

Status of Consumer Watchdog's Outstanding Discovery Requests
Submitted by State Farm General
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, Has Provided a Further Production of Documents, and Has No Further Responsive Documents to Produce.

Request No.	Original Request	Narrowed Request (if any) ¹	Produced Documents (if any)	Withheld Documents (if any)	ALJ Ruling
8	Provide all DOCUMENTS provided by YOU to any witness YOU have called or intend to call in this proceeding.		On 10/21/2025, counsel for SFG emailed CW a copy of the January 1995 order and decision and directed CW to a S&P document, which was previously produced at SFG00000794PROD.		
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.		On 10/20/2025, SFG produced responsive records. See SFG00000855PROD - SFG00000959PROD.		
13	Provide all DOCUMENTS related to the calculation of YOUR NAIC IRIS ratios as of December 31, 2023.		On 10/20/2025, SFG produced responsive records. See SFG00000964PROD.		
14	Provide all DOCUMENTS related to the calculation of YOUR NAIC IRIS ratios as of December 31, 2024.		SFG previously produced responsive records to CW on 8/13. On 10/20/2025, SFG produced additional responsive records. See SFG00000968PROD.		
15	Provide all DOCUMENTS related to the most recent calculation of YOUR NAIC IRIS ratios, if later than December 31, 2024.		On 10/20/2025, SFG produced responsive records. See SFG00000968PROD.		
27	Provide the following DOCUMENTS for STATE FARM for each year from		On 10/20/2025, SFG produced responsive	All other responsive documents have been	

¹ The parties have further narrowed or clarified some RFPs through the meet-and-confer process, which may not be fully represented in this chart.

	2020 to 2024: a. Reinsurance Summary 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.		records. See SFG00000971PROD - SFG00001186PROD. On 10/22/2025, SFG produced responsive records. See SFG00001415PROD - SFG00001419PROD.	withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 19, 20, 22-31, 97, 104.	
32	Provide all DOCUMENTS supporting YOUR statement in YOUR Answer regarding the allegedly "important role reinsurance plays in protecting State Farm's policyholders."		On 10/24/2025, SFG produced responsive records. See SFG00001475PROD.		
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.		On 10/20/2025, SFG produced responsive records. See SFG00000855PROD - SFG00000959PROD.		
37	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO YOUR emergency interim rate requests exchanged between YOU and the Insurance Commissioner or executive office personnel, but not including DOCUMENTS previously provided to Consumer Watchdog.		On 10/20/2025, SFG produced responsive records. See SFG00000855PROD - SFG00000959PROD.		
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."		On 10/21/2025, counsel for SFG emailed CW a copy of the Triple-I document responsive to this Request. SFG produced a copy with bates numbers on 10/24/2025, see SFG00001469PROD.		

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 ESG Committee meetings.	On 10/22/2025, SFG produced responsive records. See SFG00001216PROD - SFG00001414PROD.		
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2. Disputed Requests on Consumer Complaints Regarding Rate Increases and Claims Handling.

Request No.	Original Request	Narrowed Request (if any)	Produced Documents (if any)	Withheld Documents (if any)	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 <u>all</u> DOCUMENTS and COMMUNICATIONS RELATED TO <u>sufficient to show</u> 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.			
51	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO	Provide <u>all</u> DOCUMENTS and			

	any policyholder claims RELATED TO the 2025 LOS ANGELES WILDFIRES.	COMMUNICATIONS <u>RELATED TO</u> sufficient to show any disputed policyholder claims RELATED TO the 2025 LOS ANGELES WILDFIRES.			
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 <u>DOCUMENTS and COMMUNICATIONS RELATED TO</u> any initial adjustor claims reports submitted by any adjustor <u>for disputed policyholder claims</u> RELATED TO the 2025 LOS ANGELES WILDFIRES.			
53	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any STATE FARM final or approved adjustor claims reports RELATED TO the 2025 LOS ANGELES WILDFIRES.	Provide all <u>DOCUMENTS and COMMUNICATIONS RELATED TO</u> any STATE FARM final or approved adjustor claims reports <u>for disputed policyholder claims</u> RELATED TO the 2025 LOS ANGELES WILDFIRES.			
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.			
55	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any STATE FARM claims regarding any policyholder complaints RELATED TO smoke damage RELATED to the 2025 LOS ANGELES WILDFIRES.	Provide <u>all</u> DOCUMENTS and COMMUNICATIONS <u>RELATED TO</u> <u>sufficient to show</u> any STATE FARM claims regarding any policyholder complaints RELATED TO smoke damage RELATED to the 2025 LOS ANGELES WILDFIRES.			
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 <u>all</u> DOCUMENTS and COMMUNICATIONS <u>RELATED TO</u> <u>sufficient to show</u> any policyholder complaints RELATED to any STATE FARM claims adjusting RELATED TO the 2025 LOS ANGELES WILDFIRES.			
57	Provide all DOCUMENTS and COMMUNICATIONS RELATED TO any policyholder complaints RELATED to any STATE FARM claims adjustors	Provide <u>all</u> DOCUMENTS and COMMUNICATIONS <u>RELATED TO</u> <u>sufficient to show</u> any			

	RELATED TO the 2025 LOS ANGELES WILDFIRES.	policyholder complaints RELATED to any STATE FARM claims adjustors RELATED TO the 2025 LOS ANGELES WILDFIRES.			
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3. Disputed Request Over Model Output Documents.

Request No.	Original Request	Narrowed Request (if any)	Produced Documents (if any)	Withheld Documents (if any)	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. ²		All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 99.	

4. Disputed Requests Over IL DOI Emails.

Request No.	Original Request	Narrowed Request (if any)	Produced Documents (if any)	Withheld Documents (if any)	ALJ Ruling
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² The “narrowed request” described here does not fully encapsulate the parties’ lengthy conversations regarding this RFP. SFG directs the Court to the joint statement for a more fulsome discussion of this RFP.

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. SFG indicated that there are no publicly available responsive documents.		All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 101.	
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.	In addition to the withheld documents, Consumer Watchdog requested identification of, or links to, publicly-available responsive documents. SFG indicated that there are no publicly available responsive documents.		All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 101.	
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. SFG indicated that it has no publicly available responsive documents.		All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 101.	
38	Provide all DOCUMENTS and COMMUNICATIONS exchanged	In addition to the withheld documents,		All responsive documents have been	

	<p>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.</p>	<p>Consumer Watchdog requested identification of, or links to, publicly-available responsive documents. SFG indicated that there are no publicly available responsive documents.</p>		<p>withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 101.</p>	
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5. Disputed Requests Over Trade Secret and Statutorily Protected Documents.

Request No.	Original Request	Narrowed Request (if any)	Produced Documents (if any)	Withheld Documents (if any)	ALJ Ruling
7	<p>Provide all DOCUMENTS RELATED TO the APPLICATIONS, including all correspondence between individuals who assisted in compiling the APPLICATIONS.</p>	<p>In addition to the withheld documents, CW asked for any underlying analyses or calculations not considered work product and not already provided on SERFF. SFG has either produced or withheld all responsive documents.</p>	<p>SFG previously directed CW to responsive documents publicly available and produced responsive records to CW on 8/13. See SFG_00000550, SFG_00000708, SFG_00000719 - SFG_00000720. On 10/21/2025, SFG produced additional responsive records. See SFG00001189PROD, SFG00001192PROD - SFG00001194PROD, SFG00001196PROD - SFG00001199PROD, SFG00001203PROD - SFG00001207PROD, SFG00001209PROD- SFG00001215PROD.</p>	<p>All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 11-15, 102.</p>	

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.		SFG previously produced responsive records to CW. See SFG_00000193 - SFG_00000206.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 16.	
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.		SFG previously produced responsive records to CW. See SFG_00000193 - SFG_00000206.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 17.	
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. CW continues to seek the withheld documents.		All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 93.	
16	Provide all DOCUMENTS, reports, data, analyses, and calculations related to the Reinsurance Attestation Supplement for 2023.		SFG previously produced responsive records to CW.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 98.	
17	Provide all DOCUMENTS, reports, data, analyses, and calculations related to the Reinsurance Attestation Supplement for 2024.		SFG previously produced responsive records to CW.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 98.	
18	Provide the Own Risk and Solvency Assessment (“ORSA”) reports from 2020 through 2024, along with any related documents.			All other responsive documents have been withheld as trade secret and/or on statutory	

				privilege grounds. See PLOG Nos. 1-5.	
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.		SFG previously produced responsive records to CW. See SFG_00000134-SFG_00000191.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 94.	
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. SFG indicated that there are no publicly available responsive documents.		All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 101.	
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.			All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 18.	
27	Provide the following DOCUMENTS for STATE FARM for each year from 2020 to 2024: a. Reinsurance Summary 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;		On 10/20/2025, SFG produced responsive records. See SFG00000971PROD - SFG00001186PROD. On 10/22/2025, SFG produced responsive records. See SFG00001415PROD - SFG00001419PROD.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 19, 20, 22-31, 97, 104.	

	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.		SFG previously produced responsive records to CW on 8/13. See SFG_00000779.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 21-31, 106.	
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.	In addition to the withheld documents, Consumer Watchdog requested identification of, or links to, publicly-available responsive documents. SFG indicated that there are no publicly available responsive documents.		All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 101.	
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		All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 99.	

		catastrophe model used in the filing from 2020 to present. ³			
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. SFG indicated that it has no publicly available responsive documents.		All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 101.	
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.	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.		All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 33-62.	

³ The "narrowed request" described here does not fully encapsulate the parties' lengthy conversations regarding this RFP. SFG directs the Court to the joint statement for a more fulsome discussion of this RFP.

		CW continues to seek the withheld documents.			
35	Provide all Enterprise Risk Management 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.			All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 33-62.	
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.	In addition to the withheld documents, Consumer Watchdog requested identification of, or links to, publicly-available responsive documents. SFG indicated that there are no publicly available responsive documents.		All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 101.	
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.		SFG previously produced responsive records to CW on 8/13. See SFG_00000520 - SFG_00000546, SFG_00000739 - SFG_00000770.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 63-73, 100.	
42	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.		SFG previously directed CW to responsive documents publicly available.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 74-79, 102.	

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.		SFG previously directed CW to responsive documents publicly available.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 74-79, 102.	
46	Provide all DOCUMENTS and COMMUNICATIONS related to STATE FARM's decision to cease selling new home insurance policies in California in 2024.		SFG previously produced responsive records to CW on 8/13. See SFG_00000520 - SFG_00000546, SFG_00000739 - SFG_00000770.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 63-73, 100.	
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.		SFG previously produced responsive records to CW on 8/13. See SFG_00000520 - SFG_00000546, SFG_00000739 - SFG_00000770.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 63-73, 100.	
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.		SFG previously directed CW to responsive documents publicly available. On 10/21/2025, SFG produced additional responsive records. See SFG00001190PROD, SFG00001195PROD, SFG00001200PROD, SFG00001201PROD, SFG00001208PROD.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 74-79, 102.	
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.		SFG previously produced responsive records to CW on 8/13. See SFG_00000721 - SFG_00000730.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 80-82.	

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.			All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 33, 34, 35, 37, 38, 39, 45, 46, 47, 52, 53, 54, 55, 58, 59, 60, 61, 107-118.	
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.	SFG previously produced responsive records to CW on 8/13. See SFG_00000227 - SFG_00000439, SFG_00000450, SFG_00000461.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 105.	
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 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	CW continues to seek the withheld documents.	SFG previously produced responsive records to CW on 8/13. See SFG_00000779.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 105.	

	Farm Mutual holds for the protection of STATE FARM and AFFILIATES.				
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.		SFG previously produced responsive records to CW.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 105.	
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.		SFG previously produced responsive records to CW. See SFG_00000193 - SFG_00000206.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 17.	
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		All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 83-92.	

		period from 2020 to the present. CW continues to seek the withheld documents.			
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.			All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 6-10, 95.	
71	In the PDF file “NT Filing Exhibits - 1Q 2025 - Updated 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.			All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 6-10, 96.	
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 TO		SFG previously directed CW to responsive documents publicly available.	All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG No. 103.	

	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.			All responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 6-10.	
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.	SFG previously directed CW to responsive documents publicly available. On 10/21/2025, counsel for SFG emailed CW a copy of SERFF references for changes in underwriting. On 10/24/2025, SFG produced responsive records. See SFG00001489PROD - SFG00001791PROD.	All other responsive documents have been withheld as trade secret and/or on statutory privilege grounds. See PLOG Nos. 6-10, 95, 96.	