist the Commissioner of the domiciled state in monitoring
4 insurers' solvency. Here, Applicant is domiciled in the state of Illinois, meaning that the Illinois
5 Department of Insurance is its primary regulator. RBC regulation is generally guided by the
6 National Association of Insurance Commissioners (NAIC), however, my understanding is that the
7 same RBC solvency measurement principles that apply to California domiciled insurers also
8 apply to Applicant.

9 10. I also note that RBC Reports filed with the Illinois Commissioner are not
10 permitted to be used in California ratemaking per Insurance Code section 739.8, subdivision (c).
11 Accordingly, in making this declaration I have not reviewed or relied upon any RBC Report that
12 Applicant may have submitted to the Illinois Commissioner or to any other state regulator.
13 Instead, I have independently calculated Applicant's RBC ratios based upon publicly available
14 information in its annual statements, using the same formula set forth in the RBC Instructions that
15 are published by the NAIC for property and casualty insurers. My understanding is that this RBC
16 formula determines the minimum level of capital or surplus that insurers must hold based on the
17 risks they face in their business operations. The RBC formula takes into account an insurer's
18 risks which can impact its on-going concerns. These risks include asset, credit, underwriting
19 (premium and reserve), catastrophe, and other business and relevant considerations. The
20 minimum capital is defined by the Action Control Level (ACL) which is based on correlating
21 together the individual risks. The RBC Ratio measures the multiples of insurers' allowable
22 surplus over the ACL. The level of multiples over the ACL provides information or helps
23 identify whether an insurer may not have sufficient capital to withstand potential losses and
24 operational challenges. While I did not review the confidential RBC Report filed by the
25 Applicant, my understanding of how the RBC formula works allowed me to estimate the ACL
26 and the Applicant's RBC position based on publicly available information.

11. When assessing an insurer's solvency as demonstrated by its RBC ratios, based upon my education, experience, and understanding and application of the NAIC guidelines and the California Insurance Code³, it is desirable for an insurer to have an excess of capital (comprised of an insurer's statutory capital as prescribed by Statutory Accounting Standards or surplus) above the statutory RBC levels. To explain further:

- a. An RBC ratio of 2.0 or 200% or lower is considered a Company Action Level Event, meaning that the insurer is required to submit a capital restoration plan to the Commissioner.
- b. A property and casualty insurer can also be placed under Company Action level if the insurer has total adjusted capital which is greater than or equal to its Company Action Level RBC (200%) but less than the product of its Authorized Control Level RBC and 3.0 (or RBC Ratio of 300%) and triggers the trend test (deteriorating underwriting results).
- c. An RBC ratio of 1.5 or 150% or lower is considered a Regulatory Action Level Event, meaning that the regulator is required to approve an RBC Plan, which per Insurance Code section 739, subdivision (k), an RBC Plan "means a comprehensive financial plan" that contains, among other things, proposed corrective actions that the insurer intends to take to address its deteriorating RBC ratio.
- d. An RBC ratio of 1.0 or 100% or lower is considered an Authorized Control Level Event, meaning that the company may be placed under regulatory control at the Commissioner's discretion.
- e. An RBC ratio of 0.7 or 70% or lower is considered a Mandatory Control Level Event, meaning that the company shall be placed under regulatory control.

12. Based upon my analysis, Applicant has had a steadily declining RBC ratio since 2022, and is presently at an Authorized Control Level Event, meaning that the Illinois Department of Insurance has discretion to place Applicant under regulatory control. The following chart illustrates Applicant's evolving RBC ratios from 2022 to present, based upon my independent calculations⁴:

³ Sections 739-739.12 of the California Insurance Code set forth general provisions regarding RBC ratios for insurers operating in California.

⁴ I used Applicant's Annual Statement – Five Year Historical Data to calculate its estimated RBC ratios for year-end 2022 through 2024, and data provided by Applicant in the Applications and its support for its interim rate request to calculate its estimated RBC ratios at the end of Q1 2025.

	SFG RBC ratio	RBC Level Event
Year-end 2022	464%	Not applicable
Year-end 2023	228%	Company Action Level
Year-end 2024	150%	Regulatory Action Level
Est. Post-Jan 2025 wildfires	90%	Authorized Control Level

13. Based upon the foregoing, I am concerned that Applicant's financial condition as demonstrated by its estimated RBC ratios has significantly deteriorated since 2022 and that its estimated RBC ratio as of the end of the first quarter of 2025 is currently so low as to support authorized control by the Illinois Department of Insurance. Accordingly, I believe the Commissioner should grant Applicant's request for an emergency interim rate increase, subject to refunds with interest following a full rate hearing, in its homeowners lines, as a first step to begin to address its deteriorating financial condition, and I submit this declaration in further support of the two-party Stipulation previously submitted to the Commissioner on February 7, 2025.

Consumer Watchdog's objections to the Stipulated Rate Increase and the Commissioner's Proposal for capital infusion and a moratorium on non-renewals

14. Although I note Applicant's deteriorating financial condition, I also acknowledge the objections to the Stipulation by intervenor Consumer Watchdog (Intervenor or CW),⁵ as well as the Commissioner's proposal to the parties on March 12, 2025, i.e., that the Commissioner would grant the interim rate increase request subject to refunds with interest, so long as Applicant agreed to (a) obtain a capital infusion from its parent company or elsewhere, and (b) cease its pending program of nonrenewals through the end of 2025. The following is my analysis of these proposals, along with a recommended path forward for the Commissioner and the parties in this matter.

15. With respect to the Commissioner's proposal that Applicant obtain an immediate infusion of capital, I agree that Applicant will be unable to sufficiently improve its RBC ratios

⁵ Consumer Watchdog filed numerous objections to the stipulation, the most recent and extensive of which was filed with AHB on March 24, 2025.

1 based solely upon an emergency rate increase in its homeowners lines, for two main reasons.
2 First, it takes at least 12 to 24 months for an insurer to experience a noticeable increase in its
3 surplus based upon a rate increase. So, although granting an immediate interim rate increase
4 would eventually improve Applicant's financial condition, it would take a minimum of 12 to 24
5 months before there is a noticeable impact on Applicant's RBC ratios. Second, based upon my
6 very early stage, preliminary analysis, which I intend to further investigate and develop during
7 discovery as part of the full rate hearing process, I do not believe that the deterioration of
8 Applicant's surplus and RBC ratios has been solely caused by allegedly-insufficient homeowners
9 rates; rather, I believe there are other steps Applicant should be encouraged and required to take
10 to improve its financial condition. In short, increasing Applicant's homeowners rates is unlikely
11 to be sufficient by itself to effect long-term improvement to Applicant's financial condition.

12 **\$400 million Capital Infusion Should be Required as Part of The Interim Rate Increase**

13 16. Based upon the foregoing, as a first step, I agree with the Commissioner that
14 Applicant requires an immediate capital infusion in order to increase its RBC ratios above its
15 current Authorized Action Level. Applicant has indicated that its parent company is willing to
16 provide it with an immediate capital infusion in the form of a \$400 million surplus note, if and
17 when the Commissioner grants the interim rate increase subject to refunds with interest. And as a
18 second step, given that Applicant's parent company will not provide a surplus note unless
19 Applicant obtains an immediate interim rate increase, subject to refunds with interest, I also
20 believe that the Commissioner should grant the interim rate increase request, subject to refunds
21 with interest. I have analyzed the impact of a \$400 million surplus note on Applicant's financial
22 condition, with and without an interim rate increase, and agree that both these measures combined
23 will effect a substantial improvement to Applicant's financial condition as demonstrated by its
24 estimated RBC ratios, using the 2024 ACL of \$691 million:

Interim rate increase ⁶	Estimated premium impact	Surplus Note	Estimated RBC
0%	0\$	\$0	90%
0%	\$0	\$400 million	150%
21.8%	\$530 million	\$0	170%
21.8%	\$530 million	\$400 million	220%

Alternative table if we used 2023 ACL of \$589 million. The rationale for comparing RBC Ratio estimated from the 2024 ACL to 2023 is that with the rate increase, the ACL will improve over time and thereby improve the RBC position.

Interim rate increase	Estimated premium impact	Surplus Note	Estimated RBC using 2024 ACL of \$691M	Estimated RBC using 2023 ACL of \$589M
0%	0\$	\$0	90%	106%
0%	\$0	\$400 million	150%	170%
21.8%	\$530 million	\$0	170%	200%
21.8%	\$530 million	\$400 million	220%	260%

Stipulated Interim Rate Should Be Reduced from 21.8% to 17%

based on Capital Infusion and Pending Nonrenewals

17. However, also based upon the foregoing, I believe there is room to refine the Commissioner's provisional approval of the interim rate increase request, in order to also address the Commissioner's proposal that Applicant cease its currently ongoing nonrenewal program in its homeowners lines through year-end 2025. Applicant has reported that since March 2024, it has nonrenewed approximately 12,677 policyholders and is currently in progress to nonrenew an additional 11,016 policyholders. Applicant has declined the Commissioner's request that it pause these additional nonrenewals through year-end 2025, citing the need to immediately reduce its concentration in high-risk wildfire areas in order to improve its overall financial condition. As an actuary, I am concerned that these nonrenewals will alter Applicant's risk profile and the prospective loss experience to a lower level and therefore would yield a lower rate indication, and that the potential rate impact of these nonrenewals has not yet been accounted for in the

⁶ For purposes of this analysis, I have focused on the requested interim rate increase to Applicant's Non-Tenant Homeowners HO3 line because it comprises the majority of Applicant's book of business.

Applications. The Department has indicated that it will fully investigate the impact of these nonrenewals as part of the rate hearing process, but in the meantime, the Commissioner may wish to reduce the emergency interim rate increase to account for the likelihood of a potential rate impact resulting from Applicant's continued nonrenewals. Again, focusing on Applicant's Non-Tenant Homeowners HO3 line, the Commissioner may reduce the interim rate increase approval from 21.8% to 17.0%, and there will still be a significant improvement to Applicant's RBC ratios and therefore its overall financial condition:

Interim rate increase	Estimated premium impact	Surplus Note	Estimated RBC using 2024 ACL of \$691M	Estimated RBC using 2023 ACL of \$589M
0%	0\$	\$0	90%	106%
0%	\$0	\$400 million	150%	170%
21.80%	\$530 million	\$0	170%	200%
21.80%	\$530 million	\$400 million	220%	260%
17.00%	\$413 million	\$0	150%	180%
17.00%	\$413 million	\$400 million	210%	240%

18. Decreasing the interim rate increase from 21.8% to 17.0% has a small impact (a 20 point difference in estimated RBC impact, from 240% to 260% at the high end) on Applicant's RBC ratio, but may decrease the likelihood that Applicant will owe any refunds with interest following a full rate hearing, because it accounts for the possibility that Applicant's currently requested interim rate increase is over-stated because the Applications and interim rate increase request do not yet consider the effects of the additional nonrenewals Applicant intends to complete by year-end 2025. This proposed decrease from 21.8% to 17% also addresses the Commissioner's request that Applicant pause its currently pending nonrenewal program through year-end 2025 by taking into account the potential effects of Applicant continuing these nonrenewals. I further note, however, that the reduction of the interim rate to 17.0% may either over- or under-estimate the potential rate impact of the ongoing nonrenewal program, and therefore the Department intends to fully investigate the actual rate impact, if any, of these nonrenewals during the full rate hearing process.

19. Based upon all of the foregoing, I believe that an interim increase rate order with all of the following terms would be fundamentally fair, adequate, reasonable, and in the interests of justice, and therefore should be recommended by the Administrative Law Judge and adopted by the Commissioner in the above matter:

- a. That any interim rate increases be subject to refunds with interest should the Commissioner ultimately determine the interim rates were at all excessive following a rate hearing⁷;
- b. That the following interim rates be adopted with an effective date for new and renewal business of June 1, 2025, subject to refunds with interest:

File No.	Line	Interim Rate Subject to Refunds with Interest following Rate Hearing
24-1271	Homeowners Non-Tenant HO-3	+17.0%
24-1273	Overall Renter/Condo Tenant	+15%
24-1330	Rental Dwelling	+38%

- c. That Applicant's implementation of the interim rates be subject to Applicant obtaining a \$400 million surplus note from its parent company by no later than June 1, 2025; and
- d. The additional terms set forth in the original Stipulation and [Proposed] Order.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed the 2nd day of April 2025 in Los Angeles, California.

Tina Shaw

Tina Shaw

⁷ Or following a settlement in which the parties agree that interim rates were at all excessive.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE
In the Matter of the Rate Applications of
State Farm General Insurance Company, Applicant
CDI File Nos. PA-2024-00011 (RRB File #24-1273),
PA-2024-00012 (RRB File #24-1271 &
PA-2024-00013 (RRB File #24-1330)

I am over the age of eighteen years and am not a party to the within action. I am an employee of the Department of Insurance, State of California, employed at 1901 Harrison Street, 4th Floor, Oakland, CA 94612. On April 2, 2025, I served the following document(s):

**DECLARATION OF TINA SHAW SUBMITTED BY CALIFORNIA DEPARTMENT
OF INSURANCE IN SUPPORT OF HEARING ON OBJECTIONS TO STIPULATION
PURSUANT TO 10 CCR 2656.1**

on all persons named on the attached Service List, by the method of service indicated, as follows:

If **U.S. MAIL** is indicated, by placing on this date, true copies in sealed envelopes, addressed to each person indicated, in this office's facility for collection of outgoing items to be sent by mail, pursuant to Code of Civil Procedure Section 1013. I am familiar with this office's practice of collecting and processing documents placed for mailing by U.S. Mail. Under that practice, outgoing items are deposited, in the ordinary course of business, with the U.S. Postal Service on that same day, with postage fully prepaid, in the city and county of San Francisco, California.

If **OVERNIGHT SERVICE** is indicated, by placing on this date, true copies in sealed envelopes, addressed to each person indicated, in this office's facility for collection of outgoing items for overnight delivery, pursuant to Code of Civil Procedure Section 1013. I am familiar with this office's practice of collecting and processing documents placed for overnight delivery. Under that practice, outgoing items are deposited, in the ordinary course of business, with an authorized courier or a facility regularly maintained by one of the following overnight services in the city and county of San Francisco, California: Express Mail, UPS, Federal Express, or Golden State overnight service, with an active account number shown for payment.

If **FAX SERVICE** is indicated, by facsimile transmission this date to fax number stated for the person(s) so marked.

If **PERSONAL SERVICE** is indicated, by hand delivery this date.

If **INTRA-AGENCY MAIL** is indicated, by placing this date in a place designated for collection for delivery by Department of Insurance intra-agency mail. If **EMAIL** is indicated, by electronic mail transmission this date to the email address(es) listed.

Executed this date at San Francisco, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


Cecilia Padua

SERVICE LIST
In the Matter of the Rate Applications of
State Farm General Insurance Company, Applicant
CDI File Nos. PA-2024-00011 (RRB File #24-1273),
PA-2024-00012 (RRB File #24-1271 &
PA-2024-00013 (RRB File #24-1330)

<u>Name/Address</u>	<u>Phone/Fax Numbers</u>	<u>Method of Service</u>
Karl Fredric J. Seligman Administrative Law Judge Administrative Hearing Bureau CALIFORNIA DEPARTMENT OF INSURANCE 1901 Harrison Street, 3 rd Floor Oakland, CA 94612 Florinda.Cristobal@insurance.ca.gov Camille.Johnson@insurance.ca.gov	Tel: (415) 538-4243 Fax: (510) 238-7828	Via EMAIL
Vanessa Wells Victoria Brown Kristel Gelera Cathy Perry Attorneys for Applicant HOGAN LOVELLS US LLP 855 Main Street, Suite 200 Redwood City, CA 94063 Vanessa.wells@hoganlovells.com Victoria.brown@hoganloverlls.com Kristel.gelera@hoganlovells.com Cathy.perry@hoganlovells.com	Tel: (650) 463-4000 Fax: (650) 463-4199	Via EMAIL
Katherine Wellington Attorney(s) for Applicant HOGAN LOVELLS US LLP 125 High Street, Suite 2010 Boston, MA 02110 Katherine.Wellington@hoganlovells.com	Tel: (617) 371-1000 Fax: (617) 371-1037	Via EMAIL
Jordan D. Teti Attorney(s) for Applicant HOGAN LOVELLS US LLP 1999 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Jordan.Teti@hoganlovells.com /// /// /// ///	Tel: (310) 785-4600 Fax: (310) 785-4601	Via EMAIL

1 Harvey Rosenfield

Tel: (310) 392-0522

Via EMAIL

2 Pamela Pressley

Fax: (310) 392-8874

3 William Pletcher

4 Ryan Mellino

5 Benjamin Powell

6 Attorneys for Intervenor

CONSUMER WATCHDOG

7 6330 San Vicente Blvd., Suite 250

8 Los Angeles, CA 90048

9 harvey@consumerwatchdog.org

pam@consumerwatchdog.org

will@consumerwatchdog.org

ryan@consumerwatchdog.org

ben@consumerwatchdog.org

10 The Honorable California Insurance

Tel: (916) 492-3500

Via EMAIL

11 Commissioner Ricardo Lara

Fax: (916) 445-5280

12 Office of the Commissioner

CALIFORNIA DEPARTMENT OF

INSURANCE

13 300 Capitol Mall, 16th Floor

14 Sacramento, CA 95814

CommissionerLara@insurance.ca.gov

15 Michael Martinez

Tel: (916) 492-3573

Via EMAIL

16 Chief Deputy Commissioner

17 Office of the Commissioner

CALIFORNIA DEPARTMENT OF

INSURANCE

18 300 Capitol Mall, 17th Floor

19 Sacramento, CA 95814

Michael.Martinez@insurance.ca.gov

20 Lucy F. Wang, Deputy Commissioner &

Tel: (415) 538-4377

Via EMAIL

21 Special Counsel to the Commissioner

22 Office of the Special Counsel

CALIFORNIA DEPARTMENT OF

INSURANCE

23 1901 Harrison Street, 6th Floor

24 Oakland, CA 94612

Lucy.Wang@insurance.ca.gov

25 ///

26 ///

27 ///

28 ///

1 Teresa Campbell, Deputy Commissioner
2 & General Counsel
3 Heather Hoesterey
4 Assistant General Counsel
5 Legal Division

Tel: (415) 538-4126
(415) 538-4176
Fax: (510) 238-7829

Via EMAIL

6 **CALIFORNIA DEPARTMENT OF**
7 **INSURANCE**

1901 Harrison Street, 6th Floor
Oakland, CA 94612

Teresa.Campbell@insurance.ca.gov

Heather.Hoesterey@insurance.ca.gov

8 **NON PARTIES**

9 Kenneth Allen
10 Deputy Commissioner
11 Rate Regulation Branch

Tel: (213) 346-6783
Fax: (213) 897-9051

Via EMAIL

12 **CALIFORNIA DEPARTMENT OF**
13 **INSURANCE**

300 South Spring Street, 14th Floor
Los Angeles, CA 90013

Ken.allen@insurance.ca.gov

14 Margaret W. Hosel
15 Attorney and Public Advisor
16 Office of the Public Advisor
17 **CALIFORNIA DEPARTMENT OF**
18 **INSURANCE**

Tel: (415) 538-4383
Fax: (510) 238-7830

Via EMAIL

1901 Harrison Street, 6th Floor
Oakland, CA 94612

Margaret.Hosel@insurance.ca.gov

EXHIBIT 5

Harvey Rosenfield, SBN 123082
Pamela Pressley, SBN 180362
William Pletcher, SBN 212664
Benjamin Powell, SBN 311624
Ryan Mellino, SBN 342497
CONSUMER WATCHDOG
6330 San Vicente Blvd., Suite 250
Los Angeles, CA 90048
Tel. (310) 392-0522
Fax (310) 861-0862
harvey@consumerwatchdog.org
pam@consumerwatchdog.org
will@consumerwatchdog.org
ben@consumerwatchdog.org
ryan@consumerwatchdog.org

Attorneys for CONSUMER WATCHDOG

BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF CALIFORNIA

In the Matter of the Rate Applications of

State Farm General Insurance
Company,

Applicant.

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

**CONSUMER WATCHDOG'S
DISCOVERY REQUESTS PROPOUNDED
ON CALIFORNIA DEPARTMENT OF
INSURANCE**

1 DEMANDING PARTY: CONSUMER WATCHDOG

2 RESPONDING PARTY: CALIFORNIA DEPARTMENT OF INSURANCE

3 SET NUMBER: ONE

4 Pursuant to California Code of Regulations, title 10 ("10 CCR"), § 2655.1 and
5 Government Code section 11507.6, liberally construed, Intervenor Consumer Watchdog, hereby
6 propounds the following discovery requests on the CALIFORNIA DEPARTMENT OF
7 INSURANCE ("CDI").

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

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

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

24 In the event that any DOCUMENT or COMMUNICATION called for by these Requests
25 has been destroyed or discarded, that DOCUMENT or COMMUNICATION is to be identified
26 by stating: (a) the author(s), addressee(s), and any indicated or blind copy(s); (b) the
27 DOCUMENT or COMMUNICATION's date, number of pages and attachments or appendices;
28 (c) the DOCUMENT or COMMUNICATION's subject matter, (d) the date of destruction or

1 discard, manner of destruction or discard, and reason for destruction or discard; (e) the
2 PERSONS who were authorized to carry out such destruction or discard; and (f) whether any
3 copies of the DOCUMENT or COMMUNICATION presently exist and, if so, the name of the
4 custodian of each copy.

5 Electronically stored information (“ESI”) should be produced in single-page, black and
6 white, TIFF Group IV, 300 DPI TIFF images with the exception of spreadsheet type files, source
7 code, and audio and video files, which should be produced in native format. If a document is
8 produced in native format, a single-page Bates-stamped image slip stating that the document has
9 been produced in native format should also be provided. A load file of the ESI should be
10 included with the metadata fields to be agreed upon by the parties.

11 **DEFINITIONS**

12 1. The terms “CDI,” “YOU,” and “YOUR” refer to the California Department of
13 Insurance and its agents, employees, attorneys, actuaries, accountants, investigators, and anyone
14 else acting on its behalf.

15 2. The term “DOCUMENT” or “DOCUMENTS” means all items that are
16 discoverable pursuant to Government Code section 11507.6, liberally construed, including, but
17 not limited to, any “writing” as defined in section 250 of the California Evidence Code, and
18 includes e-mail, voicemail, computer files and all other forms of “electronically stored
19 information” as defined in section 2016.020 of the Code of Civil Procedure. Without limiting the
20 generality of the above, but to illustrate only, the term “DOCUMENT” includes, (a) any written,
21 printed, electronically generated/retained or recorded material or electronic data of
22 DOCUMENTS of every kind and description that are fixed on any tangible thing, including, but
23 not limited to typed or handwritten papers; books; drafts; analyses; reports; letters; envelopes;
24 post-its; electronic mail; telephone messages; voice mail; appointment calendars; address lists;
25 drawings; photographs; correspondence; marketing materials; business cards; sales pitch books;
26 newspaper clippings; memoranda; notes; agenda of meetings; summaries; outlines; calendars;
27 diaries; transcripts of notes of telephone conversations, meetings or interviews; tape recordings;
28 drafts of agreements and contracts; agreements; contracts; supplements, amendments and

1 modification of contracts; files; results of investigations; court papers; bank records; loan
2 applications; facsimile transmissions; invoices; charts; graphs; directories; file folders, file tabs
3 and labels appended to or containing any documents; logs; and transcriptions. Without limiting
4 the generality of the above, but to illustrate only, a tangible thing on which documents may be
5 fixed includes, but is not limited to, paper; audio tapes or cassettes; phonographic media;
6 photographic media; computer media (including but not limited to hard disks, floppy disks,
7 compact disks, and magnetic tapes); and optical media. "DOCUMENT" or "DOCUMENTS"
8 also includes all preliminary versions, revisions, drafts, and amendments of any of the foregoing,
9 all attachments or appendices to any of the foregoing, and all copies of the foregoing that contain
10 any commentary, notations, or alterations or that are otherwise not identical to the original.
11 "DOCUMENT" or "DOCUMENTS" also includes any "STATEMENT" or "STATEMENTS,"
12 as defined below.

13 3. "COMMUNICATION(S)" means the transmittal of information, facts, or ideas,
14 including without limitation communications in the form of any discussion, conversation,
15 inquiry, negotiation, agreement, understanding, meeting, telephone correspondence,
16 conversation, letter, correspondence, note, memorandum, e-mail message, instant message
17 (including but not limited to messages sent through any CDI messaging system), text message,
18 electronic chat, telegram, audio recordings, advertisement or other form of exchange of words,
19 whether oral or written. "COMMUNICATION" or "COMMUNICATIONS" shall also mean or
20 refer to, without limitation, all written and unwritten but recorded correspondence, including
21 non-duplicate drafts, versions not sent, and copies that differ only in margin notes or annotations,
22 including memos, letters, analog or digital recordings, audio recordings, electronic chat logs,
23 voicemail, email, text messages, instant messages, messages via social media, computer files,
24 computer disks, or other things sent or received by YOU to or from any entity or PERSON.

25 4. "INTERIM RATE HEARING" shall mean the evidentiary hearing that took place
26 commencing on April 8, 2025 regarding the two-way stipulation between YOU and STATE
27 FARM GENERAL INSURANCE COMPANY ("STATE FARM") concerning its emergency
28 interim rate requests, and Consumer Watchdog's objections, as ordered by the Commissioner on

1 March 14, 2025 and noticed by the March 24, 2025 Notice of Hearing on Stipulation issued by
2 Administrative Law Judge Seligman.

3 5. "THIS PROCEEDING" shall refer to the above referenced applications: PA-
4 2024-00011, PA-2024-00012, PA-2024-00013.

5 6. "RATE HEARING" shall mean the evidentiary hearing scheduled to take place
6 beginning on October 20, 2025 regarding State Farm's APPLICATIONS.

7 7. "STATE FARM" refers to STATE FARM GENERAL INSURANCE
8 COMPANY, its agents, employees, attorneys, accountants, investigators, and anyone else acting
9 on its behalf, including its parent company and affiliates, notwithstanding that its parent
10 company or affiliate may be identified separately in certain Requests.

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

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

20 10. The term "EXHIBIT" means such exhibit or attachment that was included with
21 the APPLICATIONS.

22 11. The term "APPLICATIONS" means STATE FARM's Prior Approval Rate
23 Applications with California Department of Insurance file numbers 24-1271, 24-1273, and 24-
24 1330, including all updates and revisions.

25 12. The term "2025 LOS ANGELES WILDFIRES" means any of the wildfires that
26 occurred across Southern California in January 2025, including but not limited to the Eaton Fire
27 and Palisades Fire.

DISCOVERY REQUESTS

1. Provide all DOCUMENTS YOU intend to offer into evidence for the RATE HEARING.

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

3. Provide any, and all, STATEMENTS pertaining to the subject matter of the RATE HEARING made by any witness whose testimony YOU intend to present in the RATE HEARING on this matter, whether through declarations or live testimony.

4. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO CDI analysis, interpretation, or implementation of 10 CCR § 2644.27(f)(6) and the meaning of the language contained therein, including the phrases “protect the insurer’s solvency,” “plan to restore the financial condition,” “insurer’s condition is restored,” and “compensate consumers for excessive charges.”

5. Provide all DOCUMENTS or COMMUNICATIONS, other than DOCUMENTS and COMMUNICATIONS already produced by CDI or made available to the public via SERFF, RELATED TO whether, or on what terms, STATE FARM’s parent company would provide any form of financial assistance to STATE FARM in connection with the interim and/or final resolution of THIS PROCEEDING.

6. Provide all DOCUMENTS or COMMUNICATIONS, other than DOCUMENTS and COMMUNICATIONS already produced by CDI or made available to the public via SERFF, RELATED TO whether STATE FARM’s parent company has ever provided any form of financial assistance to any other affiliate in the United States.

7. Provide all DOCUMENTS or COMMUNICATIONS, other than DOCUMENTS and COMMUNICATIONS already produced by CDI or made available to the public via SERFF, RELATED TO the impact on STATE FARM’s applications in THIS PROCEEDING of the financial assistance promised by State Farm’s parent company in connection with the stipulation adopted by the Commissioner on May 13, 2025.

1 8. Provide all DOCUMENTS or COMMUNICATIONS RELATED TO CDI
2 analysis of whether STATE FARM's rates, prior to its emergency rate request, were
3 "confiscatory."

4 9. Provide all DOCUMENTS and COMMUNICATIONS, other than
5 DOCUMENTS and COMMUNICATIONS already produced by CDI or made available to the
6 public via SERFF, RELATED TO stipulations between STATE FARM and CDI in THIS
7 PROCEEDING between June 1, 2024 and April 4, 2025.

8 10. Provide all COMMUNICATIONS between STATE FARM and CDI, other than
9 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
10 RELATED TO STATE FARM's financial condition dated on or after June 1, 2024.

11 11. Provide all DOCUMENTS RELATED TO STATE FARM's financial condition,
12 other than DOCUMENTS already produced by CDI or made available to the public via SERFF,
13 dated on or after June 1, 2024.

14 12. Provide all DOCUMENTS, other than DOCUMENTS already produced by CDI
15 or made available to the public via SERFF, RELATED TO the corporate structure of STATE
16 FARM, its parent company and affiliates.

17 13. Provide all DOCUMENTS, other than DOCUMENTS already produced by CDI
18 or made available to the public via SERFF, RELATED TO the financial condition of STATE
19 FARM's parent company and affiliates when taken as a combined enterprise.

20 14. Provide all DOCUMENTS, other than DOCUMENTS already produced by CDI
21 or made available to the public via SERFF, RELATED TO CDI analysis of STATE FARM's
22 block or individual non-renewal of policies to which THIS PROCEEDING applies.

23 15. Provide all DOCUMENTS and COMMUNICATIONS, other than
24 DOCUMENTS and COMMUNICATIONS already produced by CDI or made available to the
25 public via SERFF, RELATED TO CDI analysis of the possible impact of the interim and final
26 rate determinations in this matter on STATE FARM's financial condition over the course of the
27 next five years.

1 16. Provide all DOCUMENTS and COMMUNICATIONS, other than
2 DOCUMENTS and COMMUNICATIONS already produced by CDI or made available to the
3 public via SERFF, RELATED TO CDI analysis of the impact of the interim and final rate
4 determinations in this matter on STATE FARM policyholders' decisions to cancel or not to
5 renew over the course of the next five years.

6 17. Provide all DOCUMENTS and COMMUNICATIONS, other than
7 DOCUMENTS and COMMUNICATIONS already produced by CDI or made available to the
8 public via SERFF, RELATED TO CDI analysis of the impact of interim and final rate
9 determinations in this matter on STATE FARM's cancellation of policies for non-payment of
10 premium over the course of the next five years.

11 18. Provide all DOCUMENTS and COMMUNICATIONS, other than
12 DOCUMENTS and COMMUNICATIONS already produced by CDI or made available to the
13 public via SERFF, RELATED TO CDI analysis of the possible impact of interim and final rate
14 determinations on the availability of residential insurance in California's insurance market over
15 the course of the next five years.

16 19. Provide all DOCUMENTS and COMMUNICATIONS, other than
17 DOCUMENTS and COMMUNICATIONS already produced by CDI or made available to the
18 public via SERFF, RELATED TO CDI analysis of STATE FARM's qualification for the
19 ratemaking Variances requested in its applications in THIS PROCEEDING.

20 20. Provide all COMMUNICATIONS between CDI staff and the Insurance
21 Commissioner or executive office personnel RELATED TO THIS PROCEEDING.

22 21. Provide all COMMUNICATIONS between CDI or the Insurance Commissioner
23 and any rating agency (e.g., Illinois Department of Insurance) RELATED TO STATE FARM
24 and/or THIS PROCEEDING.

25 22. Provide all DOCUMENTS reflecting CDI's approval of any application by any
26 insurer during the preceding ten years for any of the variances requested by STATE FARM in
27 THIS PROCEEDING.

23. Provide all DOCUMENTS RELATED TO any request by STATE FARM to change the terms of its coverage for “loss by fire” in its contracts with policyholders on or after January 1, 2017.

24. Provide all DOCUMENTS RELATED TO studies and/or analyses conducted by CDI, other than studies and/or analyses that are presently available to the public on the CDI web site, RELATED TO the claims handling practices of insurance companies in the Oakland Hills Fire (1992), the Northridge Earthquake (1994), and wildfires from 2017 to the present, including but not limited to the Eaton and Palisades fires in January 2025.

25. Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and COMMUNICATIONS already produced by CDI or made available to the public via SERFF, RELATED TO the use of STATE FARM’s insurance policies as collateral for mortgages, generated from 2020 to the present.

26. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any STATE FARM policyholder complaints regarding any STATE FARM homeowners, rental dwelling, renters, or condo rates, from 2020 to the present, including but not limited to complaints RELATED TO the INTERIM RATE HEARING and THIS PROCEEDING.

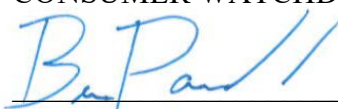
27. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any STATE FARM policyholder complaints RELATED TO the 2025 LOS ANGELES WILDFIRES.

DATED: June 30, 2025

Respectfully submitted,

Harvey Rosenfield
Pamela Pressley
William Pletcher
Benjamin Powell
Ryan Mellino
CONSUMER WATCHDOG

By:



Benjamin Powell
Attorneys for CONSUMER WATCHDOG

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

On June 30, 2025, I caused service of true and correct copies of the document entitled

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

- I declare under penalty of perjury that the foregoing is true and correct. Executed on June 30, 2025 at Los Angeles, California.

Ben Powell

Service List

Vanessa Wells
Victoria Brown
Hogan Lovells US LLP
855 Main Street, Suite 200
Redwood City, CA 94063
Tel.: (650) 463-4000
Fax: (650) 463-4199
Vanessa.Wells@hoganlovells.com
Victoria.Brown@hoganlovells.com

☐ FAX
☐ U.S. MAIL
☐ OVERNIGHT MAIL
☐ HAND DELIVERED
☒ EMAIL

Attorneys for Applicant

Katherine Wellington
Hogan Lovells US LLP
125 High Street, Suite 2010
Boston, MA 02110
Tel.: (617) 371-1000
Fax: (617) 371-1037
Katherine.Wellington@hoganlovells.com

☐ FAX
☐ U.S. MAIL
☐ OVERNIGHT MAIL
☐ HAND DELIVERED
☒ EMAIL

Attorneys for Applicant

Jordan D. Teti
Hogan Lovells US LLP
1999 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel.: (310) 785-4600
Fax: (310) 785-4601
Jordan.Teti@hoganlovells.com

☐ FAX
☐ U.S. MAIL
☐ OVERNIGHT MAIL
☐ HAND DELIVERED
☒ EMAIL

Attorneys for Applicant

Nikki McKennedy
Jennifer McCune
Daniel Wade
Duncan Montgomery
Elsa Carre
Cecilia Padua
California Department of Insurance
1901 Harrison Street, 6th Floor
Oakland, CA 94612
Tel.: (415) 538-4500
Fax: (510) 238-7830
Nikki.McKennedy@insurance.ca.gov
Jennifer.McCune@insurance.ca.gov
Daniel.Wade@insurance.ca.gov
Duncan.Montgomery@insurance.ca.gov
Elsa.Carre@insurance.ca.gov
Cecilia.Padua@insurance.ca.gov

Attorneys for CDI

Merritt David Farren
26565 West Agoura Rd., Suite 200
Calabasas, CA 91302
Tel.: (818) 474-4610
Merritt.Farren@FarrenLLP.com

*Attorney for Proposed Intervenor Merritt David
Farren*

☐ FAX
☐ U.S. MAIL
☐ OVERNIGHT MAIL
☐ HAND DELIVERED
☒ EMAIL

☐ FAX
☐ U.S. MAIL
☐ OVERNIGHT MAIL
☐ HAND DELIVERED
☒ EMAIL

EXHIBIT 6

JENNIFER McCUNE (SBN 160089)
LISBETH LANDSMAN (SBN 166973)
DANIEL WADE (SBN 296958)
DUNCAN MONTGOMERY (SBN 176138)
CALIFORNIA DEPARTMENT OF INSURANCE
1901 Harrison Street, Sixth Floor
Oakland, CA 94612
Tel: (415) 538-4162
Fax: (510) 238-7829
Email: jennifer.mccune@insurance.ca.gov
Lisbeth.landsman@insurance.ca.gov
daniel.wade@insurance.ca.gov
duncan.montgomery@insurance.ca.gov

Attorneys for The California Department of Insurance

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

In the Matter of the Rate Applications of

STATE FARM GENERAL
INSURANCE COMPANY,

Applicant.

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

**CDI's OBJECTIONS AND RESPONSES
TO CONSUMER WATCHDOG'S
DISCOVERY REQUESTS**

PROPOUNDING PARTY: CONSUMER WATCHDOG ("CWD" or
"INTERVENOR")

RESPONDING PARTY: CALIFORNIA DEPARTMENT OF INSURANCE
("Department" or "CDI")

GENERAL OBJECTIONS

The Department incorporates the following general objections (“General Objections”), as though fully set forth therein, into each of its responses to CWD’s Requests for Discovery (“Requests”):

1. CDI bases all of its responses upon only such information and documents that are presently available and known to CDI. CDI reserves the right to respond further to these Requests and to provide additional evidence of any subsequently discovered information or in rebuttal to other parties’ information.
2. CDI objects to each Request to the extent it seeks privileged information including but not limited to information and documents protected by the attorney-client privilege and/or the work product doctrine. CDI will not produce any privileged information or documents.
3. CDI objects to each Request to the extent it seeks the notes, work papers, drafts, and the like of its experts. These documents are not subject to discovery pursuant to any future Protective Order stipulated by the parties in this matter.
4. CDI objects to each Request to the extent it seeks privileged information or documents protected by the deliberative process or executive privilege. (Evid. Code § 1040.) CDI will not produce any privileged information or documents.
5. CDI objects to each Request to the extent it seeks privileged information or documents protected by the settlement communication privilege. CDI will not produce any privileged information or documents. (10 CCR § 2656.4(a): “Discussions, admissions, concessions or offers to stipulate or settle, whether oral or written, made during any negotiation or settlement conference are confidential and inadmissible for any purpose in any proceeding.”; see also, Evid. Code, §1152(a), Gov. Code § 11415.60.)
6. CDI objects to each Request to the extent it seeks confidential documents or information which are statutorily barred from production under any of the following: California Insurance Code (“CIC”) sections 735.5(c), 739.8, 935.8, 1215.8, 1858.35, and 12919, and Evid. Code sections 1040 and 1041. CDI will not produce any statutorily protected

1 information or documents.

2 **SPECIFIC OBJECTIONS AND RESPONSES**

3 **DISCOVERY REQUEST NO. 1:**

4 Provide all DOCUMENTS YOU intend to offer into evidence for the RATE HEARING.

5 **RESPONSE TO DISCOVERY REQUEST NO. 1:**

6 The Department incorporates its General Objections above as though fully set forth
7 herein. The Department objects to this request as premature. Subject to and without waiving
8 these objections, or the General Objections incorporated herein, the Department responds as
9 follows: At the present time, CDI has not determined which documents it may offer in evidence at
10 the hearing in this matter. The Department will provide the pre-filed direct testimony, including
11 exhibits, of any witness(es) it intends to offer in a timely manner and in accordance with the
12 Scheduling Order, and reserves its right to identify additional documents and things it intends to
13 offer as evidence at the hearing in this matter upon further discovery and receipt of the other
14 parties' witnesses' pre-filed direct testimony, and for purposes of rebuttal evidence at hearing.

15 **DISCOVERY REQUEST NO. 2:**

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

18 **RESPONSE TO DISCOVERY REQUEST NO. 2:**

19 The Department incorporates its General Objections above as though fully set forth
20 herein. The Department objects to this request as premature. Subject to and without waiving
21 these objections, or the General Objections incorporated herein, the Department responds as
22 follows: At the present time, the Department has not determined who will testify at hearing. The
23 Department will timely identify witnesses and provide its witnesses' pre-filed direct testimony in
24 accordance with the Scheduling Order in this matter, and reserves its right to identify additional
25 witnesses and supplement its witness list upon further discovery and receipt of the pre-filed direct
26 testimony from the other parties' witnesses, and for purposes of any rebuttal evidence at hearing.

27 ///

1 **DISCOVERY REQUEST NO. 3:**

2 Provide any, and all, STATEMENTS pertaining to the subject matter of the RATE
3 HEARING made by any witness whose testimony YOU intend to present in the RATE
4 HEARING on this matter, whether through declarations or live testimony.

5 **RESPONSE TO DISCOVERY REQUEST NO. 3:**

6 The Department incorporates its General Objections above as though fully set forth
7 herein. The Department objects to this request as premature. The Department further objects to
8 this request as vague, ambiguous, and overbroad and expansive as to time and scope so as to
9 place an undue burden on the Department to respond. The Department further objects to this
10 request to the extent it seeks documents protected by the Deliberative Process Privilege, the
11 Attorney-Client Privilege, and/or the Attorney Work Product doctrine. Subject to and without
12 waiving these objections, or the General Objections incorporated herein, the Department responds
13 as follows: At the present time, the Department has not determined who will testify at hearing.
14 The Department will timely identify witnesses and provide its witnesses' pre-filed direct
15 testimony in accordance with the Scheduling Order in this matter, and reserves its right to identify
16 additional witnesses and supplement its witness list upon further discovery and receipt of the pre-
17 filed direct testimony from the other parties' witnesses, and for purposes of any rebuttal evidence
18 at hearing.

19 **DISCOVERY REQUEST NO. 4:**

20 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO CDI analysis,
21 interpretation, or implementation of 10 CCR § 2644.27(f)(6) and the meaning of the
22 language contained therein, including the phrases "protect the insurer's solvency," "plan to
23 restore the financial condition," "insurer's condition is restored," and "compensate consumers
24 for excessive charges."

25 **RESPONSE TO DISCOVERY REQUEST NO. 4:**

26 The Department incorporates its General Objections above as though fully set forth
27 herein. Applicant State Farm General ("Applicant" or "State Farm"), not CDI, has the burden of
28

1 proving it is entitled to the rate changes it seeks in the rate applications. (CIC §1861.05(b); 10
2 CCR § 2646.) CDI objects to this request to the extent it seeks documents that are not relevant to
3 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
4 § 11507.6(e).) CWD, as an intervenor that intends to seek compensation if it makes a substantial
5 contribution to a final order by the Commissioner, cannot meet its burden of demonstrating a
6 substantial contribution by relying upon CDI's information and analyses. The Department further
7 objects to this request as vague, ambiguous, and overbroad and expansive as to time and scope so
8 as to place an undue burden on the Department to respond. The Department further objects to this
9 request to the extent it seeks documents protected by the Deliberative Process Privilege, the
10 Attorney-Client Privilege, and/or the Attorney Work Product doctrine. The Department further
11 objects to this request on the ground that it is vague and ambiguous with respect to the term
12 "analysis." The Department further objects to this request on the ground that it lacks foundation,
13 as it doesn't specify the conditions under which these phrases might be used or under which rate
14 application such an analysis might be considered. The Department further objects to this request
15 on the ground it calls for a legal conclusion from persons not authorized to speak for the
16 Department. Subject to and without waiving these objections, or the General Objections
17 incorporated herein, the Department responds as follows: Other than the rate applications and
18 other documents publicly available to all parties in this proceeding, including without limitation
19 documents publicly available through the Interim Rate Hearing that occurred in April 2025, the
20 Department is currently unaware of any non-privileged documents that may be relevant and
21 responsive to this request. The Department will provide its pre-filed direct testimony with
22 exhibits in a timely manner and in accordance with the Scheduling Order, and reserves its right to
23 file additional direct testimony and rebuttal testimony as may be required.

24 **DISCOVERY REQUEST NO. 5:**

25 Provide all DOCUMENTS or COMMUNICATIONS, other than DOCUMENTS and
26 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
27 RELATED TO whether, or on what terms, STATE FARM's parent company would provide any
28

1 form of financial assistance to STATE FARM in connection with the interim and/or final
2 resolution of THIS PROCEEDING.

3 **RESPONSE TO DISCOVERY REQUEST NO. 5:**

4 The Department incorporates its General Objections above as though fully set forth
5 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
6 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
7 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
8 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
9 intends to seek compensation if it makes a substantial contribution to a final order by the
10 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
11 upon CDI's information and analyses. The Department further objects to this request to the
12 extent that it seeks confidential documents under the Settlement Privilege set forth in 10 CCR
13 section 2656.4(a) and to the extent it seeks documents protected by the Deliberative Process
14 Privilege, the Attorney-Client Privilege, and/or the Attorney Work Product doctrine. Subject to
15 and without waiving these objections, or the General Objections incorporated herein, the
16 Department responds as follows: Other than the rate applications and other documents publicly
17 available to all parties in this proceeding, including without limitation documents publicly
18 available through the Interim Rate Hearing that occurred in April 2025, the Department is
19 currently unaware of any non-privileged documents that may be relevant and responsive to this
20 request. The Department will provide its pre-filed direct testimony with exhibits in a timely
21 manner and in accordance with the Scheduling Order, and reserves its right to file additional
22 direct testimony and rebuttal testimony as may be required.

23 **DISCOVERY REQUEST NO. 6:**

24 Provide all DOCUMENTS or COMMUNICATIONS, other than DOCUMENTS
25 and COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
26 RELATED TO whether STATE FARM's parent company has ever provided any form of
27 financial assistance to any other affiliate in the United States.

1 **RESPONSE TO DISCOVERY REQUEST NO. 6:**

2 The Department incorporates its General Objections above as though fully set forth
3 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to the
4 subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code, §
5 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
6 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
7 intends to seek compensation if it makes a substantial contribution to a final order by the
8 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
9 upon CDI's information and analyses. The Department further objects to this request on the
10 ground that it is overbroad and expansive as to time and scope, and vague and ambiguous as to
11 "financial assistance," so as to place an undue burden on the Department to respond, and to the
12 extent it seeks documents that are equally and publicly available to CWD. The Department
13 further objects to this request to the extent it seeks confidential documents which are statutorily
14 barred from production under any of the following: CIC sections 735.5(c), 739.8, 935.8, 1215.8,
15 and 12919, and Evid. Code sections 1040, and 1041. The Department further objects to this
16 request to the extent it seeks documents protected by the Deliberative Process Privilege, the
17 Attorney-Client Privilege, and/or the Attorney Work Product doctrine. The Department further
18 objects to this request to the extent it seeks confidential and/or inadmissible documents subject to
19 the Settlement Privilege set forth in 10 CCR section 2656.4(a). Subject to and without waiving
20 these objections, or the General Objections incorporated herein, the Department responds as
21 follows: Other than the rate applications and other documents publicly available to all parties in
22 this proceeding, including without limitation documents publicly available through the Interim
23 Rate Hearing that occurred in April 2025, the Department is currently unaware of any non-
24 privileged documents that may be relevant and responsive to this request.

25 **DISCOVERY REQUEST NO. 7:**

26 Provide all DOCUMENTS or COMMUNICATIONS, other than DOCUMENTS and
27 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
28

1 RELATED TO the impact on STATE FARM's applications in THIS PROCEEDING of the
2 financial assistance promised by State Farm's parent company in connection with the stipulation
3 adopted by the Commissioner on May 13, 2025

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

5 The Department incorporates its General Objections above as though fully set forth
6 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
7 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
8 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
9 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
10 intends to seek compensation if it makes a substantial contribution to a final order by the
11 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
12 upon CDI's information and analyses. The Department further objects to this request to the
13 extent it seeks documents protected by the Deliberative Process Privilege, the Attorney-Client
14 Privilege, and/or the Attorney Work Product doctrine. The Department further objects to this
15 request on the ground that it is vague and ambiguous as to "financial assistance," and overbroad
16 and expansive as to time and scope so as to place an undue burden on the Department to respond.
17 The Department objects to this request to the extent it seeks confidential documents which are
18 statutorily barred from production under any of the following: CIC sections 735.5(c), 739.8,
19 935.8, 1215.8, and 12919, and Evid. Code sections 1040, and 1041, and to the extent it seeks
20 confidential and/or inadmissible documents subject to the Settlement Privilege set forth in 10
21 CCR section 2656.4(a). Subject to and without waiving these objections, or the General
22 Objections incorporated herein, the Department responds as follows: Other than the testimony
23 and Declaration of Tina Shaw, Chief Actuary in the Rate Regulation Branch of the Department,
24 who previously testified and whose Declaration was produced at the Interim Rate Hearing, the
25 Department is currently not aware of any other non-privileged documents that may be relevant
26 and responsive to this request. The Department will provide its pre-filed direct testimony with
27 exhibits in a timely manner and in accordance with the Scheduling Order, and reserves its right to
28

1 file additional direct testimony and rebuttal testimony as may be required.

2 **DISCOVERY REQUEST NO. 8:**

3 Provide all DOCUMENTS or COMMUNICATIONS RELATED TO CDI analysis of
4 whether STATE FARM's rates, prior to its emergency rate request, were "confiscatory."

5 **RESPONSE TO DISCOVERY REQUEST NO. 8:**

6 The Department incorporates its General Objections above as though fully set forth
7 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to the
8 subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code, §
9 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
10 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
11 intends to seek compensation if it makes a substantial contribution to a final order by the
12 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
13 upon CDI's information and analyses. The Department further objects to this request to the
14 extent the term "confiscatory" is vague and ambiguous, and overbroad and expansive as to time
15 and scope so as to place an undue burden on the Department to respond. The Department further
16 objects to this request on the ground that it is vague and ambiguous with respect to the term
17 "analysis." The Department further objects to this request to the extent it seeks documents
18 protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney
19 Work Product doctrine. Subject to and without waiving this objection, or the General Objections
20 incorporated herein, the Department responds as follows: Other than documents that may be
21 publicly available as part of the rate hearing that took place with Applicant during 2015-16 in
22 matter no. PA-2015-00004, the Department is presently unaware of any non-privileged
23 documents that may be relevant and responsive to this request. The Department will provide its
24 pre-filed direct testimony with exhibits in a timely manner and in accordance with the Scheduling
25 Order, and reserves its right to file additional direct testimony and rebuttal testimony as may be
26 required.

27 ///

28

1 **DISCOVERY REQUEST NO. 9:**

2 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
3 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
4 RELATED TO stipulations between STATE FARM and CDI in THIS PROCEEDING between
5 June 1, 2024 and April 4, 2025.

6 **RESPONSE TO DISCOVERY REQUEST NO. 9:**

7 The Department incorporates its General Objections above as though fully set forth
8 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to the
9 subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code, §
10 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
11 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
12 intends to seek compensation if it makes a substantial contribution to a final order by the
13 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
14 upon CDI's information and analyses. The Department further objects to this request to the extent
15 it seeks confidential and inadmissible documents subject to the Settlement Privilege set forth in
16 10 CCR section 2656.4(a). The Department further objects to this request to the extent it seeks
17 documents protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or
18 the Attorney Work Product doctrine. Subject to and without waiving these objections, or the
19 General Objections incorporated herein, the Department responds as follows: Other than the two
20 stipulations executed in connection with the Interim Rate Hearing, copies of which CWD
21 received, and other documents publicly available to all parties in this proceeding, the Department
22 is presently unaware of any additional non-privileged documents that may be relevant and
23 responsive to this request.

24 **DISCOVERY REQUEST NO. 10:**

25 Provide all COMMUNICATIONS between STATE FARM and CDI, other than
26 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
27 RELATED TO STATE FARM's financial condition dated on or after June 1, 2024.

1 **RESPONSE TO DISCOVERY REQUEST NO. 10:**

2 The Department incorporates its General Objections above as though fully set forth
3 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
4 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
5 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
6 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
7 intends to seek compensation if it makes a substantial contribution to a final order by the
8 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
9 upon CDI's information and analyses. The Department further objects to this request to the extent
10 it seeks confidential documents which are statutorily barred from production under any of the
11 following: CIC sections 735.5(c), 739.8, 935.8, 1215.8, and 12919, and Evid. Code sections
12 1040, and 1041. The Department further objects to this request to the extent it seeks documents
13 protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney
14 Work Product doctrine. The Department further objects to this request to the extent it seeks
15 confidential and inadmissible documents subject to the settlement privilege set forth in 10 CCR
16 section 2656.4(a). Subject to and without waiving these objections, or the General Objections
17 incorporated herein, the Department responds as follows: The Department is presently unaware of
18 any additional non-privileged documents that may be relevant and responsive to this request.

19 **DISCOVERY REQUEST NO. 11:**

20 Provide all DOCUMENTS RELATED TO STATE FARM's financial condition, other
21 than DOCUMENTS already produced by CDI or made available to the public via SERFF, dated
22 on or after June 1, 2024.

23 **RESPONSE TO DISCOVERY REQUEST NO. 11:**

24 The Department incorporates its General Objections above as though fully set forth
25 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
26 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
27 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
28

1 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
2 intends to seek compensation if it makes a substantial contribution to a final order by the
3 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
4 upon CDI's information and analyses. The Department further objects to this request to the
5 extent it seeks confidential documents which are statutorily barred from production under any of
6 the following: CIC sections 735.5(c), 739.8, 935.8, 1215.8, and 12919, and Evid. Code sections
7 1040, and 1041. The Department further objects to this request to the extent it seeks documents
8 protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney
9 Work Product doctrine. Subject to and without waiving these objections, or the General
10 Objections incorporated herein, the Department responds as follows: The Department is presently
11 unaware of any additional non-privileged documents that may be relevant and responsive to this
12 request.

13 **DISCOVERY REQUEST NO. 12:**

14 Provide all DOCUMENTS, other than DOCUMENTS already produced by CDI or made
15 available to the public via SERFF, RELATED TO the corporate structure of STATE FARM, its
16 parent company and affiliates.

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

18 The Department incorporates its General Objections above as though fully set forth
19 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
20 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
21 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
22 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
23 intends to seek compensation if it makes a substantial contribution to a final order by the
24 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
25 upon CDI's information and analyses. The Department further objects to this request to the
26 extent it seeks confidential documents which are statutorily barred from production under any of
27 the following: CIC sections 735.5(c), 739.8, 935.8, 1215.8, and 12919, and Evid. Code sections
28

1 1040, and 1041. The Department further objects to this request to the extent it seeks documents
2 protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney
3 Work Product doctrine. Subject to and without waiving these objections, or the General
4 Objections incorporated herein, the Department responds as follows: Other than documents that
5 may be publicly available as part of the rate hearing that took place with Applicant during 2015-
6 16 in matter no. PA-2015-00004, the Department is presently unaware of any additional non-
7 privileged documents that may be relevant and responsive to this request.

8 **DISCOVERY REQUEST NO. 13:**

9 Provide all DOCUMENTS, other than DOCUMENTS already produced by CDI or made
10 available to the public via SERFF, RELATED TO the financial condition of STATE FARM's
11 parent company and affiliates when taken as a combined enterprise.

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

13 The Department incorporates its General Objections above as though fully set forth
14 herein. The Department objects to this request as premature. CDI further objects to this request to
15 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
16 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
17 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
18 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
19 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
20 demonstrating a substantial contribution by relying upon CDI's information and analyses. The
21 Department further objects to this request to the extent it seeks confidential documents which are
22 statutorily barred from production under any of the following: CIC sections 735.5(c), 739.8,
23 935.8, 1215.8, and 12919, and Evid. Code sections 1040, and 1041. The Department further
24 objects to this request to the extent it seeks documents protected by the Deliberative Process
25 Privilege, the Attorney-Client Privilege, and/or the Attorney Work Product doctrine. The
26 Department further objects to this request on the ground that it is overbroad and expansive as to
27 time and scope so as to place an undue burden on the Department to respond. Subject to and
28

1 without waiving these objections, or the General Objections incorporated herein, the Department
2 responds as follows: Other than documents that may be publicly available as part of the rate
3 hearing that took place with Applicant during 2015-16 in matter no. PA-2015-00004, the
4 Department is presently unaware of any additional non-privileged documents that may be
5 relevant and responsive to this request.

6 **DISCOVERY REQUEST NO. 14:**

7 Provide all DOCUMENTS, other than DOCUMENTS already produced by CDI or made
8 available to the public via SERFF, RELATED TO CDI analysis of STATE FARM's block or
9 individual non-renewal of policies to which THIS PROCEEDING applies.

10 **RESPONSE TO DISCOVERY REQUEST NO. 14:**

11 The Department incorporates its General Objections above as though fully set forth
12 herein. The Department objects to this request as premature. CDI further objects to this request to
13 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
14 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
15 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
16 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
17 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
18 demonstrating a substantial contribution by relying upon CDI's information and analyses. The
19 Department further objects to this request on the ground that it is overbroad and expansive as to
20 time and scope so as to place an undue burden on the Department to respond. The Department
21 further objects to this request on the ground that it is vague and ambiguous with respect to the
22 term "analysis." The Department further objects to this request to the extent it seeks documents
23 protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney
24 Work Product doctrine. The Department further objects to this request to the extent the
25 information sought is equally available through SERFF and other publicly available documents.
26 Subject to and without waiving these objections, or the General Objections incorporated herein,
27 the Department responds as follows: To the best of its present knowledge, information and belief,
28

1 the Department identifies the following rule filing applications as potentially containing relevant
2 documents: CDI file nos. 24-651 and 24-652, which may be accessed through the Department's
3 virtual viewing room: [https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-](https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-viewing-room/)
4 [viewing-room/](https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-viewing-room/). The Department will provide its pre-filed direct testimony with exhibits in a
5 timely manner and in accordance with the Scheduling Order, and reserves its right to file
6 additional direct testimony and rebuttal testimony as may be required.

7 **DISCOVERY REQUEST NO. 15:**

8 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
9 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
10 RELATED TO CDI analysis of the possible impact of the interim and final rate determinations in
11 this matter on STATE FARM's financial condition over the course of the next five years.

12 **RESPONSE TO DISCOVERY REQUEST NO. 15:**

13 The Department incorporates its General Objections above as though fully set forth
14 herein. The Department objects to this request as premature. CDI further objects to this request to
15 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
16 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
17 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
18 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
19 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
20 demonstrating a substantial contribution by relying upon CDI's information and analyses. The
21 Department further objects to this request to the extent it seeks documents protected by the
22 Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney Work Product
23 doctrine. The Department further objects to this request on the ground that it is vague and
24 ambiguous with respect to the terms "analysis" and "impact." The Department further objects to
25 this request to the extent it seeks confidential documents which are statutorily barred from
26 production under any of the following: CIC sections 735.5(c), 739.8, 935.8, 1215.8, and 12919,
27 and Evid. Code sections 1040, and 1041. Subject to and without waiving these objections, or the
28

1 General Objections incorporated herein, the Department is presently unaware of any non-
2 privileged documents that may be relevant and responsive to this request. The Department will
3 provide its pre-filed direct testimony with exhibits in a timely manner and in accordance with the
4 Scheduling Order, and reserves its right to file additional direct testimony and rebuttal testimony
5 as may be required.

6 **DISCOVERY REQUEST NO. 16:**

7 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
8 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
9 RELATED TO CDI analysis of the impact of the interim and final rate determinations in this
10 matter on STATE FARM policyholders' decisions to cancel or not to renew over the course of
11 the next five years.

12 **RESPONSE TO DISCOVERY REQUEST NO. 16:**

13 The Department incorporates its General Objections above as though fully set forth
14 herein. The Department objects to this request as premature. CDI further objects to this request to
15 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
16 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
17 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
18 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
19 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
20 demonstrating a substantial contribution by relying upon CDI's information and analyses. The
21 Department further objects to this request to the extent it seeks documents protected by the
22 Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney Work Product
23 doctrine. The Department further objects to this request on the ground that it is vague and
24 ambiguous with respect to the terms "analysis" and "impact," and overbroad and expansive as to
25 time and scope so as to place an undue burden on the Department to respond. Subject to and
26 without waiving these objections, or the General Objections incorporated herein, the Department
27 responds as follows: Other than the rate applications and other documents publicly available to all
28

1 parties in this proceeding, including without limitation documents publicly available through the
2 Interim Rate Hearing that occurred in April 2025, the Department is currently unaware of any
3 non-privileged documents that may be relevant and responsive to this request. The Department
4 will provide its pre-filed direct testimony with exhibits in a timely manner and in accordance with
5 the Scheduling Order, and reserves its right to file additional direct testimony and rebuttal
6 testimony as may be required.

7 **DISCOVERY REQUEST NO. 17:**

8 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
9 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
10 RELATED TO CDI analysis of the impact of interim and final rate determinations in this matter
11 on STATE FARM's cancellation of policies for non-payment of premium over the course of the
12 next five years.

13 **RESPONSE TO DISCOVERY REQUEST NO. 17:**

14 The Department incorporates its General Objections above as though fully set forth
15 herein. The Department objects to this request as premature. CDI further objects to this request to
16 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
17 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
18 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
19 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
20 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
21 demonstrating a substantial contribution by relying upon CDI's information and analyses. The
22 Department further objects to this request to the extent it seeks documents protected by the
23 Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney Work Product
24 doctrine. The Department further objects to this request on the ground that it is vague and
25 ambiguous with respect to the terms "analysis" and "impact," and overbroad and expansive as to
26 time and scope so as to place an undue burden on the Department to respond. Subject to and
27 without waiving these objections, or the General Objections incorporated herein, the Department
28

1 responds as follows: Other than the rate applications and other documents publicly available to all
2 parties in this proceeding, including without limitation documents publicly available through the
3 Interim Rate Hearing that occurred in April 2025, the Department is currently unaware of any
4 non-privileged documents that may be relevant and responsive to this request. The Department
5 will provide its pre-filed direct testimony with exhibits in a timely manner and in accordance with
6 the Scheduling Order, and reserves its right to file additional direct testimony and rebuttal
7 testimony as may be required.

8 **DISCOVERY REQUEST NO. 18:**

9 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
10 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
11 RELATED TO CDI analysis of the possible impact of interim and final rate determinations on the
12 availability of residential insurance in California’s insurance market over the course of the next
13 five years.

14 **RESPONSE TO DISCOVERY REQUEST NO. 18:**

15 The Department incorporates its General Objections above as though fully set forth
16 herein. The Department objects to this request as premature. CDI further objects to this request to
17 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
18 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
19 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
20 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
21 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
22 demonstrating a substantial contribution by relying upon CDI’s information and analyses. The
23 Department further objects to this request to the extent it seeks documents protected by the
24 Deliberative Process Privilege, the Attorney-Client Privilege, and/or Attorney Work Product
25 doctrine. The Department further objects to this request on the ground that it is vague and
26 ambiguous with respect to the terms “analysis” and “impact,” and overbroad and expansive as to
27 time and scope so as to place an undue burden on the Department to respond. Subject to and
28

1 without waiving these objections, or the General Objections incorporated herein, the Department
2 responds as follows: Other than the rate applications and other documents publicly available to all
3 parties in this proceeding, including without limitation documents publicly available through the
4 Interim Rate Hearing that occurred in April 2025, the Department is currently unaware of any
5 non-privileged documents that may be relevant and responsive to this request. The Department
6 will provide its pre-filed direct testimony with exhibits in a timely manner and in accordance with
7 the Scheduling Order, and reserves its right to file additional direct testimony and rebuttal
8 testimony as may be required.

9 **DISCOVERY REQUEST NO. 19:**

10 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
11 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
12 RELATED TO CDI analysis of STATE FARM's qualification for the ratemaking Variances
13 requested in its applications in THIS PROCEEDING.

14 **RESPONSE TO DISCOVERY REQUEST NO. 19:**

15 The Department incorporates its General Objections above as though fully set forth
16 herein. The Department objects to this request as premature. CDI further objects to this request to
17 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
18 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
19 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
20 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
21 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
22 demonstrating a substantial contribution by relying upon CDI's information and analyses. The
23 Department further objects to this request to the extent it seeks documents protected by the
24 Deliberative Process Privilege, the Attorney-Client Privilege, and/or Attorney Work Product
25 doctrine. The Department further objects to this request on the ground that it is vague and
26 ambiguous with respect to the terms "analysis" and unspecified "ratemaking Variances," and
27 overbroad and expansive as to time and scope so as to place an undue burden on the Department
28

1 to respond. Subject to and without waiving these objections, or the General Objections
2 incorporated herein, the Department responds as follows: Other than the rate applications and
3 other documents publicly available to all parties in this proceeding, including without limitation
4 documents publicly available through the Interim Rate Hearing that occurred in April 2025, the
5 Department is currently unaware of any non-privileged documents that may be relevant and
6 responsive to this request. The Department will provide its pre-filed direct testimony with
7 exhibits in a timely manner and in accordance with the Scheduling Order, and reserves its right to
8 file additional direct testimony and rebuttal testimony as may be required.

9 **DISCOVERY REQUEST NO. 20:**

10 Provide all COMMUNICATIONS between CDI staff and the Insurance Commissioner or
11 executive office personnel RELATED TO THIS PROCEEDING.

12 **RESPONSE TO DISCOVERY REQUEST NO. 20:**

13 The Department incorporates its General Objections above as though fully set forth
14 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
15 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
16 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
17 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
18 intends to seek compensation if it makes a substantial contribution to a final order by the
19 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
20 upon CDI's information and analyses. The Department further objects to this request on the
21 ground that it is vague and ambiguous as to the terms "CDI staff" and "executive office
22 personnel." The Department further objects to the extent that the documents sought are equally
23 available to CWD. The Department also objects to this request as vague, ambiguous, and
24 overbroad and expansive as to time and scope so as to place an undue burden on the Department
25 to respond. The Department further objects to this request to the extent it seeks documents
26 protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or Attorney
27 Work Product doctrine. Subject to and without waiving these objections, or the General

1 Objections incorporated herein, CDI responds that non-privileged responsive communications
2 between CDI staff and the Commissioner have been served on all parties in this matter, and are
3 equally available to CWD.

4 **DISCOVERY REQUEST NO. 21:**

5 Provide all COMMUNICATIONS between CDI or the Insurance Commissioner and any
6 rating agency (e.g., Illinois Department of Insurance) RELATED TO STATE FARM and/or
7 THIS PROCEEDING.

8 **RESPONSE TO DISCOVERY REQUEST NO. 21:**

9 The Department incorporates its General Objections above as though fully set forth
10 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
11 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
12 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
13 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
14 intends to seek compensation if it makes a substantial contribution to a final order by the
15 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
16 upon CDI's information and analyses. The Department further objects to this request on the
17 ground that it is vague and ambiguous as to the meaning of "rating agency"; the Department does
18 not understand the "Illinois Department of Insurance" to be a "rating agency." The Department
19 further objects to this request on the ground that it is overbroad and expansive as to time and
20 scope so as to place an undue burden on the Department to respond. The Department further
21 objects to this request to the extent it seeks confidential documents which are statutorily barred
22 from production under any of the following: CIC sections 735.5(c), 739.8, 935.8, 1215.8, and
23 12919, and Evid. Code sections 1040, and 1041. Subject to and without waiving these objections,
24 or the General Objections incorporated herein, the Department responds as follows: The
25 Department is unaware of any nonconfidential, nonprivileged documents responsive to this
26 request.

27 ///

28

1 **DISCOVERY REQUEST NO. 22:**

2 Provide all DOCUMENTS reflecting CDI's approval of any application by any insurer
3 during the preceding ten years for any of the variances requested by STATE FARM in THIS
4 PROCEEDING.

5 **RESPONSE TO DISCOVERY REQUEST NO. 22:**

6 The Department incorporates its General Objections above as though fully set forth
7 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to the
8 subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code, §
9 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
10 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
11 intends to seek compensation if it makes a substantial contribution to a final order by the
12 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
13 upon CDI's information and analyses. The Department further objects to this request on the basis
14 that non-privileged responsive documents, if any, are equally available to CWD through SERFF
15 and/or the Department's virtual viewing room. The Department further objects to this request on
16 the ground that it is overbroad and expansive as to time and scope and vague and ambiguous as to
17 the term "any of the variances" so as to place an undue burden on the Department to respond.

18 Subject to and without waiving these objections, or the General Objections incorporated
19 herein, and in an effort to assist CWD with its search of publicly available documents, the
20 Department refers Propounding Party to its responses to Applicant's Requests for Discovery in
21 which Applicant seeks documents related to variances 6 and 9 as follows:

22 To the best of its present knowledge, information, and belief, the Department identifies
23 the following rate applications in which insurers requested application of Variance 6: CDI File
24 Nos. 21-3225, 11-10279, 08-11854, 08-11853, 08-11851, and 07-7809. There may be additional
25 rate applications in which insurers have requested Variance 6. These identified rate applications
26 and any additional responsive documents are publicly available in rate applications filed with CDI
27 which may be accessed through the Department's virtual viewing room:

1 <https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-viewing-room/>.

2 To the best of its present knowledge, information, and belief, the Department identifies
3 the following rate applications in which insurers requested application of Variance 9: CDI File
4 Nos. 10-2526, 10-2601, 08-10004, 08-2581, 08-2582, 07-7593, 07-6489, 07-6490, 08-1409, 08-
5 842, 07-5794, 07-5795, 07-7809, 07-6508, 07-6507, 07-6504, 07-6503, 07-6501, 07-6500, 07-
6 6493, 07-6506, 07-6310, 07-4541, 07-4539, 07-4061. There may be additional rate applications
7 in which insurers have requested Variance 9. These identified rate applications and any
8 additional responsive documents are publicly available in rate applications filed with CDI which
9 may be accessed through the Department's virtual viewing room:

10 <https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-viewing-room/>.

11 **DISCOVERY REQUEST NO. 23:**

12 Provide all DOCUMENTS RELATED TO any request by STATE FARM to change the
13 terms of its coverage for "loss by fire" in its contracts with policyholders on or after January 1,
14 2017.

15 **RESPONSE TO DISCOVERY REQUEST NO. 23:**

16 The Department incorporates its General Objections above as though fully set forth
17 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
18 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
19 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
20 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
21 intends to seek compensation if it makes a substantial contribution to a final order by the
22 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
23 upon CDI's information and analyses. The Department further objects to this request to the
24 extent it seeks documents protected by the Deliberative Process Privilege, the Attorney-Client
25 Privilege, and/or Attorney Work Product doctrine. The Department further objects to this request
26 on the ground that the documents sought are publicly available on SERFF, and therefore equally
27 available to CWD. The Department further objects to this request on the ground that it is

1 overbroad and expansive as to time and scope so as to place an undue burden on the Department
2 to respond. Subject to and without waiving these objections, or the General Objections
3 incorporated herein, CDI responds that there may be responsive documents equally available to
4 CWD through the Department's virtual viewing room: [https://www.insurance.ca.gov/0250-](https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-viewing-room/)
5 [insurers/0800-rate-filings/0050-viewing-room/](https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-viewing-room/).

6 **DISCOVERY REQUEST NO. 24:**

7 Provide all DOCUMENTS RELATED TO studies and/or analyses conducted by CDI,
8 other than studies and/or analyses that are presently available to the public on the CDI website,
9 RELATED TO the claims handling practices of insurance companies in the Oakland Hills Fire
10 (1992), the Northridge Earthquake (1994), and wildfires from 2017 to the present, including but
11 not limited to the Eaton and Palisades fires in January 2025.

12 **RESPONSE TO DISCOVERY REQUEST NO. 24:**

13 The Department incorporates its General Objections above as though fully set forth
14 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
15 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
16 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
17 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
18 intends to seek compensation if it makes a substantial contribution to a final order by the
19 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
20 upon CDI's information and analyses. The Department further objects to this request on the
21 ground that it is overbroad and expansive as to time and scope so as to place an undue burden on
22 the Department to respond. The Department further objects to this request to the extent it seeks
23 documents protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or
24 the Attorney Work Product doctrine.

25 **DISCOVERY REQUEST NO. 25:**

26 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
27 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
28

1 RELATED TO the use of STATE FARM's insurance policies as collateral for mortgages,
2 generated from 2020 to the present.

3 **RESPONSE TO DISCOVERY REQUEST NO. 25:**

4 The Department incorporates its General Objections above as though fully set forth
5 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
6 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
7 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
8 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
9 intends to seek compensation if it makes a substantial contribution to a final order by the
10 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
11 upon CDI's information and analyses. The Department further objects to this request on the
12 ground that it is overbroad and expansive as to time and scope so as to place an undue burden on
13 the Department to respond. The Department further objects to this request to the extent it seeks
14 documents protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or
15 the Attorney Work Product doctrine. The Department further objects to this request on the ground
16 that any such documents are equally available to CWD. Subject to and without waiving these
17 objections, or the General Objections incorporated herein, the Department responds as follows:
18 The Department presently has no non-privileged responsive documents to this request other than
19 documents submitted as part of the Interim Rate Hearing which are equally available to CWD.
20 The Department will provide its pre-filed direct testimony with exhibits in a timely manner and in
21 accordance with the Scheduling Order, and reserves its right to file additional direct testimony
22 and rebuttal testimony as may be required.

23 **DISCOVERY REQUEST NO. 26:**

24 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any STATE FARM
25 policyholder complaints regarding any STATE FARM homeowners, rental dwelling, renters, or
26 condo rates, from 2020 to the present, including but not limited to complaints RELATED TO the
27 INTERIM RATE HEARING and THIS PROCEEDING.

1 **RESPONSE TO DISCOVERY REQUEST NO. 26:**

2 The Department incorporates its General Objections above as though fully set forth
3 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to the
4 subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code, §
5 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
6 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
7 intends to seek compensation if it makes a substantial contribution to a final order by the
8 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
9 upon CDI's information and analyses. The Department further objects to this request to the extent
10 it seeks confidential communications protected under CIC sections 735.5, 1858.35 and 12919,
11 and otherwise exempt from disclosure under the California Public Records Act under
12 Government Code section 6254(f). The Department further objects to this request on the ground
13 that it is overbroad and expansive as to time and scope so as to place an undue burden on the
14 Department to respond. The Department further objects to this request to the extent it seeks
15 documents protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or
16 the Attorney Work Product doctrine.

17 **DISCOVERY REQUEST NO. 27:**

18 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any STATE
19 FARM policyholder complaints RELATED TO the 2025 LOS ANGELES WILDFIRES.

20 **RESPONSE TO DISCOVERY REQUEST NO. 27:**

21 The Department incorporates its General Objections above as though fully set forth
22 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
23 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
24 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
25 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
26 intends to seek compensation if it makes a substantial contribution to a final order by the
27 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying

1 upon CDI's information and analyses. The Department further objects to this request to the
2 extent it seeks confidential communications protected under CIC sections 735.5, 1858.35 and
3 12919, and otherwise exempt from disclosure under the California Public Records Act under
4 Government Code section 6254(f). The Department further objects to this request on the ground
5 that it is overbroad and expansive as to time and scope so as to place an undue burden on the
6 Department to respond. The Department further objects to this request to the extent it seeks
7 documents protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or
8 the Attorney Work Product doctrine.

9
10 Dated: July 30, 2025

CALIFORNIA DEPARTMENT OF INSURANCE

11
12 By Jennifer McCune
Jennifer McCune

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE
In the Matter of the Rate Applications of
State Farm General Insurance Company, Applicant
CDI File Nos. PA-2024-00011 (RRB File #24-1273),
PA-2024-00012 (RRB File #24-1271 &
PA-2024-00013 (RRB File #24-1330)

I am over the age of eighteen years and am not a party to the within action. I am an employee of the Department of Insurance, State of California, employed at 1901 Harrison Street, 4th Floor, Oakland, CA 94612. On July 30, 2025, I served the following document(s):

CDI's OBJECTIONS AND RESPONSES TO
CONSUMER WATCHDOG'S DISCOVERY REQUESTS

on all persons named on the attached Service List, by the method of service indicated, as follows:

If **U.S. MAIL** is indicated, by placing on this date, true copies in sealed envelopes, addressed to each person indicated, in this office's facility for collection of outgoing items to be sent by mail, pursuant to Code of Civil Procedure Section 1013. I am familiar with this office's practice of collecting and processing documents placed for mailing by U.S. Mail. Under that practice, outgoing items are deposited, in the ordinary course of business, with the U.S. Postal Service on that same day, with postage fully prepaid, in the city and county of Oakland, California.

If **OVERNIGHT SERVICE** is indicated, by placing on this date, true copies in sealed envelopes, addressed to each person indicated, in this office's facility for collection of outgoing items for overnight delivery, pursuant to Code of Civil Procedure Section 1013. I am familiar with this office's practice of collecting and processing documents placed for overnight delivery. Under that practice, outgoing items are deposited, in the ordinary course of business, with an authorized courier or a facility regularly maintained by one of the following overnight services in the city and county of San Francisco, California: Express Mail, UPS, Federal Express, or Golden State overnight service, with an active account number shown for payment.

If **FAX SERVICE** is indicated, by facsimile transmission this date to fax number stated for the person(s) so marked.

If **PERSONAL SERVICE** is indicated, by hand delivery this date.

If **INTRA-AGENCY MAIL** is indicated, by placing this date in a place designated for collection for delivery by Department of Insurance intra-agency mail.

If **EMAIL** is indicated, by electronic mail transmission this date to the email address(es) listed.

Executed this date at Oakland, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.


Cecilia Padua

SERVICE LIST
In the Matter of the Rate Applications of
State Farm General Insurance Company, Applicant
CDI File Nos. PA-2024-00011 (RRB File #24-1273),
PA-2024-00012 (RRB File #24-1271 &
PA-2024-00013 (RRB File #24-1330)

<u>Name/Address</u>	<u>Phone/Fax Numbers</u>	<u>Method of Service</u>
Vanessa Wells Joe O'Connor Kristel Gelera Cathy Perry Attorneys for Applicant HOGAN LOVELLS US LLP 855 Main Street, Suite 200 Redwood City, CA 94063 Vanessa.Wells@hoganlovells.com Joe.Oconnor@hoganlovells.com Kristel.Gelera@hoganlovells.com Cathy.Perry@hoganlovells.com	Tel: (650) 463-4000 Fax: (650) 463-4199	Via EMAIL
Katherine Wellington Attorney(s) for Applicant HOGAN LOVELLS US LLP 125 High Street, Suite 2010 Boston, MA 02110 Katherine.Wellington@hoganlovells.com	Tel: (617) 371-1000 Fax: (617) 371-1037	Via EMAIL
Jordan D. Teti Attorney(s) for Applicant HOGAN LOVELLS US LLP 1999 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Jordan.Teti@hoganlovells.com	Tel: (310) 785-4600 Fax: (310) 785-4601	Via EMAIL
Harvey Rosenfield Pamela Pressley William Pletcher Ryan Mellino Benjamin Powell Attorneys for Intervenor CONSUMER WATCHDOG 6330 San Vicente Blvd., Suite 250 Los Angeles, CA 90048 harvey@consumerwatchdog.org pam@consumerwatchdog.org will@consumerwatchdog.org ryan@consumerwatchdog.org ben@consumerwatchdog.org	Tel: (310) 392-0522 Fax: (310) 392-8874	Via EMAIL

1
2 Heather Hoesterey
3 Assistant General Counsel
4 Legal Division
5 **CALIFORNIA DEPARTMENT OF**
6 **INSURANCE**
7 1901 Harrison Street, 6th Floor
8 Oakland, CA 94612
9 Heather.Hoesterey@insurance.ca.gov

Tel: (415) 538-4176
Fax: (510) 238-7829

Via EMAIL

7 Merritt David Farren, SBN 119721
8 26565 West Agoura Road, Suite 200
9 Calabasas, CA 91302
10 Merritt.Farren@farrenLLP.co

Tel: (818) 474-4610

Via EMAIL

10 **NON PARTY**

11 Margaret W. Hosel
12 Attorney and Public Advisor
13 Office of the Public Advisor
14 **CALIFORNIA DEPARTMENT OF**
15 **INSURANCE**
16 1901 Harrison Street, 6th Floor
17 Oakland, CA 94612
18 Margaret.Hosel@insurance.ca.gov

Tel: (415) 538-4383
Fax: (510) 238-7830

Via EMAIL

EXHIBIT 7

JENNIFER MCCUNE (SBN 160089)
LISBETH LANDSMAN (SBN 166973)
DANIEL WADE (SBN 296958)
DUNCAN MONTGOMERY (SBN 176138)
CALIFORNIA DEPARTMENT OF INSURANCE
1901 Harrison Street, Sixth Floor
Oakland, CA 94612
Tel: (415) 538-4162
Fax: (510) 238-7829
Email: jennifer.mccune@insurance.ca.gov
Lisbeth.landsman@insurance.ca.gov
daniel.wade@insurance.ca.gov
duncan.montgomery@insurance.ca.gov

Attorneys for The California Department of Insurance

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

In the Matter of the Rate Applications of

STATE FARM GENERAL
INSURANCE COMPANY,

Applicant.

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

**CDI's *AMENDED* OBJECTIONS AND
RESPONSES TO CONSUMER
WATCHDOG'S DISCOVERY REQUESTS**

PROPOUNDING PARTY: CONSUMER WATCHDOG ("CWD" or
"INTERVENOR")

RESPONDING PARTY: CALIFORNIA DEPARTMENT OF INSURANCE
("Department" or "CDI")

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

2
3
4

- 5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7

1 information or documents.

2 **SPECIFIC OBJECTIONS AND RESPONSES**

3 **DISCOVERY REQUEST NO. 1:**

4 Provide all DOCUMENTS YOU intend to offer into evidence for the RATE HEARING.

5 **RESPONSE TO DISCOVERY REQUEST NO. 1:**

6 The Department incorporates its General Objections above as though fully set forth
7 herein. The Department objects to this request as premature. Subject to and without waiving
8 these objections, or the General Objections incorporated herein, the Department responds as
9 follows: At the present time, CDI has not determined which documents it may offer in evidence at
10 the hearing in this matter. The Department will provide the pre-filed direct testimony, including
11 exhibits, of any witness(es) it intends to offer in a timely manner and in accordance with the
12 Scheduling Order, and reserves its right to identify additional documents and things it intends to
13 offer as evidence at the hearing in this matter upon further discovery and receipt of the other
14 parties' witnesses' pre-filed direct testimony, and for purposes of rebuttal evidence at hearing.

15 **DISCOVERY REQUEST NO. 2:**

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

18 **RESPONSE TO DISCOVERY REQUEST NO. 2:**

19 The Department incorporates its General Objections above as though fully set forth
20 herein. The Department objects to this request as premature. Subject to and without waiving
21 these objections, or the General Objections incorporated herein, the Department responds as
22 follows: At the present time, the Department has not determined who will testify at hearing. The
23 Department will timely identify witnesses and provide its witnesses' pre-filed direct testimony in
24 accordance with the Scheduling Order in this matter, and reserves its right to identify additional
25 witnesses and supplement its witness list upon further discovery and receipt of the pre-filed direct
26 testimony from the other parties' witnesses, and for purposes of any rebuttal evidence at hearing.

27 ///

1 **DISCOVERY REQUEST NO. 3:**

2 Provide any, and all, STATEMENTS pertaining to the subject matter of the RATE
3 HEARING made by any witness whose testimony YOU intend to present in the RATE
4 HEARING on this matter, whether through declarations or live testimony.

5 **RESPONSE TO DISCOVERY REQUEST NO. 3:**

6 The Department incorporates its General Objections above as though fully set forth
7 herein. The Department objects to this request as premature. The Department further objects to
8 this request as vague, ambiguous, and overbroad and expansive as to time and scope so as to
9 place an undue burden on the Department to respond. The Department further objects to this
10 request to the extent it seeks documents protected by the Deliberative Process Privilege, the
11 Attorney-Client Privilege, and/or the Attorney Work Product doctrine. Subject to and without
12 waiving these objections, or the General Objections incorporated herein, the Department responds
13 as follows: At the present time, the Department has not determined who will testify at hearing.
14 The Department will timely identify witnesses and provide its witnesses' pre-filed direct
15 testimony in accordance with the Scheduling Order in this matter, and reserves its right to identify
16 additional witnesses and supplement its witness list upon further discovery and receipt of the pre-
17 filed direct testimony from the other parties' witnesses, and for purposes of any rebuttal evidence
18 at hearing.

19 **DISCOVERY REQUEST NO. 4:**

20 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO CDI analysis,
21 interpretation, or implementation of 10 CCR § 2644.27(f)(6) and the meaning of the
22 language contained therein, including the phrases "protect the insurer's solvency," "plan to
23 restore the financial condition," "insurer's condition is restored," and "compensate consumers
24 for excessive charges."

25 **RESPONSE TO DISCOVERY REQUEST NO. 4:**

26 The Department incorporates its General Objections above as though fully set forth
27 herein. Applicant State Farm General ("Applicant" or "State Farm"), not CDI, has the burden of
28

1 proving it is entitled to the rate changes it seeks in the rate applications. (CIC §1861.05(b); 10
2 CCR § 2646.) CDI objects to this request to the extent it seeks documents that are not relevant to
3 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
4 § 11507.6(e).) CWD, as an intervenor that intends to seek compensation if it makes a substantial
5 contribution to a final order by the Commissioner, cannot meet its burden of demonstrating a
6 substantial contribution by relying upon CDI's information and analyses. The Department further
7 objects to this request as vague, ambiguous, and overbroad and expansive as to time and scope so
8 as to place an undue burden on the Department to respond. The Department further objects to this
9 request to the extent it seeks documents protected by the Deliberative Process Privilege, the
10 Attorney-Client Privilege, and/or the Attorney Work Product doctrine. The Department further
11 objects to this request on the ground that it is vague and ambiguous with respect to the term
12 "analysis." The Department further objects to this request on the ground that it lacks foundation,
13 as it doesn't specify the conditions under which these phrases might be used or under which rate
14 application such an analysis might be considered. The Department further objects to this request
15 on the ground it calls for a legal conclusion from persons not authorized to speak for the
16 Department. Subject to and without waiving these objections, or the General Objections
17 incorporated herein, the Department responds as follows: Please see the rate applications and
18 other documents publicly available to all parties in this proceeding, including without limitation,
19 documents publicly available through the Interim Rate Hearing that occurred in April 2025. The
20 Department will also produce other non-privileged documents that may be relevant and
21 responsive to this request. The Department will provide its pre-filed direct testimony with
22 exhibits in a timely manner and in accordance with the Scheduling Order, and reserves its right to
23 file additional direct testimony and rebuttal testimony as may be required.

24 **DISCOVERY REQUEST NO. 5:**

25 Provide all DOCUMENTS or COMMUNICATIONS, other than DOCUMENTS and
26 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
27 RELATED TO whether, or on what terms, STATE FARM's parent company would provide any
28

1 form of financial assistance to STATE FARM in connection with the interim and/or final
2 resolution of THIS PROCEEDING.

3 **RESPONSE TO DISCOVERY REQUEST NO. 5:**

4 The Department incorporates its General Objections above as though fully set forth
5 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
6 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
7 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
8 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
9 intends to seek compensation if it makes a substantial contribution to a final order by the
10 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
11 upon CDI's information and analyses. The Department further objects to this request to the
12 extent that it seeks confidential documents under the Settlement Privilege set forth in 10 CCR
13 section 2656.4(a) and to the extent it seeks documents protected by the Deliberative Process
14 Privilege, the Attorney-Client Privilege, and/or the Attorney Work Product doctrine. Subject to
15 and without waiving these objections, or the General Objections incorporated herein, the
16 Department responds as follows: Other than the rate applications and other documents publicly
17 available to all parties in this proceeding, including without limitation documents publicly
18 available through the Interim Rate Hearing that occurred in April 2025, the Department is
19 currently unaware of any non-privileged documents that may be relevant and responsive to this
20 request. The Department will provide its pre-filed direct testimony with exhibits in a timely
21 manner and in accordance with the Scheduling Order, and reserves its right to file additional
22 direct testimony and rebuttal testimony as may be required.

23 **DISCOVERY REQUEST NO. 6:**

24 Provide all DOCUMENTS or COMMUNICATIONS, other than DOCUMENTS
25 and COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
26 RELATED TO whether STATE FARM's parent company has ever provided any form of
27 financial assistance to any other affiliate in the United States.

1 **RESPONSE TO DISCOVERY REQUEST NO. 6:**

2 The Department incorporates its General Objections above as though fully set forth
3 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to the
4 subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code, §
5 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
6 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
7 intends to seek compensation if it makes a substantial contribution to a final order by the
8 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
9 upon CDI's information and analyses. The Department further objects to this request on the
10 ground that it is overbroad and expansive as to time and scope, and vague and ambiguous as to
11 "financial assistance," so as to place an undue burden on the Department to respond, and to the
12 extent it seeks documents that are equally and publicly available to CWD. The Department
13 further objects to this request to the extent it seeks confidential documents which are statutorily
14 barred from production under any of the following: CIC sections 735.5(c), 739.8, 935.8, 1215.8,
15 and 12919, and Evid. Code sections 1040, and 1041. The Department further objects to this
16 request to the extent it seeks documents protected by the Deliberative Process Privilege, the
17 Attorney-Client Privilege, and/or the Attorney Work Product doctrine. The Department further
18 objects to this request to the extent it seeks confidential and/or inadmissible documents subject to
19 the Settlement Privilege set forth in 10 CCR section 2656.4(a). Subject to and without waiving
20 these objections, or the General Objections incorporated herein, the Department responds as
21 follows: Other than the rate applications and other documents publicly available to all parties in
22 this proceeding, including without limitation documents publicly available through the Interim
23 Rate Hearing that occurred in April 2025, the Department is currently unaware of any non-
24 privileged documents that may be relevant and responsive to this request.

25 **DISCOVERY REQUEST NO. 7:**

26 Provide all DOCUMENTS or COMMUNICATIONS, other than DOCUMENTS and
27 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
28

1 RELATED TO the impact on STATE FARM's applications in THIS PROCEEDING of the
2 financial assistance promised by State Farm's parent company in connection with the stipulation
3 adopted by the Commissioner on May 13, 2025

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

5 The Department incorporates its General Objections above as though fully set forth
6 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
7 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
8 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
9 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
10 intends to seek compensation if it makes a substantial contribution to a final order by the
11 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
12 upon CDI's information and analyses. The Department further objects to this request to the
13 extent it seeks documents protected by the Deliberative Process Privilege, the Attorney-Client
14 Privilege, and/or the Attorney Work Product doctrine. The Department further objects to this
15 request on the ground that it is vague and ambiguous as to "financial assistance," and overbroad
16 and expansive as to time and scope so as to place an undue burden on the Department to respond.
17 The Department objects to this request to the extent it seeks confidential documents which are
18 statutorily barred from production under any of the following: CIC sections 735.5(c), 739.8,
19 935.8, 1215.8, and 12919, and Evid. Code sections 1040, and 1041, and to the extent it seeks
20 confidential and/or inadmissible documents subject to the Settlement Privilege set forth in 10
21 CCR section 2656.4(a). Subject to and without waiving these objections, or the General
22 Objections incorporated herein, the Department responds as follows: Other than the testimony
23 and Declaration of Tina Shaw, Chief Actuary in the Rate Regulation Branch of the Department,
24 who previously testified and whose Declaration was produced at the Interim Rate Hearing, the
25 Department is currently not aware of any other non-privileged documents that may be relevant
26 and responsive to this request. The Department will provide its pre-filed direct testimony with
27 exhibits in a timely manner and in accordance with the Scheduling Order, and reserves its right to
28

1 file additional direct testimony and rebuttal testimony as may be required.

2 **DISCOVERY REQUEST NO. 8:**

3 Provide all DOCUMENTS or COMMUNICATIONS RELATED TO CDI analysis of
4 whether STATE FARM's rates, prior to its emergency rate request, were "confiscatory."

5 **RESPONSE TO DISCOVERY REQUEST NO. 8:**

6 The Department incorporates its General Objections above as though fully set forth
7 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to the
8 subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code, §
9 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
10 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
11 intends to seek compensation if it makes a substantial contribution to a final order by the
12 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
13 upon CDI's information and analyses. The Department further objects to this request to the
14 extent the term "confiscatory" is vague and ambiguous, and overbroad and expansive as to time
15 and scope so as to place an undue burden on the Department to respond. The Department further
16 objects to this request on the ground that it is vague and ambiguous with respect to the term
17 "analysis." The Department further objects to this request to the extent it seeks documents
18 protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney
19 Work Product doctrine. Subject to and without waiving this objection, or the General Objections
20 incorporated herein, the Department responds as follows: Other than documents that may be
21 publicly available as part of the rate hearing that took place with Applicant during 2015-16 in
22 matter no. PA-2015-00004, the Department is presently unaware of any non-privileged
23 documents that may be relevant and responsive to this request. The Department will provide its
24 pre-filed direct testimony with exhibits in a timely manner and in accordance with the Scheduling
25 Order, and reserves its right to file additional direct testimony and rebuttal testimony as may be
26 required.

27 ///

1 **DISCOVERY REQUEST NO. 9:**

2 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
3 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
4 RELATED TO stipulations between STATE FARM and CDI in THIS PROCEEDING between
5 June 1, 2024 and April 4, 2025.

6 **RESPONSE TO DISCOVERY REQUEST NO. 9:**

7 The Department incorporates its General Objections above as though fully set forth
8 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to the
9 subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code, §
10 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
11 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
12 intends to seek compensation if it makes a substantial contribution to a final order by the
13 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
14 upon CDI's information and analyses. The Department further objects to this request to the extent
15 it seeks confidential and inadmissible documents subject to the Settlement Privilege set forth in
16 10 CCR section 2656.4(a). The Department further objects to this request to the extent it seeks
17 documents protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or
18 the Attorney Work Product doctrine. Subject to and without waiving these objections, or the
19 General Objections incorporated herein, the Department responds as follows: Other than the two
20 stipulations executed in connection with the Interim Rate Hearing, copies of which CWD
21 received, and other documents publicly available to all parties in this proceeding, the Department
22 is presently unaware of any additional non-privileged documents that may be relevant and
23 responsive to this request.

24 **DISCOVERY REQUEST NO. 10:**

25 Provide all COMMUNICATIONS between STATE FARM and CDI, other than
26 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
27 RELATED TO STATE FARM's financial condition dated on or after June 1, 2024.

1 **RESPONSE TO DISCOVERY REQUEST NO. 10:**

2 The Department incorporates its General Objections above as though fully set forth
3 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
4 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
5 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
6 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
7 intends to seek compensation if it makes a substantial contribution to a final order by the
8 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
9 upon CDI's information and analyses. The Department further objects to this request to the extent
10 it seeks confidential documents which are statutorily barred from production under any of the
11 following: CIC sections 735.5(c), 739.8, 935.8, 1215.8, and 12919, and Evid. Code sections
12 1040, and 1041. The Department further objects to this request to the extent it seeks documents
13 protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney
14 Work Product doctrine. The Department further objects to this request to the extent it seeks
15 confidential and inadmissible documents subject to the settlement privilege set forth in 10 CCR
16 section 2656.4(a). Subject to and without waiving these objections, or the General Objections
17 incorporated herein, the Department responds as follows: The Department is presently unaware of
18 any additional non-privileged documents that may be relevant and responsive to this request.

19 **DISCOVERY REQUEST NO. 11:**

20 Provide all DOCUMENTS RELATED TO STATE FARM's financial condition, other
21 than DOCUMENTS already produced by CDI or made available to the public via SERFF, dated
22 on or after June 1, 2024.

23 **RESPONSE TO DISCOVERY REQUEST NO. 11:**

24 The Department incorporates its General Objections above as though fully set forth
25 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
26 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
27 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
28

1 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
2 intends to seek compensation if it makes a substantial contribution to a final order by the
3 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
4 upon CDI's information and analyses. The Department further objects to this request to the
5 extent it seeks confidential documents which are statutorily barred from production under any of
6 the following: CIC sections 735.5(c), 739.8, 935.8, 1215.8, and 12919, and Evid. Code sections
7 1040, and 1041. The Department further objects to this request to the extent it seeks documents
8 protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney
9 Work Product doctrine. Subject to and without waiving these objections, or the General
10 Objections incorporated herein, the Department responds as follows: The Department is presently
11 unaware of any additional non-privileged documents that may be relevant and responsive to this
12 request.

13 **DISCOVERY REQUEST NO. 12:**

14 Provide all DOCUMENTS, other than DOCUMENTS already produced by CDI or made
15 available to the public via SERFF, RELATED TO the corporate structure of STATE FARM, its
16 parent company and affiliates.

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

18 The Department incorporates its General Objections above as though fully set forth
19 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
20 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
21 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
22 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
23 intends to seek compensation if it makes a substantial contribution to a final order by the
24 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
25 upon CDI's information and analyses. The Department further objects to this request to the
26 extent it seeks confidential documents which are statutorily barred from production under any of
27 the following: CIC sections 735.5(c), 739.8, 935.8, 1215.8, and 12919, and Evid. Code sections
28

1 1040, and 1041. The Department further objects to this request to the extent it seeks documents
2 protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney
3 Work Product doctrine. Subject to and without waiving these objections, or the General
4 Objections incorporated herein, the Department responds as follows: Other than documents that
5 may be publicly available as part of the rate hearing that took place with Applicant during 2015-
6 16 in matter no. PA-2015-00004, the Department is presently unaware of any additional non-
7 privileged documents that may be relevant and responsive to this request.

8 **DISCOVERY REQUEST NO. 13:**

9 Provide all DOCUMENTS, other than DOCUMENTS already produced by CDI or made
10 available to the public via SERFF, RELATED TO the financial condition of STATE FARM's
11 parent company and affiliates when taken as a combined enterprise.

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

13 The Department incorporates its General Objections above as though fully set forth
14 herein. The Department objects to this request as premature. CDI further objects to this request to
15 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
16 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
17 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
18 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
19 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
20 demonstrating a substantial contribution by relying upon CDI's information and analyses. The
21 Department further objects to this request to the extent it seeks confidential documents which are
22 statutorily barred from production under any of the following: CIC sections 735.5(c), 739.8,
23 935.8, 1215.8, and 12919, and Evid. Code sections 1040, and 1041. The Department further
24 objects to this request to the extent it seeks documents protected by the Deliberative Process
25 Privilege, the Attorney-Client Privilege, and/or the Attorney Work Product doctrine. The
26 Department further objects to this request on the ground that it is overbroad and expansive as to
27 time and scope so as to place an undue burden on the Department to respond. Subject to and
28

1 without waiving these objections, or the General Objections incorporated herein, the Department
2 responds as follows: Other than documents that may be publicly available as part of the rate
3 hearing that took place with Applicant during 2015-16 in matter no. PA-2015-00004, the
4 Department is presently unaware of any additional non-privileged documents that may be
5 relevant and responsive to this request.

6 **DISCOVERY REQUEST NO. 14:**

7 Provide all DOCUMENTS, other than DOCUMENTS already produced by CDI or made
8 available to the public via SERFF, RELATED TO CDI analysis of STATE FARM's block or
9 individual non-renewal of policies to which THIS PROCEEDING applies.

10 **RESPONSE TO DISCOVERY REQUEST NO. 14:**

11 The Department incorporates its General Objections above as though fully set forth
12 herein. The Department objects to this request as premature. CDI further objects to this request to
13 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
14 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
15 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
16 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
17 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
18 demonstrating a substantial contribution by relying upon CDI's information and analyses. The
19 Department further objects to this request on the ground that it is overbroad and expansive as to
20 time and scope so as to place an undue burden on the Department to respond. The Department
21 further objects to this request on the ground that it is vague and ambiguous with respect to the
22 term "analysis." The Department further objects to this request to the extent it seeks documents
23 protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney
24 Work Product doctrine. The Department further objects to this request to the extent the
25 information sought is equally available through SERFF and other publicly available documents.
26 Subject to and without waiving these objections, or the General Objections incorporated herein,
27 the Department responds as follows: To the best of its present knowledge, information and belief,
28

1 the Department identifies the following rule filing applications as potentially containing relevant
2 documents: CDI file nos. 24-651 and 24-652, which may be accessed through the Department's
3 virtual viewing room: [https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-](https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-viewing-room/)
4 [viewing-room/](https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-viewing-room/). The Department will provide its pre-filed direct testimony with exhibits in a
5 timely manner and in accordance with the Scheduling Order, and reserves its right to file
6 additional direct testimony and rebuttal testimony as may be required.

7 **DISCOVERY REQUEST NO. 15:**

8 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
9 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
10 RELATED TO CDI analysis of the possible impact of the interim and final rate determinations in
11 this matter on STATE FARM's financial condition over the course of the next five years.

12 **RESPONSE TO DISCOVERY REQUEST NO. 15:**

13 The Department incorporates its General Objections above as though fully set forth
14 herein. The Department objects to this request as premature. CDI further objects to this request to
15 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
16 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
17 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
18 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
19 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
20 demonstrating a substantial contribution by relying upon CDI's information and analyses. The
21 Department further objects to this request to the extent it seeks documents protected by the
22 Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney Work Product
23 doctrine. The Department further objects to this request on the ground that it is vague and
24 ambiguous with respect to the terms "analysis" and "impact." The Department further objects to
25 this request to the extent it seeks confidential documents which are statutorily barred from
26 production under any of the following: CIC sections 735.5(c), 739.8, 935.8, 1215.8, and 12919,
27 and Evid. Code sections 1040, and 1041. Subject to and without waiving these objections, or the
28

1 General Objections incorporated herein, the Department is presently unaware of any non-
2 privileged documents that may be relevant and responsive to this request. The Department will
3 provide its pre-filed direct testimony with exhibits in a timely manner and in accordance with the
4 Scheduling Order, and reserves its right to file additional direct testimony and rebuttal testimony
5 as may be required.

6 **DISCOVERY REQUEST NO. 16:**

7 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
8 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
9 RELATED TO CDI analysis of the impact of the interim and final rate determinations in this
10 matter on STATE FARM policyholders' decisions to cancel or not to renew over the course of
11 the next five years.

12 **RESPONSE TO DISCOVERY REQUEST NO. 16:**

13 The Department incorporates its General Objections above as though fully set forth
14 herein. The Department objects to this request as premature. CDI further objects to this request to
15 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
16 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
17 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
18 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
19 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
20 demonstrating a substantial contribution by relying upon CDI's information and analyses. The
21 Department further objects to this request to the extent it seeks documents protected by the
22 Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney Work Product
23 doctrine. The Department further objects to this request on the ground that it is vague and
24 ambiguous with respect to the terms "analysis" and "impact," and overbroad and expansive as to
25 time and scope so as to place an undue burden on the Department to respond. Subject to and
26 without waiving these objections, or the General Objections incorporated herein, the Department
27 responds as follows: Other than the rate applications and other documents publicly available to all
28

1 parties in this proceeding, including without limitation documents publicly available through the
2 Interim Rate Hearing that occurred in April 2025, the Department is currently unaware of any
3 non-privileged documents that may be relevant and responsive to this request. The Department
4 will provide its pre-filed direct testimony with exhibits in a timely manner and in accordance with
5 the Scheduling Order, and reserves its right to file additional direct testimony and rebuttal
6 testimony as may be required.

7 **DISCOVERY REQUEST NO. 17:**

8 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
9 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
10 RELATED TO CDI analysis of the impact of interim and final rate determinations in this matter
11 on STATE FARM's cancellation of policies for non-payment of premium over the course of the
12 next five years.

13 **RESPONSE TO DISCOVERY REQUEST NO. 17:**

14 The Department incorporates its General Objections above as though fully set forth
15 herein. The Department objects to this request as premature. CDI further objects to this request to
16 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
17 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
18 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
19 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
20 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
21 demonstrating a substantial contribution by relying upon CDI's information and analyses. The
22 Department further objects to this request to the extent it seeks documents protected by the
23 Deliberative Process Privilege, the Attorney-Client Privilege, and/or the Attorney Work Product
24 doctrine. The Department further objects to this request on the ground that it is vague and
25 ambiguous with respect to the terms "analysis" and "impact," and overbroad and expansive as to
26 time and scope so as to place an undue burden on the Department to respond. Subject to and
27 without waiving these objections, or the General Objections incorporated herein, the Department
28

1 responds as follows: Other than the rate applications and other documents publicly available to all
2 parties in this proceeding, including without limitation documents publicly available through the
3 Interim Rate Hearing that occurred in April 2025, the Department is currently unaware of any
4 non-privileged documents that may be relevant and responsive to this request. The Department
5 will provide its pre-filed direct testimony with exhibits in a timely manner and in accordance with
6 the Scheduling Order, and reserves its right to file additional direct testimony and rebuttal
7 testimony as may be required.

8 **DISCOVERY REQUEST NO. 18:**

9 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
10 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
11 RELATED TO CDI analysis of the possible impact of interim and final rate determinations on the
12 availability of residential insurance in California’s insurance market over the course of the next
13 five years.

14 **RESPONSE TO DISCOVERY REQUEST NO. 18:**

15 The Department incorporates its General Objections above as though fully set forth
16 herein. The Department objects to this request as premature. CDI further objects to this request to
17 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
18 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
19 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
20 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
21 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
22 demonstrating a substantial contribution by relying upon CDI’s information and analyses. The
23 Department further objects to this request to the extent it seeks documents protected by the
24 Deliberative Process Privilege, the Attorney-Client Privilege, and/or Attorney Work Product
25 doctrine. The Department further objects to this request on the ground that it is vague and
26 ambiguous with respect to the terms “analysis” and “impact,” and overbroad and expansive as to
27 time and scope so as to place an undue burden on the Department to respond. Subject to and
28

1 without waiving these objections, or the General Objections incorporated herein, the Department
2 responds as follows: Other than the rate applications and other documents publicly available to all
3 parties in this proceeding, including without limitation documents publicly available through the
4 Interim Rate Hearing that occurred in April 2025, the Department is currently unaware of any
5 non-privileged documents that may be relevant and responsive to this request. The Department
6 will provide its pre-filed direct testimony with exhibits in a timely manner and in accordance with
7 the Scheduling Order, and reserves its right to file additional direct testimony and rebuttal
8 testimony as may be required.

9 **DISCOVERY REQUEST NO. 19:**

10 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
11 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
12 RELATED TO CDI analysis of STATE FARM's qualification for the ratemaking Variances
13 requested in its applications in THIS PROCEEDING.

14 **RESPONSE TO DISCOVERY REQUEST NO. 19:**

15 The Department incorporates its General Objections above as though fully set forth
16 herein. The Department objects to this request as premature. CDI further objects to this request to
17 the extent that it seeks documents that are not relevant to the subject matter of this proceeding and
18 would not be admissible in this proceeding. (Gov. Code, § 11507.6(e).) Applicant, not CDI, has
19 the burden of proving it is entitled to the rate changes it seeks in the rate applications. (CIC
20 §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that intends to seek compensation if it
21 makes a substantial contribution to a final order by the Commissioner, cannot meet its burden of
22 demonstrating a substantial contribution by relying upon CDI's information and analyses. The
23 Department further objects to this request to the extent it seeks documents protected by the
24 Deliberative Process Privilege, the Attorney-Client Privilege, and/or Attorney Work Product
25 doctrine. The Department further objects to this request on the ground that it is vague and
26 ambiguous with respect to the terms "analysis" and unspecified "ratemaking Variances," and
27 overbroad and expansive as to time and scope so as to place an undue burden on the Department
28

1 to respond. Subject to and without waiving these objections, or the General Objections
2 incorporated herein, the Department responds as follows: Other than the rate applications and
3 other documents publicly available to all parties in this proceeding, including without limitation
4 documents publicly available through the Interim Rate Hearing that occurred in April 2025, the
5 Department is currently unaware of any non-privileged documents that may be relevant and
6 responsive to this request. The Department will provide its pre-filed direct testimony with
7 exhibits in a timely manner and in accordance with the Scheduling Order, and reserves its right to
8 file additional direct testimony and rebuttal testimony as may be required.

9 **DISCOVERY REQUEST NO. 20:**

10 Provide all COMMUNICATIONS between CDI staff and the Insurance Commissioner or
11 executive office personnel RELATED TO THIS PROCEEDING.

12 **RESPONSE TO DISCOVERY REQUEST NO. 20:**

13 The Department incorporates its General Objections above as though fully set forth
14 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
15 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
16 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
17 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
18 intends to seek compensation if it makes a substantial contribution to a final order by the
19 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
20 upon CDI's information and analyses. The Department further objects to this request on the
21 ground that it is vague and ambiguous as to the terms "CDI staff" and "executive office
22 personnel." The Department further objects to the extent that the documents sought are equally
23 available to CWD. The Department also objects to this request as vague, ambiguous, and
24 overbroad and expansive as to time and scope so as to place an undue burden on the Department
25 to respond. The Department further objects to this request to the extent it seeks documents
26 protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or Attorney
27 Work Product doctrine. Subject to and without waiving these objections, or the General
28

1 Objections incorporated herein, CDI responds that non-privileged responsive communications
2 between CDI staff and the Commissioner have been served on all parties in this matter, and are
3 equally available to CWD.

4 **DISCOVERY REQUEST NO. 21:**

5 Provide all COMMUNICATIONS between CDI or the Insurance Commissioner and any
6 rating agency (e.g., Illinois Department of Insurance) RELATED TO STATE FARM and/or
7 THIS PROCEEDING.

8 **RESPONSE TO DISCOVERY REQUEST NO. 21:**

9 The Department incorporates its General Objections above as though fully set forth
10 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
11 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
12 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
13 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
14 intends to seek compensation if it makes a substantial contribution to a final order by the
15 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
16 upon CDI's information and analyses. The Department further objects to this request on the
17 ground that it is vague and ambiguous as to the meaning of "rating agency"; the Department does
18 not understand the "Illinois Department of Insurance" to be a "rating agency." The Department
19 further objects to this request on the ground that it is overbroad and expansive as to time and
20 scope so as to place an undue burden on the Department to respond. The Department further
21 objects to this request to the extent it seeks confidential documents which are statutorily barred
22 from production under any of the following: CIC sections 735.5(c), 739.8, 935.8, 1215.8, and
23 12919, and Evid. Code sections 1040, and 1041. Subject to and without waiving these objections,
24 or the General Objections incorporated herein, the Department responds as follows: The
25 Department is unaware of any nonconfidential, nonprivileged documents responsive to this
26 request.

27 ///

28

1 **DISCOVERY REQUEST NO. 22:**

2 Provide all DOCUMENTS reflecting CDI's approval of any application by any insurer
3 during the preceding ten years for any of the variances requested by STATE FARM in THIS
4 PROCEEDING.

5 **RESPONSE TO DISCOVERY REQUEST NO. 22:**

6 The Department incorporates its General Objections above as though fully set forth
7 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to the
8 subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code, §
9 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
10 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
11 intends to seek compensation if it makes a substantial contribution to a final order by the
12 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
13 upon CDI's information and analyses. The Department further objects to this request on the basis
14 that non-privileged responsive documents, if any, are equally available to CWD through SERFF
15 and/or the Department's virtual viewing room. The Department further objects to this request on
16 the ground that it is overbroad and expansive as to time and scope and vague and ambiguous as to
17 the term "any of the variances" so as to place an undue burden on the Department to respond.

18 Subject to and without waiving these objections, or the General Objections incorporated
19 herein, and in an effort to assist CWD with its search of publicly available documents, the
20 Department refers Propounding Party to its responses to Applicant's Requests for Discovery in
21 which Applicant seeks documents related to variances 6 and 9 as follows:

22 To the best of its present knowledge, information, and belief, the Department identifies
23 the following rate applications in which insurers requested application of Variance 6: CDI File
24 Nos. 21-3225, 11-10279, 08-11854, 08-11853, 08-11851, and 07-7809. There may be additional
25 rate applications in which insurers have requested Variance 6. These identified rate applications
26 and any additional responsive documents are publicly available in rate applications filed with CDI
27 which may be accessed through the Department's virtual viewing room:

1 <https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-viewing-room/>.

2 To the best of its present knowledge, information, and belief, the Department identifies
3 the following rate applications in which insurers requested application of Variance 9: CDI File
4 Nos. 10-2526, 10-2601, 08-10004, 08-2581, 08-2582, 07-7593, 07-6489, 07-6490, 08-1409, 08-
5 842, 07-5794, 07-5795, 07-7809, 07-6508, 07-6507, 07-6504, 07-6503, 07-6501, 07-6500, 07-
6 6493, 07-6506, 07-6310, 07-4541, 07-4539, 07-4061. There may be additional rate applications
7 in which insurers have requested Variance 9. These identified rate applications and any
8 additional responsive documents are publicly available in rate applications filed with CDI which
9 may be accessed through the Department's virtual viewing room:

10 <https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-viewing-room/>.

11 **DISCOVERY REQUEST NO. 23:**

12 Provide all DOCUMENTS RELATED TO any request by STATE FARM to change the
13 terms of its coverage for "loss by fire" in its contracts with policyholders on or after January 1,
14 2017.

15 **RESPONSE TO DISCOVERY REQUEST NO. 23:**

16 The Department incorporates its General Objections above as though fully set forth
17 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
18 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
19 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
20 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
21 intends to seek compensation if it makes a substantial contribution to a final order by the
22 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
23 upon CDI's information and analyses. The Department further objects to this request to the
24 extent it seeks documents protected by the Deliberative Process Privilege, the Attorney-Client
25 Privilege, and/or Attorney Work Product doctrine. The Department further objects to this request
26 on the ground that the documents sought are publicly available on SERFF, and therefore equally
27 available to CWD. The Department further objects to this request on the ground that it is

1 overbroad and expansive as to time and scope so as to place an undue burden on the Department
2 to respond. Subject to and without waiving these objections, or the General Objections
3 incorporated herein, CDI responds that there may be responsive documents equally available to
4 CWD through the Department's virtual viewing room: [https://www.insurance.ca.gov/0250-](https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-viewing-room/)
5 [insurers/0800-rate-filings/0050-viewing-room/](https://www.insurance.ca.gov/0250-insurers/0800-rate-filings/0050-viewing-room/).

6 **DISCOVERY REQUEST NO. 24:**

7 Provide all DOCUMENTS RELATED TO studies and/or analyses conducted by CDI,
8 other than studies and/or analyses that are presently available to the public on the CDI website,
9 RELATED TO the claims handling practices of insurance companies in the Oakland Hills Fire
10 (1992), the Northridge Earthquake (1994), and wildfires from 2017 to the present, including but
11 not limited to the Eaton and Palisades fires in January 2025.

12 **RESPONSE TO DISCOVERY REQUEST NO. 24:**

13 The Department incorporates its General Objections above as though fully set forth
14 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
15 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
16 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
17 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
18 intends to seek compensation if it makes a substantial contribution to a final order by the
19 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
20 upon CDI's information and analyses. The Department further objects to this request on the
21 ground that it is overbroad and expansive as to time and scope so as to place an undue burden on
22 the Department to respond. The Department further objects to this request to the extent it seeks
23 documents protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or
24 the Attorney Work Product doctrine.

25 **DISCOVERY REQUEST NO. 25:**

26 Provide all DOCUMENTS and COMMUNICATIONS, other than DOCUMENTS and
27 COMMUNICATIONS already produced by CDI or made available to the public via SERFF,
28

1 RELATED TO the use of STATE FARM's insurance policies as collateral for mortgages,
2 generated from 2020 to the present.

3 **RESPONSE TO DISCOVERY REQUEST NO. 25:**

4 The Department incorporates its General Objections above as though fully set forth
5 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
6 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
7 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
8 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
9 intends to seek compensation if it makes a substantial contribution to a final order by the
10 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
11 upon CDI's information and analyses. The Department further objects to this request on the
12 ground that it is overbroad and expansive as to time and scope so as to place an undue burden on
13 the Department to respond. The Department further objects to this request to the extent it seeks
14 documents protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or
15 the Attorney Work Product doctrine. The Department further objects to this request on the ground
16 that any such documents are equally available to CWD. Subject to and without waiving these
17 objections, or the General Objections incorporated herein, the Department responds as follows:
18 The Department presently has no non-privileged responsive documents to this request other than
19 documents submitted as part of the Interim Rate Hearing which are equally available to CWD.
20 The Department will provide its pre-filed direct testimony with exhibits in a timely manner and in
21 accordance with the Scheduling Order, and reserves its right to file additional direct testimony
22 and rebuttal testimony as may be required.

23 **DISCOVERY REQUEST NO. 26:**

24 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any STATE FARM
25 policyholder complaints regarding any STATE FARM homeowners, rental dwelling, renters, or
26 condo rates, from 2020 to the present, including but not limited to complaints RELATED TO the
27 INTERIM RATE HEARING and THIS PROCEEDING.

1 **RESPONSE TO DISCOVERY REQUEST NO. 26:**

2 The Department incorporates its General Objections above as though fully set forth
3 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to the
4 subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code, §
5 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
6 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
7 intends to seek compensation if it makes a substantial contribution to a final order by the
8 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying
9 upon CDI's information and analyses. The Department further objects to this request to the extent
10 it seeks confidential communications protected under CIC sections 735.5, 1858.35 and 12919,
11 and otherwise exempt from disclosure under the California Public Records Act under
12 Government Code section 6254(f). The Department further objects to this request on the ground
13 that it is overbroad and expansive as to time and scope so as to place an undue burden on the
14 Department to respond. The Department further objects to this request to the extent it seeks
15 documents protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or
16 the Attorney Work Product doctrine.

17 **DISCOVERY REQUEST NO. 27:**

18 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any STATE
19 FARM policyholder complaints RELATED TO the 2025 LOS ANGELES WILDFIRES.

20 **RESPONSE TO DISCOVERY REQUEST NO. 27:**

21 The Department incorporates its General Objections above as though fully set forth
22 herein. CDI objects to this request to the extent that it seeks documents that are not relevant to
23 the subject matter of this proceeding and would not be admissible in this proceeding. (Gov. Code,
24 § 11507.6(e).) Applicant, not CDI, has the burden of proving it is entitled to the rate changes it
25 seeks in the rate applications. (CIC §1861.05(b); 10 CCR § 2646.5.) CWD, as an intervenor that
26 intends to seek compensation if it makes a substantial contribution to a final order by the
27 Commissioner, cannot meet its burden of demonstrating a substantial contribution by relying

1 upon CDI's information and analyses. The Department further objects to this request to the
2 extent it seeks confidential communications protected under CIC sections 735.5, 1858.35 and
3 12919, and otherwise exempt from disclosure under the California Public Records Act under
4 Government Code section 6254(f). The Department further objects to this request on the ground
5 that it is overbroad and expansive as to time and scope so as to place an undue burden on the
6 Department to respond. The Department further objects to this request to the extent it seeks
7 documents protected by the Deliberative Process Privilege, the Attorney-Client Privilege, and/or
8 the Attorney Work Product doctrine.

9
10 Dated: August 5, 2025

CALIFORNIA DEPARTMENT OF INSURANCE

11
12 By Jennifer McCune
Jennifer McCune

EXHIBIT 8



August 12, 2025

Via email

Nikki S. McKennedy
Jennifer McCune
California Department of Insurance
1901 Harrison Street, Sixth Floor
Oakland, CA 94612
Tel: (415) 538-4162
Fax: (510) 238-7829
nikki.mckennedy@insurance.ca.gov
jennifer.mccune@insurance.ca.gov

Re: CDI Responses to Consumer Watchdog Discovery Requests in the
Matters of State Farm, File Nos. PA-2024-00011, 00012, 00013

Dear Ms. McKennedy and Ms. McCune:

We are in receipt of the California Department of Insurance's ("CDI") August 5, 2025 objections and production in response to Consumer Watchdog's discovery requests in the above-referenced matters. This letter is intended to serve as a guide to structure our meet and confer call scheduled for August 13, 2025. As you are aware, motions to compel further discovery responses are due to the ALJ by August 20, 2025. If we cannot resolve the issues stated below, Consumer Watchdog intends to file such a motion.

Consumer Watchdog's requests are reasonably calculated to lead to the discovery of admissible evidence, and CDI's near-blanket refusal to produce documents in response is misplaced and contrary to law.

General Privilege Objections

Throughout its objections, CDI repeatedly asserts that Consumer Watchdog's requests seek privileged documents and information, citing various privileges including the deliberative process, attorney-client, and attorney work product privileges. However, as CDI did not produce a privilege log, it is unclear whether it is actually withholding any documents or information from production based on these privileges. Please clarify whether this is the case. If documents are being withheld based on privilege, CDI must provide a privilege log in order to comply

with 10 CCR § 2655.1(b), which requires “a list specifically identifying the items not produced that are responsive to the request, in a form that can be read in connection with the specifically stated objections for each requested item that is not made available” and “specify precisely why the stated objection applies to the specific item withheld.”

Specific Privilege Objections

Request No. 20 seeks “communications between CDI staff and the Insurance Commissioner or executive office personnel related to this proceeding.” CDI’s response notes that “non-privileged responsive communications between CDI staff and the Commissioner have been served on all parties in this matter...” Please clarify the CDI’s response to this request; are we to understand that there are also responsive communications that CDI is withholding on the basis of privilege?

Similarly, Request No. 21 seeks communications between CDI or the Insurance Commissioner and entities such as the Illinois Department of Insurance related to State Farm and/or this proceeding. CDI’s response notes that CDI is “unaware of any nonconfidential, nonprivileged documents responsive to this request.” Does this mean CDI is aware of confidential or privileged documents that are also responsive?

Relevance Objections

Most of CDI’s responses to Consumer Watchdog’s requests indicate that the “Department is currently unaware of any non-privileged documents that may be relevant and responsive” to a given request. Please clarify what is meant by this response. Does this mean that CDI has determined that responsive documents would not be relevant and is thus refusing to conduct a search? Or that CDI has conducted a search and located responsive documents, but has deemed them irrelevant and is refusing to produce them? Or that CDI has conducted a search and found nothing responsive at all? In order for Consumer Watchdog to meaningfully move forward in preparing a potential motion to compel, CDI must clarify these ambiguities in its near-universal responses.

Specific Relevance Objections

CDI objects on relevance grounds to a number of Consumer Watchdog’s requests implicating State Farm General’s financial condition (see, e.g., Request Nos. 4, 10, 11, 15). Please clarify CDI’s position in regard to this category of documents. Is CDI’s position that documents and information related to State Farm’s financial condition are per se irrelevant to these proceedings? As noted above, clarification on this point is critical to Consumer Watchdog’s ability to appropriately craft a motion to compel should it become necessary.

Request No. 24 seeks “documents related to studies and/or analyses conducted by CDI, other than studies and/or analyses that are presently available to the public on the CDI website, related to the claims handling practices of insurance companies in the Oakland Hills Fire (1992), the Northridge Earthquake (1994), and wildfires from 2017 to the present, including but not limited to the Eaton and Palisades fires in January 2025.” Please confirm CDI’s position with regard to this request. Is CDI responding with a blanket refusal to search, or could the request be narrowed in such a way as to resolve CDI’s objections?

Similarly, Request Nos. 26 and 27 seek documents and communications related to complaints from State Farm policyholders. Are CDI’s objections to these Requests to be understood as blanket refusals to search, or could the requests be narrowed in such a way that would resolve the objections?

We look forward to meeting and conferring tomorrow.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ben Powell", with a stylized flourish at the end.

Benjamin Powell
Consumer Watchdog

EXHIBIT 9

CDI PRIVILEGE LOG

PA-2024-00011; PA-2024-00012; PA-2024-00013

DOC	Date of Document	Document Type	Author	Recipient(s)	CC's	Document Description	Responsive to Document Request #s	Privilege Asserted/ Basis for Withholding ¹
1	May 1, 2025	Email	Schmitz, Timothy (IL DOI)	Inouye, Regina	Yang, Sandy; Zarate, Victoria	Email "RE: State Farm General Insurance Company – Request for Insurer Profile Summary as of 12/31/24"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
1A	May 1, 2025	Attachment				"ILLINOIS DEPARTMENT OF INSURANCE / INSURER PROFILE SUMMARY / STATE FARM GENERAL INSURANCE COMPANY / As of December 31, 2024, Updated as of March 25, 2025"	SFG's Req. No. 1; CW's Req. Nos. 11 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)

¹ By asserting certain privileges and protections herein, CDI does not waive its right to assert other relevant privileges and/or protections. Please note CDI reserves its right to further supplement this privilege log as necessary.

DOC	Date of Document	Document Type	Author	Recipient(s)	CC's	Document Description	Responsive to Document Request #s	Privilege Asserted/ Basis for Withholding ¹
2	May 1, 2025	Email	Schmitz, Timothy (IL DOI)	Inouye, Regina	Yang, Sandy; Zarate, Victoria	Email "RE: State Farm General Insurance Company – Request for Insurer Profile Summary as of 12/31/24"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
2A	May 1, 2025	Attachment				"ILLINOIS DEPARTMENT OF INSURANCE / INSURER PROFILE SUMMARY / STATE FARM GENERAL INSURANCE COMPANY / As of December 31, 2024, Updated as of March 25, 2025"	SFG's Req. No. 1; CW's Req. Nos. 11 and 21	CIC §§ 735.5, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
3	Jun 4, 2025	Email	Inouye, Regina	Schmitz, Timothy (IL DOI)	Yang, Sandy; Zarate, Victoria; Whalen, Shannon (IL DOI); Meismer, Sean (IL DOI)	Email "RE: State Farm General Insurance Company – Request for Insurer Profile Summary as of 12/31/24"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)

DOC	Date of Document	Document Type	Author	Recipient(s)	CC's	Document Description	Responsive to Document Request #s	Privilege Asserted/ Basis for Withholding ¹
4	Jun 18, 2025	Email	Inouye, Regina	Meismer, Sean (IL DOI); Schmitz, Timothy (IL DOI)	Yang, Sandy; Zarate, Victoria; Whalen, Shannon (IL DOI)	Email "RE: State Farm General Insurance Company – Request for Insurer Profile Summary as of 12/31/24"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
4A	Jun 18, 2025	Attachment	Hom, Jack	Mancias, Michelle (SF)	Inouye, Regina	"RE: State Farm General Insurance Company – Form D Application -- Surplus Note – APP-2025-00596; IDB #25-621"	SFG's Req. No. 1; CW's Req. Nos. 5, 11 and 21	CIC §§ 735.5, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
5	Apr 21, 2025	Email	Schmitz, Timothy (IL DOI)	Lo, Michelle	Yang, Sandy; Whalen, Shannon (IL DOI); Khan, Wajahat	Email "RE: Confidential Regulator Communication – State Farm General Insurance Company (IL-25151)"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
5A	Apr 17, 2025	Attachment	Kelly Edwards (SF)	Ann Gillespie (IL DOI)		"RE: SF General Ins. Co. – YE 2024 RBC Company Action Level Event" with Appendices	SFG's Req. No. 1; CW's Req. Nos. 11 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)

DOC	Date of Document	Document Type	Author	Recipient(s)	CC's	Document Description	Responsive to Document Request #s	Privilege Asserted/ Basis for Withholding ¹
6	Apr 21, 2025	Email	Schmitz, Timothy (IL DOI)	Lo, Michelle	Yang, Sandy; Whalen, Shannon (IL DOI); Khan, Wajahat	Email "RE: Confidential Regulator Communication – State Farm General Insurance Company (IL-25151)"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
6A	Apr 21, 2025	Attachment	Kelly Edwards (SF)	Ann Gillespie (IL DOI)		"RE: SF General Ins. Co. – YE 2024 RBC Company Action Level Event" with Appendices	SFG's Req. No. 1; CW's Req. Nos. 11 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
7	May 29, 2025	Email	Schmitz, Timothy (IL DOI)	Inouye, Regina	Yang, Sandy; Zarate, Victoria; Whalen, Shannon (IL DOI); Meismer, Sean (IL DOI)	Email "RE: State Farm General Insurance Company – Request for Insurer Profile Summary as of 12/31/24"	SFG's Req. No. 1; CW's Req. Nos. 5, 10 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
8	Jan 29, 2025	Email	Andersen, Cindy (IL DOI)	Clements, Laura; Lo, Michelle; Dillon, Sayaka	Whalen, Shannon (IL DOI); Shaw, Casey (IL DOI)	Email "Call on State Farm General"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)

DOC	Date of Document	Document Type	Author	Recipient(s)	CC's	Document Description	Responsive to Document Request #s	Privilege Asserted/ Basis for Withholding ¹
9	Aug 8, 2023	Zoom meeting invitation	Lo, Michelle	Organizer: Commissioner Ricardo Lara Required Attendees: Commissioner Ricardo Lara; Allen, Ken; Schnoll, Kenneth; Lo, Michelle; Uppal, Jasveet Optional Attendees: Martinez, Michael; Cimini, Edward; Teresa Campbell; Yang, Sandy; Lucy F. Wang	Allen, Ken; Schnoll, Kenneth; Lo, Michelle; Uppal, Jasveet; Cimini, Edward; Campbell, Teresa; Yang, Sandy; Wang, Lucy	Subject "Meet with Insurance Director Dana Popish Severinghaus of Illinois Department of Insurance (Virtual)"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 1215.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
10	Jul 30, 2025	Email	Frazier, Rex (PIFC)	Campbell, Teresa; Allen, Ken		Email "RE: Avoiding Serial 6.9% Filings"	SFG's Req. No. 2	CIC § 12919; CCP § 2018.030
11	May 13, 2025	Email	Clements, Laura	Whalen, Shannon (IL DOI); Shaw, Casey (IL DOI); Andersen, Cindy (IL DOI); Schmitz, Timothy (IL DOI); Wajahat, Khan	Lo, Michelle; Yang, Sandy	Email "FW: Commissioner Lara adopts judge's ruling on State Farm emergency rates, balancing consumer protections and financial solvency"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 1215.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)

DOC	Date of Document	Document Type	Author	Recipient(s)	CC's	Document Description	Responsive to Document Request #s	Privilege Asserted/ Basis for Withholding¹
12	Jan 16, 2025	Email	Andersen, Cindy (IL DOI)	Clements, Laura	Whalen, Shannon (IL DOI); Shaw, Casey (IL DOI)	Email "FW: State Farm General call with Illinois and California"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
13	May 13, 2025	Email	Whalen, Shannon (IL DOI)	Clements, Laura; Andersen, Cindy (IL DOI); Shaw, Casey (IL DOI); Schmitz, Timothy (IL DOI); Wajahat, Khan	Lo, Michelle; Yang, Sandy	Email "RE: Commissioner Lara adopts judge's ruling on State Farm emergency rates, balancing consumer protections and financial solvency"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 1215.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
14	Jan 13, 2025	Email	Whalen, Shannon (IL DOI)	Clements, Laura; Andersen, Cindy (IL DOI)	Martinez, Michael; Shaw, Casey (IL DOI); Lo, Michelle	Email "RE: State Farm General"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
15	Jan 13, 2025	Email	Whalen, Shannon (IL DOI)	Clements, Laura; Andersen, Cindy (IL DOI)	Martinez, Michael; Shaw, Casey (IL DOI); Lo, Michelle	Email "RE: State Farm General"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)

DOC	Date of Document	Document Type	Author	Recipient(s)	CC's	Document Description	Responsive to Document Request #s	Privilege Asserted/ Basis for Withholding¹
16	Jan 13, 2025	Email	Clements, Laura	Whalen, Shannon (IL DOI); Andersen, Cindy (IL DOI)	Martinez, Michael; Shaw, Casey (IL DOI); Lo, Michelle	Email re Sharing of information between IL DOI and CDI "RE: State Farm General"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
17	Jan 15, 2025	Email	Andersen, Cindy (IL DOI)	Clements, Laura		Email "RE: State Farm General"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
18	Jan 6, 2025	Email	Andersen, Cindy (IL DOI)	Clements, Laura; Whalen, Shannon (IL DOI)	Martinez, Michael; Shaw, Casey (IL DOI)	Email "RE: State Farm General"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
19	Jan 6, 2025	Email	Clements, Laura	Whalen, Shannon (IL DOI); Andersen, Cindy (IL DOI)	Martinez, Michael	Email "RE: State Farm General"	SFG's Req. No. 1; CW's Req. Nos. 10 and 21	CIC §§ 735.5, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)

DOC	Date of Document	Document Type	Author	Recipient(s)	CC's	Document Description	Responsive to Document Request #s	Privilege Asserted/ Basis for Withholding ¹
19A	Jan 6, 2025	Attachment				Document containing confidential information	SFG's Req. No. 1; CW's Req. Nos. 11 and 21	CIC §§ 735.5, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
2	Jun 10, 2025	Email	Schmitz, Timothy (IL DOI)	Inouye, Regina	Yang, Sandy; Zarate, Victoria; Whalen, Shannon (IL DOI); Meismer, Sean (IL DOI)	Email "RE: State Farm General Insurance Company – Request for Insurer Profile Summary as of 12/31/24"	SFG's Req. No. 1; CW's Req. Nos. 5, 10 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
20A	Jun 10, 2025	Attachment (letter)	Gillespie, Ann (IL DOI)	Mancias, Michelle (SF)		"RE: Form D documenting a Surplus Note between State Farm General Insurance Company and State Farm Mutual Automobile Insurance Company"	SFG's Req. No. 1; CW's Req. Nos. 5, 11 and 21	CIC §§ 735.5, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)

DOC	Date of Document	Document Type	Author	Recipient(s)	CC's	Document Description	Responsive to Document Request #s	Privilege Asserted/ Basis for Withholding¹
21	Jun 18, 2025	Email	Meismer, Sean (IL DOI)	Inouye, Regina; Schmitz, Timothy (IL DOI)	Yang, Sandy; Zarate, Victoria; Whalen, Shannon (IL DOI)	Email "RE: State Farm General Insurance Company – Request for Insurer Profile Summary as of 12/31/24"	SFG's Req. No. 1; CW's Req. Nos. 5, 10 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
21A	Apr 17, 2025	Attachment	Kelly Edwards (SF)	Ann Gillespie (IL DOI)		"RE: SF General Ins. Co. – YE 2024 RBC Company Action Level Event" with Appendices	SFG's Req. No. 1; CW's Req. Nos. 11 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)
22	Mar 4, 2025	Memo	Illinois Department of Insurance (IDOI)	To All Licensed States		"Regarding State Farm General Insurance (NAIC #25151)"	SFG's Req. No. 1; CW's Req. Nos. 11 and 21	CIC §§ 735.5, 739.8, 12919; Evid. Code §§ 1040, 1041; NAIC Master Information Sharing and Confidentiality Agreement; Illinois Insurance Code (215 ILCS 5/404)

EXHIBIT 10



August 13, 2025

Via email

Nikki S. McKennedy
Jennifer McCune
California Department of Insurance
1901 Harrison Street, Sixth Floor
Oakland, CA 94612
Tel: (415) 538-4162
Fax: (510) 238-7829
nikki.mckennedy@insurance.ca.gov
jennifer.mccune@insurance.ca.gov

Re: CDI Responses to Consumer Watchdog Discovery Requests in the
Matters of State Farm, File Nos. PA-2024-00011, 00012, 00013

Dear Ms. McKennedy and Ms. McCune:

Thank you for the meet and confer call today. We wanted to follow up regarding Consumer Watchdog's Request No. 20, which seeks "all COMMUNICATIONS between CDI staff and the Insurance Commissioner or executive office personnel RELATED TO THIS PROCEEDING."

You requested on today's call that Consumer Watchdog clarify the term "executive office personnel" in the request. In response, we would point to the organizational chart from the CDI's website located at <https://www.insurance.ca.gov/0500-about-us/025-executiveteam/Index.cfm>. That link contains the following individuals that Consumer Watchdog would include in the definition of "executive office personnel":

- Ricardo Lara, Insurance Commissioner
- Michael Martinez, Chief Deputy Commissioner
- Ken Allen, Deputy Commissioner, Rate Regulation
- Tony Cignarale, Deputy Commissioner, Consumer Services and Market Conduct
- Josephine Figueroa, Legislative Director and Deputy Commissioner Policy and Legislation
- Julia Juarez, Deputy Commissioner, Community Relations and Outreach
- Laurie Menchaca, Deputy Commissioner, Administration and Licensing Services

- Eric Charlick, Deputy Commissioner, Enforcement
- Michael Peterson, Deputy Commissioner, Climate and Sustainability
- Teresa Campbell, General Counsel and Deputy Commissioner, Legal
- Michael Soller, Deputy Commissioner, Communications and Press Relations
- Lucy Wang, Special Counsel and Deputy Commissioner

Please let us know if CDI intends to supplement its response(s) based on this clarification.

Sincerely,



Benjamin Powell
Consumer Watchdog

EXHIBIT 11



RICARDO LARA
CALIFORNIA INSURANCE COMMISSIONER

August 15, 2025

VIA EMAIL

Benjamin Powell
Consumer Watchdog
6330 San Vicente Blvd.
Suite 250
Los Angeles, CA 90048

SUBJECT: Your Letter entitled: “CDI Responses to Consumer Watchdog Discovery Requests in the Matters of State Farm, File Nos. PA-2024-00011, 00012, 00013”

Dear Ben:

I write in response to your letter regarding “CDI Responses to Consumer Watchdog Discovery Requests in the Matters of State Farm.” While we thank Consumer Watchdog for this clarification, CDI nevertheless stands firm on our objections. Specifically, we continue to view this request as vague, ambiguous, overly broad and burdensome, and effectively seeking irrelevant information and documents.

Respectfully, Consumer Watchdog’s actions here appear to be nothing but a fishing expedition. If we knew what CW was looking for or otherwise trying to prove, we could perhaps provide you with more information. But as Will Pletcher acknowledged during our meet and confer call the other day, CDI does *not* have the burden of proof in this rate hearing.

So that we’re clear, any substantive communications would be privileged under the doctrines of attorney-client communications, attorney work product, internal deliberations, and/or settlement communications. Any procedural communications would not be relevant to the subject matter of the litigation. And as we stressed on our call, the privileged communications would simply be too burdensome for the Department to collate and list on a privilege log. Further, your list of proposed “executive personnel” is so lengthy as to be burdensome and the term “CDI Staff” is simply too broad; this request implicates essentially the entirety of the Department of Insurance, even including the ALJ and his staff, along with his supervisor, Laurie Menchaca.

Finally, and most importantly, none of this appears relevant in this proceeding. And as we pressed yesterday, to be “relevant” in an administrative proceeding such as this, a document must be both relevant and admissible. (Gov. Code § 11507.6(e).)

#1526130

CALIFORNIA DEPARTMENT OF INSURANCE
PROTECT • PREVENT • PRESERVE
1901 Harrison Street, 6th Floor
Oakland, CA 94612
Tel: 415-538-4148 • Fax: 510-238-7829
Duncan.Montgomery@insurance.ca.gov

August 15, 2025

Page 2

I hope this clarifies our position for you. If you have any questions, please feel free to contact me at any time.

Best regards,

Duncan Montgomery

Duncan Montgomery
Attorney III

EXHIBIT 12



August 20, 2025

Via email

Duncan Montgomery
California Department of Insurance
1901 Harrison Street, 6th Floor
Oakland, CA 94612

Email: Duncan.Montgomery@insurance.ca.gov

**Re: CDI Responses to Consumer Watchdog Discovery Requests — State Farm
Rate Matters, File Nos. PA-2024-00011, -00012, -00013**

Dear Mr. Montgomery:

To clarify our meet-and-confer record: I did not state that CDI has “no burden of proof” in this proceeding. I explained that CDI does not bear *State Farm’s burden* to prove entitlement to a rate increase—that burden rests with the applicant under Proposition 103 and the regulations. (See Ins. Code, § 1861.05, subd. (b); see also 10 CCR § 2646.5 [“The insurer has the burden of proving, by a preponderance of the evidence, every fact necessary to show that its rate is not excessive, inadequate, unfairly discriminatory, or otherwise in violation of chapter 9...of part 2 of division 1 of the Insurance Code.”].) My comment was in response to CDI attorneys who were repeatedly asserting that CDI was working to develop evidence (including stipulations) *to support State Farm* in its rate increase application, including concerns about the overall cost to CDI for expert witnesses that CDI attorneys were suggesting would be needed to support the evidentiary basis for State Farm’s financial condition as it relates to State Farm’s requested rate increase. My comments were in objection to these statements. CDI is a party in these proceedings, but also must remain a neutral regulator, and nothing in my remarks alters CDI’s ordinary discovery obligations or Proposition 103’s transparency requirements. (See Gov. Code § 11507.6; 10 CCR § 2655.1; Ins. Code § 1861.07; Gov. Code §§ 11430.10, 11430.70; Ins. Code § 1861.08, subd. (d).)

The tenor of my comment—that CDI does not have the ultimate burden of proof to establish State Farm’s rate increase—was *not* an invitation for CDI to evade discovery. Regardless of the overall burden of proof, CDI remains a formal party and is fully subject to discovery under the Administrative Procedure Act and Proposition 103’s transparency requirements. There is no excuse for avoiding discovery and basic document production under the guise of “no burden.”

To that end, the reasons articulated by CDI to justify its refusals to respond to Consumer Watchdog’s discovery requests are insufficient.

Request No. 20 seeks “all COMMUNICATIONS between CDI staff and the Insurance Commissioner or executive office personnel RELATED TO THIS PROCEEDING.” During our meet and confer call, your team requested a clarification as to the phrase “executive office personnel.” We responded with a list of individuals from CDI website listed as part of the “Executive Team.” Your August 15 letter now states that this list is “so lengthy as to be burdensome and the term ‘CDI Staff’ is simply too broad[.]”

In response, as an initial matter Consumer Watchdog is willing to further limit the definition of “executive office personnel” to the following individuals:

- Ricardo Lara, Insurance Commissioner
- Michael Martinez, Chief Deputy Commissioner
- Ken Allen, Deputy Commissioner, Rate Regulation
- Tony Cignarale, Deputy Commissioner, Consumer Services and Market Conduct
- Teresa Campbell, General Counsel and Deputy Commissioner
- Michael Soller, Deputy Commissioner, Communications and Press Relations
- Lucy Wang, Special Counsel and Deputy Commissioner
- Eric Charlick, Deputy Commissioner, Enforcement
- Laurie Menchaca, Deputy Commissioner, Administration and Licensing Services

On our call, your team also noted that some of the individuals on the trial team for this matter could be considered “executive office personnel.” If it is CDI’s contention that any of the above-named individuals are in fact “on the trial team,” as opposed to being part of the firewalled “executive office personnel,” CDI should confirm that he or she has had no direct or indirect communications with the Commissioner or any other “executive office personnel.”

Contrary to the position in your letter, communications by CDI staff with the Commissioner and executive staff who report directly to the Commissioner regarding any issues in this proceeding are not privileged and must be disclosed under the APA and associated California regulations. (See Government Code section 11430.10 (“While the proceeding is pending there shall be no communication, direct or indirect, regarding any issue in the proceeding, to the presiding officer from an employee or representative of an agency that is a party[.]”); Government Code section 11430.70 [“the provisions of this article governing ex parte communications to the presiding officer also govern ex parte communications in an adjudicative proceeding to the agency head or other person or body to which the power to hear or decide in the proceeding is delegated.”]; see also Insurance Code section 1861.08(d) [noting that the exceptions to the ex parte rules contained in Government Code section 11430.30 (including related to communications regarding settlement) and subdivision (b) of Section 11430.70 do not apply in the context of Proposition 103 administrative hearings].) Moreover, contrary to your statement that “‘CDI Staff’ is too broad a term and ‘implicates essentially the entirety of the Department of Insurance, even including the ALJ and his staff, along with his supervisor, Laurie Menchaca,’” the request is limited to communications “related this proceeding,” so that would not include Department staff who are not communicating with the Commissioner about issues related to this proceeding. And we are not asking for the Department to produce communications

between the ALJ and executive staff or the Commissioner as presumably he would be required to disclose those ex parte communications concerning any issue in the case, if any such communications existed. If, as your letter states, enough of these responsive communications exist between employees of CDI as a party and the Commissioner or his executive staff as to be “too burdensome” to list on a privilege log, this is all the more reason they must be disclosed, per the requirements of Government Code section 11430.70. If CDI refuses to do so, Consumer Watchdog will move the ALJ for an Order requesting the same.

Finally, CDI asserted on the call that certain of Consumer Watchdog’s requests, including Nos. 4, 10, 11, and 15, relate to documents held by the Financial Surveillance Bureau at the Department, and are therefore not subject to disclosure. Please clarify CDI’s position in response to these requests. It is Consumer Watchdog’s understanding that the Financial Surveillance Bureau is contained within the California Department of Insurance, which is a party to these proceedings. As such, it is the responsibility of CDI to produce responsive, non-privileged documents, regardless of where in the Department they are located. If there are specific privileges that apply to such documents, please so state.

Sincerely,

A handwritten signature in black ink that reads "William Pletcher". The signature is written in a cursive, slightly slanted style.

William Pletcher
Consumer Watchdog

EXHIBIT 13

Subject: RE: In re State Farm General Ins. Co. - File Nos. PA-2024-00011, PA-2024-00012; PA-2024-00013
Date: Friday, August 15, 2025 at 2:51:42 PM Pacific Daylight Time
From: McCune, Jennifer
To: Osmani, Safa, Teti, Jordan, Harvey Rosenfield, Pam Pressley, Will Pletcher, Ryan Mellino, Ben Powell, Kaitlyn Gentile, McKennedy, Nikki, Wade, Daniel, Montgomery, Duncan, Landsman, Lisbeth, Hosel, Margaret, Carre, Elsa, Padua, Cecilia, Oakes, Tim, meritt.farren@farrenLLP.com
CC: Wells, Vanessa, Maddigan, Michael M., Wellington, Katherine, Perry, Cathy, O'Connor, Joe, Gelera, Kristel

All:

We cannot provide you with a copy of the NAIC Master Information Sharing and Confidentiality Agreement.

If you wish to bring a motion to compel production of any of the documents on the privileged log, CDI will stand on its remaining objections, which by themselves preclude disclosure of the listed documents.

Best, Jennifer

From: Osmani, Safa <safa.osmani@hoganlovells.com>
Sent: Thursday, August 14, 2025 10:44 AM
To: McCune, Jennifer <Jennifer.McCune@insurance.ca.gov>; Teti, Jordan <jordan.teti@hoganlovells.com>; harvey@consumerwatchdog.org; Pam Pressley <pam@consumerwatchdog.org>; will@consumerwatchdog.org; Ryan Mellino <ryan@consumerwatchdog.org>; Ben Powell <ben@consumerwatchdog.org>; Kaitlyn Gentile <kaitlyn@consumerwatchdog.org>; McKennedy, Nikki <Nikki.McKennedy@insurance.ca.gov>; Wade, Daniel <Daniel.Wade@insurance.ca.gov>; Montgomery, Duncan <Duncan.Montgomery@insurance.ca.gov>; Landsman, Lisbeth <Lisbeth.Landsman@insurance.ca.gov>; Hosel, Margaret <Margaret.Hosel@insurance.ca.gov>; Carre, Elsa <Elsa.Carre@insurance.ca.gov>; Padua, Cecilia <Cecilia.Padua@insurance.ca.gov>; Oakes, Tim <Tim.Oakes@insurance.ca.gov>; meritt.farren@farrenLLP.com
Cc: Wells, Vanessa <vanessa.wells@hoganlovells.com>; Maddigan, Michael M. <michael.maddigan@hoganlovells.com>; Wellington, Katherine <katherine.wellington@hoganlovells.com>; Perry, Cathy <cathy.perry@hoganlovells.com>; O'Connor, Joe <joe.oconnor@hoganlovells.com>; Gelera, Kristel <kristel.gelera@hoganlovells.com>
Subject: RE: In re State Farm General Ins. Co. - File Nos. PA-2024-00011, PA-2024-00012; PA-2024-00013

Thank you very much, Jennifer. Can you please provide us with a copy of the NAIC Master Information Sharing and Confidentiality Agreement so that we can better assess CDI's basis for withholding the documents listed on the privilege log?

Thank you again,
Safa

Safa Osmani
Senior Associate

Service List

Hon. Karl Fredric J. Seligman
Administrative Law Judge
Administrative Hearing Bureau
California Department of Insurance
1901 Harrison Street, 3rd Floor
Oakland, CA 94612
Tel.: (415) 538-4243
Fax: (510) 238-7828
Florinda.Cristobal@insurance.ca.gov
Camille.Johnson@insurance.ca.gov

☐ FAX
☐ U.S. MAIL
☐ OVERNIGHT MAIL
☐ HAND DELIVERED
☒ EMAIL

Vanessa Wells
Victoria Brown
Hogan Lovells US LLP
855 Main Street, Suite 200
Redwood City, CA 94063
Tel.: (650) 463-4000
Fax: (650) 463-4199
Vanessa.Wells@hoganlovells.com
Victoria.Brown@hoganlovells.com

☐ FAX
☐ U.S. MAIL
☐ OVERNIGHT MAIL
☐ HAND DELIVERED
☒ EMAIL

Attorneys for Applicant

Katherine Wellington
Hogan Lovells US LLP
125 High Street, Suite 2010
Boston, MA 02110
Tel.: (617) 371-1000
Fax: (617) 371-1037
Katherine.Wellington@hoganlovells.com

☐ FAX
☐ U.S. MAIL
☐ OVERNIGHT MAIL
☐ HAND DELIVERED
☒ EMAIL

Attorneys for Applicant

Jordan D. Teti
Hogan Lovells US LLP
1999 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel.: (310) 785-4600
Fax: (310) 785-4601
Jordan.Teti@hoganlovells.com

☐ FAX
☐ U.S. MAIL
☐ OVERNIGHT MAIL
☐ HAND DELIVERED
☒ EMAIL

Attorneys for Applicant

1 Nikki McKennedy

Jennifer McCune

2 Daniel Wade

Duncan Montgomery

3 Elsa Carre

4 Lisbeth Landsman-Smith

Cecilia Padua

5 Tim Oakes

California Department of Insurance

6 1901 Harrison Street, 6th Floor

7 Oakland, CA 94612

Tel.: (415) 538-4500

8 Fax: (510) 238-7830

Nikki.McKennedy @insurance.ca.gov

9 Jennifer.McCune@insurance.ca.gov

10 Daniel.Wade@insurance.ca.gov

Duncan.Montgomery@insurance.ca.gov

11 Elsa.Carre@insurance.ca.gov

Lisbeth.Landsman@insurance.ca.gov

12 Cecilia.Padua@insurance.ca.gov

13 Tim.Oakes@insurance.ca.gov

14 *Attorneys for CDI*

15 Merritt David Farren

16 26565 West Agoura Rd., Suite 200

Calabasas, CA 91302

17 Tel.: (818) 474-4610

18 Merritt.Farren@FarrenLLP.com

19 *Attorneys for Merritt David Farren*

☐ FAX

☐ U.S. MAIL

☐ OVERNIGHT MAIL

☐ HAND DELIVERED

☒ EMAIL

☐ FAX

☐ U.S. MAIL

☐ OVERNIGHT MAIL

☐ HAND DELIVERED

☒ EMAIL