

Status of Consumer Watchdog's Outstanding Discovery Requests

October 27, 2025

Resolved Requests – No ALJ Ruling Needed

Request No.	Status
21	Resolved
22	Resolved
23	Resolved
25	Resolved
26	Resolved
34	Resolved
39	Resolved
43	Resolved
45	Resolved
58	Resolved
62	Resolved
64	Resolved
66	Resolved
69	Resolved
73	Resolved
76	Resolved
77	Resolved
78	Resolved
79	Resolved
80	Resolved
81	Resolved
82	Resolved

1. Requests for Which SFG Has Represented That It Has Conducted a Reasonable and Diligent Search and Has or Will Be Providing a Further Production of Documents/CW Requests Ruling Ordering Production¹

Request No.	Original Request	Narrowed Request (If Any)	Notes	Joint Statement Page	Withheld Documents	ALJ Ruling
8	Provide all DOCUMENTS provided by YOU to any witness YOU have called or intend to call in this proceeding.		SFG identified two responsive documents, which were produced on 8/14 and 10/21	3		
9	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.		SFG produced some responsive documents on 10/20	3		
13	Provide all DOCUMENTS related to the calculation of YOUR NAIC IRIS ratios as of December 31, 2023.		SFG produced some responsive documents on 10/20	3		

¹ SFG produced some additional documents with respect to some of these requests on Monday, October 20, Tuesday October 21, Wednesday, October 22, and Friday, October 24, 2025. Due to the timing of these productions, CW has not had time as of the date of this filing to sufficiently review these productions for completeness and thus maintains its request for a final ruling from the ALJ ordering production of all responsive documents on these requests.

Request No.	Original Request	Narrowed Request (If Any)	Notes	Joint Statement Page	Withheld Documents	ALJ Ruling
14	Provide all DOCUMENTS related to the calculation of YOUR NAIC IRIS ratios as of December 31, 2024.		SFG produced some responsive documents on 10/20	3		
15	Provide all DOCUMENTS related to the most recent calculation of YOUR NAIC IRIS ratios, if later than December 31, 2024.		SFG produced some responsive documents on 10/20	3		
27	<p>Provide the following DOCUMENTS for STATE FARM for each year from 2020 to 2024:</p> <p>a. Reinsurance Summary Supplemental;</p> <p>b. Supplemental Compensation Exhibit;</p> <p>c. Audited Financial Reports; 2024 Reports on Audits of Financial Statements 971-1186</p> <p>d. Management's Report of Internal Control Over Financial Reporting;</p> <p>e. Notification of Adverse Financial Condition;</p>		<p>b. Supplemental Compensation Exhibit: SFG produced responsive documents on 10/22</p> <p>c. Audited Financial Reports: SFG produced responsive documents on 10/20</p> <p>e. Notification of Adverse Financial Condition: SFG confirmed on 10/21 that this document does not exist</p>	3	See Section 5, pp. 17-18 below for withheld documents responsive to items 27a, d, f, g, h.	

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	f. Corporate Governance Annual Disclosure; g. Form F-Enterprise Risk Report; h. Group Capital Calculation.					
32	Provide all DOCUMENTS supporting YOUR statement in YOUR Answer regarding the allegedly “important role reinsurance plays in protecting State Farm’s policyholders.		SFG produced some responsive documents on 10/24	3		
36	Provide all DOCUMENTS RELATED TO YOUR emergency interim rate requests exchanged between YOU and the CDI including correspondence, but not including DOCUMENTS previously provided to Consumer Watchdog.		SFG produced some responsive documents 10/20	3		
37	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO YOUR emergency interim rate requests exchanged between YOU and the Insurance		SFG produced some responsive documents on 10/20	3		

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	Commissioner or executive office personnel, but not including DOCUMENTS previously provided to Consumer Watchdog.					
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.		Produced some responsive documents on 10/24	3		
60	Provide all DOCUMENTS RELATED TO STATE FARM's Environmental, Social & Governance program from 2020 to the present.	Provide all reports, analyses, and calculations prepared for STATE FARM's Environmental, Social & Governance (ESG) program covering the period from 2023 to the present. Include the agenda, minutes and handouts from any	SFG produced some responsive documents on 10/22	3		

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		ESG Committee meetings.				

2. Disputed Requests on Consumer Complaints Regarding Rate Increases and Claims Handling

Request No.	Original Request	Narrowed Request (If Any)	Notes	Joint Statement Page	Withheld Documents	ALJ Ruling
50	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder complaints about rate increases and/or affordability regarding any STATE FARM homeowners, rental dwelling, renters, or condo rates from 2020 to present, including but not limited to complaints RELATED TO the INTERIM RATE HEARING or THIS PROCEEDING.	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO sufficient to show any policyholder complaints about rate increases and/or affordability regarding any STATE FARM homeowners, rental dwelling, renters, or condo rates from 2020 to present, including but not limited to complaints RELATED TO the INTERIM RATE HEARING or THIS PROCEEDING.	Consumer Watchdog proposed random sampling methodology to satisfy requests 50–57. SFG rejected that proposal and has not produced any responsive documents.	4, 5	SFG policyholder complaints	

Request No.	Original Request	Narrowed Request (If Any)	Notes	Joint Statement Page	Withheld Documents	ALJ Ruling
51	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder claims RELATED TO the 2025 LOS ANGELES WILDFIRES.	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO sufficient to show any disputed policyholder claims RELATED TO the 2025 LOS ANGELES WILDFIRES.	Consumer Watchdog proposed random sampling methodology to satisfy requests 50–57. SFG rejected that proposal and has not produced any responsive documents.	4, 6	SFG policyholder complaints	
52	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any initial adjustor claims reports submitted by any adjustor RELATED TO the 2025 LOS ANGELES WILDFIRES.	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any initial adjustor claims reports submitted by any adjustor for disputed policyholder claims RELATED TO the 2025 LOS ANGELES WILDFIRES.	Consumer Watchdog proposed random sampling methodology to satisfy requests 50–57. SFG rejected that proposal and has not produced any responsive documents.	4, 6	SFG policyholder complaints	
53	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any STATE FARM final or approved adjustor claims reports RELATED TO the 2025	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any STATE FARM final or approved adjustor claims reports for	Consumer Watchdog proposed random sampling methodology to satisfy requests 50–57. SFG rejected that proposal and has not	4, 6	SFG policyholder complaints	

Request No.	Original Request	Narrowed Request (If Any)	Notes	Joint Statement Page	Withheld Documents	ALJ Ruling
	LOS ANGELES WILDFIRES.	<u>disputed policyholder claims</u> RELATED TO the 2025 LOS ANGELES WILDFIRES.	produced any responsive documents.			
54	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder complaints regarding any STATE FARM claims handling from 2020 to present, including but not limited to any complaints regarding STATE FARM claims handling RELATED TO the 2025 LOS ANGELES WILDFIRES.	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO sufficient to show any policyholder complaints regarding any STATE FARM claims handling of wildfire claims from 2020 to present, including but not limited to any complaints regarding STATE FARM claims handling RELATED TO the 2025 LOS ANGELES WILDFIRES.	Consumer Watchdog proposed random sampling methodology to satisfy requests 50–57. SFG rejected that proposal and has not produced any responsive documents.	4, 7	SFG policyholder complaints	
55	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any STATE FARM claims regarding any policyholder complaints RELATED TO smoke	Provide <u>all</u> DOCUMENTS and COMMUNICATIONS RELATED TO sufficient to show any STATE FARM claims	Consumer Watchdog proposed random sampling methodology to satisfy requests 50–57. SFG rejected that proposal and has not	4, 6	SFG policyholder complaints	

Request No.	Original Request	Narrowed Request (If Any)	Notes	Joint Statement Page	Withheld Documents	ALJ Ruling
	damage RELATED to the 2025 LOS ANGELES WILDFIRES.	regarding any policyholder complaints RELATED TO smoke damage RELATED to the 2025 LOS ANGELES WILDFIRES.	produced any responsive documents.			
56	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder complaints RELATED to any STATE FARM claims adjusting RELATED TO the 2025 LOS ANGELES WILDFIRES.	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO sufficient to show any policyholder complaints RELATED to any STATE FARM claims adjusting RELATED TO the 2025 LOS ANGELES WILDFIRES.	Consumer Watchdog proposed random sampling methodology to satisfy requests 50–57. SFG rejected that proposal and has not produced any responsive documents.	4, 6	SFG policyholder complaints	
57	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder complaints RELATED to any STATE FARM claims adjustors RELATED TO the 2025 LOS ANGELES WILDFIRES.	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO sufficient to show any policyholder complaints RELATED to any STATE FARM claims adjustors RELATED TO the 2025 LOS	Consumer Watchdog proposed random sampling methodology to satisfy requests 50–57. SFG rejected that proposal and has not produced any responsive documents.	4, 6	SFG policyholder complaints	

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		ANGELES WILDFIRES.				

3. Disputed Requests Over Model Output Documents

Request No.	Original Request	Narrowed Request (If Any)	Joint Statement Page	Withheld Documents	ALJ Ruling
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.	In addition to the withheld documents, Consumer Watchdog requested all reports from State Farm's Enterprise Risk Management (ERM) program or other documents that contain any of the risk metrics and analytics (e.g., PML, TVaR, Standard Deviation, size of loss distribution, etc.) that SFG looked at / considered / evaluated for each catastrophe model used in the filing from 2020 to present.	11	Document Category ² #99: Historic Catastrophe Model Data for Models Used in Filing and AAL Data by Zip Code File	

² Document category numbers refer to the same document category numbers used in State Farm's privilege log filed on October 22, 2025.

4. Disputed Requests Over IL DOI Emails

Request No.	Original Request	Narrowed Request (If Any)	Joint Statement Page	Withheld Documents	ALJ Ruling
20	Provide all DOCUMENTS exchanged during the period from January 1, 2020 to the present dealing with solvency issues between State Farm General Insurance Company and the “IL DOI” as referenced in EXHIBIT 13, Page 1, Section D of the APPLICATIONS as State Farm General Insurance Company’s solvency regulator.	In addition to the withheld documents, Consumer Watchdog requested identification of, or links to, publicly-available responsive documents noted by SFG.	14	Document Category #101: E-mails with Illinois Department of Insurance Regarding Solvency Issues, Company Action Level Supervision, and Failure to Meet NAIC RBC Requirements	
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	In addition to the withheld documents, Consumer Watchdog requested identification of, or links to, publicly-available responsive documents noted by SFG.	14	Document Category #101: E-mails with Illinois Department of Insurance Regarding Solvency Issues, Company Action Level Supervision, and Failure to Meet NAIC RBC Requirements	

Request No.	Original Request	Narrowed Request (If Any)	Joint Statement Page	Withheld Documents	ALJ Ruling
	supervision over the Company from 2020 to the present.				
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.	In addition to the withheld documents, Consumer Watchdog requested identification of, or links to, publicly-available responsive documents noted by SFG.	14	Document Category #101: E-mails with Illinois Department of Insurance Regarding Solvency Issues, Company Action Level Supervision, and Failure to Meet NAIC RBC Requirements	
38	Provide all DOCUMENTS and COMMUNICATIONS exchanged during the period	In addition to the withheld documents, Consumer Watchdog requested	14	Document Category #101: E-mails with Illinois Department of Insurance Regarding Solvency	

Request No.	Original Request	Narrowed Request (If Any)	Joint Statement Page	Withheld Documents	ALJ Ruling
	from January 1, 2023 to the present between STATE FARM and the Illinois Department of Insurance as State Farm General Insurance Company's domestic financial solvency regulator RELATED TO YOUR failure to meet NAIC Risk-Based Capital (RBC) requirements as of year-end 2024 as stated in YOUR February 25, 2025 Written Responses to the Commissioner's Questions from February 14.	identification of, or links to, publicly-available responsive documents noted by SFG		Issues, Company Action Level Supervision, and Failure to Meet NAIC RBC Requirements	

5. Disputed Requests Over Trade Secret and Statutorily Protected Documents

Request No.	Original Request	Narrowed Request (If Any)	Joint Statement Page	Withheld Documents	ALJ Ruling
7	Provide all DOCUMENTS RELATED TO the APPLICATIONS, including all correspondence between individuals who assisted in	In addition to the withheld documents, CW asked for any underlying analyses or calculations not considered work product and not already provided on SERFF.	16, 28, 80	Document Categories #11-15: Rate Template Excel Sheets for Lines of Business for Q1 2025; CAP Inputs and FFEQ Model Results Excel Sheet	

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	compiling the APPLICATIONS.			Document Category #102: E-mails Leading to June 27, 2024 Rate Application Filing and Emails Documenting Recommended Rate Changes and Signoff Since 2020	
10	Provide the actuarial report and underlying workpapers supporting the Statement of Actuarial Opinion of the Loss and Loss Adjustment Expense Reserves as of December 31, 2023.		16, 30	Document Categories #16-17: SFG Actuarial Reports and Underlying Work Papers for 2023 and 2024	
11	Provide the actuarial report and underlying workpapers supporting the Statement of Actuarial Opinion of the Loss and Loss Adjustment Expense Reserves as of December 31, 2024.		16, 30	Document Categories #16-17: SFG Actuarial Reports and Underlying Work Papers for 2023 and 2024	
12	Provide all analyses and workpapers related to the evaluation of Loss and Loss Adjustment Expense Reserves subsequent to December 31, 2024.	Provide 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.	16, 63	Document Category #93: Quarterly Loss Reserve Analysis Documents Supporting Note 25 to State Farm General's Quarterly Financial Statement as of June 30, 2025	

Request No.	Original Request	Narrowed Request (If Any)	Joint Statement Page	Withheld Documents	ALJ Ruling
		CW continues to seek the withheld documents.			
16	Provide all DOCUMENTS, reports, data, analyses, and calculations related to the Reinsurance Attestation Supplement for 2023.		16, 73	Document Category #98: 2023-2024 Sub-Certifications to State Farm General's Reinsurance Attestation Supplements	
17	Provide all DOCUMENTS, reports, data, analyses, and calculations related to the Reinsurance Attestation Supplement for 2024.		16, 73	Document Category #98: 2023-2024 Sub-Certifications to State Farm General's Reinsurance Attestation Supplements	
18	Provide the Own Risk and Solvency Assessment (“ORSA”) reports from 2020 through 2024, along with any related documents.		16, 23	Document Categories #1-5: ORSA Report and Appendices for 2020-2024	
19	Provide all DOCUMENTS exchanged during the period from January 1, 2020 to the present between State Farm General Insurance Company and the “rating agencies” referenced in EXHIBIT 13, Page 1, Section D of the APPLICATIONS.		16, 65	Document Category #94: Data Provided to Rating Agencies	
20	Provide all DOCUMENTS exchanged during the period	Consumer Watchdog requested identification of, or	16, 78	Document Category #101: E-mails with Illinois Department of	

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	from January 1, 2020 to the present dealing with solvency issues between State Farm General Insurance Company and the “IL DOI” as referenced in EXHIBIT 13, Page 1, Section D of the APPLICATIONS as State Farm General Insurance Company’s solvency regulator.	links to, publicly-available responsive documents noted by SFG in its 7/30 responses. CW continues to seek the withheld documents.		Insurance Regarding Solvency Issues, Company Action Level Supervision, and Failure to Meet NAIC RBC Requirements	
24	YOUR response to the 7/10/2024 Objections, Nos. 5 and 6, stated in part: “To support the catastrophe risk component, a study was done that analyzed catastrophe reinsurance program quotes from internal and publicly available data for both traditional and non-traditional reinsurers.” Provide that study, and all DOCUMENTS RELATED TO that study.		16, 33	Document Category #18: 2023 CRCP Study and Underlying Data	
27	Provide the following DOCUMENTS for STATE FARM for each year from 2020 to 2024: a. Reinsurance Summary		16, 35, 38, 71, 83	Document Categories #22-31: Reinsurance Summaries - Active Contracts for 2015-2014	

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	Supplemental; b. Supplemental Compensation Exhibit; 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.			Document Category #19-20: Corporate Governance Annual Disclosure ("CGAD") Management's Report of Internal Control from 2020-2024 Document Category #104: Form F-Enterprise Risk Reports Document Category #97: 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.		16, 39, 42, 88	Document Category #21: Annual Holding Company Registration Statement (RFP #28) Document Category #106: Reinsurance Agreements Document Categories #22-31: Reinsurance Summaries - Active Contracts for 2015-2014	
29	YOUR Answer to Consumer Watchdog's Petition for	Consumer Watchdog requested identification of, or	16, 78	Document Category #101: E-mails with Illinois Department of	

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	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.	links to, publicly-available responsive documents noted by SFG in its 7/30 responses. CW continues to seek the withheld documents.		Insurance Regarding Solvency Issues, Company Action Level Supervision, and Failure to Meet NAIC RBC Requirements	
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.		16, 75	Document Category #99: Historic Catastrophe Model Data for Models Used in Filing and AAL Data by Zip Code File	
31	YOUR Answer to Consumer Watchdog’s Petition for Hearing stated in part (4:22–	Consumer Watchdog requested identification of, or links to, publicly-available	78	Document Category #101: E-mails with Illinois Department of Insurance Regarding Solvency	

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	<p>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.”</p> <p>Please provide all DOCUMENTS listing and/or explaining the risk metrics that STATE FARM stated are considered by regulators.</p> <p>Additionally, provide all DOCUMENTS demonstrating the value of, and derivation of, the values of those metrics for STATE FARM from 2020 to the present.</p>	<p>responsive documents noted by SFG in its 7/30 responses.</p> <p>CW continues to seek the withheld documents.</p>		<p>Issues, Company Action Level Supervision, and Failure to Meet NAIC RBC Requirements</p>	
33	<p>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,</p>	<p>Provide all Hazard Analyses performed by or on behalf of STATE FARM from 2020 to the present for any purpose <u>related to its financial condition</u>, including, but not limited to, capital adequacy, capital allocation,</p>	16, 44, 46, 47, 49, 51, 52	<p>Document Categories #33-35, 37-39, 45-47, 52-55, 58-61, 107-118: 2020-2024 State Farm Stress Test Results, Review, Summary, and Supporting Documentation for Capital Management and Enterprise Risk Management;</p>	

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	exposure management, and reinsurance.	underwriting, exposure management, and reinsurance. CW continues to seek the withheld documents.		Supporting Stress Test Documents from 2016-2019 Document Categories #40-42: CA TRA Refresh, 2021 Targeted Risk Assessment; Appendix A; and Appendix B Document Categories #36, 43-44, 48, 51, 56, 62: Chief Risk Officer Report: Q3 2021, Q2 2022, Q3 2022, Q2 2023, Q3 2023, Q1 2025; Risk Conversation: Catastrophe Risk Document Category #49: Capital Philosophy/Affiliate Economic Capital Presentation Document Category #50: 2023 CA Strategy Risk Summary, Enterprise Risk Management Document Category #57: FAIR Plan Policy Perils Exclusion Endorsement Summary of Risk and Opportunities, Enterprise Risk Management	
35	Provide all Enterprise Risk Management Analyses performed by or on behalf of STATE FARM from 2020 to		16, 44, 46, 47, 49, 51, 52	Document Categories #33-35, 37-39, 45-47, 52-55, 58-61, 107-118: 2020-2024 State Farm Stress Test Results, Review, Summary, and	

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	the present for any purpose, including, but not limited to, capital adequacy, capital allocation, underwriting, exposure management, and reinsurance.			<p>Supporting Documentation for Capital Management and Enterprise Risk Management; Supporting Stress Test Documents from 2016-2019</p> <p>Document Categories #40-42: CA TRA Refresh, 2021 Targeted Risk Assessment; Appendix A; and Appendix B</p> <p>Document Categories #36, 43-44, 48, 51, 56, 62: Chief Risk Officer Report: Q3 2021, Q2 2022, Q3 2022, Q2 2023, Q3 2023, Q1 2025; Risk Conversation: Catastrophe Risk</p> <p>Document Category #49: Capital Philosophy/Affiliate Economic Capital Presentation</p> <p>Document Category #50: 2023 CA Strategy Risk Summary, Enterprise Risk Management</p> <p>Document Category #57: FAIR Plan Policy Perils Exclusion Endorsement Summary of Risk and Opportunities, Enterprise Risk Management</p>	

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38	Provide all DOCUMENTS and COMMUNICATIONS exchanged during the period from January 1, 2023 to the present between STATE FARM and the Illinois Department of Insurance as State Farm General Insurance Company's domestic financial solvency regulator RELATED TO YOUR failure to meet NAIC Risk-Based Capital (RBC) requirements as of year- end 2024 as stated in YOUR February 25, 2025 Written Responses to the Commissioner's Questions from February 14.	Consumer Watchdog requested identification of, or links to, publicly-available responsive documents noted by SFG in its 7/30 responses. CW continues to seek the withheld documents.	16, 78	Document Category #101: E-mails with Illinois Department of Insurance Regarding Solvency Issues, Company Action Level Supervision, and Failure to Meet NAIC RBC Requirements	
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.		16, 54, 76	Document Categories #63-65, 67, 69: 2020 California Non-Tenant Homeowners Growth Sustainability Plan (GSP); 2020 California GSP; 2021 California NTHO GSP; 2022 California NTHO GSP; Document #66: Policyholder Protection Fund Excel Spreadsheet; Documents #68, 70-73: Internal - 2021 California Homeowners Non-	

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				<p>Tenant Growth Sustainability Plan Message Points; Leadership EMC - California Homeowners Non-Tenant Growth Sustainability Plan (GSP); 2022 GSP Message for Agency Leadership; 2022 California Non-Tenant Homeowners GSP Communication Resources; California P&C Eligibility Changes</p> <p>Document Category #100: Output Analyses for Final Decisions Regarding Non-Renewals from 2020 to Present and Decisions to Cease Selling New Policies</p>	
42	<p>Provide all DOCUMENTS and COMMUNICATIONS RELATED TO STATE FARM business strategies or management decisions RELATED TO STATE FARM requesting 6.9% homeowners rate increases in California, rather than any higher amount, from 2018 to 2022.</p>		16, 56, 80	<p>Document Categories #74-79: 2018, 2020, 2021 California Homeowners Rate Proposals and Rewrite; 2022-2024 PIF Growth and Incremental Rate History</p> <p>Document Category #102: E-mails Leading to June 27, 2024 Rate Application Filing and Emails Documenting Recommended Rate Changes and Signoff Since 2020</p>	

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44	Provide all DOCUMENTS and COMMUNICATIONS by YOU RELATED TO whether YOUR then-current rate levels were adequate given levels of wildfire risk for YOUR in-force homeowners policies from 2020 to the present.		16, 56, 80	Document Categories #74-79: 2018, 2020, 2021 California Homeowners Rate Proposals and Rewrite; 2022-2024 PIF Growth and Incremental Rate History Document Category #102: E-mails Leading to June 27, 2024 Rate Application Filing and Emails Documenting Recommended Rate Changes and Signoff Since 2020	
46	Provide all DOCUMENTS and COMMUNICATIONS related to STATE FARM's decision to cease selling new home insurance policies in California in 2024.		16, 54, 76	Document Categories #63-65, 67, 69: 2020 California Non-Tenant Homeowners Growth Sustainability Plan (GSP); 2020 California GSP; 2021 California NTHO GSP; 2022 California NTHO GSP; Document #66: Policyholder Protection Fund Excel Spreadsheet; Documents #68, 70-73: Internal - 2021 California Homeowners Non-Tenant Growth Sustainability Plan Message Points; Leadership EMC - California Homeowners Non-Tenant Growth Sustainability Plan (GSP); 2022 GSP Message for Agency Leadership; 2022 California Non-	

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				Tenant Homeowners GSP Communication Resources; California P&C Eligibility Changes Document Category #100: Output Analyses for Final Decisions Regarding Non-Renewals from 2020 to Present and Decisions to Cease Selling New Policies	
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.		16, 54, 76	Document Categories #63-65, 67, 69: 2020 California Non-Tenant Homeowners Growth Sustainability Plan (GSP); 2020 California GSP; 2021 California NTHO GSP; 2022 California NTHO GSP; Document #66: Policyholder Protection Fund Excel Spreadsheet; Documents #68, 70-73: Internal - 2021 California Homeowners Non-Tenant Growth Sustainability Plan Message Points; Leadership EMC - California Homeowners Non-Tenant Growth Sustainability Plan (GSP); 2022 GSP Message for Agency Leadership; 2022 California Non-Tenant Homeowners GSP Communication Resources;	

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				California P&C Eligibility Changes Document Category #100: Output Analyses for Final Decisions Regarding Non-Renewals from 2020 to Present and Decisions to Cease Selling New Policies	
48	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO STATE FARM insurance premium pricing decisions, analysis, reviews, or strategies regarding homeowners insurance policies in California from 2020 to the present.		16, 56, 80	Document Categories #74-79: 2018, 2020, 2021 California Homeowners Rate Proposals and Rewrite; 2022-2024 PIF Growth and Incremental Rate History Document Category #102: E-mails Leading to June 27, 2024 Rate Application Filing and Emails Documenting Recommended Rate Changes and Signoff Since 2020	
49	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO STATE FARM's analysis of insurance premium pricing information related to all other home insurers offering homeowners insurance policies in California from 2020 to the present.		16, 58	Document Categories #80-82: High Value Homes: California by County; SF CA HO Competitiveness by County Excel Spreadsheet Document; NTHO Comparative Rating - CA 1/2024	

Request No.	Original Request	Narrowed Request (If Any)	Joint Statement Page	Withheld Documents	ALJ Ruling
59	Provide all DOCUMENTS RELATED TO STATE FARM's economic capital modeling and stress testing on underwriting results, investment results, operating results and surplus from 2016 to the present.		16, 44	Document Categories #33-35, 37-39, 45-47, 52-55, 58-61, 107-118: 2020-2024 State Farm Stress Test Results, Review, Summary, and Supporting Documentation for Capital Management and Enterprise Risk Management; Supporting Stress Test Documents from 2016-2019	
61	Provide all DOCUMENTS RELATED TO STATE FARM's infrastructure and its commonality / overlap with AFFILIATES (including parent company, State Farm Mutual) from 2020 to the present.	Consumer Watchdog provided further clarification that SFG should look for a list of divisions with commonality and overlap with State Farm Mutual. CW continues to seek the withheld documents.	16, 85	Document Category #105: Line of Credit, Liquidity Pooling Agreements, Servicing and Facilities Agreements, Surplus Note	
63	Provide all DOCUMENTS RELATED TO any programs, investment policies, or agreements STATE FARM currently participates in with AFFILIATES (including parent company, State Farm Mutual) to manage risks and improve cash flow and liquidity, including but not limited to any investment	Consumer Watchdog noted that the 2013 Servicing and Facilities Agreement being withheld was admitted and unsealed in the 2016 State Farm Homeowners proceeding, and therefore that it should be noncontroversial to produce now.	16, 85	Document Category #105: Line of Credit, Liquidity Pooling Agreements, Servicing and Facilities Agreements, Surplus Note	

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	pooling agreement with AFFILIATES (including parent company, State Farm Mutual), any common clearing account agreement with AFFILIATES (including parent company, State Farm Mutual), any Services and Facilities Agreement with AFFILIATES (including parent company, State Farm Mutual), any line of credit available to STATE FARM from parent company, State Farm Mutual, and any segregated surplus State Farm Mutual holds for the protection of STATE FARM and AFFILIATES.	CW continues to seek the withheld documents.			
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		16, 85	Document Category #105: Line of Credit, Liquidity Pooling Agreements, Servicing and Facilities Agreements, Surplus Note	

Request No.	Original Request	Narrowed Request (If Any)	Joint Statement Page	Withheld Documents	ALJ Ruling
	proceedings involving rate applications PA-2024-00011, PA-2024-00012, or PA-2024-00013.				
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.		16, 30	Document Categories #16-17: SFG Actuarial Reports and Underlying Work Papers for 2023 and 2024	

Request No.	Original Request	Narrowed Request (If Any)	Joint Statement Page	Withheld Documents	ALJ Ruling
68	Provide all data, DOCUMENTS, analyses, and calculations dealing with the impact of rate changes on lapse and cancellation rates for the lines of business written by STATE FARM.	Provide all reports, analyses, and calculations dealing with the impact of rate changes on lapse and cancellation rates for the lines of business written by STATE FARM covering the period from 2020 to the present. CW continues to seek the withheld documents.	16, 60, 61	Document Categories #83-87: California NTHO Non-Renewals, August through December 2024 Updates Document Categories #88-92: California Apartment and 30K Initiatives and California NTHO Non-Renewals, January through May 2025 Updates	
70	In the PDF file “NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9”, EXHIBIT 13, Page 9 states “On January 1st, 2023, the values that are immediately applied as the initial case reserve estimate were updated.” Provide all data and DOCUMENTS showing the numerical value of the initial case reserves used by STATE FARM from 2021 to the present, along with the time period when the initial case reserve was applicable.		16, 26, 67	Document Categories #6-11: P&C Claims Policies and Procedures/Claim Reserve Operation Guide, No. 70-101 for Various Dates in 2020-2023 Document Category #95: California Table Reserves (a/k/a “Initial Case Reserves”)	
71	In the PDF file “NT Filing Exhibits - 1Q 2025 - Updated		16, 26, 69	Document Categories #6-11: P&C Claims Policies and	

Request No.	Original Request	Narrowed Request (If Any)	Joint Statement Page	Withheld Documents	ALJ Ruling
	Exhibit 9", EXHIBIT 13, Page 9 states "Moving forward we expect the initial case reserves to be more reflective of the ultimate amount to be paid." Provide all data, DOCUMENTS, analyses and calculations that forms the basis of that statement.			Procedures/Claim Reserve Operation Guide, No. 70-101 for Various Dates in 2020-2023 Document Category #96: Internal Email Chain Concerning SFG's and its Fire Affiliates' Payment Severity for Different Perils ("Fire Reserve E-Mail on Payment Severity")	
72	In the PDF file "NT Filing Exhibits - 1Q 2025 - Updated Exhibit 9", EXHIBIT 13, Page 9 states, "In order to adjust the incurred loss development factors, we used an approach commonly referred to as the 'Berquist and Sherman Case Outstanding Adjustment'." In reference to Appendix B from the Berquist & Sherman paper listing "Sample Questions for Department Executives" which was attached to Consumer Watchdog 6/4/25 RFIs, provide all documents RELATED TO each of the items set forth therein, including all data and DOCUMENTS RELATED		16, 82	Document Category #103: E-mail Between State Farm General Actuaries and Claims Department	

Request No.	Original Request	Narrowed Request (If Any)	Joint Statement Page	Withheld Documents	ALJ Ruling
	TO YOUR 6/20/25 responses for each question in Appendix B. If STATE FARM contends that any of those items are not relevant or not applicable to STATE FARM's rate filing, provide the basis for that contention including all related DOCUMENTS.				
74	Provide all “operation guides”, as referenced in STATE FARM response to Consumer Watchdog 6/4/25 RFI 2, from 2021 to the present.		16, 26	Document Categories #6-11: P&C Claims Policies and Procedures/Claim Reserve Operation Guide, No. 70-101 for Various Dates in 2020-2023	
75	Provide all DOCUMENTS RELATED TO any changes in operations (e.g., underwriting, book of business, rating, marketing, claims handling/settlement, reserving, policy provisions, etc.) from 2017 to the present for each of the policy forms that are the subject of the APPLICATIONS.	Provide DOCUMENTS sufficient to show SFG's changes in operations regarding underwriting, marketing, claims handling/settlement, reserving, and policy provisions from 2017 to the present for each of the policy forms that are the subject of the APPLICATIONS. CW continues to seek the withheld documents.	16, 26, 67, 69	Document Categories #6-11: P&C Claims Policies and Procedures/Claim Reserve Operation Guide, No. 70-101 for Various Dates in 2020-2023 Document Category #95: California Table Reserves (a/k/a “Initial Case Reserves”) Document Category #96: Internal Email Chain Concerning SFG's and its Fire Affiliates' Payment Severity for Different Perils	

Request No.	Original Request	Narrowed Request (If Any)	Joint Statement Page	Withheld Documents	ALJ Ruling
				(“Fire Reserve E-Mail on Payment Severity”)	

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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 October 27, 2025, I caused service of true and correct copies of the document entitled

STATUS OF CONSUMER WATCHDOG'S OUTSTANDING DISCOVERY REQUESTS

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 October 27, 2025 at Los Angeles, California.


Kaitlyn Gentile

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