

In 2006, for the first time in history, the Alabama Department of Insurance said people of Baldwin and Mobile counties should be treated <u>radically</u> different than the rest of the state.





90 years old, widowed, Foley High School graduate, never made a claim, charged \$3,000 a year more than her peers in the rest of the state because DOI said to treat Mobile and Baldwin counties <u>radically</u> different.



Dumped by insurance company though he lives in Little River – 70 miles from the coast; charged 3 times as much when he found another insurance company.



Charged 4 times the state average because DOI said Baldwin and Mobile counties should be treated radically different than the rest of the state.



Thousands of Mobile and Baldwin families have dropped their wind-and-hail insurance.



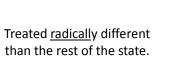
Treated <u>radically</u> different than the rest of the state







Treated <u>radically</u> different than the rest of the state









Thousands are "Functionally Uninsured". . . Though they have insurance, they don't have the extraordinary deductibles.



More than \$150 million a year syphoned out of Mobile-Baldwin economies because DOI believes they should be treated radically different than the rest of the state.



The Alabama DOI believes coastal counties should be treated  $\underline{\text{radically}}$  different than the rest of the state . . .

... yet the new Clarity Law data says just the opposite.





500 People at HHII meeting at Foley First Baptist Church – Nov. 2008



Going to Montgomery to Testify at a Special Joint House and Senate Banking and Insurance Committee Hearing – March 2009



Then-Candidate now Alabama Governor Bentley at an HHII Gubernatorial Candidate Forum in May 2010



HHII meeting with Gov. Robert Bentley in 2011.

Afterward he publicly announced his support of the Clarity Bill.

Said coastal insurance is "unfair," when speaking on Uncle Henry's talk show on 710 am Radio.

September 30, 2014.



Early Planning Meeting involving four Gulf Coast states



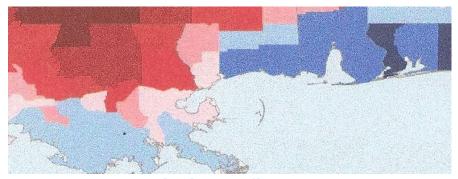
Louisiana Cajun Band and Christian Recording Artist Angie Lewis and Mobile Radio Talk Show personality Uncle Henry.

Michelle Kurtz discusses Multistate initiative with Alabama Coastal Legislators – senators, representatives, Democrat and Republican





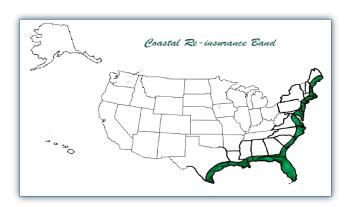
Fish Fry Focused on Reaching Out across State Lines
- 1,000 Baldwin County people attended June 2013



It is time to fix our

# Coastal Insurance Crisis! The Coastal Band

21



This Gulf-Coast-East-Coast/HHII

#### **Coastal Catastrophic Insurance Entity would:**

- -- Be a band 70 miles inland from the beach, running from Maine to Mexico;
- -- Collect the hurricane premiums currently paid in the coastal band;
- -- Pay for wind damages that resulted from named storms in the band;
- -- Be crafted by a Congressional Act or Interstate Compacts;
- -- Be governed as a non-profit, by consumers.

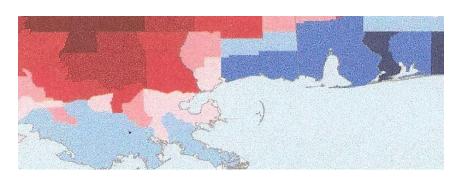
## With wind premiums cut in half, this Plan. . .

- -- Insures our homes at an affordable price;
- -- Requires no tax money;
- -- Protects private insurance companies from catastrophic wind events;
- -- Brings these companies back to the coast in droves;



Very significantly . . .

-- The band has no affect on inland constituencies, thus removing obstacles raised by inland politicians.



It is time to fix our

# Coastal Insurance Crisis! Clarity Law data

has been analyzed by the Homeowners Hurricane Insurance Initiative and the facts are startling.

### Reminder . . .

The state average for homeowners insurance is \$950

with a \$1,000 deductible.

Mobile and Baldwin counties paid the state average until the Department of Insurance insisted on draconian changes based on experimental hurricane catastrophe models starting in 2006.

The DOI's fundamental assumption was that Mobile and Baldwin counties have 3 to 6 times the losses or claims-dollars paid out compared with the rest of the state. The Clarity Law data shows this is <u>not</u> true.

It shows that the 10-year average coastal claimsdollars per policy is \$622 (far left bar) compared to \$722 (far right bar) for the rest of the state. The data includes our hurricane years.

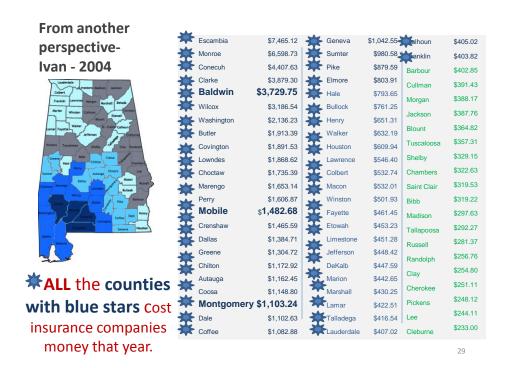


A very significant unknown discovery: coastal counties paid <u>half</u> their hurricane claims-dollars or losses with premiums collected the very years of Ivan and Katrina.

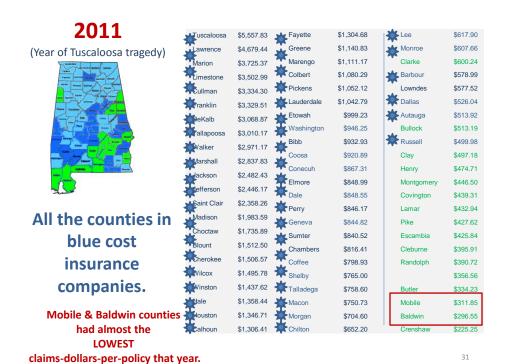


Very Significantly, the coastal counties paid for hurricane losses, plus company overhead, plus profits in the years before the storms. . . back in the days before the spike in prices, when we paid <a href="mailto:the state average">the state average</a>.

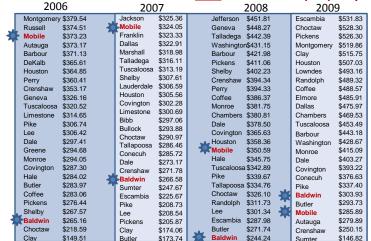
Looking deeper-\$7,465,12 Talladega \$416.54 Escambia Coffee \$1.082.88 2004 Lauderdale \$407.02 Monroe \$6.598.73 Geneva \$1.042.55 \$405.02 Conecuh \$4,407,63 Sumter \$980.58 Calhoun Hurricane Franklin \$403.82 Clarke \$3.879.30 Pike \$879.59 Baldwin \$3,729.75 Barbour \$402.85 Elmore \$803.91 lvan Cullman \$391.43 Wilcox \$3,186.54 \$793.65 Morgan Washington \$2,136.23 Bullock \$761.25 Jackson Butler \$1,913,39 Henry \$651.31 \* Four INLAND counties Blount \$364.82 \$1,891.53 Tuscaloosa \$357.31 had greater \$1,868.62 Lowndes Houston \$609.94 Shelby \$329.15 \$1,735.39 Choctaw Lawrence \$546.40 claims-dollars-losses Chambers \$322 63 Marengo \$1,653.14 Colbert Saint Clair \$319.53 than Baldwin County. \$1,606.87 \$532.01 Perry Macon Ribb \$319.22 Mobile \$1,482,68 \$501.93 Winston Madison \$297.63 Crenshaw \$1,465.59 Fayette \$461.45 TWELVE(!) inland Tallapoosa \$453.23 counties suffered Greene \$1,304.72 Limestone \$451.28 Randolph \$256.76 Chilton \$1,172.92 Jefferson \$448.42 greater Clav \$254.80 \$1,162.45 \$447.59 Cherokee \$251.11 claims-dollars than \$1,148.80 \$442.65 Coosa Marion Pickens \$248.12 Mobile County. Montgomery \$1,103,24 Marshall \$430.25 Lee \$244 11 \$1,102.63 \$422.51 Cleburne \$233.00







Summarizing the <u>non-hurricane</u> years: There are 67 counties in Alabama. This chart shows the 22 counties with the <u>least</u> claims-dollars-per-policy each year.



2006: Mobile in bottom third; Baldwin third lowest

2007: Mobile in bottom third; Baldwin eighth lowest

2008: Mobile in bottom sixth; Baldwin WITH LEAST LOSSES in state

2009: Mobile and Baldwin in the bottom six (the year of Tropical Storm Ida) 32

## Continuing the summary of the bottom-third counties with the least amount of losses in Alabama

|     | 2010       |          |    | 2011      |          |   | 2012       |          |
|-----|------------|----------|----|-----------|----------|---|------------|----------|
|     | Blount     | \$490.57 |    | Talladega | \$758.60 |   | Bibb       | \$400.07 |
|     | Cherokee   | \$471.24 |    | Macon     | \$750.73 | 3 | Franklin   | \$397.63 |
|     | Choctaw    | \$461.61 |    | Morgan    | \$704.60 |   | Dale       | \$383.39 |
|     | Clarke     | \$457.73 |    | Chilton   | \$652.20 |   | Marengo    | \$382.22 |
|     | Tuscaloosa | \$452.46 |    | Lee       | \$617.9  |   | Henry      | \$372.32 |
|     | Dale       | \$448.61 |    | Monroe    | \$607.6  | 3 | Conecuh    | \$367.09 |
|     | Houston    | \$436.71 |    | Clarke    | \$600.24 | ı | Lee        | \$351.96 |
|     | Conecuh    | \$434.11 |    | Barbour   | \$578.99 | 9 | Lamar      | \$350.31 |
|     | Henry      | \$423.90 |    | Lowndes   | \$577.52 | 2 | Montgomery | \$334.56 |
|     | Geneva     | \$422.98 |    | Dallas    | \$526.0  | 1 | Crenshaw   | \$332.09 |
|     | Elmore     | \$406.46 |    | Autauga   | \$513.93 | 2 | Dallas     | \$322.20 |
|     | Clay       | \$404.20 |    | Bullock   | \$513.19 |   | Bullock    | \$312.70 |
|     | Escambia   | \$398.77 |    | Russell   | \$499.9  | 3 | Mobile     | \$301.46 |
|     | Barbour    | \$374.13 |    | Clay      | \$497.18 | 3 | Pike       | \$299.05 |
|     | Russell    | \$372.93 |    | Henry     | \$474.7  |   | Cleburne   | \$293.67 |
|     | Pike       | \$363.63 |    | Montgomen | \$446.50 |   | Covington  | \$269.22 |
| -4- | Lee        | \$359.17 |    | Covington | \$439.3  |   | Escambia   | \$268.13 |
| 录   | Mobile     | \$340.08 |    | Lamar     | \$432.9  | 1 | Coosa      | \$264.01 |
|     | Coffee     | \$335.90 |    | Pike      | \$427.62 |   | Monroe     | \$259.30 |
|     | Bibb       | \$319.62 |    | Escambia  | \$425.84 | 1 | Washington | \$253.84 |
|     | Autauga    | \$306.68 |    | Cleburne  | \$395.9  |   | Barbour    | \$247.18 |
|     | Pickens    | \$300.75 |    | Randolph  | \$390.72 | 2 | Choctaw    | \$245.76 |
|     | Covington  | \$290.72 |    | Butler    | \$334.23 | 3 | Autauga    | \$234.57 |
|     | Crenshaw   | \$265.82 | 29 | Mobile    | \$311.8  |   | Butler     | \$224.49 |
| -   | Butler     | \$246.48 | 10 | Baldwin   | \$296.5  |   | Fayette    | \$185.31 |
| 7   | Baldwin    | \$228.73 |    | Crenshaw  | \$225.2  | 5 | Baldwin    | \$156.61 |

2010: Mobile in bottom ten; Baldwin in WITH LEAST LOSSES in state

2011: Mobile third lowest; Baldwin second lowest

2012: Mobile in bottom fourth; Baldwin WITH LEAST LOSSES in state

(NOTE: 2012 was the year of Mobile's Christmas tornados)



## **ALABAMA RATE STATUTES**

Alabama statute says that rates must not be:

- \* Excessive to the consumer
- \* Inadequate to the industry
- \* Unfairly discriminatory

It's their current official position.

Challenges with Drawing Conclusions from The Clarity Act Data

Alabama Department of Insurance

A White Paper



#### The White Paper is divided into three parts.

The meat of the Paper is its list of six "key challenges."

#### An Introduction & Explanation of How it Sets Coastal Prices

The Alabama Legislature charged the Alabama
Department of Insurance (ALDOI) with the
responsibility of collecting data specified in the
Property Insurance Clarity Act of 2012 and providing
public access to that data. In November, 2013, the
ALDOI published such data on its website, which may
be found at the following link:

#### http://www.aldoi.gov/Consumers/ClarityActCon

mers.aspx. These additional links are available on the Department's website page:

•Industry Data by Zip Code

Property Insurance Clarity Act

•Basic Flow Chart of the Homeowners Insurance Ratemaking Process Six Weaknesses in or Challenges to the Data

#### Six Key Challenges

There are no less than six key challenges that arise when using the Clarity Act data to draw conclusions about the profitability of individual counties, and the equity between premiums being charged by counties. Four of the six challenges relate to information that is missing from the Clarity act data. It is impossible to get the full picture of the real situation with regard to homeowners premiums in Alabama, be it Coastal or Upstate, without looking at all of the available data, beyond what is provided under the Clarity Act.

1. Missing "Cost of Doing Business" expense data; Clarity Act data only includes losses. Compiling the Clarity Act data over the 10 years 2003-2012, one finds the loss ratios (ratios of losses paid to premiums collected) for Mobile/Baldwin Counties versus the Rest of State to be 51% versus 925, respectively. Just looking at these

loss ratios certainly could suggest that the
Coast is less expensive than Upstate for insurance

Conclusions

#### Accurate Conclusions

While the Clarity Act may provide good information for the public arean, it's important to note that there are many challenges that arise when attempting to analyze the information to evaluate homeowners insurance rates. It becomes even more complicated and difficult when attempting to use the information to compare Coastal versus Upstate insurance rates. Therefore, when considering all of the above, the Clarity Act simply is not useful for determining what rates an insurance company should be permitted to charge for homeowners insurance. Analysis using incomplete and insufficient data can too often lead to inaccurate and misleading conclusions.

Anyone analyzing the Clarity Act data should keep in mind the following:

For years, the ALDOI has been receiving sufficient territorial and statewide premium and loss data from each insurance company to statistically support requested homeowners rate increases.

(These DOI complaints are what the media currently reports)

3) Hurricane vs. Tornado losses



Hurricanevs. Tornadolosses: The Charty Act data currently covers 2003-2012. This data for Mobile/Baldwin Counties includes hurricane losses from 2004 and 2005. These hurricanes were not atypical of hurricanes that we can expect to occur every 15-25 years on our Coast. The Upstate data includes numerous cornado losses, but especially includes the losses from the April 2011 Tornado Outbreak. Tornado computer models developed by

The DOI said: "If we exclude the rare April 2011 Tornado Outbreak losses from the Upstate data . . . we find that the Coastal 10-year average losses per policy are about 20% greater than the Upstate 10-year average losses per policy."

One of the six complains that the data includes the 2011 Tuscaloosa Tornado.

The DOI believes the Tuscaloosa Tornado data should be excluded, but all hurricane data should remain included.

Another one of the six complaints points out that surplus line insurance data is not included.

This is true, but if their data were added, coastal claims-dollars-per-policy would decrease, not increase.



Coastal losses may be

HHII analysts agree with three of the six DOI complaints.

But, when adjustments are made to account for these three weaknesses, coastal claims-dollars-per-policy only increases to \$816.

Coastal claims-dollars are . . . \$816

The Rest of the State is . . . \$722

The Rest of the State is . . . \$722

Whether the data is taken raw, or adjusted for DOI complaints, coastal losses are <u>Nowhere Near</u> 400 to 600% higher than the rest of the state.

13%! *≠* 400%!!!!

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with a \$1,000 deductible.

The DOI's fundamental assumption was that Mobile and Baldwin counties have

3 to 6 times the losses in claims

compared with the rest of the state. The Clarity Law data shows this is <u>not</u> true.

It's time to return to fair premiums statewide.

Enough is Enough!



The solution is simple:

- -- Governor Bentley publicly validates the significance of the Clarity Law data;
- -- He orders the DOI to enforce existing law: to direct insurance companies to submit plans for fair premiums within 60 days;
- -- The DOI submits the plans to the Gulf Coast Insurance Working Task Force for collating and fine-tuning;
- -- The task force delivers the final plan to the governor in 120 days;
- -- The Governor-DOI implement the fair pricing plan immediately.



These radically unfair rates will continue unless you join the

# **GroundSwell**

HHII, community leaders, and homeowners are uniting behind coastal legislators as they prepare to voice strong demand that the Alabama DOI immediately stop its unfair geographical discrimination and develop a rate-making process that accurately reflects risk statewide. We ask that you join this Groundswell.