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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

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

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
3 a Staff 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 forth
5 herein, and, if called upon, could and would competently testify thereto under oath.

6 2. A true and correct copy of the Commissioner's August 14, 2025 Order granting
7 Consumer Watchdog's intervention in the proceeding on State Farm's HO-3 rate filing is
8 attached hereto as Exhibit 1.

9 3. A true and correct copy of Consumer Watchdog's June 30, 2025 Discovery
10 Requests Propounded on State Farm General Insurance Company is attached hereto as Exhibit 2.

11 4. A true and correct copy of State Farm General Insurance Company's July 30,
12 2025 Responses to Consumer Watchdog's Discovery Requests Propounded on State Farm
13 General Insurance Company is attached hereto as Exhibit 3.

14 5. On August 12, 2025, I sent a letter via email to counsel for State Farm to initiate
15 the meet and confer process. A true and correct copy of this letter is attached hereto as Exhibit 4.
16 Counsel for Consumer Watchdog and State Farm met and conferred the following day.

17 6. On August 13, 2025, State Farm produced a document with a list showing which
18 produced documents responded to which requests, and a separate document clarifying the basis
19 of its privilege objections. True and correct copies of these documents are attached hereto as
20 Exhibit 5 and 6, respectively.

21 7. On August 18, 2025, Consumer Watchdog sent a follow-up letter to State Farm,
22 clarifying its position on certain of its discovery requests and agreeing to narrow others. A true
23 and correct copy of this letter is attached hereto as Exhibit 7.

24 8. As of this filing, State Farm has not agreed to produce any further documents as a
25 result of the Parties' meet and confer efforts with the exception of two publicly available
26 documents.

1 9. During our meet and confer call with State Farm, we reiterated Consumer
2 Watchdog's willingness to enter into a limited "interim" stipulation regarding confidentiality for
3 discovery purposes only, but could not reach an agreement as to such a stipulation.

4 10. A true and correct copy of the 2016 ALJ Final Rulings on Motion to Seal,
5 Admission of Exhibits, Closing Evidentiary Hearing, and Briefing ultimately adopted by the
6 Commissioner in the prior 2015 State Farm homeowners rate case is attached hereto as Exhibit 8.

7 11. A true and correct copy of the San Diego Superior Court writ denial decision
8 arising out of the aforementioned 2015 State Farm homeowners rate case is attached hereto as
9 Exhibit 9.

10 12. During the Parties' meet and confer call, State Farm counsel noted orally that it
11 didn't understand there to be a "supplement" component to the Reinsurance Attestation
12 document available on the CDI website.

13 13. A true and correct copy of State Farm's August 20, 2025 letter is attached hereto
14 as Exhibit 10.

15 14. During the Parties' meet and confer call, State Farm counsel noted orally that
16 seeking computer code in discovery is "extraordinary."

17 15. On information and belief, State Farm has produced such "R computer code" in
18 connection with a North Carolina homeowners insurance rate case.

19 16. During the Parties' meet and confer call, State Farm counsel asserted that it was
20 unsure what was meant by the term "Hazard Analysis" in Request No. 33.

21 17. During the Parties' meet and confer call, I informed State Farm counsel that
22 Consumer Watchdog would consider limiting the scope of certain of its Requests.

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1 I declare under penalty of perjury that the foregoing is true and correct and that this Declaration
2 was executed on August 20, 2025 in Los Angeles, California.
3
4

5 /s/ Benjamin Powell
6 Benjamin Powell (SBN: 311624)
7 ben@consumerwatchdog.org
8 6330 San Vicente Blvd., Suite 250
9 Los Angeles, CA 90048
Tel: (310) 392-0522

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Attorneys for Intervenor
CONSUMER WATCHDOG

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

In the Matter of the Petition to Intervene of:

File # IP-2024-00013

CONSUMER WATCHDOG,

Petitioner.

ORDER GRANTING CONSUMER WATCHDOG'S PETITION TO INTERVENE

Application of State Farm General Insurance Company (SFGIC)

Rate File No.: 24-1271

14 As set forth below, the California Insurance Commissioner Ricardo Lara (Insurance
15 Commissioner) grants Petitioner Consumer Watchdog's (Petitioner) Petition to Intervene and
16 Notice of Intent to Seek Compensation (Petition) in the above proceeding regarding the rate
17 application of SFGIC (Applicant).

18 | I. APPLICABLE LAW

19 In November 1988, California voters approved Proposition 103, which made changes in
20 the regulation of automobile insurance, as well as the approval of premium rates for property and
21 casualty lines of insurance in California. (Ins. Code §§ 1861.01, et seq.) Proposition 103 also
22 allows for public participation through consumer intervention. (Ins. Code § 1861.10.) The
23 Commissioner has implemented Proposition 103's statutory provisions concerning consumer
24 participation through regulations. (California Code of Regulations, Title 10 ("10 CCR") §§
25 2661.1, et seq.)

26 II. BRIEF SUMMARY OF PROCEDURAL HISTORY

27 //

1 On or about June 27, 2024, Applicant filed the rate change application (File No. 24-1271)
2 with the California Department of Insurance. On or about July 5, 2024, the Department notified
3 the public of the pending application.

4 On July 26, 2024, Petitioner submitted its verified and consolidated Petition for Hearing,
5 Petitioner to Intervene, and Notice of Intent to Seek Compensation. Petitioner contends it would
6 present and elicit evidence that Applicant's application violates provisions of the Insurance Code
7 and the implementing Regulations. Petitioner contends it has identified issues with Applicant's
8 rate applications. (*Ibid.*) The Petition also purports to reserve Petitioner's right to, at a future
9 time, seek discovery and raise additional issues. Petitioner contends its Petition is based on a
10 preliminary analysis of the rate application. (*Id.* at 6.) Petitioner reserves the right to modify,
11 withdraw, and/or add other issues for consideration as more information becomes available,
12 including but not limited to violations of section 1859. (*Ibid.*)

13 Petitioner also contends that it will "attend and participate in this proceeding without
14 unreasonably [sic] delaying this proceeding or any other proceedings before the Insurance
15 Commissioner." (Petition at p. 9.)

16 Petitioner also propounded formal discovery requests on Applicant at the same time that
17 Petitioner submitted its petition to intervene.

18 Petitioner further stated it intends to seek compensation in this proceeding and submitted
19 its Preliminary Budget along with an explicit statement that the hourly rates Petitioner has sought
20 in Preliminary Budget are market rates and that an amended budget will be filed when Petitioner
21 learns that the Preliminary Budget has increased by ten-thousand dollars (\$10,000.00).

22 On August 12, 2024, Applicant filed an answer in which it denied the material allegations
23 of the Petition for Hearing.

24 **III. FINDINGS**

25 1. The Petition meets the requirements set forth in Cal. Code Regs. §§ 2652.1
26 through 2652.3, inclusive. Petitioner has verified that it will be able to attend and participate in
27 the proceedings without unreasonably delaying this or any other proceeding before the

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1 Commissioner. (See Cal. Code Regs., §§ 2661.3, 2652.4.) The Commissioner finds that the
2 amount of compensation sought and the possibility of duplication are not grounds for denying
3 intervention.

4 2. The granting of a Petition to Intervene, and to intervene only, requires only that at
5 least one of the issues Petitioner wishes to raise in the proceeding is pertinent and germane to the
6 rate setting forum. A granting of a Petition to Intervene does not explicitly or implicitly guarantee
7 that any particular issue being raised by Petitioner will be found to be compensable if the
8 Petitioner should seek compensation for participation in regard to any particular issue.

9 3. Whether the time spent by Petitioner arguing any particular issue raised in the
10 Petition to Intervene is compensable will be determined when and if a request for compensation is
11 submitted.

12 4. This matter has not been brought to a hearing before an administrative law judge.
13 The formal discovery procedures invoked by Petitioner are not yet available.

14 **IV. ORDER**

15 1. For the foregoing reasons, Petitioner's Petition to Intervene is **GRANTED**.
16 Intervention is granted in this matter, not as to any specific issue that Petitioner may seek to
17 argue.

18 2. Whether compensation can be sought for any particular issue raised and
19 subsequently argued by Petitioner in the proceeding shall be determined when and if a request for
20 compensation is filed.

21 3. This Order grants only Petitioner's Petition to Intervene. The Petition for Hearing
22 will be determined in a separate order if needed.

23 4. Petitioner's formal discovery requests shall be deferred until the Petition for
24 Hearing is adjudicated. While the Petition for Hearing is pending, the discovery requests may be
25 construed as informal requests for information.

26 5. This Order Granting the Petition to Intervene is based on facts currently before the
27 Commissioner. The relevance of the specific issues raised in the Petition may be impacted by
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1 evidence deduced during the course of these proceedings and any further pleadings, including any
2 amended pleading filed by the Department. Any disputes concerning the continued relevance of
3 specific issues may be raised by the trier of fact and/or any party.

4 6. This Order Granting the Petition to Intervene does not ensure compensation or
5 compensation at the rates sought. Petitioner must show substantial contribution to the proceedings
6 and document and substantiate the hourly rate being sought in the Request for Compensation,
7 including but not limited to, the attorneys' hourly rate at the time compensation is sought, before
8 compensation will be awarded. Petitioner shall note that the market rate at the time a request for
9 compensation is filed may in-fact be lower than the market rate is today. Petitioner must establish
10 that its advocacy and witness fees and expenses are reasonable and that its substantial
11 contribution to the proceeding does not merely duplicate the participation by the Department of
12 Insurance's staff. In order to receive compensation in this matter, Petitioner must comply with all
13 of the relevant provisions of CIC § 1861.10 and Cal. Code Regs. §§ 2661.1, et seq. A separate
14 Decision regarding compensation, if any, will be issued on the basis of Petitioner's substantial
15 contribution to the proceeding.

16

17 Dated: August 14, 2024

RICARDO LARA

California Insurance Commissioner

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By


LUCY F. WANG

Deputy Commissioner and Special Counsel

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PROOF OF SERVICE
to Intervene of: CONSUM
Case No. IP-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 Street, 4th Floor, Oakland, California 94612. On August 14, 2024, I served the following document(s):

**ORDER GRANTING CONSUMER WATCHDOG'S AMENDED
PETITION TO INTERVENE - Application of State Farm General Insurance
Company (SFGIC) – Rate File No. 24-1271**

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 Sacramento and the 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 of Oakland and the county of Alameda, 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.

 Christine Warren

**PROOF OF SERVICE
SERVICE LIST**

**In the Matter of the Petition to Intervene of: CONSUMER WATCHDOG Petitioner.
Case No. IP-2024-00013**

	<u>Name/Address</u>	<u>Phone/Fax Numbers</u>	<u>Method of Service</u>
4			
5	Harvey Rosenfield	Tel: (310) 392-0522	Via EMAIL
6	Pamela Pressley	Fax: (310) 392-8874	
7	Benjamin Powell		
8	Ryan Mellino		
9	CONSUMER WATCHDOG		
10	6330 San Vicente Blvd., Suite 250		
11	Los Angeles, CA 90048		
	harvey@consumerwatchdog.org		
	pam@consumerwatchdog.org		
	ben@consumerwatchdog.org		
	ryan@consumerwatchdog.org		
12			
13	Vanessa Wells	Tel: (650) 463-4000	Via EMAIL
14	Victoria Brown	Fax: (650) 463-4199	
15	HOGAN LOVELLS UP LLP		
16	855 Main Street, Suite 200		
17	Redwood City, CA 94063		
	vanessa.wells@hoganlovells.com		
	victoria.brown@hoganlovells.com		
18			
19	Nikki McKenna	Tel: (415) 538-4500	Via EMAIL
20	Melissa Wurster	Fax: (510) 238-7830	
21	Daniel Wade		
22	Rate Enforcement Bureau		
23	Legal Division		
24	CALIFORNIA DEPARTMENT		
	OF INSURANCE		
	1901 Harrison Street, 4 th Floor		
	Oakland, CA 94612		
	Nikki.McKennedy@insurance.ca.gov		
	Melissa.Wurster@insurance.ca.gov		
	Daniel.Wade@insurance.ca.gov		

EXHIBIT 2

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

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10 Fax (310) 861-0862

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15 ryan@consumerwatchdog.org

16 Attorneys for CONSUMER WATCHDOG

17
18 BEFORE THE INSURANCE COMMISSIONER
19
20 OF THE STATE OF CALIFORNIA
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22 In the Matter of the Rate Applications of

23 State Farm General Insurance
24 Company,

25 Applicant.

26 File No.: PA-2024-00011, PA-2024-00012,
27 PA-2024-00013

28 **CONSUMER WATCHDOG'S
DISCOVERY REQUESTS PROPOUNDED
ON STATE FARM GENERAL
INSURANCE COMPANY**

1 DEMANDING PARTY: CONSUMER WATCHDOG

2 RESPONDING PARTIES: STATE FARM GENERAL INSURANCE COMPANY

3 SET NUMBER: ONE

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

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

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

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

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

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

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

10 **DEFINITIONS**

11 1. The terms “STATE FARM,” “YOU,” and “YOUR” refer to applicant STATE
12 FARM GENERAL INSURANCE COMPANY and applicants’ agents, employees, attorneys,
13 accountants, investigators, and anyone else acting on its behalf, including its parent company and
14 affiliates, notwithstanding that its parent company or affiliates may be identified separately in
15 certain Requests.

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

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

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

26 4. “STATEMENT” or “STATEMENTS” shall have the same meaning as that term
27 is defined in Government Code section 11507.6, liberally construed to include: “written
28 statements by the person signed or otherwise authenticated by him or her, stenographic,

mechanical, electrical or other recordings, or transcripts thereof, of oral statements by the person, and written reports or summaries of these statements.”

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

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

7. “INTERIM RATE HEARING” shall mean the evidentiary hearing that took place commencing on April 8, 2025 regarding the two-way stipulation between YOU and CDI concerning YOUR emergency interim rate requests, and Consumer Watchdog’s objections, as ordered by the Commissioner on March 14, 2025 and noticed by the March 24, 2025 Notice of Hearing on Stipulation issued by Administrative Law Judge Seligman.

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

9. The term "APPLICATIONS" means the Prior Approval Rate Applications with California Department of Insurance file numbers 24-1271, 24-1273, and 24-1330 which are the subject of this hearing, including all updates and revisions, including those required pursuant to any orders issued by the Administrative Law Judge.

10. The term "AFFILIATES" means all entities effectively controlling YOU or controlled by YOU or associated with YOU in any way under common ownership or control.

11. The term “2025 LOS ANGELES WILDFIRES” means any of the wildfires that occurred across Southern California in January 2025, including but not limited to the Eaton Fire and Palisades Fire.

DISCOVERY REQUESTS

1. Provide all DOCUMENTS YOU intend to offer into evidence in this matter.

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

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

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

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

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

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

15 8. Provide all DOCUMENTS provided by YOU to any witness YOU have called or
16 intend to call in this proceeding.

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

20 10. Provide the actuarial report and underlying workpapers supporting the Statement
21 of Actuarial Opinion of the Loss and Loss Adjustment Expense Reserves as of December 31,
22 2023.

23 11. Provide the actuarial report and underlying workpapers supporting the Statement
24 of Actuarial Opinion of the Loss and Loss Adjustment Expense Reserves as of December 31,
25 2024.

26 12. Provide all analyses and workpapers related to the evaluation of Loss and Loss
27 Adjustment Expense Reserves subsequent to December 31, 2024.

1 13. Provide all DOCUMENTS related to the calculation of YOUR NAIC IRIS ratios
2 as of December 31, 2023.

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

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

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

9 17. Provide all DOCUMENTS, reports, data, analyses, and calculations related to the
10 Reinsurance Attestation Supplement for 2024.

11 18. Provide the Own Risk and Solvency Assessment (“ORSA”) reports from 2020
12 through 2024, along with any related documents.

13 19. Provide all DOCUMENTS exchanged during the period from January 1, 2020 to
14 the present between State Farm General Insurance Company and the “rating agencies”
15 referenced in EXHIBIT 13, Page 1, Section D of the APPLICATIONS.

16 20. Provide all DOCUMENTS exchanged during the period from January 1, 2020 to
17 the present dealing with solvency issues between State Farm General Insurance Company and
18 the “IL DOI” as referenced in EXHIBIT 13, Page 1, Section D of the APPLICATIONS as State
19 Farm General Insurance Company’s solvency regulator.

20 21. YOUR response to the California Department of Insurance’s 7/10/2024
21 Objections (the “7/10/2024 Objections”) stated in part: “The forecast analysis process was
22 mainly performed using the R statistical language, therefore, many of the requested calculations
23 cannot be directly provided in a spreadsheet presentation format.” Provide all DOCUMENTS,
24 including but not limited to computer code and data files, RELATED TO the forecast analysis
25 mainly performed using the R statistical language. Also provide all DOCUMENTS describing
26 what else other than the R statistical language STATE FARM used in the forecast analysis
27 process.

1 22. EXHIBIT 13, provided with YOUR APPLICATIONS, states in part: “...[W]e
2 have attached a calculation of the rate template that adjusts the leverage ratio...in order to
3 increase the maximum permitted indication to a level that will help protect the insurer’s financial
4 solvency...” The adjusted leverage ratio in the referenced calculation (“NT Variance 6 Rate
5 Template.xlsx”) is 50%. Provide all DOCUMENTS, including but not limited to computer code
6 and data files, used by STATE FARM in deriving this adjusted leverage ratio of 50%.

7 23. EXHIBIT 13, provided with YOUR APPLICATIONS, states in part: “....[W]e
8 have attached a calculation of the rate template that adjusts the...rate of return in order to
9 increase the maximum permitted indication to a level that will help protect the insurer’s financial
10 solvency...” The adjusted rate of return in the referenced calculation (“NT Variance 6 Rate
11 Template.xlsx”) is 15%.” Provide all DOCUMENTS, analyses, and calculations used in deriving
12 the 15% value.

13 24. YOUR response to the 7/10/2024 Objections, Nos. 5 and 6, stated in part: “To
14 support the catastrophe risk component, a study was done that analyzed catastrophe reinsurance
15 program quotes from internal and publicly available data for both traditional and non-traditional
16 reinsurers.” Provide that study, and all DOCUMENTS RELATED TO that study.

17 25. YOUR response to the 7/10/2024 Objections, No. 4a, stated in part: “Refer to
18 Exhibit E for Non-Catastrophe pure premium trend selections by segment.” Provide comparable
19 trend values, including all underlying data and calculations, based on renewal business only.

20 26. YOUR response to the 7/10/2024 Objections, No. 4b, stated in part: “Refer to
21 Exhibit F for historical trends from the corresponding filings. The projected pure premium trend
22 selections are reasonable when compared to historical trends.” Provide the corresponding
23 premium trend values, including all underlying data and calculations.

24 27. Provide the following DOCUMENTS for STATE FARM for each year from 2020
25 to 2024:

- 26 a. Reinsurance Summary Supplemental;
- 27 b. Supplemental Compensation Exhibit;
- 28 c. Audited Financial Reports;

- d. Management's Report of Internal Control Over Financial Reporting;
- e. Notification of Adverse Financial Condition;
- f. Corporate Governance Annual Disclosure;
- g. Form F-Enterprise Risk Report;
- h. Group Capital Calculation.

28. YOUR Answer to Consumer Watchdog's Petition for Hearing stated in part (4:25–26): "The reinsurance agreements at issue are filed annually with State Farm General's regulator to ensure the terms are fair and reasonable for the affiliated companies." Please provide copies of those reinsurance agreements from 2015 to the present.

29. YOUR Answer to Consumer Watchdog's Petition for Hearing stated in part (6:11–12): "State Farm's solvency regulator has initiated company action level supervision over the Company." Provide all documents exchanged between STATE FARM and STATE FARM's solvency regulator regarding the company action level supervision over the Company from 2020 to the present.

30. For each catastrophe model used in the filing, provide all catastrophe risk metrics and analytics (e.g., PML, TVaR, Standard Deviation, size of loss distribution, etc.) that STATE FARM used during 2020 to the present for any purpose, including, but not limited to, capital adequacy, capital allocation, underwriting, exposure management, and reinsurance.

31. YOUR Answer to Consumer Watchdog's Petition for Hearing stated in part (4:22–25): "CW's allegation that State Farm's reinsurance agreement 'is not a true transfer of risk' is conclusory and ignores the important role reinsurance plays in protecting State Farm's policyholders and ensuring that State Farm can meet risk metrics considered by regulators."

Please provide all DOCUMENTS listing and/or explaining the risk metrics that STATE FARM stated are considered by regulators. Additionally, provide all DOCUMENTS demonstrating the value of, and derivation of, the values of those metrics for STATE FARM from 2020 to the present.

1 32. Provide all DOCUMENTS supporting YOUR statement in YOUR Answer
2 regarding the allegedly “important role reinsurance plays in protecting State Farm’s
3 policyholders.”

4 33. Provide all Hazard Analyses performed by or on behalf of STATE FARM from
5 2020 to the present for any purpose, including, but not limited to, capital adequacy, capital
6 allocation, underwriting, exposure management, and reinsurance.

7 34. Provide all Dynamic Financial Analyses performed by or on behalf of STATE
8 FARM from 2020 to the present for any purpose, including, but not limited to, capital adequacy,
9 capital allocation, underwriting, exposure management, and reinsurance.

10 35. Provide all Enterprise Risk Management Analyses performed by or on behalf of
11 STATE FARM from 2020 to the present for any purpose, including, but not limited to, capital
12 adequacy, capital allocation, underwriting, exposure management, and reinsurance.

13 36. Provide all DOCUMENTS RELATED TO YOUR emergency interim rate
14 requests exchanged between YOU and the CDI including correspondence, but not including
15 DOCUMENTS previously provided to Consumer Watchdog.

16 37. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO YOUR
17 emergency interim rate requests exchanged between YOU and the Insurance Commissioner or
18 executive office personnel, but not including DOCUMENTS previously provided to Consumer
19 Watchdog.

20 38. Provide all DOCUMENTS and COMMUNICATIONS exchanged during the
21 period from January 1, 2023 to the present between STATE FARM and the Illinois Department
22 of Insurance as State Farm General Insurance Company’s domestic financial solvency regulator
23 RELATED TO YOUR failure to meet NAIC Risk-Based Capital (RBC) requirements as of year-
24 end 2024 as stated in YOUR February 25, 2025 Written Responses to the Commissioner’s
25 Questions from February 14.

26 39. Provide all DOCUMENTS supporting YOUR statements in YOUR February 25,
27 2025 Written Responses to the Commissioner’s Questions from February 14 that State Farm
28 Mutual provides YOUR reinsurance “at a fair price that is well below what is available from

1 external reinsurers and at an amount of coverage that external reinsurers wouldn't provide" and
2 "that external reinsurer capacity to underwrite significantly greater portions of SFG's massive
3 risk portfolio at a reasonable price (or possibly, at any price) does not currently exist."

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

8 41. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO STATE
9 FARM business strategies or management decisions RELATED TO determining whether to
10 continue to write, cancel, or non-renew homeowners insurance policies due to wildfire risk from
11 2020 to the present.

12 42. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO STATE
13 FARM business strategies or management decisions RELATED TO STATE FARM requesting
14 6.9% homeowners rate increases in California, rather than any higher amount, from 2018 to
15 2022.

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

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

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

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

27 47. Provide all DOCUMENTS and COMMUNICATIONS related to State Farm's
28 decision to non-renew residential homeowners policies on a "block" basis in March 2024.

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

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

7 50. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any
8 policyholder complaints about rate increases and/or affordability regarding any STATE FARM
9 homeowners, rental dwelling, renters, or condo rates from 2020 to present, including but not
10 limited to complaints RELATED TO the INTERIM RATE HEARING or THIS PROCEEDING.

11 51. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any
12 policyholder claims RELATED TO the 2025 LOS ANGELES WILDFIRES.

13 52. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any initial
14 adjustor claims reports submitted by any adjustor RELATED TO the 2025 LOS ANGELES
15 WILDFIRES.

16 53. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any
17 STATE FARM final or approved adjustor claims reports RELATED TO the 2025 LOS
18 ANGELES WILDFIRES.

19 54. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any
20 policyholder complaints regarding any STATE FARM claims handling from 2020 to present,
21 including but not limited to any complaints regarding STATE FARM claims handling
22 RELATED TO the 2025 LOS ANGELES WILDFIRES.

23 55. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any
24 STATE FARM claims regarding any policyholder complaints RELATED TO smoke damage
25 RELATED to the 2025 LOS ANGELES WILDFIRES.

26 56. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any
27 policyholder complaints RELATED to any STATE FARM claims adjusting RELATED TO the
28 2025 LOS ANGELES WILDFIRES.

1 57. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any
2 policyholder complaints RELATED to any STATE FARM claims adjustors RELATED TO the
3 2025 LOS ANGELES WILDFIRES.

4 58. Provide all DOCUMENTS RELATED TO STATE FARM's Enterprise Risk
5 Management (ERM) program covering the period from 2016 to the present.

6 59. Provide all DOCUMENTS RELATED TO STATE FARM's economic capital
7 modeling and stress testing on underwriting results, investment results, operating results and
8 surplus from 2016 to the present.

9 60. Provide all DOCUMENTS RELATED TO STATE FARM's Environmental,
10 Social & Governance program from 2020 to the present.

11 61. Provide all DOCUMENTS RELATED TO STATE FARM's infrastructure and its
12 commonality / overlap with AFFILIATES (including parent company, State Farm Mutual) from
13 2020 to the present.

14 62. Provide all DOCUMENTS RELATED TO STATE FARM's management team
15 and its commonality / overlap with AFFILIATES (including parent company, State Farm
16 Mutual) from 2020 to the present.

17 63. Provide all DOCUMENTS RELATED TO any programs, investment policies, or
18 agreements STATE FARM currently participates in with AFFILIATES (including parent
19 company, State Farm Mutual) to manage risks and improve cash flow and liquidity, including
20 but not limited to any investment pooling agreement with AFFILIATES (including parent
21 company, State Farm Mutual), any common clearing account agreement with AFFILIATES
22 (including parent company, State Farm Mutual), any Services and Facilities Agreement with
23 AFFILIATES (including parent company, State Farm Mutual), any line of credit available to
24 STATE FARM from parent company, State Farm Mutual, and any segregated surplus State Farm
25 Mutual holds for the protection of STATE FARM and AFFILIATES.

26 64. In relation to the PDF file "NT Filing Exhibits - 1Q 2025", EXHIBIT 13, Page 1,
27 provide all data, DOCUMENTS, analyses and calculations that are, or will be, used to determine:

28 i. The definition of "line of business",

- ii. The relationship between STATE FARM's statewide average premium for that line compared to the average statewide premium of the industry,
- iii. Whether or not there is a favorable outlook on ability to have adequate rates,
- iv. That the risk-based capital is sufficient to avoid required company or regulator action under insurer solvency regulations,
- v. That there is an achievement of a surplus-to-net written premium ratio of 1.0 or better giving consideration to then current reinsurance utilization,
- vi. STATE FARM's ability to recover from stresses,
- vii. Whether or not there is a favorable rating by rating agencies,
- viii. The criteria and analysis used by the IL DOI (as STATE FARM's solvency regulator) for acquiescence to any filing to reduce rates.

65. Provide all DOCUMENTS and COMMUNICATIONS RELATED TO whether, and on what terms, STATE FARM's parent company, State Farm Mutual, has or will provide any form of financial assistance to STATE FARM in connection with the interim and/or final resolution of any proceedings involving rate applications PA-2024-00011, PA-2024-00012, or PA-2024-00013.

66. Provide a copy of the surplus note STATE FARM received from its parent company, State Farm Mutual, including the terms thereof, in connection with the Commissioner's May 13, 2025 adoption of the stipulation between CDI and STATE FARM.

67. The STATE FARM Statement of Actuarial Opinion as of December 31, 2024 states, “Beginning in 2023 and continuing during 2024, the Company has strengthened net reserves for prior accident years, largely in its Umbrella and Commercial Multi-Peril coverages. Both coverages were impacted by sharp increases in claim severity and an extended time frame for claim resolution. These factors resulted in claim development that was well in excess of estimates based on recent development patterns. In particular, such adverse trends have been observed across the sector for Umbrella.” Provide all data, DOCUMENTS, analyses and calculations RELATED TO those statements.

1 68. Provide all data, DOCUMENTS, analyses, and calculations dealing with the
2 impact of rate changes on lapse and cancellation rates for the lines of business written by STATE
3 FARM.

4 69. With regard to the statement in EXHIBIT 13, Page 10 that, “It is likely that a
5 catastrophe factor calculated based on wildfire models, and inclusion of a provision for the Net
6 Cost of Reinsurance, would produce a rate meeting State Farm General’s needs”, provide all
7 data, DOCUMENTS, analyses, and calculations RELATED TO that statement.

8 70. In the PDF file “NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9”, EXHIBIT
9 13, Page 9 states “On January 1st, 2023, the values that are immediately applied as the initial
10 case reserve estimate were updated.” Provide all data and DOCUMENTS showing the numerical
11 value of the initial case reserves used by STATE FARM from 2021 to the present, along with the
12 time period when the initial case reserve was applicable.

13 71. In the PDF file “NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9”, EXHIBIT
14 13, Page 9 states “Moving forward we expect the initial case reserves to be more reflective of the
15 ultimate amount to be paid.” Provide all data, DOCUMENTS, analyses and calculations that
16 forms the basis of that statement.

17 72. In the PDF file “NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9”, EXHIBIT
18 13, Page 9 states, “In order to adjust the incurred loss development factors, we used an approach
19 commonly referred to as the ‘Berquist and Sherman Case Outstanding Adjustment’.” In
20 reference to Appendix B from the Berquist & Sherman paper listing “Sample Questions for
21 Department Executives” which was attached to Consumer Watchdog 6/4/25 RFIs, provide all
22 documents RELATED TO each of the items set forth therein, including all data and
23 DOCUMENTS RELATED TO YOUR 6/20/25 responses for each question in Appendix B. If
24 STATE FARM contends that any of those items are not relevant or not applicable to STATE
25 FARM’s rate filing, provide the basis for that contention including all related DOCUMENTS.

26 73. In response to the 6/4/25 RFIs from Consumer Watchdog, STATE FARM
27 provided the following PDF files: “Exhibit 8 – Accident Year”, “Exhibit 8 – By Peril” and
28 “Exhibit 9 – By Peril”. Provide these documents in Excel format.

1 74. Provide all “operation guides”, as referenced in STATE FARM response to
2 Consumer Watchdog 6/4/25 RFI 2, from 2021 to the present.

3 75. Provide all DOCUMENTS RELATED TO any changes in operations (e.g.,
4 underwriting, book of business, rating, marketing, claims handling/settlement, reserving, policy
5 provisions, etc.) from 2017 to the present for each of the policy forms that are the subject of the
6 APPLICATIONS.

7 76. In reference to the PDF file “NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9”,
8 EXHIBIT 9, Page 8., provide all data, DOCUMENTS, analyses and calculations that form the
9 basis of the values shown in Columns (3), (4) and (5).

10 77. STATE FARM’s response to Consumer Watchdog 6/4/25 RFI 10 states, “We
11 submitted a correction to the 2024 values in Exhibit 13 in SERFF on 6/19/2025. These
12 corrections will adjust the 2025-2028 surplus projections slightly, but do not result in a material
13 change.” Provide DOCUMENTS that show the amount of changes in the 2024 values, as well as
14 the basis for the corrections.

15 78. Provide DOCUMENTS, showing, explaining and providing the basis for all
16 changes in the corrected EXHIBIT 13 submitted in SERFF on 6/19/2025 compared to the
17 previous EXHIBIT 13.

18 79. In reference to STATE FARM’s response to Consumer Watchdog 6/4/25 RFI 11
19 which states, “State Farm reviews each model independently for reasonability,” provide all
20 DOCUMENTS related to those reviews.

21 80. STATE FARM’s response to Consumer Watchdog 6/4/25 RFI 12 states, “As
22 noted in Exhibit 19, Closed with Payment claim counts are not explicitly collected. Rather, an
23 assumption-based approach is used to develop these claim counts.” Provide all DOCUMENTS
24 related to that assumption-based approach.

25 81. STATE FARM’s response to Consumer Watchdog 6/4/25 RFI 15 states, “To
26 assist with your review, we have provided a 20-year weighted average of the percent of losses
27 from each bucket for the Wildfire cause of loss from a different data source.” Provide all
28

DOCUMENTS showing the derivation of the 20-year weighted average including but not limited to the yearly values and the weighting procedure.

82. Unlike previous submissions in this matter, STATE FARM did not provide a “No Variance” Rate Template along with the Rate Templates and other materials submitted via SERFF on June 6, 2025 in response to Objection #1 in CDI’s May 23, 2025 Objections. Provide a “No Variance” Rate Template for both the “Interim Rate Approved” (using a 1/1/2026 effective date with the interim rate reflected in the on-leveled earned premium) and “with 6-1-2025 Effective Date” (without the interim rate reflected in the on-leveled earned premium) scenarios, in both Excel and pdf format.

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

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

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

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

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

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

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

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

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



Benjamin Powell

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18 *Attorney for Proposed Intervenor Merritt David*
19 *Farren*

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EXHIBIT 3

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Attorneys for Applicant
STATE FARM GENERAL INSURANCE
COMPANY

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

In the Matter of the Rate Application of
**STATE FARM GENERAL
INSURANCE COMPANY,**
Applicant.

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

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

1 PROPOUNDING PARTY : Consumer Watchdog
2 RESPONDING PARTY : State Farm General Insurance Company
3 SET NUMBER : One (1)
4

5 Pursuant to California Government Code Section 11507.6 and the applicable Rules of
6 Practice and Procedure for Insurance Commissioner Rate Proceedings, 10 C.C.R. § 2655.1, State
7 Farm General Insurance Company (“SFG” or “Applicant”) hereby responds to Consumer
8 Watchdog’s (“CW”) Discovery Requests, propounded on June 30, 2025 (the “Requests”).

9 **PRELIMINARY STATEMENT**

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

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

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

GENERAL OBJECTIONS & OBJECTIONS TO DEFINITIONS

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

A. General Objections

1. SFG objects to the Requests to the extent that they are protected from disclosure by the attorney-client privilege, work product doctrine, joint or common interest privilege, or any other privilege, protection, or immunity. Discovery in these proceedings does not “authorize the inspection of any writing or thing which is privileged from disclosure by law or otherwise made confidential or protected as the attorney’s work product.” Cal. Gov. Code § 11507.6. Nothing in these responses in any way constitutes a waiver of any applicable privilege or protection from disclosure. Further, any inadvertent production of privileged or protected information is not a waiver of any privilege or protection from disclosure.

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

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

4. SFG objects to these Requests to the extent they seek documents not relevant to the Rate Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this context of requests for documents regarding State Farm General's financial condition that are

1 statutorily privileged and/or protected from disclosure (included but not limited to specific
2 Insurance Code as well as trade secret protection), when State Farm General's solvency regulator
3 (the Illinois Department of Insurance) has made a determination regarding SFG's financial
4 condition, any "relevance" is subsumed in the regulator's determination and the documents are
5 not "relevant" when balanced against confidentiality interests. In addition, the Requests are not
6 relevant to the extent that they seek to treat SFG and State Farm Mutual as a single entity. *See*
7 *State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021).

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

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

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

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

27 9. SFG will provide a log for discovery responses by the date upon which it
28

1 completes its document production. Certain examples of withheld documents are being provided
2 at this time in the below responses and objections.

3 **B. Objections to Definitions**

4 10. SFG objects to the definitions in CW's requests to the extent they alter the
5 generally understood meanings of common terms. SFG does not adopt CW's definitions.

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

10 12. SFG objects to the definitions of "DOCUMENT," "DOCUMENTS," and
11 "COMMUNICATION(S)" as overly broad and unduly burdensome.

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

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

17 **RESPONSES TO DISCOVERY REQUESTS**

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

19 Provide all DOCUMENTS YOU intend to offer into evidence in this matter.

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

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

23 SFG objects that this Request is premature at this time; for example, as of this date, SFG's
24 pre-filed direct testimony is not due.

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

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

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

8 SFG's rate application, submissions in SERFF, responses to Consumer Watchdog's
9 Requests for Information, and forthcoming document production(s) by the agreed upon date of
10 August 5, 2025, include documents that SFG intends to offer into evidence in this matter. SFG's
11 pre-filed direct testimony is also expected to include documents that SFG will offer into evidence
12 in this matter.

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

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

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

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

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

22 SFG objects that this Request seeks information about witnesses that goes beyond the
23 information permitted under California Government Code § 11507.6(1).

24 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
25 relates to the terms and phrases, "subject matter" and "role in preparation of the
26 APPLICATIONS."

27 SFG objects on the grounds that this request is overly broad due to the use of the term

1 “all.”

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

3 As of this date, SFG’s pre-filed direct testimony is not due; witness designations, as set
4 forth in the Scheduling Order, will provide the names of the witnesses that SFG intends to call at
5 the final hearing.

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

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

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

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

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

16 SFG objects that this Request seeks information about witnesses that goes beyond the
17 information permitted under California Government Code § 11507.6(1).

18 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
19 because it seeks “the DOCUMENTS and issues that are the subject of the document requests
20 contained herein,” which is an extremely broad category.

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

22 As of this date, SFG’s pre-filed direct testimony is not due; witness designations, as set
23 forth in the Scheduling Order, will provide the names of the witnesses that SFG intends to call at
24 the final hearing.

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

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

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

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

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

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

8 As of this date, SFG's pre-filed direct testimony is not due; witness designations, as set
9 forth in the Scheduling Order, will provide the names of the witnesses that SFG intends to call at
10 the final hearing.

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

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

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

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

17 SFG objects to this Request as overly broad and unduly burdensome, including due to the
18 use of the terms "any, and all" and "any."

19 SFG objects to the extent that this Request seeks "Statements" beyond those permitted
20 under California Government Code §§ 11507.6(a)–(c).

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

24 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
25 limited to competitively sensitive information), which are privileged and protected under
26 California law and SFG objects to their disclosure without a suitable protective order, including
27 sealing when such trade secret information is introduced into the record, and an agreement by the
28

1 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
2 352, 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

3 SFG objects that this Request is vague, ambiguous, and unduly burdensome as it relates to
4 the phrase, “subject matter.”

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

6 SFG directs CW to the declarations of David Appel and Bryon Ehrhart, filed on April 2,
7 2025 in support of SFG’s Brief in support of Interim Rate Request and Response to Consumer
8 Watchdog’s Pre-Hearing Objections. SFG further states that it intends to submit its pre-filed
9 direct testimony pursuant to the scheduling order entered by the ALJ.

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

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

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

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

16 SFG objects to this Request as overly broad and unduly burdensome, including due to the
17 use of the terms “any, and all” and “any.”

18 SFG objects to the extent that this Request seeks “Statements” beyond those permitted
19 under California Government Code §§ 11507.6(a)–(c).

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

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

2 SFG objects that this Request is vague, ambiguous, and unduly burdensome as it relates to
3 the terms and phrases, “subject matter” and “any other persons having personal knowledge of the
4 APPLICATIONS.”

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

6 SFG directs CW to the declarations of David Appel and Bryon Ehrhart, filed on April 2,
7 2025 in support of SFG’s Brief in support of Interim Rate Request and Response to Consumer
8 Watchdog’s Pre-Hearing Objections. SFG further states that it intends to submit its pre-filed
9 direct testimony pursuant to the scheduling order entered by the ALJ.

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

11 Provide all DOCUMENTS RELATED TO the APPLICATIONS, including all
12 correspondence between individuals who assisted in compiling the APPLICATIONS.

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

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

16 SFG objects to this Request as overly broad and unduly burdensome, including due to the
17 use of the terms “all” and “including.”

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

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

25 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
26 limited to competitively sensitive information), which are privileged and protected under
27 California law and SFG objects to their disclosure without a suitable protective order, including

1 sealing when such trade secret information is introduced into the record, and an agreement by the
2 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
3 352, 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

4 SFG objects that this Request is vague, ambiguous, and unduly burdensome as it relates to
5 the terms and phrases, “individuals who assisted in compiling the APPLICATIONS.” SFG will
6 not search for or produce “all correspondence” between individuals who assisted in compiling the
7 application. SFG further objects to this Request as overly broad on its face as it seeks “all
8 documents” related to the Applications.

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

10 SFG’s rate application, submissions in SERFF, responses to Consumer Watchdog’s
11 Requests for Information, and forthcoming document production(s) by the agreed upon date of
12 August 5, 2025, include documents that SFG intends to offer into evidence in this matter and that
13 relate to SFG’s rate applications. SFG’s pre-filed direct testimony is also expected to include
14 documents that relate to SFG’s rate applications and that SFG will offer into evidence in this
15 matter.

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

17 Provide all DOCUMENTS provided by YOU to any witness YOU have called or intend
18 to call in this proceeding.

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

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

22 SFG objects to this Request as overly broad and unduly burdensome, including due to the
23 use of the terms “all” and “any.”

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

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

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

10 SFG objects that this Request is vague, ambiguous, and unduly burdensome because it
11 seeks “all DOCUMENTS provided by YOU to any witness YOU have called or intend to call in
12 this proceeding,” regardless of the subject matter.

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

14 SFG directs CW to SFG’s prior submissions to the Administrative Law Judge in
15 connection with the interim rate hearing. SFG’s pre-filed direct testimony is also expected to
16 include responsive documents.

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

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

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

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

24 SFG objects to this Request as overly broad and unduly burdensome, including due to the
25 use of the term “all.”

26 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
27 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). Nor would this

1 category of documents be the sort of evidence on which responsible persons would rely in these
2 rate review proceedings. Cal. Gov. Code § 11513(c).

3 SFG further objects to the extent this Request seeks protected settlement communications
4 under California Evidence Code sections 1152 and 1154 that are beyond the scope of relevant and
5 admissible evidence discoverable under California Government Code section 11507.6(2)(e).

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

12 SFG objects that this Request is vague, ambiguous, and unduly burdensome because it
13 seeks “all DOCUMENTS RELATED TO the APPLICATIONS exchanged between YOU and the
14 California Department of Insurance including correspondence,” which is an extremely broad
15 category.

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

18 Subject to and consistent with the foregoing objections, SFG responds as follows:
19 SFG directs CW to documents regarding SFG’s Applications submitted to CDI via
20 SERFF.

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

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

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

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

27 SFG objects to this Request as overly broad and unduly burdensome.

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

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

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

20 SFG further objects to the extent that this Request seeks documents that are statutorily
21 protected as confidential, privileged, and not subject to discovery. *See* Cal. Ins. Code § 935.6; *see*
22 *also* 215 ILCS § 5/136.

23 Further, underlying workpapers supporting the Statement of Actuarial Opinion of the Loss
24 and Loss Adjustment Expense Reserves are not the property of SFG, but of its auditors and are
25 subject to contractual confidentiality provisions.

26 SFG objects that this Request is vague, ambiguous, and unduly burdensome as it relates to
27 the terms and phrases, "actuarial report," "underlying workpapers," "Statement of Actuarial

1 Opinion of the Loss" and "Loss Adjustment Expense Reserves."

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

3 SFG directs CW to the Statement of Actuarial Opinion, which is publicly available. *See*
4 215 ILCS Section 5/136. SFG further directs CW to the documents produced on May 30, 2025,
5 bates stamped as SFG_00000193 through SFG_00000206, which are responsive to this Request.
6 SFG does not intend to produce any additional documents in response to this Request, as framed.
7 Given that a suitable Protective Order has not been agreed upon and is not in place, SFG is
8 withholding the following documents: Actuarial Opinion Summary and Actuarial Report.

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

10 Provide the actuarial report and underlying workpapers supporting the Statement of
11 Actuarial Opinion of the Loss and Loss Adjustment Expense Reserves as of December 31, 2024.

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

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

15 SFG objects to this Request as overly broad and unduly burdensome.

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

26 SFG further specifically objects to the extent this Request seeks documents protected from
27 disclosure by the attorney-client privilege, work product doctrine, joint or common interest

1 privilege, or any other privilege, protection, or immunity.

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

8 SFG further objects to the extent that this Request seeks documents that are statutorily
9 protected as confidential, privileged, and not subject to discovery. *See* Cal. Ins. Code § 935.6; *see*
10 *also* 215 ILCS § 5/136.

11 Further, underlying workpapers supporting the Statement of Actuarial Opinion of the Loss
12 and Loss Adjustment Expense Reserves are not the property of SFG, but of its auditors and are
13 subject to contractual confidentiality provisions.

14 SFG objects that this Request is vague, ambiguous, and unduly burdensome as it relates to
15 the terms and phrases, “actuarial report,” “underlying workpapers,” “Statement of Actuarial
16 Opinion of the Loss” and “Loss Adjustment Expense Reserves.”

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

18 SFG directs CW to the Statement of Actuarial Opinion, which is publicly available. *See*
19 215 ILCS Section 5/136. SFG further directs CW to the documents produced on May 30, 2025,
20 bates stamped as SFG_00000193 through SFG_00000206, which are responsive to this Request.
21 SFG does not intend to produce any additional documents in response to this Request, as framed.
22 Given that a suitable Protective Order has not been agreed upon and is not in place, SFG is
23 withholding the following documents: Actuarial Opinion Summary and Actuarial Report.

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

25 Provide all analyses and workpapers related to the evaluation of Loss and Loss
26 Adjustment Expense Reserves subsequent to December 31, 2024.

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

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

3 SFG objects to this Request as overly broad and unduly burdensome, including due to the
4 use of the term “all.”

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

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

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

24 State Farm further objects to the extent that this Request seeks documents that are
25 statutorily protected as confidential, privileged, and not subject to discovery. *See* Cal. Ins. Code §
26 935.6; *see also* 215 ILCS § 5/136.

27 SFG objects that this Request is vague, ambiguous, and unduly burdensome as it relates to
28

1 the terms and phrases, “all analyses and workpapers,” “evaluation” and “Loss Adjustment
2 Expense Reserves.”

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

4 SFG agrees to meet and confer regarding the scope of this Request.

5 **REQUEST FOR DISCOVERY NO. 13:**

6 Provide all DOCUMENTS related to the calculation of YOUR NAIC IRIS ratios as of
7 December 31, 2023.

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

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

11 SFG objects to this Request as overly broad and unduly burdensome, including due to the
12 use of the terms “all” and “related to.”

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

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

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

26 SFG objects that this Request is vague, ambiguous, and unduly burdensome as it relates to
27 the terms and phrases, “calculation” and “NAIC IRIS ratios.”

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

SFG is conducting a reasonably diligent search and will produce responsive, non-privileged documents, if any, based on that search.

REQUEST FOR DISCOVERY NO. 14:

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

RESPONSE TO REQUEST FOR DISCOVERY NO. 14:

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

SFG objects to this Request as overly broad and unduly burdensome, including due to the use of the terms “all” and “related to.”

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

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

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

SFG objects that this Request is vague, ambiguous, and unduly burdensome as it relates to the terms and phrases, “calculation” and “NAIC IRIS ratios.”

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

1 SFG is conducting a reasonably diligent search and will produce responsive, non-
2 privileged documents, if any, based on that search.

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

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

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

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

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

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

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

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

24 SFG objects that this Request is vague, ambiguous, and unduly burdensome as it relates to
25 the terms and phrases, “calculation” and “NAIC IRIS ratios.”

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

27 SFG is conducting a reasonably diligent search and will produce responsive, non-

1 privileged documents, if any, based on that search.

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

3 Provide all DOCUMENTS, reports, data, analyses, and calculations related to the
4 Reinsurance Attestation Supplement for 2023.

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

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

8 SFG objects to this Request as overly broad and unduly burdensome, including due to the
9 use of the terms “all” and “related to.”

10 SFG objects to this Request to the extent it seeks documents not relevant to the Rate Hearing and
11 not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, the Requests are not
12 relevant to the extent that they seek to treat SFG and State Farm Mutual as a single entity. *See*
13 *State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021). Nor would this
14 category of documents be the sort of evidence on which responsible persons would rely in these
15 rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

25 SFG objects that this Request is vague, ambiguous, and unduly burdensome because it
26 seeks “all DOCUMENTS, reports, data, analyses, and calculations related to the Reinsurance
27 Attestation Supplement for 2023,” which is an extremely broad category.

1 SFG objects to this Request to the extent the Attestation is publicly available on CDI's
2 website.

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

4 SFG agrees to meet and confer regarding the scope of this Request.

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

6 Provide all DOCUMENTS, reports, data, analyses, and calculations related to the
7 Reinsurance Attestation Supplement for 2024.

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

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

11 SFG objects to this Request as overly broad and unduly burdensome, including due to the
12 use of the terms "all" and "related to."

13 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
14 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, the
15 Requests are not relevant to the extent that they seek to treat SFG and State Farm Mutual as a
16 single entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021).
17 Nor would this category of documents be the sort of evidence on which responsible persons
18 would rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

1 SFG objects that this Request is vague, ambiguous, and unduly burdensome because it
2 seeks “all DOCUMENTS, reports, data, analyses, and calculations related to the Reinsurance
3 Attestation Supplement for 2024,” which is an extremely broad category.

4 SFG objects to this Request to the extent the Attestation is publicly available on CDI’s
5 website.

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

7 SFG agrees to meet and confer regarding the scope of this Request.

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

9 Provide the Own Risk and Solvency Assessment (“ORSA”) reports from 2020 through
10 2024, along with any related documents.

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

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

14 SFG objects to this Request as overly broad and unduly burdensome, including due to the
15 use of the term “any related documents.”

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

26 SFG further specifically objects to the extent this Request seeks documents protected from
27 disclosure by the attorney-client privilege, work product doctrine, joint or common interest

1 privilege, or any other privilege, protection, or immunity.

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

8 SFG further objects to the extent that this Request seeks documents that are statutorily
9 protected as confidential, privileged, and not subject to discovery. *See* Cal. Ins. Code § 935.8; *see*
10 *also* 215 ILC § 5/129.8.

11 SFG objects that this Request is vague, ambiguous, and unduly burdensome because it
12 seeks “the Own Risk and Solvency Assessment (“ORSA”) reports from 2020 through 2024, along
13 with any related documents,” which is an extremely broad category.

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

15 SFG does not intend to produce documents in response to this Request, as framed. Given
16 that a suitable Protective Order has not been agreed upon and is not in place, SFG is withholding
17 the following documents: the 2020 Own Risk and Solvency Assessment report, the 2021 Own
18 Risk and Solvency Assessment report, the 2022 Own Risk and Solvency Assessment report, the
19 2023 Own Risk and Solvency Assessment report, and the 2024 Own Risk and Solvency
20 Assessment report, and, potentially, attachments, all of which are protected from disclosure.

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

22 Provide all DOCUMENTS exchanged during the period from January 1, 2020 to the
23 present between State Farm General Insurance Company and the “rating agencies” referenced in
24 EXHIBIT 13, Page 1, Section D of the APPLICATIONS.

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

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

1 SFG objects to this Request as overly broad and unduly burdensome, including due to the
2 use of the term “all.”

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

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

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

16 SFG objects that this Request is vague, ambiguous, and unduly burdensome because it
17 seeks “all DOCUMENTS exchanged during the period from January 1, 2020 to the present
18 between State Farm General Insurance Company and the ‘rating agencies’ referenced in
19 EXHIBIT 13, Page 1, Section D of the APPLICATIONS,” which is an extremely broad category.

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

21 SFG produced documents on May 30, 2025, which are responsive to this Request. SFG
22 directs CW to the documents bates stamped as SFG_00000134 through SFG_00000191.

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

24 Provide all DOCUMENTS exchanged during the period from January 1, 2020 to the
25 present dealing with solvency issues between State Farm General Insurance Company and the “IL
26 DOI” as referenced in EXHIBIT 13, Page 1, Section D of the APPLICATIONS as State Farm
27 General Insurance Company’s solvency regulator.

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

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

4 SFG objects to this Request as overly broad and unduly burdensome, including due to the
5 use of the terms “all.”

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

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

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

25 SFG further objects to the extent that this Request seeks documents that are statutorily
26 protected as confidential, privileged, and not subject to discovery under the California Insurance
27 Code. *See* Cal. Ins. Code §§ 1215.8, 1215.5; *see also* 215 ILCS § 5/131.22; Cal. Ins. Code §

1 739.8; 215 ILC § 5/35A-50; Cal. Ins. Code § 935.8; 215 ILC § 5/129.8; Cal. Ins. Code § 935.6;
2 215 ILCS § 5/136.

3 SFG objects that this Request is vague, ambiguous, and unduly burdensome because it
4 seeks “all DOCUMENTS exchanged during the period from January 1, 2020 to the present
5 dealing with solvency issues between State Farm General Insurance Company and the “IL DOI”
6 as referenced in EXHIBIT 13, Page 1, Section D of the APPLICATIONS as State Farm General
7 Insurance Company’s solvency regulator,” which is an extremely broad category.

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

9 SFG directs CW to publicly available documents on file with the Illinois Department of
10 Insurance.

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

12 YOUR response to the California Department of Insurance’s 7/10/2024 Objections (the
13 “7/10/2024 Objections”) stated in part: “The forecast analysis process was mainly performed
14 using the R statistical language, therefore, many of the requested calculations cannot be directly
15 provided in a spreadsheet presentation format.” Provide all DOCUMENTS, including but not
16 limited to computer code and data files, RELATED TO the forecast analysis mainly performed
17 using the R statistical language. Also provide all DOCUMENTS describing what else other than
18 the R statistical language STATE FARM used in the forecast analysis process.

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

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

22 SFG objects to this Request as overly broad and unduly burdensome, including due to the
23 use of the terms “all,” “including but not limited to” and “RELATED TO.”

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

1 SFG objects to this Request as irrelevant because the analysis referred to in this Request
2 was subsequently revised and SFG is no longer relying on it.

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

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

12 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
13 relates to the terms and phrases, “the forecast analysis mainly performed using the R statistical
14 language” and “what else other than the R statistical language SFG used in the forecast analysis
15 process.”

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

17 SFG agrees to meet and confer regarding the scope of this Request.

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

19 EXHIBIT 13, provided with YOUR APPLICATIONS, states in part: “[W]e have
20 attached a calculation of the rate template that adjusts the leverage ratio...in order to increase the
21 maximum permitted indication to a level that will help protect the insurer’s financial solvency...”
22 The adjusted leverage ratio in the referenced calculation (“NT Variance 6 Rate Template.xlsx”) is
23 50%. Provide all DOCUMENTS, including but not limited to computer code and data files, used
24 by SFG in deriving this adjusted leverage ratio of 50%.

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

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

1 SFG objects to this Request as overly broad and unduly burdensome, including due to the
2 use of the terms “all” and “including but not limited to.”

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

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

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

22 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
23 relates to the terms and phrases, “adjusted leverage ratio in the referenced calculation (‘NT
24 Variance 6 Rate Template.xlsx’) is 50%” and “deriving this adjusted leverage ratio of 50%.”

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

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

28

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

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

7 EXHIBIT 13, provided with YOUR APPLICATIONS, states in part: “....[W]e have
8 attached a calculation of the rate template that adjusts the...rate of return in order to increase the
9 maximum permitted indication to a level that will help protect the insurer’s financial solvency...”
10 The adjusted rate of return in the referenced calculation (“NT Variance 6 Rate Template.xlsx”) is
11 15%. Provide all DOCUMENTS, analyses, and calculations used in deriving the 15% value.

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

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

15 SFG objects to this Request as overly broad and unduly burdensome, including due to the
16 use of the term “all.”

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

27 SFG further specifically objects to the extent this Request seeks documents protected from
28

1 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
2 privilege, or any other privilege, protection, or immunity.

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

9 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
10 relates to the terms and phrases, “adjusted rate of return in the referenced calculation (‘NT
11 Variance 6 Rate Template.xlsx’) is 15%” and “deriving the 15% value.”

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

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

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

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

19 YOUR response to the 7/10/2024 Objections, Nos. 5 and 6, stated in part: “To support the
20 catastrophe risk component, a study was done that analyzed catastrophe reinsurance program
21 quotes from internal and publicly available data for both traditional and non-traditional
22 reinsurers.” Provide that study, and all DOCUMENTS RELATED TO that study.

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

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

26 SFG objects to this Request as overly broad and unduly burdensome, including due to the
27 use of the terms “all” and “RELATED TO.”

1 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
2 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, the
3 Requests are not relevant to the extent that they seek to treat SFG and State Farm Mutual as a
4 single entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021).
5 Nor would this category of documents be the sort of evidence on which responsible persons
6 would rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

16 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
17 because it seeks “that study, and all DOCUMENTS RELATED TO that study,” which is an
18 extremely broad category.

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

20 SFG is conducting a reasonably diligent search and will produce relevant, non-privileged
21 documents responsive to this request, if any, based on that search. Given that a suitable
22 Protective Order has not been agreed upon and is not in place, SFG is withholding the study and
23 related documents on trade secret and confidentiality grounds.

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

25 YOUR response to the 7/10/2024 Objections, No. 4a, stated in part: “Refer to Exhibit E
26 for Non-Catastrophe pure premium trend selections by segment.” Provide comparable trend
27 values, including all underlying data and calculations, based on renewal business only.

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

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

4 SFG objects to this Request as overly broad and unduly burdensome, including due to the
5 use of the term “all.”

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

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

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

19 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
20 because it seeks “comparable trend values, including all underlying data and calculations, based
21 on renewal business only,” which is an extremely broad category.

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

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

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

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

2 YOUR response to the 7/10/2024 Objections, No. 4b, stated in part: “Refer to Exhibit F
3 for historical trends from the corresponding filings. The projected pure premium trend selections
4 are reasonable when compared to historical trends.” Provide the corresponding premium trend
5 values, including all underlying data and calculations.

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

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

9 SFG objects to this Request as overly broad and unduly burdensome, including due to the
10 use of the term “all.”

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

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

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

24 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
25 because it seeks “corresponding premium trend values, including all underlying data and
26 calculations,” which is an extremely broad category. This Request is also vague and ambiguous
27 because it purports to quote “No. 4b” when the text of the Request actually quotes from No.

1 4c. Subject to these objections, SFG will provide information regarding No. 4c.

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

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

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

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

9 Provide the following DOCUMENTS for STATE FARM for each year from 2020 to
10 2024:

11 a. Reinsurance Summary Supplemental;
12 b. Supplemental Compensation Exhibit;
13 c. Audited Financial Reports;
14 d. Management's Report of Internal Control Over Financial Reporting;
15 e. Notification of Adverse Financial Condition;
16 f. Corporate Governance Annual Disclosure;
17 g. Form F-Enterprise Risk Report;
18 h. Group Capital Calculation.

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

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

22 SFG objects to this Request as overly broad and unduly burdensome.

23 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
24 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, this
25 Request is not relevant to the extent that it seeks to treat SFG and State Farm Mutual as a single
26 entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021). In
27 addition, the Requests are not relevant to the extent that they seek to treat SFG and State Farm

1 Mutual as a single entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173
2 (2021). Nor would this category of documents be the sort of evidence on which responsible
3 persons would rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

13 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
14 relates to the terms and phrases, “Reinsurance Summary Supplemental,” “Supplemental
15 Compensation Exhibit,” “Audited Financial Reports,” “Management’s Report of Internal Control
16 Over Financial Reporting,” “Notification of Adverse Financial Condition,” “Corporate
17 Governance Annual Disclosure,” “Form F-Enterprise Risk Report,” and “Group Capital
18 Calculation.”

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

20 SFG is conducting a reasonably diligent search and will produce responsive, non-
21 privileged documents responsive to this Request, if any, based on that search. Given that a
22 suitable Protective Order has not been agreed upon and is not in place, SFG will withhold trade
23 secret and confidential documents, including the Corporate Governance Annual Disclosure and
24 the Managements’ Report.

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

26 YOUR Answer to Consumer Watchdog’s Petition for Hearing stated in part (4:25–26):
27 “The reinsurance agreements at issue are filed annually with State Farm General’s regulator to
28

1 ensure the terms are fair and reasonable for the affiliated companies.” Please provide copies of
2 those reinsurance agreements from 2015 to the present.

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

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

6 SFG objects to this Request as overly broad and unduly burdensome.

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

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

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

1 SFG further objects to the extent that this Request seeks documents that are statutorily
2 protected as confidential, privileged, and not subject to discovery under the California Insurance
3 Code. *See Cal. Ins. Code §§ 1215.8, 1215.5; see also 215 ILCS § 5/131.22.*

4 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
5 because it seeks “reinsurance agreements from 2015 to the present,” which is an extremely broad
6 category.

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

8 SFG will produce document(s) sufficient to identify any of its reinsurance agreements
9 with State Farm Mutual Insurance Company, any affiliate(s) of State Farm Mutual Insurance
10 Company from January 1, 2015 to the present, and summarize their terms. Given that a suitable
11 Protective Order has not been agreed upon and is not in place, SFG is withholding reinsurance
12 agreements from 2015 through 2024, and Annual Registration Statements, on the basis of trade
13 secret and confidentiality.

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

15 YOUR Answer to Consumer Watchdog’s Petition for Hearing stated in part (6:11–12):
16 “SFG’s solvency regulator has initiated company action level supervision over the Company.”
17 Provide all documents exchanged between STATE FARM and STATE FARM’s solvency
18 regulator regarding the company action level supervision over the Company from 2020 to the
19 present.

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

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

23 SFG objects to this Request as overly broad and unduly burdensome, including as to the
24 term “all.”

25 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
26 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this
27 context of requests for documents regarding State Farm General’s financial condition that are
28

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

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

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

17 SFG further objects to the extent that this Request seeks documents that are statutorily
18 protected as confidential, privileged, and not subject to discovery under the California Insurance
19 Code. *See* Cal. Ins. Code §§ 1215.8, 1215.5; *see also* 215 ILCS § 5/131.22; Cal. Ins. Code §
20 739.8; 215 ILC § 5/35A-50; Cal. Ins. Code § 935.8; 215 ILC § 5/129.8; Cal. Ins. Code § 935.6;
21 215 ILCS § 5/136.

22 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
23 because it seeks "all documents exchanged between SFG and SFG's solvency regulator regarding
24 the company action level supervision over the Company from 2020 to the present," which is an
25 extremely broad category.

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

27 SFG directs CW to publicly available documents on file with the Illinois Department of

1 Insurance.

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

3 For each catastrophe model used in the filing, provide all catastrophe risk metrics and
4 analytics (e.g., PML, TVaR, Standard Deviation, size of loss distribution, etc.) that STATE
5 FARM used during 2020 to the present for any purpose, including, but not limited to, capital
6 adequacy, capital allocation, underwriting, exposure management, and reinsurance.

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

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

10 SFG objects to this Request as overly broad and unduly burdensome, including as to the
11 terms “all.”

12 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
13 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, the
14 Requests are not relevant to the extent that they seek to treat SFG and State Farm Mutual as a
15 single entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021).
16 Nor would this category of documents be the sort of evidence on which responsible persons
17 would rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

27 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it

1 relates to the terms and phrases, “catastrophe model,” “catastrophe risk metrics and analytics
2 (e.g., PML, TVaR, Standard Deviation, size of loss distribution, etc.),” and “capital adequacy,
3 capital allocation, underwriting, exposure management, and reinsurance.”

4 Subject to and consistent with the foregoing objections, SFG responds as follows:
5 SFG directs CW to documents regarding SFG’s Applications submitted to CDI via SERFF.

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

7 YOUR Answer to Consumer Watchdog’s Petition for Hearing stated in part (4:22–25):
8 “CW’s allegation that State Farm’s reinsurance agreement ‘is not a true transfer of risk’ is
9 conclusory and ignores the important role reinsurance plays in protecting State Farm’s
10 policyholders and ensuring that State Farm can meet risk metrics considered by regulators.”

11 Please provide all DOCUMENTS listing and/or explaining the risk metrics that STATE FARM
12 stated are considered by regulators. Additionally, provide all DOCUMENTS demonstrating the
13 value of, and derivation of, the values of those metrics for STATE FARM from 2020 to the
14 present.

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

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

18 SFG objects to this Request as overly broad and unduly burdensome, including due to the
19 use of the term “all.”

20 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
21 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this
22 context of requests for documents regarding State Farm General’s financial condition that are
23 statutorily privileged and/or protected from disclosure (included but not limited to specific
24 Insurance Code as well as trade secret protection), when State Farm General’s solvency regulator
25 (the Illinois Department of Insurance) has made a determination regarding SFG’s financial
26 condition, any “relevance” is subsumed in the regulator’s determination and the documents are
27 not “relevant” when balanced against confidentiality interests. In addition, the Requests are not

1 relevant to the extent that they seek to treat SFG and State Farm Mutual as a single entity. *See*
2 *State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021). Nor would this
3 category of documents be the sort of evidence on which responsible persons would rely in these
4 rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

14 SFG further objects to the extent that this Request seeks documents that are statutorily
15 protected as confidential, privileged, and not subject to discovery under the California Insurance
16 Code. *See* Cal. Ins. Code §§ 1215.8, 1215.5; *see also* 215 ILCS § 5/131.22.

17 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
18 relates to the terms and phrases, “risk metrics that SFG stated are considered by regulators” and
19 “demonstrating the value of, and derivation of, the values of those metrics for SFG from 2020 to
20 the present.”

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

22 SFG directs CW to publicly available documents on file with the Illinois Department of
23 Insurance. SFG also directs CW to the declaration of David Appel filed on April 2, 2025 in
24 support of SFG’s Brief in support of Interim Rate Request and Response to Consumer
25 Watchdog’s Pre-Hearing Objections.

26 **REQUEST FOR DISCOVERY NO. 32:**

27 Provide all DOCUMENTS supporting YOUR statement in YOUR Answer regarding the
28

1 allegedly “important role reinsurance plays in protecting State Farm’s policyholders.”

2 **RESPONSE TO REQUEST FOR DISCOVERY NO. 32:**

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

5 SFG objects to this Request as overly broad and unduly burdensome, including as to the
6 use of the term “all.”

7 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
8 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, the
9 Requests are not relevant to the extent that they seek to treat SFG and State Farm Mutual as a
10 single entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021).
11 Nor would this category of documents be the sort of evidence on which responsible persons
12 would rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

22 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
23 because it seeks “all DOCUMENTS supporting YOUR statement in YOUR Answer regarding the
24 allegedly ‘important role reinsurance plays in protecting SFG’s policyholders,’” which is an
25 extremely broad category.

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

27 SFG directs CW to the declaration of David Appel filed on April 2, 2025 in support of

1 SFG's Brief in Support of Interim Rate Request and Response to Consumer Watchdog's Pre-
2 Hearing Objections.

3 **REQUEST FOR DISCOVERY NO. 33:**

4 Provide all Hazard Analyses performed by or on behalf of STATE FARM from 2020 to
5 the present for any purpose, including, but not limited to, capital adequacy, capital allocation,
6 underwriting, exposure management, and reinsurance.

7 **RESPONSE TO REQUEST FOR DISCOVERY NO. 33:**

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

10 SFG objects to this Request as overly broad and unduly burdensome, including as to the
11 use of the terms "all," "any," and "including, but not limited to."

12 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
13 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, the
14 Requests are not relevant to the extent that they seek to treat SFG and State Farm Mutual as a
15 single entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021).
16 Nor would this category of documents be the sort of evidence on which responsible persons
17 would rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

27 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
28

1 because it seeks “all Hazard Analyses performed by or on behalf of SFG from 2020 to the present
2 for any purpose, including, but not limited to, capital adequacy, capital allocation, underwriting,
3 exposure management, and reinsurance,” which is an extremely broad category.

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

5 SFG agrees to meet and confer regarding the scope of this Request.

6 **REQUEST FOR DISCOVERY NO. 34:**

7 Provide all Dynamic Financial Analyses performed by or on behalf of STATE FARM
8 from 2020 to the present for any purpose, including, but not limited to, capital adequacy, capital
9 allocation, underwriting, exposure management, and reinsurance.

10 **RESPONSE TO REQUEST FOR DISCOVERY NO. 34:**

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

13 SFG objects to this Request as overly broad and unduly burdensome, including as to the
14 use of the terms “all,” “any,” and “including, but not limited to.”

15 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
16 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, the
17 Requests are not relevant to the extent that they seek to treat SFG and State Farm Mutual as a
18 single entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021).
19 Nor would this category of documents be the sort of evidence on which responsible persons
20 would rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

24 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
25 limited to competitively sensitive information), which are privileged and protected under
26 California law and SFG objects to their disclosure without a suitable protective order, including
27 sealing when such trade secret information is introduced into the record, and an agreement by the
28

1 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
2 352, 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

3 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
4 because it seeks “all Dynamic Financial Analyses performed by or on behalf of SFG from 2020 to
5 the present for any purpose, including, but not limited to, capital adequacy, capital allocation,
6 underwriting, exposure management, and reinsurance,” which is an extremely broad category.

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

8 SFG is conducting a reasonably diligent search and will produce responsive, non-
9 privileged documents responsive to this Request, if any, based on that search.

10 **REQUEST FOR DISCOVERY NO. 35:**

11 Provide all Enterprise Risk Management Analyses performed by or on behalf of STATE
12 FARM from 2020 to the present for any purpose, including, but not limited to, capital adequacy,
13 capital allocation, underwriting, exposure management, and reinsurance.

14 **RESPONSE TO REQUEST FOR DISCOVERY NO. 35:**

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

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

19 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
20 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, the
21 Requests are not relevant to the extent that they seek to treat SFG and State Farm Mutual as a
22 single entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021).
23 Nor would this category of documents be the sort of evidence on which responsible persons
24 would rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

7 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
8 because it seeks “all Enterprise Risk Management Analyses performed by or on behalf of SFG
9 from 2020 to the present for any purpose, including, but not limited to, capital adequacy, capital
10 allocation, underwriting, exposure management, and reinsurance,” which is an extremely broad
11 category.

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

13 SFG does not intend to produce documents in response to this Request given that it seeks
14 confidential and trade secret documents. Given that a suitable Protective Order has not been
15 agreed upon and is not in place, SFG will withhold documents on such grounds, including trade
16 secret assessments, stress test information, and economic capital presentations.

17 **REQUEST FOR DISCOVERY NO. 36:**

18 Provide all DOCUMENTS RELATED TO YOUR emergency interim rate requests
19 exchanged between YOU and the CDI including correspondence, but not including
20 DOCUMENTS previously provided to Consumer Watchdog.

21 **RESPONSE TO REQUEST FOR DISCOVERY NO. 36:**

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

24 SFG objects to this Request as overly broad and unduly burdensome, including as to the
25 term “all.”

26 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
27 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). Nor would this

1 category of documents be the sort of evidence on which responsible persons would rely in these
2 rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

12 SFG further objects to the extent this Request seeks protected settlement communications
13 under California Evidence Code sections 1152 and 1154 that are beyond the scope of relevant and
14 admissible evidence discoverable under California Government Code section 11507.6(2)(e).

15 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
16 because it seeks “all DOCUMENTS RELATED TO YOUR emergency interim rate requests
17 exchanged between YOU and the CDI including correspondence,” which is an extremely broad
18 category.

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

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

22 SFG directs CDI to responsive documents submitted by SFG via SERFF.

23 **REQUEST FOR DISCOVERY NO. 37:**

24 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO YOUR emergency
25 interim rate requests exchanged between YOU and the Insurance Commissioner or executive
26 office personnel, but not including DOCUMENTS previously provided to Consumer Watchdog.

27 **RESPONSE TO REQUEST FOR DISCOVERY NO. 37:**

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

3 SFG objects to this Request as overly broad and unduly burdensome, including as to the
4 use of the term “all.”

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

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

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

18 SFG further objects to the extent this Request seeks protected settlement communications
19 under California Evidence Code sections 1152 and 1154 that are beyond the scope of relevant and
20 admissible evidence discoverable under California Government Code section 11507.6(2)(e).

21 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
22 because it seeks “all DOCUMENTS and COMMUNICATIONS RELATED TO YOUR
23 emergency interim rate requests exchanged between YOU and the Insurance Commissioner or
24 executive office personnel,” which is an extremely broad category.

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

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

1 SFG directs CW to documents regarding SFG's Applications submitted to CDI via
2 SERFF.

3 **REQUEST FOR DISCOVERY NO. 38:**

4 Provide all DOCUMENTS and COMMUNICATIONS exchanged during the period from
5 January 1, 2023 to the present between STATE FARM and the Illinois Department of Insurance
6 as State Farm General Insurance Company's domestic financial solvency regulator RELATED
7 TO YOUR failure to meet NAIC Risk-Based Capital (RBC) requirements as of yearend 2024 as
8 stated in YOUR February 25, 2025 Written Responses to the Commissioner's Questions from
9 February 14.

10 **RESPONSE TO REQUEST FOR DISCOVERY NO. 38:**

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

13 SFG objects to this Request as overly broad and unduly burdensome, including as to the
14 use of the term "all."

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

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

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

7 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
8 relates to the terms and phrases, “failure to meet NAIC Risk-Based Capital (RBC) requirements.”

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

10 SFG directs CW to publicly available documents on file with the Illinois Department of
11 Insurance.

12 **REQUEST FOR DISCOVERY NO. 39:**

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

19 **RESPONSE TO REQUEST FOR DISCOVERY NO. 39:**

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

22 SFG objects to this Request as overly broad and unduly burdensome, including due to the
23 use of the term “all.”

24 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
25 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, this
26 Request is not relevant to the extent that it seeks to treat SFG and State Farm Mutual as a single
27 entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021). Nor

1 would this category of documents be the sort of evidence on which responsible persons would
2 rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

12 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
13 because it seeks “all DOCUMENTS supporting YOUR statements in YOUR February 25, 2025
14 Written Responses to the Commissioner’s Questions from February 14,” which is an extremely
15 broad category.

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

17 SFG directs CW to the declaration of Bryon Ehrhart filed on April 2, 2025 in support of
18 SFG’s Brief in support of Interim Rate Request and Response to Consumer Watchdog’s Pre-
19 Hearing Objections.

20 **REQUEST FOR DISCOVERY NO. 40:**

21 Provide all DOCUMENTS supporting YOUR statements in YOUR February 25, 2025
22 Written Responses to the Commissioner’s Questions from February 14 that “SFG’s financial
23 distress results from macroeconomic changes and market trends, including construction cost
24 inflation and litigation.”

25 **RESPONSE TO REQUEST FOR DISCOVERY NO. 40:**

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

1 SFG objects to this Request as overly broad and unduly burdensome, including as to the
2 use of the term “all.”

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

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

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

22 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
23 because it seeks “all DOCUMENTS supporting YOUR statements in YOUR February 25, 2025
24 Written Responses to the Commissioner’s Questions from February 14,” which is an extremely
25 broad category.

26 SFG further objects to this Request to the extent it assumes facts regarding a general
27 statement in SFG’s correspondence with the Commissioner.

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

SFG agrees to meet and confer regarding the scope of this request.

REQUEST FOR DISCOVERY NO. 41:

Provide all DOCUMENTS and COMMUNICATIONS RELATED TO STATE FARM business strategies or management decisions RELATED TO determining whether to continue to write, cancel, or non-renew homeowners insurance policies due to wildfire risk from 2020 to the present.

RESPONSE TO REQUEST FOR DISCOVERY NO. 41:

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

SFG objects to this Request as overly broad and unduly burdensome, including as to the use of the term “all.”

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

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

SFG further objects to the extent this Request seeks SFG trade secrets (including but not limited to competitively sensitive information), which are privileged and protected under

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

5 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
6 because it seeks “all DOCUMENTS and COMMUNICATIONS RELATED TO SFG business
7 strategies or management decisions RELATED TO determining whether to continue to write,
8 cancel, or non-renew homeowners insurance policies due to wildfire risk from 2020 to the
9 present,” which is an extremely broad category.

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

11 SFG is conducting a reasonably diligent search and will produce responsive, non-
12 privileged documents responsive to this Request, if any, based on that search.

13 **REQUEST FOR DISCOVERY NO. 42:**

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

17 **RESPONSE TO REQUEST FOR DISCOVERY NO. 42:**

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

20 SFG objects to this Request as overly broad and unduly burdensome, including due to the
21 use of the terms “all” and “RELATED TO.”

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

26 SFG further specifically objects to the extent this Request seeks documents protected from
27 disclosure by the attorney-client privilege, work product doctrine, joint or common interest

1 privilege, or any other privilege, protection, or immunity.

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

8 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
9 because it seeks “all DOCUMENTS and COMMUNICATIONS RELATED TO SFG business
10 strategies or management decisions RELATED TO SFG requesting 6.9% homeowners rate
11 increases in California, rather than any higher amount, from 2018 to 2022,” which is an extremely
12 broad category.

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

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

16 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
17 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
18 believes are responsive to this CDI Request. Given that a suitable Protective Order has not been
19 agreed upon and is not in place, SFG will withhold certain documents on trade secret and
20 confidentiality grounds regarding internal data, actuarial support, and recommended rate actions.

21 **REQUEST FOR DISCOVERY NO. 43:**

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

25 **RESPONSE TO REQUEST FOR DISCOVERY NO. 43:**

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

1 SFG objects to this Request as overly broad and unduly burdensome, including as to the
2 use of the term “all.”

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

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

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

16 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
17 because it seeks “all DOCUMENTS and COMMUNICATIONS with the Commissioner or CDI
18 indicating that SFG would cancel or non-renew homeowners policies if YOU were unable to
19 obtain approval of requested rate increases from 2020 to the present,” which is an extremely
20 broad category.

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

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

24 SFG agrees to meet and confer regarding the scope of this Request.

25 **REQUEST FOR DISCOVERY NO. 44:**

26 Provide all DOCUMENTS and COMMUNICATIONS by YOU RELATED TO whether
27 YOUR then-current rate levels were adequate given levels of wildfire risk for YOUR in-force
28

1 homeowners policies from 2020 to the present.

2 **RESPONSE TO REQUEST FOR DISCOVERY NO. 44:**

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

5 SFG objects to this Request as overly broad and unduly burdensome, including as to the
6 use of the term “all.”

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

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

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

20 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
21 because it seeks “all DOCUMENTS and COMMUNICATIONS by YOU RELATED TO whether
22 YOUR then-current rate levels were adequate given levels of wildfire risk for YOUR in-force
23 homeowners policies from 2020 to the present,” which is an extremely broad category.

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

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

27 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached

1 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
2 believes are responsive to this CDI Request. Given that a suitable Protective Order has not been
3 agreed upon and is not in place, SFG will withhold certain documents on trade secret and
4 confidentiality grounds regarding internal data, actuarial support, and recommended rate actions.

5 **REQUEST FOR DISCOVERY NO. 45:**

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

9 **RESPONSE TO REQUEST FOR DISCOVERY NO. 45:**

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

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

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

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

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

27 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
28

1 relates to the terms and phrases, “2021 internal list containing zip codes” and “restrict sales of
2 homeowners insurance policies.”

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

4 SFG agrees to meet and confer regarding the scope of this Request.

5 **REQUEST FOR DISCOVERY NO. 46:**

6 Provide all DOCUMENTS and COMMUNICATIONS related to STATE FARM’s
7 decision to cease selling new home insurance policies in California in 2024.

8 **RESPONSE TO REQUEST FOR DISCOVERY NO. 46:**

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

11 SFG objects to this Request as overly broad and unduly burdensome, including as to the
12 use of the terms “all” and “related to.”

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

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

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

26 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
27 relates to the terms and phrases “cease selling new home insurance policies.”

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

SFG is conducting a reasonably diligent search and will produce responsive, non-privileged documents responsive to this Request, if any, based on that search.

REQUEST FOR DISCOVERY NO. 47:

Provide all DOCUMENTS and COMMUNICATIONS related to State Farm's decision to non-renew residential homeowners policies on a "block" basis in March 2024.

RESPONSE TO REQUEST FOR DISCOVERY NO. 47:

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

SFG objects to this Request as overly broad and unduly burdensome, including as to the use of the term “all.”

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

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

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

SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it relates to the terms and phrases “non-renew residential homeowners policies on a ‘block’ basis.”

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

1 SFG is conducting a reasonably diligent search and will produce responsive, non-
2 privileged documents responsive to this Request, if any, based on that search.

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

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

7 **RESPONSE TO REQUEST FOR DISCOVERY NO. 48:**

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

10 SFG objects to this Request as overly broad and unduly burdensome, including as to the
11 use of the terms “all” and “RELATED TO.”

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

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

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

25 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
26 because it seeks “all DOCUMENTS and COMMUNICATIONS RELATED TO SFG insurance
27 premium pricing decisions, analysis, reviews, or strategies regarding homeowners insurance

1 policies in California from 2020 to the present,” which is an extremely overbroad category.

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

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

5 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached
6 Exhibit A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG
7 believes are responsive to this CDI Request. Given that a suitable Protective Order has not been
8 agreed upon and is not in place, SFG will withhold certain documents on trade secret and
9 confidentiality grounds regarding internal data, actuarial support, and recommended rate actions.

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

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

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

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

17 SFG objects to this Request as overly broad and unduly burdensome, including as to the
18 use of the term “all.”

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

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

26 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
27 limited to competitively sensitive information), which are privileged and protected under

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

5 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
6 because it seeks “all DOCUMENTS and COMMUNICATIONS RELATED TO SFG’s analysis
7 of insurance premium pricing information related to all other home insurers offering homeowners
8 insurance policies in California from 2020 to the present,” which is an extremely overbroad
9 category.

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

11 SFG is conducting a reasonably diligent search and will produce responsive, non-
12 privileged documents responsive to this Request, if any, based on that search. Given that a
13 suitable Protective Order has not been agreed upon and is not in place, SFG will withhold certain
14 documents on trade secret and confidentiality grounds, including documents with comparative
15 ratings.

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

17 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder
18 complaints about rate increases and/or affordability regarding any STATE FARM homeowners,
19 rental dwelling, renters, or condo rates from 2020 to present, including but not limited to
20 complaints RELATED TO the INTERIM RATE HEARING or THIS PROCEEDING.

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

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

24 SFG objects to this Request as overly broad and unduly burdensome, including due to the
25 use of the terms “all,” “any,” and “including but not limited to.”

26 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
27 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). Nor would this

1 category of documents be the sort of evidence on which responsible persons would rely in these
2 rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

12 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
13 because it seeks “all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder
14 complaints about rate increases and/or affordability regarding any SFG homeowners, rental
15 dwelling, renters, or condo rates from 2020 to present, including but not limited to complaints
16 RELATED TO the INTERIM RATE HEARING or THIS PROCEEDING,” which is an
17 extremely overbroad category.

18 SFG also objects to this Request to the extent it seeks personal information of SFG’s
19 policyholders, as this information is protected by the California Constitution. *See In re Ins.*
20 *Installment Fee Cases*, 211 Cal. App. 4th 1395, 1426 (2012). SFG cannot disclose this
21 information without notice to the policyholders and depending on the type of personal
22 information, either an opportunity for the policyholder to object or a requirement for affirmative
23 consent from the policyholder prior to disclosure. *Id.* at 1430-31.

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

25 SFG does not intend to produce documents in response to this Request, as framed.

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

27 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder

1 claims RELATED TO the 2025 LOS ANGELES WILDFIRES.

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

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

5 SFG objects to this Request as overly broad and unduly burdensome, including as to the
6 use of the terms “all,” and “RELATED TO.”

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

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

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

20 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
21 because it seeks “all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder
22 claims RELATED TO the 2025 LOS ANGELES WILDFIRES,” which is an extremely overbroad
23 category.

24 SFG also objects to this Request to the extent it seeks personal information of SFG’s
25 policyholders, as this information is protected by the California Constitution. *See In re Ins.*
26 *Installment Fee Cases*, 211 Cal. App. 4th 1395, 1426 (2012). SFG cannot disclose this
27 information without notice to the policyholders and depending on the type of personal
28

1 information, either an opportunity for the policyholder to object or a requirement for affirmative
2 consent from the policyholder prior to disclosure. *Id.* at 1430-31.

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

4 SFG does not intend to produce documents in response to this Request, as framed.

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

6 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any initial adjustor
7 claims reports submitted by any adjustor RELATED TO the 2025 LOS ANGELES WILDFIRES.

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

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

11 SFG objects to this Request as overly broad and unduly burdensome, including as to the
12 use of the terms “all” and “RELATED TO.”

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

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

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

26 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
27 because it seeks “all DOCUMENTS and COMMUNICATIONS RELATED TO any initial

1 adjustor claims reports submitted by any adjustor RELATED TO the 2025 LOS ANGELES
2 WILDFIRES,” which is an extremely overbroad category.

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

4 SFG does not intend to produce documents in response to this Request, as framed.

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

6 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any SFG final or
7 approved adjustor claims reports RELATED TO the 2025 LOS ANGELES WILDFIRES.

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

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

11 SFG objects to this Request as overly broad and unduly burdensome, including as to the
12 use of the terms “all,” “any,” and “RELATED TO.”

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

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

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

26 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
27 because it seeks “all DOCUMENTS and COMMUNICATIONS RELATED TO any SFG final or

1 approved adjustor claims reports RELATED TO the 2025 LOS ANGELES WILDFIRES,” which
2 is an extremely overbroad category.

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

4 SFG does not intend to produce documents in response to this Request, as framed.

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

6 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder
7 complaints regarding any STATE FARM claims handling from 2020 to present, including but not
8 limited to any complaints regarding STATE FARM claims handling RELATED TO the 2025
9 LOS ANGELES WILDFIRES.

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

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

13 SFG objects to this Request as overly broad and unduly burdensome, including as to the
14 use of the terms “all,” “RELATED TO,” “any,” and “including but not limited to.”

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

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

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

1 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
2 because it seeks “all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder
3 complaints regarding any SFG claims handling from 2020 to present, including but not limited to
4 any complaints regarding SFG claims handling RELATED TO the 2025 LOS ANGELES
5 WILDFIRES,” which is an extremely overbroad category.

6 SFG also objects to this Request to the extent it seeks personal information of SFG’s
7 policyholders, as this information is protected by the California Constitution. *See In re Ins.*
8 *Installment Fee Cases*, 211 Cal. App. 4th 1395, 1426 (2012). SFG cannot disclose this
9 information without notice to the policyholders and depending on the type of personal
10 information, either an opportunity for the policyholder to object or a requirement for affirmative
11 consent from the policyholder prior to disclosure. *Id.* at 1430-31.

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

13 SFG does not intend to produce documents in response to this Request, as framed.

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

15 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any STATE
16 FARM claims regarding any policyholder complaints RELATED TO smoke damage RELATED
17 to the 2025 LOS ANGELES WILDFIRES.

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

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

21 SFG objects to this Request as overly broad and unduly burdensome, including as to the
22 use of the terms “all,” “any,” and “RELATED TO.”

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

27 SFG further specifically objects to the extent this Request seeks documents protected from
28

1 disclosure by the attorney-client privilege, work product doctrine, joint or common interest
2 privilege, or any other privilege, protection, or immunity.

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

9 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
10 because it seeks “all DOCUMENTS and COMMUNICATIONS RELATED TO any SFG claims
11 regarding any policyholder complaints RELATED TO smoke damage RELATED to the 2025
12 LOS ANGELES WILDFIRES,” which is an extremely overbroad category.

13 SFG also objects to this Request to the extent it seeks personal information of SFG’s
14 policyholders, as this information is protected by the California Constitution. *See In re Ins.*
15 *Installment Fee Cases*, 211 Cal. App. 4th 1395, 1426 (2012). SFG cannot disclose this
16 information without notice to the policyholders and depending on the type of personal
17 information, either an opportunity for the policyholder to object or a requirement for affirmative
18 consent from the policyholder prior to disclosure. *Id.* at 1430-31.

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

20 SFG does not intend to produce documents in response to this Request, as framed.

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

22 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder
23 complaints RELATED to any STATE FARM claims adjusting RELATED TO the 2025 LOS
24 ANGELES WILDFIRES.

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

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

1 SFG objects to this Request as overly broad and unduly burdensome, including as to the
2 use of the terms “all,” RELATED TO” and “any.”

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

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

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

16 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
17 because it seeks “all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder
18 complaints RELATED to any SFG claims adjusting RELATED TO the 2025 LOS ANGELES
19 WILDFIRES,” which is an extremely overbroad category.

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

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

27 SFG does not intend to produce documents in response to this Request, as framed.

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

2 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder
3 complaints RELATED to any STATE FARM claims adjustors RELATED TO the 2025 LOS
4 ANGELES WILDFIRES.

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

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

8 SFG objects to this Request as overly broad and unduly burdensome, including as to the
9 use of the terms “all,” “any,” and “RELATED TO.”

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

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

17 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
18 limited to competitively sensitive information), which are privileged and protected under
19 California law and SFG objects to their disclosure without a suitable protective order, including
20 sealing when such trade secret information is introduced into the record, and an agreement by the
21 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
22 352, 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

23 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
24 because it seeks “all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder
25 complaints RELATED to any SFG claims adjustors RELATED TO the 2025 LOS ANGELES
26 WILDFIRES,” which is an extremely overbroad category.

27 SFG also objects to this Request to the extent it seeks personal information of SFG’s
28

1 policyholders, as this information is protected by the California Constitution. *See In re Ins.*
2 *Installment Fee Cases*, 211 Cal. App. 4th 1395, 1426 (2012). SFG cannot disclose this
3 information without notice to the policyholders and depending on the type of personal
4 information, either an opportunity for the policyholder to object or a requirement for affirmative
5 consent from the policyholder prior to disclosure. *Id.* at 1430-31.

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

7 SFG does not intend to produce documents in response to this Request, as framed.

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

9 Provide all DOCUMENTS RELATED TO STATE FARM's Enterprise Risk
10 Management (ERM) program covering the period from 2016 to the present.

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

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

14 SFG objects to this Request as overly broad and unduly burdensome, including as to the
15 use of the term "all."

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

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

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

1 352, 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

2 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
3 because it seeks “all DOCUMENTS RELATED TO SFG’s Enterprise Risk Management (ERM)
4 program covering the period from 2016 to the present,” which is an extremely overbroad
5 category. ERM is a business discipline, not an identifiable category of documents. SFG will
6 provide a description of ERM.

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

8 SFG does not intend to produce documents in response to this Request, as framed.

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

10 Provide all DOCUMENTS RELATED TO STATE FARM’s economic capital modeling
11 and stress testing on underwriting results, investment results, operating results and surplus from
12 2016 to the present.

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

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

16 SFG objects to this Request as overly broad and unduly burdensome, including as to the
17 use of the term “all.”

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

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

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

10 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
11 because it seeks “all DOCUMENTS RELATED TO SFG’s economic capital modeling and stress
12 testing on underwriting results, investment results, operating results and surplus from 2016 to the
13 present,” which is an extremely overbroad category.

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

15 SFG does not intend to produce documents in response to this Request, as framed.

16 **REQUEST FOR DISCOVERY NO. 60:**

17 Provide all DOCUMENTS RELATED TO STATE FARM’s Environmental, Social &
18 Governance program from 2020 to the present.

19 **RESPONSE TO REQUEST FOR DISCOVERY NO. 60:**

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

22 SFG objects to this Request as overly broad and unduly burdensome, including as to the
23 use of the term “all” and “RELATED TO.”

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

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

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

10 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
11 because it seeks “all DOCUMENTS RELATED TO SFG’s Environmental, Social & Governance
12 program from 2020 to the present,” which is an extremely overbroad category.

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

14 SFG does not intend to produce documents in response to this Request, as framed.

15 **REQUEST FOR DISCOVERY NO. 61:**

16 Provide all DOCUMENTS RELATED TO STATE FARM’s infrastructure and its
17 commonality / overlap with AFFILIATES (including parent company, State Farm Mutual) from
18 2020 to the present.

19 **JRESPONSE TO REQUEST FOR DISCOVERY NO. 61:**

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

22 SFG objects to this Request as overly broad and unduly burdensome, including due to the
23 use of the term “all.”

24 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
25 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, this
26 Request is not relevant to the extent that it seeks to treat SFG and State Farm Mutual as a single
27 entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021). Nor

1 would this category of documents be the sort of evidence on which responsible persons would
2 rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

12 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
13 because it seeks “all DOCUMENTS RELATED TO SFG’s infrastructure and its commonality /
14 overlap with AFFILIATES (including parent company, State Farm Mutual) from 2020 to the
15 present,” which is an extremely overbroad category.

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

17 SFG states it is an Illinois-domiciled stock insurance company, whose sole shareholder is
18 State Farm Mutual Automobile Insurance Company, an Illinois-domiciled mutual insurance
19 company and directs CW to Schedule Y included within the Quarterly and Annual Financial
20 Statements for State Farm General Insurance Company up to and as of March 31, 2025 already on
21 file with the California Department of Insurance.

22 **REQUEST FOR DISCOVERY NO. 62:**

23 Provide all DOCUMENTS RELATED TO STATE FARM’s management team and its
24 commonality / overlap with AFFILIATES (including parent company, State Farm Mutual) from
25 2020 to the present.

26 **RESPONSE TO REQUEST FOR DISCOVERY NO. 62:**

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

1 herein.

2 SFG objects to this Request as overly broad and unduly burdensome, including due to the
3 use of the terms “all” and “RELATED TO.”

4 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
5 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, this
6 Request is not relevant to the extent that it seeks to treat SFG and State Farm Mutual as a single
7 entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021). Nor
8 would this category of documents be the sort of evidence on which responsible persons would
9 rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

19 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
20 because it seeks “all DOCUMENTS RELATED TO SFG’s management team and its
21 commonality / overlap with AFFILIATES (including parent company, State Farm Mutual) from
22 2020 to the present,” which is an extremely overbroad category.

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

24 SFG identifies the following individuals currently serving on the State Farm General
25 Insurance Company Board of Directors as of July 25, 2025, the same individuals also identified
26 on the Jurat Pages within the Quarterly and Annual Financial Statements for State Farm General
27 Insurance Company already on file with the California Department of Insurance: Kristyn Ann
28

1 Cook; Deon Sherie Johnson; Daniel Joseph Krause; Bradley Doyle Montgomery; Christopher
2 Alexander Schell; Mark Edward Schwamberger; Brian Everett Truttmann. SFG has also
3 produced a document, bates stamped as SFG_00000192, which is sufficient to show the names
4 and titles of the Board of Directors of State Farm Mutual Automobile Insurance Company.

5 **REQUEST FOR DISCOVERY NO. 63:**

6 Provide all DOCUMENTS RELATED TO any programs, investment policies, or
7 agreements STATE FARM currently participates in with AFFILIATES (including parent
8 company, State Farm Mutual) to manage risks and improve cash flow and liquidity, including but
9 not limited to any investment pooling agreement with AFFILIATES (including parent company,
10 State Farm Mutual), any common clearing account agreement with AFFILIATES (including
11 parent company, State Farm Mutual), any Services and Facilities Agreement with AFFILIATES
12 (including parent company, State Farm Mutual), any line of credit available to STATE FARM
13 from parent company, State Farm Mutual, and any segregated surplus State Farm Mutual holds
14 for the protection of STATE FARM and AFFILIATES.

15 **RESPONSE TO REQUEST FOR DISCOVERY NO. 63:**

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

18 SFG objects to this Request as overly broad and unduly burdensome, including due to the
19 use of the terms “all,” “RELATED TO”, “any” and “including but not limited to.”

20 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
21 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this
22 context of requests for documents regarding State Farm General’s financial condition that are
23 statutorily privileged and/or protected from disclosure (included but not limited to specific
24 Insurance Code as well as trade secret protection), when State Farm General’s solvency regulator
25 (the Illinois Department of Insurance) has made a determination regarding SFG’s financial
26 condition, any “relevance” is subsumed in the regulator’s determination and the documents are
27 not “relevant” when balanced against confidentiality interests. In addition, this Request is not

1 relevant to the extent that it seeks to treat SFG and State Farm Mutual as a single entity. *See State*
2 *Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021). Nor would this category of
3 documents be the sort of evidence on which responsible persons would rely in these rate review
4 proceedings. Cal. Gov. Code § 11513(c).

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

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

14 SFG further objects to the extent that this Request seeks documents that are statutorily
15 protected as confidential, privileged, and not subject to discovery under the California Insurance
16 Code. *See* Cal. Ins. Code §§ 1215.8, 1215.5; *see also* 215 ILCS § 5/131.22.

17 SFG also objects that this Request is vague, ambiguous, and unduly burdensome as it
18 relates to the terms and phrases, “programs, investment policies, or agreements SFG currently
19 participates in with AFFILIATES (including parent company, State Farm Mutual),” “manage
20 risks and improve cash flow and liquidity,” “any investment pooling agreement with
21 AFFILIATES (including parent company, State Farm Mutual),” “any common clearing account
22 agreement with AFFILIATES (including parent company, State Farm Mutual),” “any Services
23 and Facilities Agreement with AFFILIATES (including parent company, State Farm Mutual),”
24 “any line of credit available to SFG from parent company, State Farm Mutual,” and “any
25 segregated surplus State Farm Mutual holds for the protection of SFG and AFFILIATES.”

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

27 SFG will produce document(s) sufficient to identify any inter-affiliate agreements

1 between SFG and State Farm Mutual Insurance Company, from January 1, 2015 to the present,
2 and summarize their relevant terms.

3 **REQUEST FOR DISCOVERY NO. 64:**

4 In relation to the PDF file “NT Filing Exhibits - 1Q 2025”, EXHIBIT 13, Page 1, provide
5 all data, DOCUMENTS, analyses and calculations that are, or will be, used to determine:

- 6 i. The definition of “line of business”,
- 7 ii. The relationship between STATE FARM’s statewide average premium for that line
8 compared to the average statewide premium of the industry,
- 9 iii. Whether or not there is a favorable outlook on ability to have adequate rates,
- 10 iv. That the risk-based capital is sufficient to avoid required company or regulator action
11 under insurer solvency regulations,
- 12 v. That there is an achievement of a surplus-to-net written premium ratio of 1.0 or better
13 giving consideration to then current reinsurance utilization,
- 14 vi. STATE FARM’s ability to recover from stresses,
- 15 vii. Whether or not there is a favorable rating by rating agencies,
- 16 viii. The criteria and analysis used by the IL DOI (as STATE FARM’s solvency
17 regulator) for acquiescence to any filing to reduce rates.

18 **RESPONSE TO REQUEST FOR DISCOVERY NO. 64:**

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

21 SFG objects to this Request as overly broad and unduly burdensome, including due to the
22 use of the terms “[i]n relation to” and “all.”

23 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
24 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this
25 context of requests for documents regarding State Farm General’s financial condition that are
26 statutorily privileged and/or protected from disclosure (included but not limited to specific
27 Insurance Code as well as trade secret protection), when State Farm General’s solvency regulator

1 (the Illinois Department of Insurance) has made a determination regarding SFG's financial
2 condition, any "relevance" is subsumed in the regulator's determination and the documents are
3 not "relevant" when balanced against confidentiality interests. In addition, the Requests are not
4 relevant to the extent that they seek to treat SFG and State Farm Mutual as a single entity. *See*
5 *State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021). Nor would this
6 category of documents be the sort of evidence on which responsible persons would rely in these
7 rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

17 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
18 relates to the terms and phrases, "relationship between SFG's statewide average premium for that
19 line compared to the average statewide premium of the industry," "favorable outlook on ability to
20 have adequate rates," "risk-based capital is sufficient to avoid required company or regulator
21 action under insurer solvency regulations," "achievement of a surplus-to-net written premium
22 ratio of 1.0 or better giving consideration to then current reinsurance utilization," "ability to
23 recover from stresses," "favorable rating by rating agencies," and "criteria and analysis used by
24 the IL DOI (as SFG's solvency regulator) for acquiescence to any filing to reduce rates."

25 Subject to and consistent with the foregoing objections, SFG responds as follows:
26 SFG directs CDI to responsive documents submitted by SFG via SERFF. In the attached Exhibit
27 A, which is incorporated by reference herein, SFG identifies SERFF documents that SFG believes
28

1 are responsive to this CDI Request.

2 **REQUEST FOR DISCOVERY NO. 65:**

3 Provide all DOCUMENTS and COMMUNICATIONS RELATED TO whether, and on
4 what terms, STATE FARM's parent company, State Farm Mutual, has or will provide any form
5 of financial assistance to STATE FARM in connection with the interim and/or final resolution of
6 any proceedings involving rate applications PA-2024-00011, PA-2024-00012, or PA-2024-
7 00013.

8 **RESPONSE TO REQUEST FOR DISCOVERY NO. 65:**

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

11 SFG objects to this Request as overly broad and unduly burdensome, including with
12 regard to the use of the terms "all," "RELATED TO," "any" and "in connection with."

13 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
14 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, this
15 Request is not relevant to the extent that it seeks to treat SFG and State Farm Mutual as a single
16 entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021). Nor
17 would this category of documents be the sort of evidence on which responsible persons would
18 rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

1 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
2 relates to the terms and phrases, “STATE FARM’s parent company, State Farm Mutual,” and
3 “any form of financial assistance.”

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

5 SFG is conducting a reasonably diligent search and will produce relevant, non-privileged
6 documents responsive to this request, if any, based on that search.

7 **REQUEST FOR DISCOVERY NO. 66:**

8 Provide a copy of the surplus note STATE FARM received from its parent company, State
9 Farm Mutual, including the terms thereof, in connection with the Commissioner’s May 13, 2025
10 adoption of the stipulation between CDI and STATE FARM.

11 **RESPONSE TO REQUEST FOR DISCOVERY NO. 66:**

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

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

16 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
17 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, this
18 Request is not relevant to the extent that it seeks to treat SFG and State Farm Mutual as a single
19 entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021). Nor
20 would this category of documents be the sort of evidence on which responsible persons would
21 rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

25 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
26 limited to competitively sensitive information), which are privileged and protected under
27 California law and SFG objects to their disclosure without a suitable protective order, including

1 sealing when such trade secret information is introduced into the record, and an agreement by the
2 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
3 352, 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

4 SFG further objects that this Request is vague, ambiguous, and unduly burdensome as it
5 relates to the terms and phrases, “surplus note,” “parent company, State Farm Mutual,” and
6 “terms thereof.”

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

8 SFG is conducting a reasonably diligent search and will produce relevant, non-privileged
9 documents responsive to this request, if any, based on that search.

10 **REQUEST FOR DISCOVERY NO. 67:**

11 The STATE FARM Statement of Actuarial Opinion as of December 31, 2024 states,
12 “Beginning in 2023 and continuing during 2024, the Company has strengthened net reserves for
13 prior accident years, largely in its Umbrella and Commercial Multi-Peril coverages. Both
14 coverages were impacted by sharp increases in claim severity and an extended time frame for
15 claim resolution. These factors resulted in claim development that was well in excess of estimates
16 based on recent development patterns. In particular, such adverse trends have been observed
17 across the sector for Umbrella.” Provide all data, DOCUMENTS, analyses and calculations
18 RELATED TO those statements.

19 **RESPONSE TO REQUEST FOR DISCOVERY NO. 67:**

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

22 SFG objects to this Request as overly broad and unduly burdensome, including due to the
23 use of the terms “all” and “RELATED TO.”

24 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
25 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this
26 context of requests for documents regarding State Farm General’s financial condition that are
27 statutorily privileged and/or protected from disclosure (included but not limited to specific

1 Insurance Code as well as trade secret protection), when State Farm General's solvency regulator
2 (the Illinois Department of Insurance) has made a determination regarding SFG's financial
3 condition, any "relevance" is subsumed in the regulator's determination and the documents are
4 not "relevant" when balanced against confidentiality interests. Nor would this category of
5 documents be the sort of evidence on which responsible persons would rely in these rate review
6 proceedings. Cal. Gov. Code § 11513(c).

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

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

16 SFG further objects to the extent that this Request seeks documents that are statutorily
17 protected as confidential, privileged, and not subject to discovery. *See* Cal. Ins. Code § 935.6; *see*
18 *also* 215 ILCS § 5/136.

19 SFG also objects that this Request is vague, ambiguous, and unduly burdensome because
20 it seeks "all data, DOCUMENTS, analyses and calculations RELATED TO those statements,"
21 which is an extremely broad category.

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

23 SFG directs CW to the Statement of Actuarial Opinion, which is publicly available. *See*
24 215 ILCS Section 5/136. SFG further directs CW to the documents produced on May 30, 2025,
25 bates stamped as SFG_00000193 through SFG_00000206, which are responsive to this Request.

26 **REQUEST FOR DISCOVERY NO. 68:**

27 Provide all data, DOCUMENTS, analyses, and calculations dealing with the impact of

1 rate changes on lapse and cancellation rates for the lines of business written by STATE FARM.

2 **RESPONSE TO REQUEST FOR DISCOVERY NO. 68:**

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

5 SFG objects to this Request as overly broad and unduly burdensome, including due to the
6 use of the term “all.”

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

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

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

20 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
21 because it seeks “all data, DOCUMENTS, analyses, and calculations dealing with the impact of
22 rate changes on lapse and cancellation rates for the lines of business written by SFG,” which is an
23 extremely broad category.

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

25 SFG does not intend to produce documents in response to this Request, as framed. Given
26 that a suitable Protective Order has not been agreed upon and is not in place, SFG is withholding
27 on trade secret and confidentiality grounds reports and analysis related to monitoring

1 nonrenewals.

2 **REQUEST FOR DISCOVERY NO. 69:**

3 With regard to the statement in EXHIBIT 13, Page 10 that, “It is likely that a catastrophe
4 factor calculated based on wildfire models, and inclusion of a provision for the Net Cost of
5 Reinsurance, would produce a rate meeting State Farm General’s needs”, provide all data,
6 DOCUMENTS, analyses, and calculations RELATED TO that statement.

7 **RESPONSE TO REQUEST FOR DISCOVERY NO. 69:**

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

10 SFG objects to this Request as overly broad and unduly burdensome, including due to the
11 use of the terms “all” and “RELATED TO.”

12 SFG objects to this Request to the extent it seeks documents not relevant to the Rate
13 Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, the
14 Requests are not relevant to the extent that they seek to treat SFG and State Farm Mutual as a
15 single entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021).
16 Nor would this category of documents be the sort of evidence on which responsible persons
17 would rely in these rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

27 SFG further objects that this Request is vague, ambiguous, and unduly burdensome

1 because it seeks “all data, DOCUMENTS, analyses, and calculations RELATED TO that
2 statement,” which is an extremely broad category.

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

4 SFG is conducting a reasonably diligent search and will produce responsive, non-
5 privileged documents responsive to this Request, if any, based on that search. Given that a
6 suitable Protective Order has not been agreed upon and is not in place, SFG will withhold certain
7 documents on trade secret and confidentiality grounds, including underlying analyses concerning
8 reinsurance costs.

9 **REQUEST FOR DISCOVERY NO. 70:**

10 In the PDF file “NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9”, EXHIBIT 13, Page 9
11 states “On January 1st, 2023, the values that are immediately applied as the initial case reserve
12 estimate were updated.” Provide all data and DOCUMENTS showing the numerical value of the
13 initial case reserves used by STATE FARM from 2021 to the present, along with the time period
14 when the initial case reserve was applicable.

15 **RESPONSE TO REQUEST FOR DISCOVERY NO. 70:**

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

18 SFG objects to this Request as overly broad and unduly burdensome, including due to the
19 use of the term “all.”

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

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

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

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

6 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
7 because it seeks “all data and DOCUMENTS showing the numerical value of the initial case
8 reserves used by SFG from 2021 to the present, along with the time period when the initial case
9 reserve was applicable,” which is an extremely broad category.

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

11 SFG is conducting a reasonably diligent search and will produce responsive, non-
12 privileged documents responsive to this Request, if any, based on that search. Given that a
13 suitable Protective Order has not been agreed upon and is not in place, SFG is withholding
14 documents related to claim reserves on trade secret and confidentiality grounds.

15 **REQUEST FOR DISCOVERY NO. 71:**

16 In the PDF file “NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9”, EXHIBIT 13, Page 9
17 states “Moving forward we expect the initial case reserves to be more reflective of the ultimate
18 amount to be paid.” Provide all data, DOCUMENTS, analyses and calculations that forms the
19 basis of that statement.

20 **RESPONSE TO REQUEST FOR DISCOVERY NO. 71:**

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

23 SFG objects to this Request as overly broad and unduly burdensome, including with
24 regard to the use of the term “all.”

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

1 rate review proceedings. Cal. Gov. Code § 11513(c).

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

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

11 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
12 because it seeks “all data, DOCUMENTS, analyses and calculations that forms the basis of that
13 statement,” which is an extremely broad category.

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

15 SFG is conducting a reasonably diligent search and will produce responsive, non-
16 privileged documents responsive to this Request, if any, based on that search. Given that a
17 suitable Protective Order has not been agreed upon and is not in place, SFG is withholding
18 documents related to claim reserves on trade secret and confidentiality grounds.

19 **REQUEST FOR DISCOVERY NO. 72:**

20 In the PDF file “NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9”, EXHIBIT 13, Page 9
21 states, “In order to adjust the incurred loss development factors, we used an approach commonly
22 referred to as the ‘Berquist and Sherman Case Outstanding Adjustment’.” In reference to
23 Appendix B from the Berquist & Sherman paper listing “Sample Questions for Department
24 Executives” which was attached to Consumer Watchdog 6/4/25 RFIs, provide all documents
25 RELATED TO each of the items set forth therein, including all data and DOCUMENTS
26 RELATED TO YOUR 6/20/25 responses for each question in Appendix B. If STATE FARM
27 contends that any of those items are not relevant or not applicable to STATE FARM’s rate filing,

1 provide the basis for that contention including all related DOCUMENTS.

2 **RESPONSE TO REQUEST FOR DISCOVERY NO. 72:**

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

5 SFG objects to this Request as overly broad and unduly burdensome, including with
6 regard to the use of the terms “all” and “RELATED TO.”

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

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

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

20 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
21 because it seeks “all documents RELATED TO each of the items set forth therein, including all
22 data and DOCUMENTS RELATED TO YOUR 6/20/25 responses for each question in Appendix
23 B,” which is an extremely broad category.

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

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

27 SFG is conducting a reasonably diligent search and will produce responsive, non-

1 privileged documents responsive to this Request, if any, based on that search. In addition, SFG
2 directs CDI to responsive documents submitted by SFG via SERFF. In the attached Exhibit A,
3 which is incorporated by reference herein, SFG identifies SERFF documents that SFG believes
4 are responsive to this CDI Request.

5 **REQUEST FOR DISCOVERY NO. 73:**

6 In response to the 6/4/25 RFIs from Consumer Watchdog, STATE FARM provided the
7 following PDF files: “Exhibit 8 – Accident Year”, “Exhibit 8 – By Peril” and “Exhibit 9 – By
8 Peril”. Provide these documents in Excel format.

9 **RESPONSE TO REQUEST FOR DISCOVERY NO. 73:**

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

12 SFG objects to this Request as overly broad and unduly burdensome.

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

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

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

26 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
27 because it seeks “these documents in Excel format.”

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

2 SFG is conducting a reasonably diligent search and will produce responsive, non-
3 privileged documents responsive to this Request, if any, based on that search.

4 | REQUEST FOR DISCOVERY NO. 74:

5 Provide all “operation guides”, as referenced in STATE FARM response to Consumer
6 Watchdog 6/4/25 RFI 2, from 2021 to the present.

7 | **RESPONSE TO REQUEST FOR DISCOVERY NO. 74:**

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

10 SFG objects to this Request as overly broad and unduly burdensome, including with
11 regard to the use of the term “all.”

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

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

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

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

26 SFG does not intend to produce documents in response to this Request, as framed. Given
27 that a suitable Protective Order has not been agreed upon and is not in place, SFG is withholding

1 documents related to claim reserves on trade secret and confidentiality grounds.

2 **REQUEST FOR DISCOVERY NO. 75:**

3 Provide all DOCUMENTS RELATED TO any changes in operations (e.g., underwriting,
4 book of business, rating, marketing, claims handling/settlement, reserving, policy provisions, etc.)
5 from 2017 to the present for each of the policy forms that are the subject of the APPLICATIONS.

6 **RESPONSE TO REQUEST FOR DISCOVERY NO. 75:**

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

9 SFG objects to this Request as overly broad and unduly burdensome, including with
10 regard to the use of the terms “all,” “RELATED TO,” and “any.”

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

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

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

24 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
25 because it seeks “all DOCUMENTS RELATED TO any changes in operations (e.g.,
26 underwriting, book of business, rating, marketing, claims handling/settlement, reserving, policy
27 provisions, etc.) from 2017 to the present for each of the policy forms that are the subject of the

1 APPLICATIONS,” which is an extremely broad category.

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

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

5 SFG directs CDI to responsive documents submitted by SFG via SERFF.

6 **REQUEST FOR DISCOVERY NO. 76:**

7 In reference to the PDF file “NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9”,
8 EXHIBIT 9, Page 8, provide all data, DOCUMENTS, analyses and calculations that form the
9 basis of the values shown in Columns (3), (4) and (5).

10 **RESPONSE TO REQUEST FOR DISCOVERY NO. 76:**

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

13 SFG objects to this Request as overly broad and unduly burdensome, including due to the
14 use of the term “all” with regard to the broad categories of information sought.

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

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

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

1 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
2 because it seeks “all data, DOCUMENTS, analyses and calculations that form the basis of the
3 values shown in Columns (3), (4) and (5),” which is an extremely broad category.

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

5 SFG agrees to meet and confer regarding the scope of this Request.

6 **REQUEST FOR DISCOVERY NO. 77:**

7 STATE FARM’s response to Consumer Watchdog 6/4/25 RFI 10 states, “We submitted a
8 correction to the 2024 values in Exhibit 13 in SERFF on 6/19/2025. These corrections will adjust
9 the 2025-2028 surplus projections slightly, but do not result in a material change.” Provide
10 DOCUMENTS that show the amount of changes in the 2024 values, as well as the basis for the
11 corrections.

12 **RESPONSE TO REQUEST FOR DISCOVERY NO. 77:**

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

15 SFG objects to this Request as overly broad and unduly burdensome.

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

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

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

1 352, 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

2 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
3 because it seeks “DOCUMENTS that show the amount of changes in the 2024 values, as well as
4 the basis for the corrections,” which is an extremely broad category.

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

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

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

13 **REQUEST FOR DISCOVERY NO. 78:**

14 Provide DOCUMENTS, showing, explaining and providing the basis for all changes in
15 the corrected EXHIBIT 13 submitted in SERFF on 6/19/2025 compared to the previous EXHIBIT
16 13.

17 **RESPONSE TO REQUEST FOR DISCOVERY NO. 78:**

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

20 SFG objects to this Request as overly broad and unduly burdensome, including with
21 regard to the use of the term “all.”

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

26 SFG further specifically objects to the extent this Request seeks documents protected from
27 disclosure by the attorney-client privilege, work product doctrine, joint or common interest

1 privilege, or any other privilege, protection, or immunity.

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

8 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
9 because it seeks “DOCUMENTS, showing, explaining and providing the basis for all changes in
10 the corrected EXHIBIT 13 submitted in SERFF on 6/19/2025 compared to the previous EXHIBIT
11 13,” which is an extremely broad category.

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

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

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

20 **REQUEST FOR DISCOVERY NO. 79:**

21 In reference to STATE FARM’s response to Consumer Watchdog 6/4/25 RFI 11 which
22 states, “State Farm reviews each model independently for reasonability,” provide all
23 DOCUMENTS related to those reviews.

24 **RESPONSE TO REQUEST FOR DISCOVERY NO. 79:**

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

27 SFG objects to this Request as overly broad and unduly burdensome, including with

1 regard to the use of the terms “all” and “related to.”

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

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

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

15 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
16 because it seeks “all DOCUMENTS related to those reviews,” which is an extremely overbroad
17 category.

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

19 SFG agrees to meet and confer regarding the scope of this Request.

20 **REQUEST FOR DISCOVERY NO. 80:**

21 STATE FARM’s response to Consumer Watchdog 6/4/25 RFI 12 states, “As noted in
22 Exhibit 19, Closed with Payment claim counts are not explicitly collected. Rather, an assumption-
23 based approach is used to develop these claim counts.” Provide all DOCUMENTS related to that
24 assumption-based approach.

25 **RESPONSE TO REQUEST FOR DISCOVERY NO. 80:**

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

1 SFG objects to this Request as overly broad and unduly burdensome, including with
2 regard to the use of the terms “all” and “related to.”

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

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

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

16 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
17 because it seeks “all DOCUMENTS related to those reviews,” which is an extremely overbroad
18 category.

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

20 SFG agrees to meet and confer regarding the scope of this Request.

21 **REQUEST FOR DISCOVERY NO. 81:**

22 STATE FARM’s response to Consumer Watchdog 6/4/25 RFI 15 states, “To assist with
23 your review, we have provided a 20-year weighted average of the percent of losses from each
24 bucket for the Wildfire cause of loss from a different data source.” Provide all DOCUMENTS
25 showing the derivation of the 20-year weighted average including but not limited to the yearly
26 values and the weighting procedure.

27 **RESPONSE TO REQUEST FOR DISCOVERY NO. 81:**

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

3 SFG objects to this Request as overly broad and unduly burdensome, including with
4 regard to the use of the terms “all” and “including but not limited to.”

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

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

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

18 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
19 because it seeks “all DOCUMENTS showing the derivation of the 20-year weighted average
20 including but not limited to the yearly values and the weighting procedure,” which is an
21 extremely overbroad category.

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

23 SFG is conducting a reasonably diligent search and will produce responsive, non-
24 privileged documents responsive to this Request, if any, based on that search.

25 **REQUEST FOR DISCOVERY NO. 82:**

26 Unlike previous submissions in this matter, STATE FARM did not provide a “No
27 Variance” Rate Template along with the Rate Templates and other materials submitted via
28

1 SERFF on June 6, 2025 in response to Objection #1 in CDI's May 23, 2025 Objections. Provide a
2 "No Variance" Rate Template for both the "Interim Rate Approved" (using a 1/1/2026 effective
3 date with the interim rate reflected in the on-leveled earned premium) and "with 6-1-2025
4 Effective Date" (without the interim rate reflected in the on-leveled earned premium) scenarios,
5 in both Excel and pdf format.

6 **RESPONSE TO REQUEST FOR DISCOVERY NO. 82:**

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

9 SFG objects to this Request as overly broad and unduly burdensome.

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

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

17 SFG further objects to the extent this Request seeks SFG trade secrets (including but not
18 limited to competitively sensitive information), which are privileged and protected under
19 California law and SFG objects to their disclosure without a suitable protective order, including
20 sealing when such trade secret information is introduced into the record, and an agreement by the
21 parties to keep such material confidential and use only in this proceeding. *See* Cal. Evid. Code §§
22 352, 1060; Cal. Civ. Code § 3426.1; Cal. Code Civ. P. § 2031.60(f).

23 SFG further objects that this Request is vague, ambiguous, and unduly burdensome
24 because it seeks "a 'No Variance' Rate Template for both the 'Interim Rate Approved' (using a
25 1/1/2026 effective date with the interim rate reflected in the on-leveled earned premium) and
26 'with 6-1-2025 Effective Date' (without the interim rate reflected in the on-leveled earned
27 premium) scenarios, in both Excel and pdf format."

1 SFG further objects to the extent the Requests are improper interrogatories or call for the
2 creation of documents, which are not permitted under Government Code § 11507.6.

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

4 SFG does not intend to produce documents in response to this Request, as framed.

5
6
7 Dated: July 30, 2025

HOGAN LOVELLS US LLP

8
9 By:/s/ *Vanessa O. Wells*

10
11 Vanessa O. Wells
12 Attorneys for Applicant
13 SFG Insurance Company

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EXHIBIT A

Request #	SERFF documents:
7	<p>NT filing 24-1271</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>NT PriorAppRateAPL.pdf</p> <p>NT PriorAppRateAPL.xlsxm</p> <p>Q1 2025 Data</p> <p>NT PriorAppRateAPL - 1Q 2025.pdf</p> <p>NT PriorAppRateAPL - 1Q 2025.xlsxm</p> <p> TN filing 24-1273</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>TN PriorAppRateAPL.pdf</p> <p>TN PriorAppRateAPL.xlsxm</p> <p>Q1 2025 Data</p> <p>TN PriorAppRateAPL - 1Q 2025.pdf</p> <p>TN PriorAppRateAPL - 1Q 2025.xlsxm</p> <p> RDP filing 24-1330</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>RDP PriorAppRateAPL.pdf</p> <p>RDP PriorAppRateAPL.xlsxm</p> <p>Q1 2025 Data</p> <p>RDP PriorAppRateAPL - 1Q 2025.pdf</p> <p>RDP PriorAppRateAPL - 1Q 2025.xlsxm</p>
22	<p>NT filing 24-1271</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>NT Variance 6 Rate Template.pdf</p> <p>NT Variance 6 Rate Template.xlsx</p> <p>Final Adjusted CDI Parameters</p> <p>Rate Change Calculation</p> <p>NT Filing Exhibits.pdf</p> <p>Exhibit Page 1</p> <p>Q1 2025 Data</p> <p>NT PriorAppRateTI All Var - 1Q 2025.pdf</p> <p>NT PriorAppRateTI All Var - 1Q 2025.xlsx</p> <p>Final Adjusted CDI Parameters</p> <p>Rate Change Calculation</p> <p>NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9.pdf</p>

Exhibit Page 1

Filing Correspondence

Objections

Response to 8-9 Objection submitted 9/10/2024

8-9-2024 Objection Response - NT.pdf

Question 2

Question 3

Question 4

Final Exhibits.pdf

Final Exhibits.xlsx

Exhibit R

Response to 5-23 Objection submitted 6/06/2025

5-23-2025 Objection Response.pdf

Question 1

NT PriorAppRateTI All Var - 1Q 2025 - Interim Rate Approved.pdf

NT PriorAppRateTI All Var - 1Q 2025 - Interim Rate Approved.xlsx

Final Adjusted CDI Parameters

Rate Change Calculation

NT PriorAppRateTI All Var - 1Q 2025 with 6-1-2025 Effective Date.pdf

NT PriorAppRateTI All Var - 1Q 2025 with 6-1-2025 Effective Date.xlsx

Final Adjusted CDI Parameters

Rate Change Calculation

Response to 6-27 Objection submitted 7/08/2025

6-27-2025 Objection Response.pdf

Question 4

Amendments

Response to 7-10 Objection submitted on 8/27/2024

7-10-24 Objection Response - Non-Tenant.pdf

Question 5 & 6

TN filing 24-1273

Supporting Documentation

New Prior Approval Rate Application

TN Variance 6 Rate Template.pdf

TN Variance 6 Rate Template.xlsx

Final Adjusted CDI Parameters

Rate Change Calculation

TN Filing Exhibits.pdf

Exhibit Page 1

Q1 2025 Data

TN PriorAppRateTI All Var - 1Q 2025.pdf

TN PriorAppRateTI All Var - 1Q 2025.xlsx

Final Adjusted CDI Parameters

Rate Change Calculation

TN Filing Exhibits - 1Q 2025.pdf

Exhibit Page 1

Filing Correspondence

Objections

Response to 8-13 Objection submitted 9/10/2024

8-13-2024 Objection Response - TN.pdf

Question 2

Question 3

Question 4

TN Final Exhibits.pdf

TN Final Exhibits.xlsx

Exhibit R

Amendments

Response to 7-10 Objection submitted on 8/28/2024

7-10-24 Objection Response - Tenants.pdf

Question 5 & 6

RDP filing 24-1330

Supporting Documentation

New Prior Approval Rate Application

RDP Variance 6 Rate Template.pdf

RDP Variance 6 Rate Template.xlsx

Final Adjusted CDI Parameters

Rate Change Calculation

RDP Filing Exhibits.pdf

Exhibit Page 1

Q1 2025 Data

RDP PriorAppRateTI All Var - 1Q 2025.pdf

RDP PriorAppRateTI All Var - 1Q 2025.xlsx

Final Adjusted CDI Parameters

Rate Change Calculation

RDP Filing Exhibits.pdf

Page 1

Filing Correspondence

Objections

Response to 8-13 Objection submitted 9/10/2024

8-13-2024 Objection Response - RDP.pdf

Question 2

Question 3

Question 4

Final Exhibits.pdf

Final Exhibits.xlsx

Exhibit R

Amendments

Response to 7-12 Objection submitted on 8/28/2024

7-12-24 Objection Response - Rental Dwelling.pdf

Question 5 & 6	
23	<p>NT filing 24-1271</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p style="padding-left: 20px;">NT Variance 6 Rate Template.pdf</p> <p style="padding-left: 20px;">NT Variance 6 Rate Template.xlsx</p> <p style="padding-left: 20px;">Rate Change Calculation</p> <p style="padding-left: 20px;">NT Filing Exhibits.pdf</p> <p style="padding-left: 20px;">Exhibit 13 Page 1</p> <p>Q1 2025 Data</p> <p style="padding-left: 20px;">NT PriorAppRateTI All Var - 1Q 2025.pdf</p> <p style="padding-left: 20px;">NT PriorAppRateTI All Var - 1Q 2025.xlsx</p> <p style="padding-left: 20px;">Rate Change Calculation</p> <p style="padding-left: 20px;">NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9.pdf</p> <p style="padding-left: 20px;">Exhibit 13 Page 1</p> <p>Filing Correspondence</p> <p>Objections</p> <p style="padding-left: 20px;">Response to 8-9 Objection submitted 9/10/2024</p> <p style="padding-left: 20px;">8-9-2024 Objection Response - NT.pdf</p> <p style="padding-left: 20px;">Question 2</p> <p style="padding-left: 20px;">Question 3dii</p> <p style="padding-left: 20px;">Question 4</p> <p style="padding-left: 20px;">Final Exhibits.pdf</p> <p style="padding-left: 20px;">Final Exhibits.xlsx</p> <p style="padding-left: 20px;">Exhibit R</p> <p style="padding-left: 20px;">Response to 6-27 Objection submitted 7/08/2025</p> <p style="padding-left: 20px;">6-27-2025 Objection Response.pdf</p> <p style="padding-left: 20px;">Question 4</p> <p>Amendments</p> <p style="padding-left: 20px;">Response to 7-10 Objection submitted on 8/27/2024</p> <p style="padding-left: 20px;">7-10-24 Objection Response - Non-Tenant.pdf</p> <p style="padding-left: 20px;">Question 5 & 6</p> <p>TN filing 24-1273</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p style="padding-left: 20px;">TN Variance 6 Rate Template.pdf</p> <p style="padding-left: 20px;">TN Variance 6 Rate Template.xlsx</p> <p style="padding-left: 20px;">Rate Change Calculation</p> <p style="padding-left: 20px;">TN Filing Exhibits.pdf</p> <p style="padding-left: 20px;">Exhibit 13 Page 1</p> <p>Q1 2025 Data</p> <p style="padding-left: 20px;">TN PriorAppRateTI All Var - 1Q 2025.pdf</p> <p style="padding-left: 20px;">TN PriorAppRateTI All Var - 1Q 2025.xlsx</p> <p style="padding-left: 20px;">Rate Change Calculation</p> <p style="padding-left: 20px;">Updated TN Filing Exhibits - 1Q 2025.pdf</p>

Exhibit 13 Page 1

Filing Correspondence
Objections

Response to 8-13 Objection submitted 9/10/2024

8-13-2024 Objection Response - TN.pdf

Question 2

Question 3dii

Question 4

Final Exhibits.pdf

Final Exhibits.xlsx

Exhibit R

Amendments

Response to 7-10 Objection submitted on 8/28/2024

7-10-24 Objection Response - Tenants.pdf

Question 5 & 6

RDP filing 24-1330

Supporting Documentation

New Prior Approval Rate Application

RDP Variance 6 Rate Template.pdf

RDP Variance 6 Rate Template.xlsx

Rate Change Calculation

RDP Filing Exhibits.pdf

Exhibit 13 Page 1

Q1 2025 Data

RDP PriorAppRateTI All Var - 1Q 2025.pdf

RDP PriorAppRateTI All Var - 1Q 2025.xlsx

Rate Change Calculation

RDP Filing Exhibits.pdf

Exhibit 13 Page 1

Filing Correspondence

Objections

Response to 8-13 Objection submitted 9/10/2024

8-13-2024 Objection Response - RDP.pdf

Question 2

Question 3dii

Question 4

Final Exhibits.pdf

Final Exhibits.xlsx

Exhibit R

Amendments

Response to 7-12 Objection submitted on 8/28/2024

7-12-24 Objection Response - Rental Dwelling.pdf

Question 5 & 6

Response to 8-9 Objection
8-9-2024 Objection Response - NT.pdf
Question 5c
Final Exhibits.pdf and Final Exhibits.xlsx
Exhibit S
Supplemental Exhibit S
Exhibit T
Response to 7-10 Objection
NT 7-10-24 Objection Response part 2.pdf
Question 2
NT - Final Exhibits - p2.pdf and NT - Final Exhibits - p2.xlsx
Exhibit J

TN filing 24-1273
Supporting Documentation
Response to 8-13 Objection
8-13-2024 Objection Response - TN.pdf
Question 5c
Final Exhibits.pdf and Final Exhibits.xlsx
Exhibit S
Supplemental Exhibit S
Exhibit T
Response to 7-10 Objection
TN 7-10-24 Objection Response part 2.pdf
Question 2
TN Final Exhibits - p2.pdf and TN Final Exhibits - p2.xlsx
Exhibit J

RDP filing 24-1330
Supporting Documentation
Response to 8-13 Objection
8-13-2024 Objection Response - RDP.pdf
Question 4c
Final Exhibits.pdf and Final Exhibits.xlsx
Exhibit S
Supplemental Exhibit S
Exhibit T
Response to 7-12 Objection
RDP 7-10-24 Objection Response part 2.pdf
Question 2
RDP Final Exhibits - p2.pdf and RDP Final Exhibits - p2.xlsx
Exhibit J

	<p>New Prior Approval Rate Application NT StdExhTI No Var.xlsm (Updated) NT StdExhTI No Var.pdf Exhibit 5</p> <p>TN filing 24-1273 Supporting Documentation New Prior Approval Rate Application TN StdExhTI No Var.pdf TN StdExhTI No Var.xlsm Exhibit 5</p> <p>RDP filing 24-1330 Supporting Documentation New Prior Approval Rate Application RDP StdExhTI No Var.pdf RDP StdExhTI No Var.xlsm Exhibit 5</p>
42	<p>HO Filing 18-1196 Supporting Documentation Filing Memorandum and Exhibits CA HO Filing Memo 2018.pdf</p> <p>HO Filing 18-4896 Supporting Documentation New Prior Approval Rate Application CA HO Filing Memo.pdf</p> <p>HO Filing 19-2063 Supporting Documentation New Prior Approval Rate Application CA HO Filing Memo 2020.pdf</p> <p>HO Filing 21-1404 Supporting Documentation New Prior Approval Rate Application CA NT HO Filing memo.pdf</p> <p>HO Filing 22-1514 Supporting Documentation New Prior Approval Rate Application Non-Tenant Condo Filing Memo.pdf</p>

	<p>RDP 18-2502 Supporting Documentation Filing Memorandum and Exhibits CA RDP Filing Memo 2019.pdf</p> <p>RDP filing 19-3750 Supporting Documentation Filing Memorandum and Exhibits CA RDP Filing memo.pdf</p>
44	<p>HO filing 18-4896 Supporting Documentation New Prior Approval Rate Application CA HO Filing Memo.pdf</p> <p>IV. Non-Tenant Homeowners Proposed Changes B. Location Rating</p> <p>NT filing 21-1404 Supporting Documentation New Prior Approval Rate Application CA NT HO Filing memo.pdf</p> <p>III. B. Non-Tenant Homeowners Changes 2. Location Rating</p> <p>III B. Non-Tenant Homeowners Changes 3. Water Sublimits (varying by County)</p> <p>III B. Non-Tenant Homeowners Changes 4. Reduced Coverage B Limits</p> <p>Response to 2021-10-25 Objection 10-25-2021 Objection Responses.pdf</p> <p>Number 7</p> <p>Number 8</p> <p>Supplemental Exhibit 16.pdf</p> <p>Supplemental Exhibit 16.xls</p> <p>Supplemental Exhibit 17.pdf</p> <p>Supplemental Exhibit 17.xls</p> <p>Response to 2021-11-04 Objection 11-4 Objection Response.pdf</p> <p>Number 4</p> <p>NT HO-6 filing 22-1514 Supporting Documentation New Prior Approval Rate Application Non-Tenant Condo Filing Memo.pdf</p> <p>III. B. Non-Tenant Homeowners Program Changes 2. Location Rating</p> <p>III. B. Non-Tenant Homeowners Program Changes 3. Increased Limit Endorsement</p>

	<p>HO filing 23-613</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>HO Filing Memo.pdf</p> <p>III. B. Non-Tenant Homeowners Changes 2. Location Rating</p>
48	<p>HO Filing 18-4896</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>CA HO Filing Memo.pdf</p> <p>HO Filing 19-2063</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>CA HO Filing Memo 2020.pdf</p> <p>HO Filing 21-1404</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>CA NT HO Filing memo.pdf</p> <p>HO Filing 22-1514</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>Non-Tenant Condo Filing Memo.pdf</p> <p>HO Filing 23-613</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>HO Filing Memo.pdf</p> <p>NT filing 24-1271</p> <p>Filing Correspondence</p> <p>Amendments</p> <p>Response to 7-10 Objection submitted on 8/27/2024</p> <p>NT - Final Exhibits - p2.xlsx</p> <p>Exhibit M</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>NT Filing Memo.pdf</p> <p>TN filing 24-1273</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>TN Filing Memo.pdf</p>

	<p>RDP filing 19-3750 Supporting Documentation Filing Memorandum and Exhibits CA RDP Filing memo.pdf</p> <p>RDP Filing 23-563 Supporting Documentation New Prior Approval Rate Application RDP Filing Memo.pdf</p> <p>RDP filing 24-1330 Supporting Documentation New Prior Approval Rate Application RDP Filing Memo.pdf</p>
64	<p>iii.</p> <p>NT filing 24-1271 Q1 2025 Data NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9.pdf Exhibit 13 Pages 1-8</p> <p>TN filing 24-1273 Q1 2025 Data Updated TN Filing Exhibits - 1Q 2025.pdf Exhibit 13 Pages 1-8</p> <p>RDP filing 24-1330 Q1 2025 Data RDP Filing Exhibits.pdf Exhibit 13 Pages 1-8</p> <p>V.</p> <p>NT filing 24-1271 Q1 2025 Data NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9.pdf Exhibit 13 Pages 1-8</p> <p>TN filing 24-1273 Q1 2025 Data Updated TN Filing Exhibits - 1Q 2025.pdf Exhibit 13 Pages 1-8</p> <p>RDP filing 24-1330 Q1 2025 Data RDP Filing Exhibits.pdf Exhibit 13 Pages 1-8</p>

72	<p>NT filing 24-1271</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>NT Filing Memo.pdf</p> <p>Part 1: Development</p> <p>Q1 2025 Data</p> <p>NT Filing Memo - 1Q 2025 Data.pdf</p> <p>Part 1: Development</p> <p>NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9.pdf</p> <p>Exhibit 13 Page 9</p> <p>TN filing 24-1273</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>TN Filing Memo.pdf</p> <p>Part 1: Development</p> <p>Q1 2025 Data</p> <p>TN Filing Memo - 1Q 2025 Data.pdf</p> <p>Part 1: Development</p> <p>Updated TN Filing Exhibits - 1Q 2025.pdf</p> <p>Exhibit 13 Page 9</p> <p>RDP filing 24-1330</p> <p>Supporting Documentation</p> <p>New Prior Approval Rate Application</p> <p>RDP Filing Memo.pdf</p> <p>Part 1: Development</p> <p>Q1 2025 Data</p> <p>RDP Filing Memo - 1Q 2025 Data.pdf</p> <p>Part 1: Development</p> <p>RDP Filing Exhibits.pdf</p> <p>Exhibit 13 Page 9</p>
77	<p>For the uncorrected version, please refer to:</p> <p>NT filing 24-1271</p> <p>Supporting Documentation</p> <p>Q1 2025 Data (Date Submitted: 5/19/2025)</p> <p>Exhibit 13 Calculation Sheet - 1Q 2025.xlsx</p> <p>NT Filing Exhibits - 1Q 2025.pdf</p> <p>Exhibit 13</p> <p>For the corrected version, please refer to:</p> <p>NT filing 24-1271</p> <p>Supporting Documentation</p> <p>Q1 2025 Data (Date Submitted: 6/19/2025)</p>

	<p>Exhibit 13 Calculation Sheet - 1Q 2025.xlsx NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9.pdf Exhibit 13</p>
78	<p>For the uncorrected version, please refer to: NT filing 24-1271 Supporting Documentation Q1 2025 Data (Date Submitted: 5/19/2025) Exhibit 13 Calculation Sheet - 1Q 2025.xlsx NT Filing Exhibits - 1Q 2025.pdf Exhibit 13</p> <p>For the corrected version, please refer to: NT filing 24-1271 Supporting Documentation Q1 2025 Data (Date Submitted: 6/19/2025) Exhibit 13 Calculation Sheet - 1Q 2025.xlsx NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9.pdf Exhibit 13</p>

EXHIBIT 4



August 12, 2025

Via email

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

Dear Counsel:

We are in receipt of State Farm General Insurance Company's ("State Farm") August 5, 2025 responses 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 State Farm's categorical objections based on, *inter alia*, trade secret and confidentiality grounds, are unfounded.

As an initial matter, the format of State Farm's August 5 production has made it particularly difficult to review. There are hundreds of image files and text files, many of which appear to be duplicates. In addition, if we understand State Farm's cover letter correctly, it has opted to make one large production of documents in response to both the CDI's discovery requests and Consumer Watchdog's. This has only increased the difficulty of reviewing State Farm's production on the already-shortened timelines, particularly where State Farm has simultaneously refused to identify which documents are responsive to which request.

Refusal to Produce Without Protective Order in Place

In response to a number of requests, State Farm asserted that it has withheld responsive documents “[g]iven that a suitable Protective Order has not been agreed upon and is not in place.” State Farm claims the following documents are protected from disclosure “on trade secret and confidentiality grounds”:

- In response to Request Nos. 10, 11:
 - Actuarial Opinion Summary and Actuarial Report
- In response to Request No. 18:
 - 2020 Own Risk and Solvency Assessment report
 - 2023 Own Risk and Solvency Assessment report
 - 2024 Own Risk and Solvency Assessment report and (potentially) attachments
- In response to Request No. 24:
 - Catastrophe reinsurance program study and related documents
- In response to Request No. 27:
 - Corporate Governance Annual Disclosure
 - Managements’ Report
- In response to Request No. 28:
 - Reinsurance agreements from 2015 to 2024
 - Annual Registration Statements
- In response to Request No. 35:
 - Trade secret assessments, stress test information
 - Economic capital presentations
- In response to Request No. 69:
 - Underlying analyses concerning reinsurance costs
- In response to Request Nos. 70, 71, 74:
 - Documents related to claim reserves

We are also in receipt of the “Withheld Document Log,” which ostensibly contains documents withheld in response to both Consumer Watchdog and CDI’s discovery requests (though no differentiation is made in the log).

As Consumer Watchdog has maintained, State Farm may not withhold responsive documents based on a prospective protective order it plans to seek after the production deadline; any motion can proceed, but it must produce now (subject, at most, to a stipulated interim designation (to which Consumer Watchdog would agree)) and it is the designating party’s burden to justify sealing. State Farm’s failure to timely invoke any specific privilege or protection is a waiver as to those grounds, and it cannot use a late motion to suspend present production duties.

In any event, State Farm must 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 that “specif[ies] precisely why the stated objection applies to the specific item withheld.” The Withheld Document Log does not meet the regulation’s requirements, as the items it references are not connected to specifically stated objections (nor to either Consumer Watchdog’s or CDI’s requests), and State Farm’s blanket objections on “trade secret and confidentiality grounds” do not provide the item-by-item specificity required. State Farm’s failure to provide a sufficient privilege log along with its responses is not reflective of a good-faith effort to resolve discovery disputes without needing to involve the Court.

Documents State Farm Agreed to Search For

In response to Request Nos. 13, 14, 15, 22, 24, 27, 34, 41, 46, 47, 49, 65, 66, 69, 70–73, 77, 78, and 81, State Farm has agreed to produce documents after a “reasonably diligent search.” Assuming that such a search was conducted in order to produce documents on August 5, it is unclear from that production which, if any, of the more than 500 documents are responsive to which requests, particularly due to State Farm’s decision to produce documents responsive to both Consumer Watchdog and the Department’s discovery requests in one combined production. Please provide guidance on where in State Farm’s production we can locate the documents responsive to Consumer Watchdog’s requests, as opposed to the Department’s.

Clarification of Scope

In response to Request Nos. 12, 16, 17, 21, 33, 40, 43, 45, 76, 79, and 80, State Farm writes that it “agrees to meet and confer regarding the scope of this Request.”

Please clarify the issues regarding scope. Does State Farm require a further specification of, for example, time or subject matter? The scope of the individual requests is fairly specific in nature; please explain your objections further so that we can modify as necessary.

General Relevance Objections

State Farm’s General Objection No. 4 states:

SFG objects to these Request[sic] to the extent they seek documents not relevant to the Rate Hearing and not admissible in evidence. Cal. Gov. Code § 11507.6(2)(e). For example, in this context of requests for documents regarding State Farm General’s financial condition that are

statutorily privileged and/or protected from disclosure (included but not limited to specific Insurance Code as well as trade secret protection), when State Farm General's solvency regulator (the Illinois Department of Insurance) has made a determination regarding SFG's financial condition, any "relevance" is subsumed in the regulator's determination and the documents are not "relevant" when balanced against confidentiality interests.

This objection is unclear. If it is State Farm's position that any responsive documents regarding State Farm General's financial condition are privileged, please so state. Further, it is unclear why a "determination" made by the Illinois Department of Insurance would have a preclusive effect on the relevance of any such documents to State Farm's rate application and the hearing in this matter. Please cite the specific "determination" referenced in the Objection, as well as authority supporting the assertion that such a determination "subsume[s]" the relevance of any otherwise responsive documents.

General Objection No. 4 further states:

In addition, the Requests are not relevant to the extent that they seek to treat SFG and State Farm Mutual as a single entity. *See State Farm General Ins. Co. v. Lara*, 71 Cal. App.5th 148, 172-173 (2021).

Consumer Watchdog is not seeking to treat State Farm General and State Farm Mutual as a single entity. Discovery requests referencing State Farm Mutual are aimed at elucidating the nature of State Farm General's relationship to its parent company, which is relevant to the issues to be determined at the rate hearing in this matter—as was the case with the interim rate settlement that was expressly conditioned on action by State Farm Mutual.

Individual Relevance Objections

In addition to the general relevance objections above, State Farm also makes relevance objections to a number of individual requests, several of which are addressed below.

State Farm objects on relevance grounds to Request No. 7, which states: "Provide all DOCUMENTS RELATED TO the APPLICATIONS, including all correspondence between individuals who assisted in compiling the APPLICATIONS."

It is unclear how documents related to the rate applications at issue in this proceeding are irrelevant. Please provide further explanation, or whether a

clarification from Consumer Watchdog as to scope or definition would resolve the relevance objection.

State Farm also objects on relevance grounds to Request No. 8, which states: "Provide all DOCUMENTS provided by YOU to any witness YOU have called or intend to call in this proceeding."

Documents provided by State Farm to witnesses in anticipation of the rate hearing are directly relevant to the issues to be resolved at the hearing. Please provide further explanation, or whether a clarification from Consumer Watchdog as to scope or definition would resolve the relevance objection.

State Farm objects on relevance grounds to Request No. 9 as well, which states: "Provide all DOCUMENTS RELATED TO the APPLICATIONS exchanged between YOU and the California Department of Insurance including correspondence, but not including DOCUMENTS previously provided to Consumer Watchdog."

Please clarify State Farm's position with respect to this request. Documents and correspondence exchanged between State Farm and Department staff related to the rate applications at issue in this proceeding are certainly relevant to the rate hearing and should be produced.

Requests for Information

Finally, as of this writing, State Farm has not responded to Consumer Watchdog's supplemental Requests for Information, served June 30, 2025. Consumer Watchdog counsel sent an email to you on July 31, 2025, following a telephone conversation the day before. When this communication went unanswered, Consumer Watchdog again sent an email on August 7, 2025, requesting responses by Monday, August 11 to allow Consumer Watchdog to take those responses into consideration for its meet and confer efforts. Specifically, CWD Supplemental Request for Information #2 asked: "On what date were the interim rates as approved by the May 13, 2025 Order Adopting Proposed Decision Approving Interim Rate Stipulation first implemented? In other words, were the interim rates applied to all policies renewed on or after June 1, 2025 or some other later date?" Please respond immediately to this request, and as soon as possible to all other requests.

Sincerely,



Benjamin Powell
Consumer Watchdog

EXHIBIT 5

State Farm General Insurance Company – Responsive Documents List

August 13, 2025

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

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

State Farm General Insurance Company – Responsive Documents List

August 13, 2025

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

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

SFG_00000479	CW 34
SFG_00000481	CW 34
SFG_00000490	CW 34
SFG_00000499	CW 34
SFG_00000508	CW 34
SFG_00000520	CW 41, 46, 47
SFG_00000521	CW 41, 46, 47
SFG_00000524	CW 41, 46, 47
SFG_00000526	CW 41, 46, 47
SFG_00000528	CW 41, 46, 47
SFG_00000529	CW 41, 46, 47
SFG_00000532	CW 41, 46, 47
SFG_00000533	CW 41, 46, 47
SFG_00000534	CW 41, 46, 47
SFG_00000536	CW 41, 46, 47
SFG_00000538	CW 41, 46, 47
SFG_00000540	CW 41, 46, 47
SFG_00000542	CW 41, 46, 47
SFG_00000544	CW 41, 46, 47
SFG_00000546	CW 41, 46, 47
SFG_00000548	CW 77, 78
SFG_00000549	CDI 47, 48
SFG_00000550	CW 7
SFG_00000551	CDI 29, 33, 34, 35, 36, 38, 41, CW 22
SFG_00000708	CW 7
SFG_00000709	CW 73
SFG_00000710	CDI 29, 33
SFG_00000719	CW 7
SFG_00000720	CW 7
SFG_00000721	CW 49
SFG_00000724	CW 49
SFG_00000725	CW 49
SFG_00000728	CW 49
SFG_00000730	CW 49
SFG_00000735	CW 81
SFG_00000736	CW 73
SFG_00000737	CDI 37
SFG_00000738	CW 73
SFG_00000739	CW 41, 46, 47
SFG_00000740	CW 41, 46, 47
SFG_00000741	CW 41, 46, 47
SFG_00000752	CW 41, 46, 47
SFG_00000754	CW 41, 46, 47
SFG_00000756	CW 41, 46, 47
SFG_00000758	CW 41, 46, 47
SFG_00000760	CW 41, 46, 47
SFG_00000770	CW 41, 46, 47
SFG_00000779	CDI 9, 10, 11, CW 28, 63

State Farm General Insurance Company – Responsive Documents List

August 13, 2025

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

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

EXHIBIT 6

SFG – Withheld Document Log¹

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

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

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

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

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

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

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

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

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

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

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

EXHIBIT 7



August 18, 2025

Via email

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Re: *In the Matters of State Farm, File Nos. PA-2024-00011, PA-2024-00012, PA-2024-00013*

Dear Counsel:

Thank you for the meet and confer call on Wednesday, August 13, 2025. Following up on that call, we wanted to (1) clarify the scope and definitions contained in a number of Consumer Watchdog's Discovery Requests ("Requests") sent to State Farm General ("State Farm"), and (2) confirm State Farm's positions on other Requests in anticipation of filing a Motion to Compel further responses with the ALJ on August 20, 2025.

Clarification/Narrowing of Scope of Individual Requests

In response to Request Nos. 12, 16, 17, 21, 33, 40, 43, 45, 76, 79, and 80, State Farm writes that it "agrees to meet and confer regarding the scope of this Request." During our meet and confer call, State Farm requested that if Consumer Watchdog

were to narrow, specify, or otherwise limit these requests, State Farm would consider searching for and producing responsive documents. Our responses as to each request are below:

Request No. 12: Provide all analyses and workpapers related to the evaluation of Loss and Loss Adjustment Expense Reserves subsequent to December 31, 2024.

Consumer Watchdog agrees to narrow this request to seek “all analyses and workpapers, if any, related to the evaluation of Loss and Loss Adjustment Expense Reserves as of March 31, 2025; June 30, 2025; and September 30, 2025.”

Further, we would point out that State Farm produced quarterly financial statements as of March 31 and June 30, 2024 that were submitted to the Department. Both of those financial statements contain values for loss reserves and loss adjustment expense reserves. State Farm must therefore be in possession of analysis as to how those values, as contained in the financial statements submitted to the Department, were derived.

Request No. 16: Provide all DOCUMENTS, reports, data, analyses, and calculations related to the Reinsurance Attestation Supplement for 2023.

Request No. 17: Provide all DOCUMENTS, reports, data, analyses, and calculations related to the Reinsurance Attestation Supplement for 2024.

During the meet and confer, State Farm counsel noted that it didn’t understand there to be a “Supplement” component to the Reinsurance Attestation document available on the CDI website. Consumer Watchdog can clarify that Request Nos. 16 and 17 refer to the “Reinsurance Attestation Supplement” document available on the CDI website (an example from 2024 is attached hereto as Exhibit 1), and seek related documents, reports, data, analyses, and calculations. To be clear, Consumer Watchdog can obtain the Reinsurance Attestation Supplements for 2023 and 2024 on the CDI website so long as State Farm is willing to attest that those documents are in fact the actual documents. However, Consumer Watchdog still requests all related reports, data, analyses, and calculations for both 2023 and 2024.

Request No. 21: YOUR response to the California Department of Insurance’s 7/10/2024 Objections...stated in part: “The forecast analysis process was mainly performed using the R statistical language, therefore, many of the requested calculations cannot be directly provided in a spreadsheet presentation format.” Provide all DOCUMENTS, including but not limited to computer code and data files, RELATED TO the forecast

analysis mainly performed using the R statistical language. Also provide all DOCUMENTS describing what else other than the R statistical language STATE FARM used in the forecast analysis process.

Consumer Watchdog disagrees with State Farm's contention during the meet and confer that seeking computer code is "extraordinary." Per its response to the Department's objections cited above, State Farm has placed documents and information related to the forecast analysis, including the R computer code, at issue. These documents are therefore relevant to Consumer Watchdog's analysis of State Farm's rate applications. Further, Consumer Watchdog is aware that State Farm has produced such code in connection with a North Carolina homeowners insurance rate case, so such a production should not be considered "extraordinary." Consumer Watchdog therefore reaffirms its position that documents responsive to the Request, including the R computer code, should be produced.

Request No. 33: Provide all Hazard Analyses performed by or on behalf of STATE FARM from 2020 to the present for any purpose, including, but not limited to, capital adequacy, capital allocation, underwriting, exposure management, and reinsurance.

During the meet and confer, counsel for State Farm asserted that it was unsure what was meant by the term "Hazard Analysis" in the Request. Consumer Watchdog responds that a "Hazard Analysis" is a methodology that can be used to assess risk, in this case risk related to State Farm's financial condition.

Consumer Watchdog therefore proposes to further clarify this request as follows (changes in bold): "Provide all Hazard Analyses performed by or on behalf of STATE FARM from 2020 to the present for any purpose **related to its financial condition**, including, but not limited to, capital adequacy, capital allocation, underwriting, exposure management, and reinsurance."

Request No. 45: Provide all DOCUMENTS and COMMUNICATIONS related to a 2021 internal list containing zip codes wherein STATE FARM intended to restrict sales of homeowners insurance policies.

To clarify, this Request refers to the following line contained in a Wall Street Journal article produced by Consumer Watchdog as part of its August 5, 2025 production, located at Bates CWD000313: "State Farm, by contrast, was expanding with few apparent limits. A 2021 internal list restricted sales of new policies for particularly high-risk areas—but that included only six of the 97 ZIP Codes that were at the heart of the recent fires, according to the Journal's analysis."

Request No. 40: Provide all DOCUMENTS supporting YOUR statements in YOUR February 25, 2025 Written Responses to the Commissioner's Questions from February 14 that "SFG's financial distress results from macroeconomic changes and market trends, including construction cost inflation and litigation."

Request No. 43: Provide all DOCUMENTS and COMMUNICATIONS with the Commissioner or CDI indicating that STATE FARM would cancel or non-renew homeowners policies if YOU were unable to obtain approval of requested rate increases from 2020 to the present.

Request No. 76: In reference to the PDF file "NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9", EXHIBIT 9, Page 8., provide all data, DOCUMENTS, analyses and calculations that form the basis of the values shown in Columns (3), (4) and (5).

Request No. 79: In reference to STATE FARM's response to Consumer Watchdog 6/4/25 RFI 11 which states, "State Farm reviews each model independently for reasonability," provide all DOCUMENTS related to those reviews.

Request No. 80: STATE FARM's response to Consumer Watchdog 6/4/25 RFI 12 states, "As noted in Exhibit 19, Closed with Payment claim counts are not explicitly collected. Rather, an assumption-based approach is used to develop these claim counts." Provide all DOCUMENTS related to that assumption-based approach.

Consumer Watchdog believes these requests are already sufficiently specific and appropriately narrowed to request relevant, admissible evidence in this proceeding. State Farm should therefore produce responsive documents. If not, Consumer Watchdog will move the ALJ to order such production.

State Farm's Positions on Other Requests

Request No. 7: Provide all DOCUMENTS RELATED to the APPLICATIONS, including all correspondence between individuals who assisted in compiling the APPLICATIONS.

State Farm makes a number of objections to this Request, including those based on relevance, privilege, and overbreadth. Specifically, State Farm asserts that the phrase "individuals who assisted in compiling the APPLICATIONS" is vague and

August 18, 2025
State Farm Counsel
In the Matters of State Farm, File Nos. PA-2024-00011, 00012, 00013
Page 5 of 5

ambiguous, and states that it “will not search for or produce ‘all correspondence’ between individuals who assisted in compiling the application.”

Any document related to the Applications is, by definition, relevant to the Rate Hearing. Further, the cited phrase is not vague and specifies what is sought. State Farm should therefore search for and produce documents responsive to this Request.

Finally, for **Request Nos. 13, 24, 27, 65, 66, 69, 70, and 71**, State Farm’s responses indicated that it “is conducting a reasonably diligent search and will produce responsive, non-privileged documents, if any, based on that search.” Consumer Watchdog notes that the “Responsive Documents List” provided by State Farm on August 13, 2025 appears to indicate that no documents were found as a result of State Farm’s search. Please confirm this to be the case.

We look forward to your responses on the above issues. Please inform Consumer Watchdog whether State Farm intends to supplement its responses or production as a result. As noted, if we are unable to resolve these issues, Consumer Watchdog intends to bring a Motion to Compel on August 20, 2025.

Sincerely,


Benjamin Powell
Attorney for Consumer Watchdog

EXHIBIT 1



SUPPLEMENT FOR THE YEAR 2024 OF THE State Farm General Insurance Company

REINSURANCE ATTESTATION SUPPLEMENT

**ATTESTATION OF CHIEF EXECUTIVE OFFICER AND CHIEF FINANCIAL OFFICER REGARDING
REINSURANCE AGREEMENTS**

The Chief Executive Officer and Chief Financial Officer shall attest, under penalties of perjury, with respect to all reinsurance contracts for which the reporting entity is taking credit on its current financial statement, that to the best of their knowledge and belief after diligent inquiry:

- (I) Consistent with SSAP No. 62R—*Property and Casualty Reinsurance*, there are no separate written or oral agreements between the reporting entity (or its affiliates or companies it controls) and the assuming reinsurer that would under any circumstances, reduce, limit, mitigate or otherwise affect any actual or potential loss to the parties under the reinsurance contract, other than inuring contracts that are explicitly defined in the reinsurance contract except as disclosed herein;
- (II) For each such reinsurance contract entered into, renewed, or amended on or after January 1, 1994, for which risk transfer is not reasonably considered to be self-evident, documentation concerning the economic intent of the transaction and the risk transfer analysis evidencing the proper accounting treatment, as required by SSAP No. 62R—*Property and Casualty Reinsurance*, is available for review;
- (III) The reporting entity complies with all the requirements set forth in SSAP No. 62R—*Property and Casualty Reinsurance*; and
- (IV) The reporting entity has appropriate controls in place to monitor the use of reinsurance and adhere to the provisions of SSAP No. 62R—*Property and Casualty Reinsurance*.

If there are any exception(s), that fact should be noted in the Reinsurance Attestation Supplement filed electronically with the NAIC and in hard copy with the domestic regulator (excluding the details of the exceptions). The details of the exceptions shall be filed in a separate hard copy supplement (Exceptions to the Reinsurance Attestation Supplement) with the domestic regulator.

Exceptions

For reporting period ended December 31, 2024

Signed:

Daniel J. Krause Chief Executive Officer	02/24/2025 Date	Mark E. Schwamberger Chief Financial Officer	02/24/2025 Date
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EXHIBIT 8

**DEPARTMENT OF INSURANCE
ADMINISTRATIVE HEARING BUREAU
45 Fremont Street, 22nd Floor
San Francisco, CA 94105
Telephone: (415) 538-4251
FAX No.: (415) 904-5854
www.insurance.ca.gov**

FILED

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115
ADMINISTRATIVE HEARING BUREAU

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

In the Matter of the Rate Application of

) FILE NO.: PA-2015-00004

)
**STATE FARM GENERAL
INSURANCE COMPANY,**

)
Applicant.

)

**FINAL RULINGS ON MOTION TO SEAL,
ADMISSION OF EXHIBITS, CLOSING EVIDENTIARY HEARING, AND
BRIEFING**

I. Introduction

The parties' August 4, 2015 Protective Order created a mechanism for protecting the potential confidentiality of documents during the evidentiary hearing. In accordance with the Protective Order, State Farm General Insurance Company (SFG or Applicant) designated numerous documents and some testimony conditionally confidential. Prior to the commencement of the evidentiary hearing, the parties filed objections to documents designated confidential and SFG filed a motion to seal those documents. On November 13, 2015, the Administrative Law Judge (ALJ) deferred ruling on the admissibility and confidentiality of documents designated conditionally confidential until the close of the evidentiary hearing.

At the close of the evidentiary hearing, the ALJ scheduled final motions regarding confidentiality. On February 4, 2016, SFG filed a renewed motion to seal exhibits and testimony. On February 12, 2016, the California Department of Insurance (CDI), Consumer Watchdog (CW), and Consumer Federation of California (CFC) filed responses in opposition. On February 17, 2016, SFG filed a Further Memorandum Concerning Waiver or Judicial Estoppel Concerning Application of Insurance Code¹ 1861.07. On February 18, 2016, SFG filed a Motion for Leave to Submit Sur-rebuttal Testimony. On February 18, 2016, the ALJ issued tentative rulings granting in part and denying in part SFG's Motion to Seal.

On February 19, 2016, the ALJ heard oral argument on SFG's Motion to Seal. Vanessa Wells, Esq. and Chris Mammen, Esq. appeared on behalf of State Farm General Insurance Company (SFG). Nikki McKenna, Esq. and Summer Volkmer, Esq. appeared on behalf of CDI. Daniel Zohar, Esq., Todd Foreman, Esq., Harvey Rosenfield, Esq., Johnathan Phenix, Esq., and Pamela Pressley, Esq. appeared on behalf of CW. Aaron Lewis, Esq. and Douglas Heller appeared on behalf of CFC. The parties presented additional arguments regarding some of the tentative rulings summarized below. At the conclusion of the hearing, the ALJ took the matters under submission.

Having considered all SFG's motions and each opposition thereto in writing and at the hearing, the tentative rulings are incorporated herein. The ALJ admits the exhibits found to be relevant and not unnecessarily cumulative. SFG's motion to seal the admitted documents is denied. However, the final ruling unsealing conditional confidential evidence is stayed pending the effective date of the Commissioner's decision in this matter.

¹ All references to the Insurance Code are to the California Insurance Code.

II. Disputed Issues

In this rate hearing, the following issues are in dispute:

A. What is the maximum permitted earned premium produced by the regulatory formula for each subline of homeowners insurance absent a variance? To determine that, two issues are in dispute:

1. What is Applicant's Catastrophe Adjustment Factor?
2. What is Applicant's Projected Yield?

B. Does Applicant qualify for a Leverage Factor Variance pursuant to California Code of Regulations, title 10, section 2644.27, subdivision (f)(3)?

C. Does Applicant qualify for a confiscation variance pursuant to California Code of Regulations, title 10, section 2644.27, subdivision (f)(9)?

D. Are Applicant's requested rates excessive as of July 15, 2015?

III. Applicable Law

A. Admission of Evidence in Proposition 103 Rate Hearings

Insurance Code section 1861.08 provides that rate hearings shall be conducted pursuant to Chapter 5 (commencing with section 11500) of Part 1 of Division 3, of Title 2 of the Government Code.

Government Code section 11513 states that all relevant evidence shall be admitted if it is the type of evidence normally relied upon, regardless of any common law or statutory objection. Section 11513 does not preserve all privileges in the Evidence Code. Section 11513(e) states:

The rules of privilege shall be effective to the extent that they are otherwise required by statute to be recognized at the hearing.

Some hearsay evidence may be used for the purpose of supplementing or explaining other evidence:

The presiding officer has discretion to exclude evidence if its probative value is substantially outweighed by the probability that its admission will necessitate undue consumption of time. Government Code section 11513(f).

The Own Risk and Solvency Assessment Act (ORSA) requires insurers to maintain a risk management framework and to report its material and relevant risks to the Commissioner.² The ORSA Act does not require privileges created by it be recognized at rate hearings.³ Insurance Code section 935.8(a) states:

Documents, materials, or other information, including the ORSA Summary Report, in the possession of or control of the Department of Insurance that are obtained by, created by, or disclosed to the commissioner or any other person under this article,⁴ are recognized by this state as being proprietary and contain trade secrets. These documents, materials, or other information shall be confidential by law and privileged, shall not be subject to disclosure pursuant to the California Public Records Act (Chapter 3.5 (commencing with section 6250) of Division 7 of Title 1 of the Government Code), and shall not be subject to subpoena or discovery, or admissible in evidence, in any private civil action. However, the commissioner is authorized to use those documents, materials, or other information in the furtherance of any regulatory or legal action brought as a part of the commissioner's official duties. The commissioner shall not otherwise make those documents, materials, or other information public without the prior written consent of the insurer.

The Holding Company Act requires insurer's to file registration statements and other information with the Department of Insurance.⁵ The Holding Company Act requires such information to be kept confidential, but this act does not require the confidentiality of such documents to be recognized at a rate hearing. Section 1215.8(a) of the act states:

All information, documents, and copies thereof obtained by or disclosed to the commissioner or any other person in the course of an examination or investigation

² Insurance Code section 935.1 et seq.

³ Insurance Code section 935.8.

⁴ Article 10.6 beginning at Insurance Code section 935.1 only contains the ORSA Act.

⁵ Insurance Code section 1215.8(a).

made pursuant to Section 1215.4, 1215.5, 1215.6, or 1215.75, and all information reported or provided pursuant to Section 1215.4, 1215.5, 1215.6, or 1215.75 shall be kept confidential, is not subject to disclosure by the commissioner pursuant to the California Public Records Act (Chapter 3.5 (commencing with Section 6250) of Division 7 of Title 1 of the Government Code), is not subject to subpoena, and is not subject to discovery from the commissioner or admissible into evidence in any private civil action if obtained from the commissioner in any manner. This information shall not be made public by the commissioner or any other person except to insurance departments of other states without the prior written consent of the insurance company to which it pertains, unless the commissioner, after giving the insurer and its affiliates who would be affected thereby notice and opportunity to be heard, determines that the interests of policyholders, shareholders, or the public will be served by the publication thereof, in which event he or she may publish all or any part thereof in a manner as he or she may deem appropriate.

B. Pre-filed and Oral, Direct and Rebuttal Testimony

The Regulations require parties to prepare and file direct testimony.⁶ Prior to cross-examination of this testimony, parties may provide an hour of additional testimony without the need to meet the requirements of pre-filing it.⁷ The same requirements do not apply to rebuttal testimony, the allowance of which is in the discretion of the ALJ.⁸ “In addition to its burden of proof, the applicant [has] … the burden of presenting its evidence and witnesses first.⁹ The ALJ may also “limit the number of witnesses, the time for testimony upon a particular issue, and the use of other procedures to avoid unnecessary cumulative evidence or the undue consumption of time.¹⁰ Finally, opening and reply briefs are filed concurrently.¹¹

C. Exhibits

California Code of Regulations, title 10, section 2655.2 governs the presentation of documentary evidence during a prior approval proceeding. Section 2655.2 states that

⁶ California Code of Regulations, title 10, section 2655.6(a).

⁷ California Code of Regulations, title 10, section 2655.8(a).

⁸ California Code of Regulations, title 10, section 2655.6(c).

⁹ California Code of Regulations, title 10, section 2655.7.

¹⁰ California Code of Regulations, title 10, section 2654.1(c).

¹¹ California Code of Regulations, title 10, section 2657.1(d).

documents offered in evidence shall not contain significant amounts of irrelevant or immaterial information. A party offering a document in excess of ten pages must designate specifically the relevant and material portions and shall provide a copy of the entire document to every other party prior to offering it into evidence. If admission of the entire document would unnecessarily encumber the record, the document shall not be received in evidence, but the relevant and material portions shall be received as an exhibit of the parties. In addition, the ALJ may generally limit evidence that is unnecessarily cumulative or that would constitute an undue consumption of time.¹²

D. Relevance

The Government Code permits an ALJ to admit any evidence which responsible persons reasonably rely upon. Nevertheless, irrelevant evidence is objectionable and the ALJ has discretion to exclude evidence if its probative value is outweighed by the probability that its admission will necessitate undue consumption of time.¹³ Relevant evidence is evidence having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action.¹⁴ The test of relevance is whether the evidence tends logically, naturally, and by reasonable inference to establish material facts.¹⁵

E. The Purpose of Proposition 103

The purpose of Proposition 103 is to protect consumers from arbitrary insurance rates and practices, to encourage a competitive insurance marketplace, to provide for an

¹² California Code of Regulations, title 10, section 2654.1(c).

¹³ Government Code section 11513(f).

¹⁴ Evidence Code section 210.

¹⁵ *Smith v. Selma Community Hosp.* (2008) 164 Cal.App.4th 1478.

accountable Insurance Commissioner, and to ensure that insurance is fair, available, and affordable for all Californians.¹⁶

The Insurance Code and Government Code do not require any rules of privilege to be recognized at rate hearings. Instead, Division 1, Part 2, Chapter 9, Article 10 of the Insurance Code includes section 1861.07, which requires:

All information provided to the commissioner pursuant to this article shall be available for public inspection...

The article referred to in section 1861.07 is Article 10 which includes the procedural law governing rate hearings.¹⁷

A statute that has the effect of undermining the underlying purposes of Proposition 103 may not be valid. As held in *Foundation for Taxpayer and Consumer Rights (FTCR) v. Garamendi* (2005) 132 Cal.App.4th 1354, Proposition 103 section 8(b) provides that the provisions of Proposition 103 “shall not be amended by the Legislature except to further its purposes” and that Proposition 103 “shall be liberally construed and applied to fully promote its underlying purposes.”

IV. Discussion

A. Public Inspection of Documents Privileged by Statute Admitted in a Rate Hearing

Applicant argues that section 1861.07 does not apply to rate hearings for a number of reasons including: 1) the case is heard by an ALJ instead of the agency head and therefore the record cannot be equated with providing information to the Commissioner; 2) *State Farm v. Garamendi*¹⁸ “expressly held that its construction of

¹⁶ Prop. 103, Stats. 1988, § 2, emphasis added.

¹⁷ Insurance Code section 1861.08.

¹⁸ *State Farm Mut. Auto Ins. Co. v. Garamendi*, *supra*, 32 Cal.4th at 1040.

section 1861.07 does not extend to the context of hearings;" and 3) a litigant has a right to seal information amounting to a trade secret under a constitutional balancing test.¹⁹

The ALJ does not find Applicant's arguments persuasive. Applicant's first argument is inapplicable because the ALJ presides under the Commissioner's authority and issues a decision that must be approved by the Commissioner. Applicant's second argument relies on *State Farm v. Garamendi*. But *State Farm v. Garamendi* did not involve a rate hearing. In addition, California Code of Regulations, title 10, section 2652.9 states:

In addition to the information set forth in California Insurance Code section 1861.07, all pleadings filed pursuant to this subchapter shall be available for public inspection at the Department's public viewing rooms in Los Angeles and San Francisco.

Applicant argues section 2652.9 requires pleadings to be available for public inspection but does not require all admitted evidence be available for public inspection.²⁰ The ALJ finds this argument unpersuasive.

Applicant also contends it has a constitutional right to seal information based on cases concerning the First Amendment right of public access.²¹ Applicant cites *NBC Subsidiary (KNBC-TV), Inc. v. Superior Court* (1999) 20 Cal.4th 1178 which involves the sealing of transcripts of civil trial proceedings held outside the presence of a jury.²² *NBC Subsidiary* is not relevant to this proceeding because section 1861.07 aims to increase access, not to limit access as the trial court attempted in *NBC Subsidiary*.

Applicant cites other cases applying the California Rules of Court. These cases do not apply to administrative rate hearings because the rules of procedure are provided fully

¹⁹ *State Farm General Insurance Company's Motion to Seal* dated February 4, 2016.

²⁰ Transcript of February 19, 2016 Motion to Seal Hearing, page 46, lines 15-19.

²¹ Transcript of February 19, 2016 Motion to Seal Hearing, pages 9-14.

²² *NBC Subsidiary (KNBC-TV), Inc. v. Superior Court* (1999) 20 Cal.4th 1178, 1181.

within the Government Code and the California Code of Regulations. The cases interpreting the California Rules of Court also do not address the nature of rate hearings. For example, if cost and pricing information were required to be kept confidential as a trade secret, little actuarial data in rate hearings would be left for the public to inspect. Such a result would undermine Proposition 103 and the explicit purpose of section 1861.07.

Even if trade secret privileges applied to rate hearings, the ALJ does not find that Applicant met its burden in demonstrating the elements required for trade secret protection. For example, Applicant does not identify the nature of the harm threatened by public disclosure of most documents. Even if those elements were satisfied, the interest in the public disclosure of all the exhibits not statutorily privileged outweighs concerns over their claimed confidentiality.

1. Information in ORSA Reports

Applicant argues that the Own Risk and Solvency Assessment (ORSA) Act protects the confidentiality of documents that are part of Applicant's ORSA Report. But Applicant does not address how the ORSA Act can apply to Proposition 103 rate hearings without undermining the purposes of Proposition 103 in accordance with *Foundation for Taxpayer and Consumer Rights (FTCR) v. Garamendi* (2005) 132 Cal.App.4th 1354.

In the tentative rulings, the ALJ applied the ORSA Act to rate hearings in part by following the dicta in *State Farm v. Garamendi*, stating that a party may invoke privileges in a rate hearing. Upon careful consideration of arguments made in the hearing on this motion and the consequences of applying statutory privileges to rate hearings, the

ALJ does not adopt the tentative rulings applying the protections of the ORSA Act and Holding Company Act to rate hearings for the reasons that follow.

Section 935.8(a) specifically limits the application of section 935.8(a) to information already disclosed to the Commissioner in the article codifying the ORSA Act.²³ In this rate hearing, the parts of the ORSA reports at issue were produced through discovery, not by way of the ORSA statute. If ORSA reports are disclosed to the Commissioner under the ORSA statute, they cannot be discovered in a “private civil action,” which Applicant concedes does not include an administrative hearing.²⁴

If the ORSA Act were to apply to rate hearings, section 935.8(a) would authorize the Commissioner to use information obtained under the ORSA Act in furtherance of any regulatory action as part of the Commissioner’s official duties. However, information obtained under ORSA could not be made public without the written consent of the insurer. Applicant argues that the last sentence of section 935.8(a) applies, but the other parties do not because they do not agree on the application of statutory privileges to rate hearings.

CW argues that allowing insurer’s to refuse to consent to information they provide in an administrative hearing because the information is contained in an ORSA report would undermine the underlying purposes of Proposition 103.²⁵ In addition, CW argues that insurers could unilaterally expand the number of documents they withhold from rate hearings by including them within ORSA reports.²⁶

²³ Insurance Code section 935.1 et seq.

²⁴ Transcript of February 19, 2016 Motion to Seal Hearing, pages 19-20.

²⁵ *Foundation for Taxpayer and Consumer Rights (FTCR) v. Garamendi* (2005) 132 Cal.App.4th 1354.

²⁶ Consumer Watchdog’s Opposition to State Farm’s (Renewed) Motion to Seal dated February 12, 2016.

Applying the ORSA Act to allow insurers to withhold consent for the use of information in a rate hearing might put insurers in the difficult position of having to choose between consenting to public disclosure of documents versus withholding information that may support an insurer's rate application. Applicant argues it has a right to seal confidential documents in a hearing and that sealing documents does not conflict with the public right to information in a hearing. But the ALJ is not persuaded that the authorities cited by Applicant overcome the express language of section 1861.07. The public has an interest in inspecting exhibits experts have relied upon in forming their opinions regarding the public's insurance rates. Accordingly, the ALJ does not adopt the tentative rulings with regard to applying the consent provision of Insurance Code section 935.8(a) and instead admits and unseals Exhibits 400 – 402, 710, 719, and 720. However, the ALJ stays this ruling until the effective date of the Commissioner's decision in this matter.

2. Information Disclosed Pursuant to the Insurance Holding Company System Regulatory Act (Holding Company Act)

In the tentative rulings, the ALJ also ruled that Applicant may withhold consent to the disclosure of information provided to the Commissioner pursuant to the Holding Company Act.²⁷ The confidentiality provisions of the Holding Company Act and the ORSA Act are different in at least one respect. Unlike section 935.8(a), section 1215.8(a) allows the Commissioner to ultimately publish information obtained through the Holding Company Act if the Commissioner determines that the interests of the public will be served by publishing it. After a rate hearing, the public's interest in accessing the

²⁷ Insurance Code section 1215.8(a).

evidence used to determine their rates is even higher than the public's interest in documents submitted pursuant to the ORSA Act or the Holding Company Act.

Accordingly, the ALJ does not adopt his tentative rulings with regard to allowing Applicant to withhold consent for the disclosure of Exhibits 329-331, 340, 343, 346-347, and 365-367. These exhibits are admitted and unsealed. However, the ALJ stays the ruling unsealing these exhibits until the effective date of the Commissioner's decision in this matter.

B. Judicial Estoppel

After CDI, CW, and CFC argued that Insurance Code section 1861.07 requires public disclosure, SFG filed a memorandum arguing that the other parties should be judicially estopped from advancing their section 1861.07 argument. Applicant bases its judicial estoppel argument on *Jackson v. City of Los Angeles* (1997) 60 Cal.App.4th 171, 183. That case enumerates the following five elements of judicial estoppel: 1) the same party has taken two positions; 2) the positions were taken in judicial or quasi-judicial administrative proceedings; 3) the party was successful in asserting the first position; 4) the two positions were totally inconsistent; and 5) the first position was not taken as a result of ignorance, fraud, or mistake. Four of these elements hinge on a finding that the parties took inconsistent positions.

The ALJ does not find that CDI, CW, and CFC took inconsistent positions by stipulating to a process for litigating confidentiality and later arguing that the information could not be designated unconditionally confidential in this hearing. The record also does not show that the parties ever agreed on the law regarding confidentiality. The parties lack of familiarity regarding the issue of confidentiality which has never been litigated in

a Proposition 103 rate hearing also militates against satisfying the fifth element of the judicial estoppel test. Essentially, the parties signed their Protective Order and agreed to litigate confidentiality at a later date. Accordingly, SFG's request for a waiver of the provisions of section 1861.07 and its request to bar the parties from asserting it, is denied.

C. Stay of Final Ruling on Confidentiality

SFG requests a stay of the ALJ's final ruling unsealing documents sealed as conditionally confidential during this hearing. No parties opposed SFG's request to stay a final ruling unsealing documents. Staying this ruling also allows this rate application to proceed to briefing the merits of the substantive issues. Accordingly, the ALJ issues this final order unsealing exhibits and testimony and stays it pending the effective date of the Commissioner's final determination in this matter.

V. Rulings on Specific Exhibits and Other Matters

In the tentative rulings, the ALJ did not admit some exhibits that appeared to cumulative. Upon further consideration, the ALJ does not adopt those rulings where those exhibits do not appear to be unnecessarily cumulative.

A. ORSA Risk Management Exhibits

1. Exhibit 311

Exhibit 311 is an un-redacted portion of the Economic Capital Model that discusses the Oakland Hills Fire. This information is relevant to the appropriate actuarial treatment of losses arising from the Oakland Hills Fire. A considerable amount of other evidence has been admitted regarding the Oakland Hills Fire. But upon further consideration, the ALJ finds Exhibit 311 to be relevant and not unnecessarily cumulative. Exhibit 311 is admitted unsealed. However, the order unsealing Exhibit 311 is stayed.

2. Exhibits 400 – 402, 710, 719, 720

Exhibits 400-402 and 710 contain risk management information related to investment risk modeled by Applicant's stress test results described in Exhibits 719 and 720. These exhibits are relevant to the Leverage Factor Variance and possibly Variance 9. Exhibit 400 is a 2014 risk report to the State Farm Board Risk Committee and is an Appendix to the State Farm's ORSA Report. Exhibit 401 is a comparable report, dated two years earlier. Although the AM Best reports provide an overview of some of this information and quote directly from at least one of these exhibits, Applicant argued that some statements in these exhibits were taken out of context. The ALJ is persuaded that the context provided in this group of related documents is relevant and not unnecessarily cumulative. The ALJ modifies the tentative rulings pertaining to these exhibits and admits Exhibits 400-402 and 710 unsealed. However, the order unsealing them is stayed.

Exhibits 719 and 720 are 2014 State Farm Enterprise Risk Management Stress Test Results. In his pre-filed direct testimony, Mr. Schwartz discusses stress test results specific to SFG and the Leverage Factor Variance. This information is summarized briefly in AM Best reports, but not to the level of detail highlighted by Mr. Schwartz. Although it is not clear how much relevant detail Exhibits 719 and 720 provide beyond the testimony of Mr. Schwartz, Exhibits 719 and 720 provide background information that helps one understand the testimony. After further consideration, the ALJ modifies the tentative rulings pertaining to these exhibits and admits Exhibits 719 and 720. These exhibits are unsealed. However, the order unsealing them is stayed.

B. Information Pertaining to SFG's Wildfire Exposure

1. Exhibits 109.3, 406, 512, and 517

Exhibit 109.3 is a spreadsheet of SFG's exposure to wildfire losses prepared by SFG and relevant to Applicant's catastrophe trend selection. Exhibit 109.3 is not cumulative because no other exhibit provides this data. Exhibits 406, 512 and 517 provide additional relevant details regarding Applicant's wildfire exposure. Accordingly, the ALJ adopts the tentative ruling regarding Exhibits 109.3, 406, 512, and 517. The ALJ admits them into evidence unsealed.

2. Exhibit 305

Exhibit 305 is a one-page document summarizing California Homeowners' rate needs, including wildfire underwriting restrictions. Upon further consideration, the ALJ does not find Exhibit 305 to be unnecessarily cumulative and admits Exhibit 305 unsealed. However, the order unsealing Exhibit 305 is stayed.

3. Exhibit 424

Exhibit 424 is a stipulation regarding Applicant's wildfire underwriting restrictions entered into by CDI, SFG, and CFC to avoid further discovery and litigation over the confidentiality of additional evidence. CW objects to the admissibility of Exhibit 424 in part because some facts underlying the stipulation were not produced. Both CDI and SFG refute CW's arguments. In particular, although discovery pertaining to the subject is a separate issue, adequate evidence regarding these restrictions has been introduced and cross-examined. Exhibit 424 is admissible as an admission independent from the discovery issues argued by CW. Neither is CW's participation in the stipulation

necessary to enter it into evidence. The ALJ adopts the tentative ruling and admits Exhibit 424 into evidence.

4. Exhibit 319

Exhibit 319 provides information regarding wildfire modeling. At the hearing, CDI contended that Exhibit 319 included relevant information that was not unnecessarily cumulative. Accordingly, the ALJ modifies the tentative ruling regarding Exhibit 319 and admits a version of it on the condition that the information pertaining to modeling is redacted.

5. Exhibit 320

Exhibit 320 summarizes changes in underwriting restrictions and includes relevant information in addition to Exhibit 424 and testimony. Exhibit 320 is not confidential because it represents a response Applicant provided to CDI prior to this hearing being noticed. This information was provided online through the application SERFF, which displays rate filing information to the public. Accordingly, Exhibit 320 is admitted and the testimony accompanying it is unsealed.

6. Exhibit 381

During the hearing, the parties clarified their arguments regarding Exhibit 381. CDI contended that the information in Exhibit 381 is not unnecessarily cumulative. SFG argued that if Exhibit 381 is admitted, the testimony regarding Exhibit 381 should not be admitted based on the arguments SFG raised in its Motion for Leave to Submit Sur-Rebuttal Testimony discussed below. The ALJ finds that Exhibit 381 is not unnecessarily cumulative and admits Exhibit 381 unsealed.

C. Insurance to Value: Exhibits 315 and 316

Whether changes in ITV distorted catastrophe load ratios is relevant to determining the most appropriate exposure base, Applicant has not demonstrated how these exhibits and the accompanying testimony are unnecessarily cumulative of other exhibits. This was not contested at the hearing on this motion. Accordingly, the ALJ admits Exhibits 315 and 316 unsealed.

D. Inter-Affiliate Agreements and Reinsurance Contracts

After further consideration of the arguments during the hearing regarding the applicability of the Holding Company Act to rate hearings, the ALJ modifies the tentative rulings pertaining to the exhibits below. These exhibits are unsealed. However, the order unsealing them is stayed.

1. Exhibits 329-331

Exhibits 329 and 330 are relevant to the assertion that "SFG, its parent, SFMA, and its affiliates are also tied together financially through reinsurance contracts" or more simply to show the financial interconnectedness of the State Farm Group. Exhibit 331 is a duplicate of 329 and will be withdrawn.

At the hearing, CDI contended that Exhibits 329 and 330 are not unnecessarily cumulative and SFG argued the opposite. Since the parties do not know what SFG will argue in its briefs, the ALJ is not persuaded that these exhibits are unnecessarily cumulative and admits them into evidence unsealed.

2. Exhibits 340, 343 and 346

Exhibits 340 and 343 are inter-affiliate income tax allocation agreements offered for the same generalized point as many other conditionally confidential documents – “to show the financial interconnectedness of the State Farm Group.” Applicant has argued that the issue of SFG’s independence is relevant to Variance 9. CDI offers Exhibit 346 for the same reasons CDI offers Exhibit 340 and 343 – to rebut “SFG’s alleged corporate separateness.”

At the hearing, the ALJ clarified that the ALJ found these exhibits to be relevant, and not cumulative. SFG did not object to this finding if Exhibits 340, 343, and 346 remain filed conditionally confidential under seal until the effective date of the Commissioner’s decision. Accordingly, Exhibits 340, 343 and 346 are admitted into evidence. As a final ruling by the ALJ, these documents are unsealed, but they remain sealed as conditionally confidential during the period of the stay of this ruling.

3. Exhibit 347

Schedule 2 of Exhibit 347 lists the services State Farm Mutual (SFM) offers its affiliates. CDI offers Exhibit 347 to show the “overall context of the shared inter-affiliate services at issue.” As with Exhibits 340, 343 and 346, CDI contended at the hearing that these documents are not unnecessarily cumulative. Consistent with the ruling on the income tax allocation exhibits, the ALJ does not adopt the tentative ruling and admits Exhibit 347. Exhibit 347 is unsealed. However, the order unsealing Exhibit 347 is stayed.

E. Reinsurance Contracts (Exhibits 365-367)

Applicant contended in its motion that the reinsurance contracts in these exhibits are cumulative because there is ample testimony in the record to establish that SFG has a

reinsurance program and the portion that is provided by SFM. At the hearing, CDI contended that these exhibits are not unnecessarily cumulative. Since the parties do not know how SFG will argue issues related to them in their post-hearing briefs, the ALJ does not adopt the tentative rulings and admits Exhibits 365-367, which are unsealed. However, the order unsealing Exhibits 365-367 is stayed.

F. Marketing Exhibits 344, 345, 350 and 712.

Exhibits 344, 345 and 350 offer information on the allocation of marketing expenses and strategy relevant to the independence of SFG. Exhibit 712 is a redacted copy of Exhibit 344. Exhibit 712 is not admitted. Accordingly, Exhibits 344, 345 and 350 are admitted and the accompanying testimony is unsealed.

G. Investment Policies (Exhibits 354, 181, and 363)

Exhibit 354 and 363 are investment policies for the State Farm Group. Exhibit 181 is part of Exhibit 354. They are relevant to Applicant's investment risk and the relationship between SFG and SFM. For example, CDI offers Exhibit 363 to support testimony that Applicant is invested 100% in bonds as part of State Farm Group's overall investment strategy. Applicant has not demonstrated how the information in these exhibits is cumulative. Accordingly, Exhibits 354 and 363 are admitted and the accompanying testimony is unsealed. Exhibit 181 is not admitted as it is subsumed within Exhibit 344.

H. Exhibits 704, 705, 706, 707, 708 and 709

Exhibit 704 contains answers given by SFG to questions asked by AM Best in preparing its credit reports. This exhibit partially explains how AM Best gathered information to prepare its reports. Exhibits 705 and 706 include detailed information

regarding Probable Maximum Loss (PML) data. Exhibit 707 is a detailed description of State Farm's Mega Catastrophe Measure (MCM), and Exhibits 708 and 709 are emails regarding the same.

The tentative rulings regarding these specific exhibits were not discussed at the hearing. Upon further consideration, the ALJ does not find Exhibits 704-709 to be unnecessarily cumulative. Consistent with the rulings regarding the other exhibits, the ALJ admits Exhibits 704-709 unsealed. However, the order unsealing Exhibits 704-709 is stayed.

I. Officers, Directors, and Committee Members (Exhibits 754 and 755)

Exhibits 754 and 755 are Secretary's Certificates, identifying officers and directors of SFM and SFG. Only some of this information appears in other exhibits. Applicant has not demonstrated that this information is not publicly available from the Illinois Secretary of State. SFG did not contest the finding that these documents are relevant, not cumulative, and not statutorily privileged. Accordingly, the ALJ admits Exhibits 754 and 755 unsealed and unseals any accompanying testimony.

J. Exhibits 904 and 905

The ALJ adopts the tentative ruling not to admit these documents because no party moved that they be admitted into evidence.

K. Confidentiality Designations Withdrawn by SFG

During the hearing, Applicant withdrew the confidential status of Exhibits 332, 379 and 418. Applicant also withdrew the confidential status of pre-filed direct testimony of Dr. Hemphill paragraphs 51-58, 83, 84, 123; pre-filed rebuttal testimony of Dr. Hemphill paragraphs 57 and 58; pre-filed direct testimony of Mr. Schwartz lines 20:20-

21:11, 32:1-17; pre-filed rebuttal testimony of Ms. Spiker paragraphs 4 and 7; and the testimony noted in section 8 of the orders. Accordingly, this testimony is unsealed.

L. Pre-filed and Hearing Testimony

In accordance with Insurance Code section 1861.07, all conditionally confidential pre-filed testimony and hearing testimony not already unsealed is unsealed. However, the unsealing of this testimony is stayed until the effective date of the Commissioner's final decision in this matter during which time said testimony remains designated conditionally confidential and filed under seal.

M. SFG's Motion for Leave to Submit Sur-rebuttal Testimony

On February 18, 2016, SFG filed a motion for leave to file additional sur-rebuttal testimony. At the hearing all other parties opposed this motion. As summarized in section II.B above, there is no provision for submitting additional sur-rebuttal or any other testimony at this date, well after the end of the evidentiary hearing in this matter.

Applicant has had ample opportunity to present evidence in support of its rate application. Applicant has filed extensive, complex direct testimony of its experts and over 200 exhibits. Rebuttal testimony is not required, but extensive pre-filed and oral sur-rebuttal has been permitted.

According to the regulations, if the further expert testimony was needed on a particular issue, the ALJ could order it. The ALJ also has broad discretion to limit witnesses and evidence that is unnecessarily cumulative. According to the regulations, the Applicant has the burden of presenting the evidence to support its rate application first. Applicant is not entitled to present opinion testimony last and post-hearing briefs are

filed concurrently. The ALJ can determine the weight of all the evidence admitted. Thus, SFG's motion for leave to file additional sur-rebuttal testimony is denied.

N. Post-Hearing Briefs

On February 25, 2016, Applicant requested permission to exceed the page limit for post-hearing briefs set by California Code of Regulations, title 10, section 2657.1. Applicant requests permission to file 100 pages for its opening brief and 50 pages for its reply brief based on the complexity of the issues, the volume of evidence, and the length of briefing in the last rate application determined by a hearing and proposed decision - *In the Matter of the Rate Application of Mercury Casualty Company*, File No.: PA-2009-00009 (Mercury). To review the request to exceed the briefing page limit, Applicant provided the Table of Contents of the opening brief from *Mercury*.

CW opposed this request and disputed the Applicant's argument that the present appeal is more complex and voluminous than *Mercury*. CDI does not oppose Applicant's request. Instead, CDI requests that if the ALJ increases the page limit, the time allowed for filing reply briefs also be expanded.

California Code of Regulations, title 10, section 2657.1 limits opening briefs to 50 pages and reply briefs to 25 pages, exclusive of the table of contents and table of authorities. These limits may only be exceeded upon written motion and for good cause shown. In *Mercury*, the Applicant submitted an opening brief of 110 pages and the ALJ did not allow an increase in the pages of the reply brief. In addition to the issues noted in section II of this ruling, the parties dispute three components of the catastrophe adjustment (exposure base, trend, Oakland Hills fire treatment) and three undisputed but unstipulated to issues (number of years, beta method, and weighting).

Based on the foregoing, the ALJ finds that the complexity and novelty of this rate hearing warrant an increase in the opening briefs to 75 pages but no increase in the length of the reply briefs. This amounts to a total of 100 pages of briefing per party for a total of 400 pages of briefing. Since section 2657.1 does not allow for an increase in the length of time for filing reply briefs, the ALJ does not alter the regulatory time for briefing.

For the reasons stated above and in the tentative ruling incorporated herein by reference, IT IS HEREBY ORDERED:

1. SFG's Motion for Leave to Submit Sur-rebuttal Testimony is denied.
2. Exhibits 181, 712, 904 and 905 are not admitted.
3. Exhibits 332 (as redacted), 379, and 418 are admitted and unsealed.
4. Pre-filed direct testimony of Dr. Hemphill in paragraphs 51-58, 83, 84, 123 is unsealed.
5. Pre-filed rebuttal testimony of Dr. Hemphill in paragraphs 57 and 58 is unsealed.
6. Pre-filed direct testimony of Mr. Schwartz in lines 20:20-21:11, 32:1-17 is unsealed.
7. Pre-filed rebuttal testimony of Ms. Spiker in paragraphs 4 and 7 is unsealed.
8. The following lines of testimony are unsealed:
111:3-17, 222:14-223:12, 223:17-224:10, 223:13-16; 224:11-19; 226:9-21, 751:15, 1368:23-1369:2, 1704:10-1705:2, 1707:19-24, 1712:5-9, 1778:13-1779:16, 1806:6-11, 2215:23-2216:6, 2242:17-18, 2243:7-9, 2276:25-2278:13; 2287:20-2288:3, 2718:24-2721:15, 2722:22-2723:23.
9. The following documents are admitted into evidence:
109.3, 305, 311, 315, 316, 320, 329, 330, 340, 343, 344, 345, 346, 347, 350, 354, 363, 365-367, 381, 400-402, 406, 424, 512, 517, 704-709, 710, 719, 720, 754, and 755.

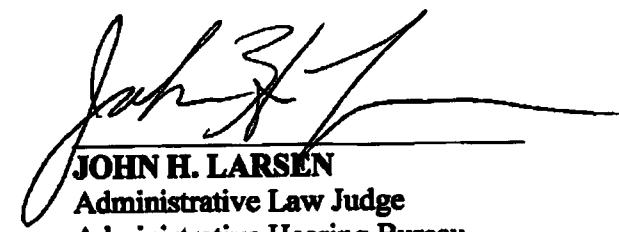
The documents above in this section are unsealed; however, the unsealing of these exhibits is stayed until the effective date of the Commissioner's decision in this matter during which time said testimony remains designated conditionally confidential and filed under seal.

10. Exhibit 319 is admitted on the condition that information pertaining to wildfire modeling is redacted. However, unsealing of Exhibit 319 is stayed until the effective date of the Commissioner's decision in this matter during which time said testimony remains designated conditionally confidential and filed under seal.
11. The pre-filed direct, pre-filed rebuttal, and hearing testimony not already unsealed is unsealed. However, other than the pages unsealed in sections 4-8 above, this order unsealing the remainder of the testimony is stayed until the effective date of the Commissioner's decision in this matter during which time said testimony remains designated conditionally confidential and filed under seal.
12. If not explicitly ruled on in this order, any document filed conditionally confidential in this matter remains filed under seal pursuant to the parties' Protective Order until the effective date of the Commissioner's decision.
13. The parties shall refile exhibits and pre-filed testimony along with a Final Joint Exhibit List in accordance with this order by **March 10, 2016** at which time the evidentiary hearing in this matter is closed.
14. In accordance, with California Code of Regulations, title 10, section 2657.1, the parties shall file concurrent opening briefs by **April 11, 2016**. Opening

briefs shall not exceed 75 pages, exclusive of the table of contents and table of authorities.

15. The parties shall file concurrent reply briefs by **April 26, 2016**. Reply briefs shall not exceed 25 pages, exclusive of the table of contents and table of authorities.

Dated: March 3, 2016



JOHN H. LARSEN
Administrative Law Judge
Administrative Hearing Bureau
California Department of Insurance

DECLARATION OF SERVICE BY MAIL (AND FAX)

Case Name/No.: **In the Matter of the Rate Application of:
STATE FARM GENERAL INSURANCE COMPANY
FILE NO. PA-2015-00004**

I, CARMENCITA O. MALBOG, declare that:

I am employed in the County of San Francisco, California. I am over the age of 18 years and not a party to this action. My business address is State of California, Department of Insurance, Administrative Hearing Bureau, 45 Fremont Street, 22nd Floor, San Francisco, California, 94105.

I am readily familiar with the business practices of the San Francisco Office of the California Department of Insurance for collection and processing of correspondence for mailing with the United States Postal Service. Said ordinary business practice is that correspondence is deposited with the United States Postal Service that same day in San Francisco, California.

On March 3, 2016, following ordinary business practices, I caused a true and correct copy of the following document(s):

FINAL RULINGS ON MOTION TO SEAL, ADMISSION OF EXHIBITS, CLOSING EVIDENTIARY HEARING, AND BRIEFING

to be placed for collection and mailing at the office of the California Department of Insurance at 45 Fremont Street, San Francisco, California, with proper postage prepaid, in a sealed envelope(s) addressed as follows:

(SEE ATTACHED SERVICE LIST)

In addition, on March 3, 2016, I also FAX'ed a copy of said document to all parties where indicated to the FAX number which is printed under each address on this Declaration.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed at San Francisco, California, on March 3, 2016.

March 3, 2016

DATE


CARMENCITA O. MALBOG

PARTY SERVICE LIST
FILE NO. PA-2015-00004

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EXHIBIT 9

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14 *Lara, in his official capacity as the Insurance*
15 *Commissioner of the State of California*

Exempt from Filing Fees
Pursuant to Gov. Code § 6103

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF SAN DIEGO

11
12
13 **STATE FARM GENERAL INSURANCE**
14 **COMPANY,**

15 Petitioner and Plaintiff,

16 v.

17 **RICARDO LARA, IN HIS OFFICIAL**
18 **CAPACITY AS THE INSURANCE**
19 **COMMISSIONER OF THE STATE OF**
20 **CALIFORNIA; and Does 1-50,**

21 Respondent and Defendant,

22 **CONSUMER WATCHDOG,**

23 Intervenor

24
25 Case No. 37-2016-00041750-CU-MC-CTL

NOTICE OF ENTRY OF JUDGMENT
DENYING PETITION FOR WRIT OF
MANDAMUS (PHASE 2)

26 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

27 PLEASE TAKE NOTICE THAT on July 9, 2019, in the above-entitled action, this court
28 entered a Judgment Denying Petition for Writ of Mandate (Phase 2). A copy of the judgment is

1 attached, and incorporated into this notice by this reference.

2 Dated: July 12, 2019

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Respectfully submitted,
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KAREN W. YIU
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14 *Ricardo Lara, in his Official Capacity as the*
15 *Insurance Commissioner of the State of California*

FILED
Clerk of the Superior Court

JUL 09 2019

By: C. Beutler, Deputy

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF SAN DIEGO

12
13 STATE FARM GENERAL INSURANCE
14 COMPANY,

15 Petitioner and Plaintiff,

16 v.

17 RICARDO LARA, IN HIS OFFICIAL
18 CAPACITY AS THE INSURANCE
19 COMMISSIONER OF THE STATE OF
20 CALIFORNIA; and Does 1-50,

21 Defendant and Respondent.

22 CONSUMER WATCHDOG,

23 Intervenor.

24 Case No. 37-2016-00041750-CU-MC-CTL

25 ~~PROPOSED~~

26 JUDGMENT DENYING PETITION FOR
27 WRIT OF MANDATE (PHASE 2)

28 Dept: 69
Judge: The Honorable Katherine A.
Bacal

Action Filed: November 28, 2016

29 This matter came on regularly before the Court on December 21, 2018, in Department 69,
30 the Honorable Katherine Bacal presiding. Vanessa O. Wells and Christian E. Mammen appeared
31 for petitioner State Farm General Insurance Company ("State Farm"). Deputy Attorney General
32

1 Cara M. Porter appeared for defendant and respondent Ricardo Lara¹ in his official capacity as
2 the Insurance Commissioner of the State of California. Michael J. Strumwasser and Bryce A.
3 Gee appeared for intervenor Consumer Watchdog.

4 The Court, having considered the lodged record of the administrative proceedings, the
5 briefs of the parties, and the arguments of counsel, and the Court having entered its Minute Order
6 of January 14, 2019, in which it denied State Farm's Petition for Writ of Mandate,

7 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:**

8 1. For the reasons stated in the Court's January 14, 2019 Minute Order, attached hereto
9 as Exhibit A and hereby incorporated by reference, the petition for writ of mandate is DENIED,
10 *in full*

11 2. Judgment is entered for the Commissioner and Consumer Watchdog and against State
12 Farm.

13 3. The Commissioner and Consumer Watchdog shall recover their costs in an amount to
14 be determined at a later date.

15 Let judgment be entered accordingly.

16
17 Dated:

18 *7/9/19*



19 Honorable Katherine A. Bacal
Judge of the Superior Court

20 Approved as to form:

21
22 Dated:

23 By: *Not signed*
24 Vanessa O. Wells
Christian E. Mammen
25 *Counsel for Petitioner State*
Farm General Insurance
Company

26 ¹ For purposes of this [Proposed] Judgment, the name of the Insurance Commissioner,
27 Ricardo Lara, who took office on January 7, 2019, has been substituted for that of former
28 Commissioner Dave Jones. The case is the same for all purposes as that filed under the name of
Dave Jones, as Insurance Commissioner, and the case number remains the same, i.e. Case
No. 2017-37-00027239-CU-WM-CTL.

1
2 Dated:

3 By:

4 Harvey Rosenfield
5 Pamela Pressley
6 Michael J. Strumwasser
7 Bryce A. Gee
8 *Counsel for Intervenor*
9 *Consumer Watchdog*

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SUPERIOR COURT OF CALIFORNIA,
COUNTY OF SAN DIEGO
CENTRAL

MINUTE ORDER

DATE: 01/14/2019

TIME: 04:09:00 PM

DEPT: C-69

JUDICIAL OFFICER PRESIDING: Katherine Bacal

CLERK: Calvin Beutler

REPORTER/ERM:

BAILIFF/COURT ATTENDANT:

CASE NO: 37-2016-00041750-CU-MC-CTL CASE INIT. DATE: 11/28/2016

CASE TITLE: State Farm General Insurance Company vs Administrative Hearing Bureau of the California Department of Insurance [E-FILE]

CASE CATEGORY: Civil - Unlimited CASE TYPE: Misc Complaints - Other

APPEARANCES

The Court, having taken the above-entitled matter under submission on 12/21/18 and having fully considered the arguments of all parties, both written and oral, as well as the evidence presented, now rules as follows:

The petition for writ of mandate, filed by State Farm General Insurance Company ("State Farm"), is denied.

Preliminary Matters

State Farm's request for judicial notice ("RJN") of Exhibits B-C and Supplemental RJN of Exhibits G-K and N are denied.

Consumer Watchdog's ("CW") RJN of Exhibits A-B is denied.

All other RJNs are granted.

State Farm's objections to the sixth column of Exhibit A of McKenna's declaration are sustained.

Background

The California Department of Insurance and intervenor CW were parties to State Farm's Prior Approval Rate Hearing. During the proceeding the parties entered into a Stipulated Protective Order. AR 389-411 [Protective Order]. The Protective Order was intended to "facilitate discovery" and "govern the disclosure of materials that the parties may deem confidential...." *Id.* at p. 1:4-6. While the documents could be filed conditionally under seal under the terms of the Protective Order, the administrative law judge ("ALJ") had the right to make orders regarding information produced under the agreement, including that the document was not entitled to be sealed. *Id.* at ¶¶ 10, 16.

Prior to the evidentiary hearing, State Farm filed a motion to seal documents designated as confidential. AR 3303. The documents allegedly contained trade secret and other proprietary information. The ALJ deferred ruling until the close of the evidentiary hearing. *Id.* On May 3, 2016, after the evidentiary hearing and oral argument on State Farm's motion to seal, the ALJ denied the motion. AR 3304. The Insurance Commissioner adopted the ALJ's Revised Proposed Decision on November 8, 2016. AR 5074.

State Farm seeks review of the March 3 Order.

Discussion

State Farm argues that the ALJ erred in finding that Insurance Code section 1861.07 precludes sealing privileged documents. However, the ALJ also concluded that even if a trade secret privilege applied to rate hearings, State Farm did not meet its burden to demonstrate the elements required for trade secret protection. AR 3311. In particular, State Farm did not "identify the nature of the harm threatened by public disclosure of most documents." *Id.* If the ALJ did not abuse his discretion in reaching this conclusion, whether or not he was also correct in finding the documents could not be sealed is immaterial.

State Farm's opening brief does not attempt to demonstrate that any of the 39 exhibits at issue are trade secret. Instead, State Farm argues that the finding is deficient because it fails to "set forth findings to bridge the analytical gap between the raw evidence and ultimate decision or order." *Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515. State Farm contends that respondents did not contest its evidentiary showing and essentially conceded the issue. CW says its opposition brief below contained 13 pages which discussed why each record was not entitled to confidential treatment. AR 2907-2919. In Reply, State Farm argues that although courts must typically remand in the absence of adequate findings, the Court should exercise its discretion to independently review the evidence and make its own findings. See, *Levingston v. Retirement Board* (1995) 38 Cal.App.4th 996, 1000.

Findings "do not need to be extensive or detailed." *Environmental Protection Information Center v. California Dept. of Forestry & Fire Protection* (2008) 44 Cal.4th 459, 516. "The nature of the statute, ordinance, or rule being applied by that agency is also relevant to the analysis of the adequacy of an administrative agency's findings." *Young v. City of Coronado* (2017) 10 Cal.App.5th 408, 421. Here, the issue of sealing was extensively briefed and argued by the parties. The applicable standard for a trade secret is relatively straight-forward. The ALJ had the benefit of the parties' briefing, the documents at issue, and argument. Under these circumstances, the ALJ's finding was sufficient. At oral argument State Farm argued that the findings are deficient because the "nature of the harm" is not an element of trade secret. A trade secret must have "independent economic value." Civil Code, § 3426.1, subd. (d)(1). The ALJ's use of the phrase "nature of the harm" conveys the same meaning as "independent economic value."

At oral argument State Farm said some of the records were also protected from disclosure by Insurance Code section 935.8 of the Own Risk and Solvency Assessment Act ("ORSA") and section 1218.8 of the Holding Company Act ("HCA"). However, the ALJ addressed these Acts as well. AR 3311-3314. Furthermore, ORSA documents that are "obtained by, created by, or disclosed to the commissioner or any other person under this article, are recognized by this state as being proprietary and contain trade secrets." Insur. Code, § 935.8, subd. (a). In other words, this provision merely recognizes protections; it does not create a privilege. Further, the documents were produced in discovery, not under ORSA.

Finally, ORSA documents are not subject to discovery or admissible in evidence "in any private civil action." *Id.* The rate hearing was an administrative proceeding, not a private civil action. Similarly, the HCA restricts the disclosure of certain information by the Commissioner to third parties and precludes such information obtained from the Commissioner from being discoverable or admissible in private civil actions. Insur. Code, § 1215.8. Again, the rate hearing was not a private civil action and the information was obtained in discovery, not from the Commissioner. Thus, ORSA and HCA do not protect the documents from disclosure.

Because State Farm has not demonstrated that the ALJ abused his discretion in finding that the documents were not protected from disclosure, the petition is denied.

The minute order will be the order of the Court.



Judge Katherine Bacal

CERTIFICATE OF SERVICE

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collecting and processing electronic correspondence. Correspondence that is submitted electronically is transmitted using the One Legal electronic filing system. Participants who are registered with One Legal will be served electronically. Participants in this case who are not registered with One Legal will receive copies of said correspondence via email.

On July 12, 2019, I electronically served the attached:

**NOTICE OF ENTRY OF JUDGMENT DENYING PETITION FOR WRIT OF
MANDAMUS (PHASE 2)**

by transmitting a true copy via the One Legal file and serve system to the participants in this case. On July 12, 2019, I also served the attached document by transmitting a true copy via electronic mail to the e-mail addresses as follows:

SEE ATTACHED SERVICE LIST

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on July 12, 2019, at San Francisco, California.

David Limin
Declarant

O'Z
S. 14

Signature

SERVICE LIST

Case Name:	<i>State Farm General Insurance Company v. Dave Jones</i> Superior Court of California, County of San Diego
Case No.:	37-2016-00041750-CU-MC-CTL

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EXHIBIT 10

August 20, 2025

By Electronic Mail

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ben@consumerwatchdog.org

Re: *In the Matter of State Farm General, File Nos. PA-2024-00011, PA-2024-00012, PA-2024-00013*

Ben:

We write on behalf of State Farm General (SFG) in response to the discovery-related letter sent by Consumer Watchdog (CW) the evening of August 18, 2025 to State Farm General in the above-referenced matter. Your letter's posture ("in anticipation of filing a Motion to Compel") and timing (allowing one business day to resolve disputes prior to the Motion to Compel deadline) are not indicative of a good faith attempt to meaningfully narrow your overbroad requests or to resolve any disputes. We were hopeful we could reach some compromise following our conversation on August 13, 2025, in which we explained our objections (which of course we do not waive) and you agreed to discuss with your team potential ways to narrow the scope of CW's extremely overbroad requests. Your August 18 letter fails to address these concerns.

While we will not address all of the points and mischaracterizations in your letter, in anticipation of addressing them more fully in an Opposition to the forthcoming Motion to Compel that you have already indicated you are committed to filing, we will provide certain responses at this time:

1. At p. 4-5 of your letter, you appear to continue to demand production, without any narrowed focus, of "all documents related to the applications . . ." (CW Request No. 7). As we discussed, your request for "all" documents "related to" SFG's applications is extraordinarily broad and clearly exceeds the scope of what is relevant and appropriate in this administrative proceeding. See, e.g., Cal. Gov. Code § 11507.6; *Brown v. Valverde*, 183 Cal. App. 4th 1531, 1548–49 (2010) ("extensive discovery available in civil proceedings is deemed inappropriate for administrative adjudications, which should be simple, quick, and inexpensive"). Without identifying specific disputed issues tied to the rate that is the subject matter of this proceeding, you erroneously conclude that "any document related to the Applications is, by definition, relevant to the Rate Hearing." (Letter, p. 5.) Of course, with this breadth, your Request No. 7 appears to engulf all of your other requests in blanket fashion, untethered to anything you believe you would anticipate finding that relates to any issue in this case.

2. Your letter suggests that you may continue to seek internal notes and communications within SFG without regard to the limitations of Cal. Gov. Code § 11507.6 and without explaining the connection of such requests to disputed issues in this rate proceeding. In our meet and confer on August 13, 2025, you stated that CW's internal work papers and notes regarding the Applications and communications with external expert witnesses are protected as work product. CW has not produced any such documents and has not even provided any log at all, which is in contrast to the logs provided by CDI and SFG in discovery in this matter. CW's position that internal work papers, notes, and communications are not discoverable is at odds with its August 18 letter and continued demands for such material from SFG.
3. Regarding the Reinsurance Attestation Supplement issue, we appreciate CW's clarification and plan to produce Bates-stamped versions of the Reinsurance Attestation Supplement for 2023 and 2024.

Sincerely,

/s/ Jordan D. Teti

Jordan D. Teti

Partner

jordan.teti@hoganlovells.com

D (310) 785-4756

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

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

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

On September 5, 2025, I caused service of true and correct copies of the document entitled

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

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 5, 2025 at Los Angeles, California.


Kaitlyn Gentile

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